

Todd Fuller

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Ed Bangs, Western Gray Wolf Recovery Coordinator
U.S. Fish and Wildlife Service
585 Shepard Way
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Dear Ed,

Below are my answers to the questions you posed concerning the U.S. Fish and Wildlife Service's proposal to modify the current Regulations for Nonessential Experimental Populations of the Western Distinct Population Segment of the Gray Wolf (70 FR 1286), as well as a few additional comments:

1. Have we accurately characterized the potential impact of predation on wild ungulates, livestock, and domestic animals by wolves of the nonessential experimental populations in the northern Rocky Mountains?

The rule identifies some of the circumstances under which wolves may be a major contributor to wild ungulate population declines, but also indicates that many ungulate declines are due to a variety of factors, of which wolf predation is often times a small part. It has not clearly identified the criteria to be used to assess whether or not a wolf reduction program will, in and of itself or combined with other management measures, actually result in ungulate population recovery. It does not address the potential problem of states or tribes unintentionally but wrongly setting long-term, sustainable ungulate population goals that might only be met if wolves did not occur in an area. The relationship between wolves and livestock and domestic animals is accurately described.

2. Have we adequately considered effectiveness of wolf control and its effects to a recovered wolf population?

Wolf populations recover from reductions through reproduction and immigration. Reproductive potential depends on food availability, and thus if not severely overharvested such that matings do not occur, reduced wolf populations should have relatively higher per capita food resources and thus high reproduction and survival. On the other hand, immigration depends on adjacent, "source" populations of wolves (populations with increasing numbers such that dispersing wolves can serve as immigrants). As a result, small, isolated populations of wolves (single or a few packs) subjected to major reductions may not remain intact and recover themselves, but rather the area may eventually be recolonized by dispersing wolves from other, non-adjacent areas. Thus, wolf "recovery" could be slower (to non-existent) in some cases.

3. Are our assumptions logical and adequate regarding the numerical safety margin for conservation of a recovered wolf population in light of potential additional take?

Given wolf reproductive potential and the recent population changes in the Rocky Mountain West, the safety margin seems reasonable, given that the distribution of packs is taken into consideration (see above).

4. Are there any significant oversights, omissions or inconsistencies in the proposed revision of the special rule?

The ability to adequately identify the relative importance of ungulate population limitation factors, the effects of various subsequent management applications, and the potential to reach state and tribal population goals without adequate justification or data could limit the Service's ability to confidently make management determinations. All such management programs should have identified scientific monitoring procedures in place to assess the effectiveness of any management actions.

5. Are our conclusions logical and supported by the evidence we provide?

In general, yes, but see above.

6. Did we include all necessary and pertinent literature to support our assumptions and conclusions?

For the most part, yes, but the National Research Council (1997) report has important recommendations that are not clearly identified as part of wolf management planning efforts.

I think the idea of greatly flexibility is a good one, but making sure that the consequences of management actions are actually the intended ones is a tricky business. There is no definition here of what is a "major" (vs. what?) cause of not meeting management goals, and it is not clear that concurrent management actions related to even more important causes of the decline are required to be implemented along with wolf control. If poor habitat management is causing ungulates to become more susceptible to predation, where is the real problem? Also, we are trusting "peer review" to catch and identify all of the possible interactions that need to be considered in order to design an appropriate plan of action, but it is difficult to do.

Thank you for the opportunity to help.

Sincerely,

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