

The Gray Wolf Recovery Program in the Northern Rocky Mountain area of the United States has been a remarkable success story. Much of that success was due to the fact that the program, right from its inception, was science based. The document under review (Part 3, Department of the Interior, Fish and Wildlife Document number 50 CFR Part 17) is a continuation of that very high level of excellence in science and the application of science to social issues.

Recovery of the species, and recommendation for the delisting of the Gray Wolf, has been a dynamic process, requiring adaptive management in all of the steps along the way. The above named document is a valuable landmark furthering that process.

In my opinion, there are two issues that might usefully be addressed in greater detail. Some reference has already been made to one of these management problems (conflict with hunter / wolf competition) while the other (political boundaries to establish target numbers) is one that may need refinement in future plans.

I assume that the assignment of management goal of establishing 10 breeding pairs (100) wolves per State for each of three States (Idaho, Wyoming and Montana) was a natural extension of earlier plans that were drawn up at the time of the first releases. However, now that populations have been established in each of the 3 States, it might be scientifically more acceptable if population goals are assigned independently of political boundaries and be based on biological criteria, namely available wilderness areas that serve as suitable wolf habitats. Once that has been achieved the relative numbers per political jurisdiction could be re - evaluated.

The second aspect that needs further clarification in the delisting process is, to what extent will delisting endanger wolf populations that come into conflict with the big game hunting community? Some mention of this has been made in the document but likely needs further clarification. As wolf numbers increase, or in some cases level out, the impact of predation on ungulates (particularly on Elk), will likely cause a new round of public debates calling for predator management. States will have greater flexibility to address those management needs but it needs to be made clear, in the delisting process, to what extent the current minimum wolf population levels (30 breeding pairs -- 300 wolves) will be located in strict Nature Reserves e.g. National Parks and what other percentage could be subjected to predator control programs in wilderness areas outside of strict Nature Reserves. Some discussion on this was given for the Wyoming population (page 6125) but that discussion may well be extended to the other areas as well. The very figure of 300 wolves was an " administrative " goal and, now with actual population numbers, that figure probably should be re - evaluated.

The interagency wolf monitoring program stands out as a monumental achievement. It obviously has very effectively provided the foundation for this document and the recommendation for delisting. An impressive precedent has been set and it remains to be seen if delisting, should that occur, will provide the same level of co-operation and excellence of a science based program.

As an aside, I have noted that many of the references (citations) are not from the primary literature, but information comes from secondary and tertiary sources. Not a problem in itself, as in a management document, the information given is (as far as I can see) accurate and pertinent to the delisting process.

In summary, I have concluded that this is a useful document and should serve well the dynamic process of adaptive management.

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