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I have been asked to review the U. S. Fish and Wildlife Service's proposal to designate the Northern Rocky Mountain (NRM) population of the gray wolf as a distinct population segment (DPS), and to remove it from the list of Endangered and Threatened Species (RIN 1018-AU53).

Overall, I agree with the analyses presented and believe that the DPS designation and delisting are appropriate. The dimensions of the proposed NRM DPS are in keeping with the known distribution and dispersal history of wolves in the area. The Service's arguments regarding the discreteness and significance of the NRM wolf population seem unquestionable.

I agree with the Service's contention that it is appropriate to delist wolves as they become recovered in significant portions of their former range, regardless of their status in other parts of the country. Any other interpretation will result in a long series of extensions of where wolf recovery might be promoted in ever-less-suitable habitat, while the species has long since recovered in truly suitable areas. Furthermore, I agree that the Northern Rocky Mountain wolf population represents a significant part of the species' range, suitable for delisting as an independent unit. Analyses of suitable habitat, the significance of the NRM portion of wolf range, and potential threats seem thorough and appropriate. The demonstrated links between this population and larger, contiguous populations in Canada obviate any concerns about genetic isolation.

The proposed "predatory animal" status in most of Wyoming appears inappropriate for a species just removed from the endangered species list. It is tantamount to the now seldom-used classification of certain species as vermin. It is likely to result in a seesaw of management as wolf numbers exceed, then fall below the management threshold, with different state agencies managing wolves under these circumstances. This will demand very careful monitoring and will result in inevitable challenges to monitoring data. The analysis makes a convincing case that the existing Wyoming management plan could result in the need for wolves to again be federally listed as they fell below recovery thresholds in the years after delisting. However, it's worth pointing out that similar regulations (unregulated harvest by individuals, pre-emptive control efforts) have been established in the larger part of Minnesota (Zone B) where wolves were recently delisted.

A key difference is that wolf numbers in Minnesota are so far above recovery thresholds that there is little concern they will fall below them.

My strongest recommendation for management after delisting is that states do not try to manage wolves at an extreme minimal level, to satisfy the requirements of federal monitoring and their own management plans. Managing at bare minimum levels will require much more careful monitoring, continual tweaking of management strategies, the need to respond to challenges to monitoring data, contention between states about who "owns" a wolf pack, and the very real danger of wolves being re-listed under an emergency action.

The use of alternative monitoring strategies equivalent to the complicated breeding pair recovery criterion, but requiring less rigorous identification of wolves in the monitoring process, will make the documentation of wolf recovery after delisting more simple, economical and defendable. If it can be demonstrated that simple counts of packs and pack sizes can be equated to the breeding pair criterion, then it won't be necessary to determine the ages and sexes of wolves in order to evaluate recovery.

Wolves have shown themselves to be an adaptable and resilient species that can quickly achieve healthy populations when they aren't intensely persecuted by humans. The recovery of wolves in the Western Great Lakes and Northern Rocky Mountain areas represent significant achievements of the Endangered Species Act. The delisting of these populations represents a milestone in wildlife management and a tremendous boost to the credibility and prestige of the Endangered Species Act. I recommend that the proposed action be carried out as described.

Sincerely,

Thomas J. Meier