

Ed Bangs
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26 Mar 07

Re: Wolf Delisting Draft

Dear Ed:

I have gone over the draft several times now and find it well written, edited, and generally all-inclusive. My overall appraisal of it is that it is largely a legal document since it contains extensive reference to the ESA and the exigencies related to the listing and delisting of the gray wolf, not a criticism.

I did find myself anticipating issues in one section that were addressed in later sections, but decided that wasn't cause for comment other than to note that many who read this will find themselves doing the same thing. Of course, this can encourage taking items out of context by those who don't consider the whole document.

I found the literature cited to be especially tedious to use. On the other hand, when you get into each individual pdf file, you get the whole reference, which is good. I wonder if you might not provide a more complete citation in the text, i.e., Bangs, E. 1492. Memo to C. Columbus. That way we would know what document you are referring to in the text. This clutters up the document for some, but makes it more useful for people like myself.

Specific comments are tied to page numbers in the draft.

Page 6107. The basis for determining that ten packs and 100 individuals constitute a recovery goal for each of the three states needs additional comment. As I understand, a panel of qualified biologists was asked to provide input on this, and that should be mentioned in this section. Minimum viable population estimates are still conjectural to some extent, and reference to this might be useful. Essentially, you used the best information from an extended number of people to derive this goal. In reality, it probably isn't too important from a practical standpoint since the wolf population is quite likely to exist at much higher levels, at least in Montana and Idaho. But in terms of the legalities and social perceptions, it is important.

Page 6110. No consideration of whether the central Idaho population has reached some level of saturation or not, as with the GYE and NW Montana, is provided. I believe the Nez Perce Tribe can provide estimates of number of packs and animals in four hunting units surrounding the location of the transplants which might be helpful in this area. They told me that for 2006, 15 packs with over 100 wolves occupied Idaho hunting units 20A, 26, 27, and 28. These are the units that include the original transplant sites and the locations of initial breeding packs. I know that the number of packs has varied, but has the numbers of wolves associated with identified packs varied that much over the last 5

years or so? My impression is that the Idaho wolf population is expanding beyond the wilderness area where it was initiated, but in that core area, it might have reached some saturation level and is fluctuating something like the population in YNP is.

Page 6110. It is unclear why maintaining wolf populations above the recovery levels depends upon wolves living outside YNP in Wyoming. A sentence of clarification here would be helpful.

Page 6111. It would be helpful to list the states and tribes that had Service approved plans in the central Idaho and GYE systems.

Page 6111. Why do Oregon, Utah, and Washington not need wolf management plans while Idaho, Montana, and Wyoming do? This appears to be a Service view, because the states are in fact developing plans. Perhaps this could be recognized some how in this section. They may not have much suitable habitat as defined, and they might not be necessary to have wolves for the purposes of delisting, but it is virtually certain that they will have wolves, and criteria for suitable habitat as specified can change.

Also, I understand that roads are easily recognizable boundaries for recovery areas as compared with other kinds of boundaries, such as unsuitable habitat (extensive sagebrush steppe, farmland, etc.). Page 6113 discusses these issues, I note. However, I am reminded that early work emanating from Wisconsin suggested that wolves shied away from extensive road systems. Subsequently this did not prevent them from colonizing areas. In Minnesota, wolves now occur clear in to Pine County, where human access is high. Obviously, human tolerance and changes in wolf behavior are responsible, so suitable habitat definitions that incorporate present conditions involving human tolerance may reduce the estimated area available when these conditions change. Also, the status of livestock grazing on western rangeland is in flux and what is currently considered unsuitable habitat because of high livestock presence may well become suitable habitat as livestock distributions change. You may wish to acknowledge these issues by simply recognizing that the suitable habitat designation at this point may change some time in the future.

Page 6113. Sink habitat should be defined and clarified.

Page 6115. I see that both extinction and extirpation are used. While it is too late now, I think if the ESA had specified extirpated throughout all or a significant portion of the species' range, it might have been more appropriate terminology for species such as the gray wolf. The wolf is not extinct in the sense that it no longer exists, but rather it was extirpated in the western states. Just a comment from a nit-picker.

Page 6118 or thereabouts. I wonder whether some discussion about the conditions in forests that are needed to maintain prey populations for wolves might be included. In multiple use areas, use of prescription fire and judicious logging creates habitat for deer and elk. In wilderness and national parks, prescription wildfire policies that are used to restore natural dynamic processes benefit prey and predator. So a definition of suitable

habitat could include something about how current land management practices and policies actually benefit predator as well as prey. This applies to the recovery area, and not west coast conditions which are different.

Also, the legislation that created wilderness and national parks specifies restoration and preservation of natural conditions. Restoration of the gray wolf is entirely consonant with this, and in fact, can be considered as being mandated by that legislation. Essentially, some commentary concerning forest succession as it influences habitat suitability for prey and wolf alike should be included. I think a brief sentence or two concerning these issues might be appropriate to include.

Page 6120. Including areas not suitable as occupied may be confusing. I wonder if unsuitable areas within the core recovery segments could be described as something different.

Page 6120. Do we really have enough data to assume stagnant distribution patterns or is this an artifact of inadequate monitoring? This gets back to my comments dealing with material on page 6110. I think you do have information which can be analyzed to support your statement here, but the skeptic will question this.

Page 6121. While I agree that traditional land use practices don't need modification, there is and will be modification of grazing distributions and other husbandry in wolf-occupied areas. For instance, sheep bands can be redistributed away from wolves, managed at night differently, etc. Livestock managers are likely to adjust their traditional grazing practices to better accommodate the presence of wolves, and some are doing so now. Some mention of this might be useful.

Page 6123. Regulate hunting and trapping to help manage wolves. This is okay, but it would appear that other efforts will need to be used to really suppress populations. I wonder if more discussion of this is needed.

Page 6126. Human caused mortality. Is there any evidence that illegal mortality and legal mortality are compensatory with each other as applied to the wolf? Do humans tend to be more tolerant of wolves when they can be legally taken?

Final Comment. I consider the biological rationale for asking Wyoming to revise its wolf management plan, scattered across the draft, to be defensible and understandable.

Sincerely yours,

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