

From: [Sam Eaton](#)
To: betty_grizzle@fws.gov
Cc: [Bush, Jodi](#); [Sallabanks, Rex](#); sharon.kiefer@idfg.idaho.gov; [Dustin T. Miller](#)
Subject: Idaho Comments on Wolverine SSA
Date: Thursday, March 16, 2017 3:28:14 PM
Attachments: [State of Idaho Comments on Wolverine SSA 031617.pdf](#)

Hi Betty,

Please find the attached comments from the State of Idaho concerning the wolverine SSA. Please call with questions.

Thank you,

Sam Eaton
Deputy Administrator | Legal Counsel
Governor's Office of Species Conservation
208.332.1552 | sam.eaton@osc.idaho.gov

OFFICE OF SPECIES CONSERVATION

C.L. "BUTCH" OTTER
Governor

DUSTIN T. MILLER
Administrator



P.O. Box 83720
Boise, Idaho 83720-0195

304 North Eighth Street, Suite 149
Boise, Idaho 83702

March 16, 2017

Betty Grizzle
U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office of Species Conservation
2177 Salk Ave, Ste. 250
Carlsbad, CA 92008

RE: State of Idaho Comments on Species Status Assessment for North American Wolverine.

Dear Ms. Grizzle,

The Governor's Office of Species Conservation (OSC) and the Idaho Department of Fish and Game (IDFG), on behalf of the state of Idaho, submit the following comments and data on the recent species status assessment for the North American wolverine (Wolverine SSA). First and foremost, in response to the U.S. Fish and Wildlife Service's (Service) Wolverine SSA and formal request for comments (*see* 81 Fed. Reg. 71,670, Oct. 18, 2016), Idaho reiterates its position that wolverines belong under state management, and the Endangered Species Act (ESA) is not equipped to afford protections over and above those protections provided by the states. To the contrary, we believe Idaho is well situated to conserve and manage its wolverine population.

On November 17, 2016, the State provided comments on the reopening of the comment period for the proposed rule to list wolverine as a threatened species under the ESA.¹ Idaho considers those comments still relevant, as well as comments previously submitted to the Service.² During the reopened comment period in November 2016, the Service requested specific information, including a request for new information on wolverine status, distribution, and trends in Idaho. The State provided the requested information during that comment period and except for some updated occurrences (attached), the State has very little new information regarding the wolverine's status within the state.

As a reminder, the state of Idaho remains opposed to the Service's determination that the wolverine population in the contiguous United States qualifies as a distinct population segment (DPS) under the ESA. Much like the Service's analysis for the Canadian lynx DPS, Idaho strongly believes that the Service is misapplying the DPS Policy as it relates to wolverine. The SSA process will ultimately help inform whether the population is truly discrete and significant as required by the DPS Policy. The State encourages the Service to take a renewed look at their DPS determination when developing the Wolverine SSA and prior to considering a proposed rule or not-warranted finding.

¹ Letter from Sam Eaton to Jodi Bush dated Nov. 17, 2016.

² *See* State of Idaho Comments dated May 6, 2013; Dec. 2, 2013; May 6, 2014

It is our hope that the Service will continue to engage with the states during this SSA process and beyond. Please do not hesitate to contact us with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Eaton", with a stylized flourish at the end.

Sam Eaton
Deputy Administrator



IDAHO DEPARTMENT OF FISH AND GAME

600 S Walnut / P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Virgil Moore / Director

March 16, 2017

Idaho Department of Fish and Game Comments Re: U.S. Fish and Wildlife Service's Species Status Assessment for the North American Wolverine (*Gulo gulo luscus*).

The U.S. Fish and Wildlife Service (Service) is in the process of determining the status of the distinct population segment of the North American wolverine (*Gulo gulo luscus*) (hereafter wolverine) in the contiguous United States. To conduct its review, the Service will be using the Species Status Assessment (SSA) framework and is currently seeking information to guide their evaluation. Most recently (S. Eaton letter to Service, November 17, 2016), the Idaho Department of Fish and Game (Department) provided information in response to the reopening of the comment period on the proposed rule to list the wolverine as a threatened species under the Endangered Species Act. The technical information included in the November 17, 2016 submission addressed the information and data now being requested by the Service in preparation for the SSA. As such, the Department has no additional comments at this time with the exception of the following update regarding wolverine distribution and new detections since November 2016. If there are any questions about this information, please direct them to Dr. Rex Sallabanks, Wildlife Diversity Program Manager, rex.sallabanks@idfg.idaho.gov.

Information requested:

Specific information on the conservation status of the wolverine, including information on distribution, abundance, and population trends.

Previous comments submitted by the Department included maps of wolverine observations compiled through November 4, 2016, overlaid on a composite wolverine habitat model based on spring snow coverage (Copeland et al. 2010) and female dispersal habitat as modeled by Inman (2013). The Department recently revised maps to include an additional 26 wolverine records collected through March 9, 2017 (Table 1, Appendix A). The new records include 12 detections from camera stations deployed as part of the Western States Wolverine Conservation Project (WSWCP), five detections from camera stations deployed for Idaho wolf monitoring, and nine incidental observations submitted by the public (one verified, eight possible).

As part of the WSWCP, three additional wolverine occurrences were documented in survey grid cells along the Idaho/Montana border in the Clearwater region during winter 2016–2017. These survey sites and data are managed by Montana partners on the WSWCP, however, and are not included here.

Table 1. Status of and changes to wolverine records in the Idaho Fish and Wildlife Information System's Observations database, including the number of new records submitted to the database (# New) and the number of existing records changed from Possible to Verified based on new evidence (photos, # Updated).

	Verified or Trusted	Possible or Unverified	Total
Status as of November 4, 2016	613	386	999
Changes			
# New	18	8	
# Updated	7	-7	
# Misidentified*		-1	
Status as of March 13, 2017	638	386	1024

** Photos from 1 existing record (#1197565, previously considered Unverified) were reviewed and determined to be misidentified. In addition, 1 new submission was determined to be misidentified and is not included here.*

Of the 1,024 wolverine observations currently in the Department's database, 62.3% ($n=638$) are verifiable based on specimens, confirmed DNA, photographs, targeted and non-targeted capture, and tracks identified by species experts. In previous comments, 54% (2013) and 61% (2016) of the Department's records were similarly unequivocal.

Literature Cited

- Copeland, JP, KS McKelvey, KB Aubry, A Landa, J Persson, RM Inman, J Krebs, E Lofroth, H Golden, JR Squires, A Magoun, MK Schwartz, J Wilmot, CL Copeland, RE Yates, I Kojola, and R May. 2010. The bioclimatic envelope of the wolverine (*Gulo gulo*): do climatic constraints limit its geographic distribution? *Canadian Journal of Zoology* 88:233–246.
- Inman, RM. 2013. Wolverine ecology and conservation in the western United States. Dissertation, Swedish University of Agricultural Sciences, Uppsala, Sweden.

Appendix A
Wolverine Observations in Idaho, 1891–2017

Wolverine Observations in Idaho, 1891-2017

Observations

- Verified/Trusted (n=638)
- Possible/Unverified (n=386)

- County Boundaries
- Lakes and Rivers
- Composite Habitat Model

Miles
0 25 50 100

Map created March 13, 2017.



Point data are from the Idaho Fish and Wildlife Information System's Observations database as of March 9, 2017. The composite habitat model was developed from Copeland et al. (2010) and Inman et al. (2013).

