

# American Society of Mammalogists

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Secretary Sally Jewell  
Department of Interior  
1849 C Street NW  
Washington, DC 20240

cc: Dan Ashe, Director  
U.S. Fish and Wildlife Service  
1849 C Street NW  
Washington, DC 20240

Dear Secretary Jewell:

The American Society of Mammalogists (ASM) is a non-profit, professional, scientific, and educational Society consisting of nearly 3,000 members from all 50 United States and 60 other countries worldwide. The ASM was founded in 1919 and is the world's oldest and largest organization devoted to the study of mammals. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The ASM has a long history of reviewing issues related to mammalian conservation, and where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats based upon our scientific expertise.

ASM has closely followed and frequently offered its professional opinion on the issue of gray wolf (*Canis lupus*) conservation and restoration in the US. We look forward to the day when the scientific evidence clearly points to the conclusion that federal protection of the gray wolf under the Endangered Species Act is no longer needed to ensure full recovery of this important apex predator. However, we believe it is premature to declare that that day has arrived. We understand that you are considering whether or not to publish a proposed rule by the US Fish and Wildlife Service to remove all ESA protections from all gray wolves in the US except for the Mexican gray wolf (*C. l. baileyi*) "where found." Below we briefly describe a few of the concerns we have about this proposal, and we request that, at a minimum, you postpone this decision until the views of all experts on gray wolf biology have been fully aired.

**1) Concerning the recently delisted Northern Rocky Mountain (NRM) Distinct Population Segment (DPS) of the gray wolf.** In the first year or so after the removal of ESA protections, this DPS has been subjected to a level of human-caused mortality that is unprecedented in the history of the ESA. All told, “34% of the absolute minimum NRM DPS estimated wolf population was removed due to human-causes [sic]” in 2012 (USFWS 2013). If this level of mortality continues or even increases, particularly as states consider increasing quotas and season lengths, recent simulation modeling casts serious doubt on the long-term viability of the population (Creel and Rotella 2011). Establishment of breeding populations outside of the NRM DPS with connectivity to the latter—which has begun to happen in Washington and Oregon—would help ameliorate that effect. There is sufficient wolf habitat and prey in the northern Rockies outside of the currently occupied NRM recovery area, primarily in Colorado and Utah, that could support a wolf population equal to that in the NRM (Carroll et al. 2006).

The Service has repeatedly made the claim, again most recently in the March 2013 Service Review of the 2012 wolf population in the NRM DPS (Jimenez *in* USFWS 2013), that this DPS has surpassed its original recovery goal of *100 wolves in each of the 3 recovery areas for 3 consecutive years* continuously since 2002. The Service’s own data show this not to be the case (USFWS 2013; Fig. 6a); in fact, the annual wolf censuses in the NW Montana recovery area were <100 in 2003 and 2004 and increased to >100 in 2005. This means that the first year in which the original criteria were met was 2007. However, the original recovery goal was increased to 150 wolves in each of the 3 recovery areas in Secretary Salazar’s delisting rule published in 2009 (April 2009 Federal Register notice *in* USFWS 2013). The first year that the NW Montana recovery area would have achieved a census of 150 wolves for 3 consecutive years would have been 2008 (USFWS 2013; Fig. 6a). Thus, even by the very conservative recovery goals that were adopted, this population has been technically recovered in the 3 core recovery areas in the NRM DPS only for the past 5 years. In fact, those original recovery goals were developed by an arbitrary process and were not the result of any scientific study or data (Bergstrom et al. 2009).

The core recovery area of the NRM DPS currently occupied by wolves represents only 26% of the actual land area of the DPS and only 6% of the historic range of the non-Mexican gray wolf populations of the US states west of the 97th parallel (excluding Arizona and New Mexico; Bergstrom et al. 2009). Removing ESA protections from this vast area of suitable habitat and thus potentially occupied wolf range would probably prevent the re-establishment of the gray wolf in significant areas across the mountainous West, thus ensuring that the species remains extirpated from “a significant portion of its range,” an outcome contrary to the spirit and letter of the ESA. It would also mean that the ecosystem restoration that has been documented to result from restoring this apex

predator (e.g., Ripple and Beschta 2003) would not be allowed to occur in these areas, and that would not allow fulfillment of the ESA's charge "to provide a means whereby the ecosystems upon which endangered species... depend may be conserved" (16 U.S.C. 1531–1544, 87 Stat. 884).

**2) The taxonomic status of gray wolves in Eastern North America is far from settled.** In fact, the Fish and Wildlife Service seems to have drawn a taxonomic conclusion with crucial conservation implications based on a single study, not representative of the majority view among wolf taxonomists (see von Holdt *et al.* 2011). A recent case should serve as a cautionary tale: in this previous delisting proposal on which we commented—Preble's Meadow Jumping Mouse (*Zapus hudsonius preblei*) in 2006—the Service similarly based its decision on a single study, which later was refuted by studies conducted by USGS scientists and others, and by a special peer-review panel convened to arbitrate the controversy (King *et al.* 2006; Vignieri *et al.* 2006). This resulted in the USFWS reversing its decision and re-listing the Colorado DPS of the subspecies. In the case of eastern wolves, the Service should wait until the science is settled. In any case, the apparent lack of any US wolf population east of the Great Lakes should warrant ESA protection for any wild wolf that may colonize suitable habitat in that region, regardless of whether it belongs to *Canis lupus* or *C. lycaon*.

**3) We agree with the Service's proposal to recognize the Mexican gray wolf (*C. lupus baileyi*) as a distinct subspecies and to list it as endangered.** However, given that this taxon is one of the most endangered mammals in North America and its recovery seems to have stalled, it is remiss for the Service not to designate a specific geographic area for its recovery. The Mexican wolf recovery plan, which has endured lengthy delays and numerous setbacks in implementation, has identified areas well to the north of the current distribution as *essential to the recovery of this critically endangered species*. We do not feel that designating the species as protected "where found" is strong enough protection to overcome the many obstacles to recovery that this struggling species has faced in the region.

The preceding was a brief synopsis of the concerns ASM has about the proposed delisting. We would be happy to discuss these issues with you at greater length and to make available our expertise on gray wolf conservation at any time. Thank you for your consideration.

Respectfully yours,



Edward J. Heske, Ph.D.  
President, American Society of Mammalogists



Bradley J. Bergstrom, Ph.D.  
Chair, ASM Conservation Committee

## References

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