

# American Society of Mammalogists

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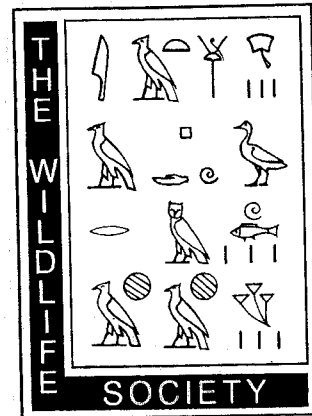
Gray Wolf Delist – Eastern Distinct Population Segment

C/o Content Analysis Team

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Dear Content Analysis Team:

The American Society of Mammalogists (ASM) is a non-profit, professional scientific society consisting of over 4,000 members from the United States and 60 other countries worldwide. It was founded in 1919 and is the world's oldest and largest organization devoted to the study of mammals. The Wildlife Society (TWS) is the international scientific and educational organization of professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship, with almost 9,000 members from over 60 countries. Both Societies are deeply concerned about the future of mammals worldwide in increasingly threatened habitats, and thus we strongly support mammalian conservation and responsible use based on sound scientific research.

The following letter outlines our concerns in opposition of the US Fish and Wildlife Service's (USFWS) proposal to remove the eastern Distinct Population Segment (DPS) of the gray wolf (*Canis lupus*) from Endangered Species Act protection across a substantial portion of

its historic range that currently does not sustain wolf populations. In the 21 July 2004 *Federal Register* the USFWS published a proposed rule to completely delist gray wolves in the eastern DPS, composed of 21 states from the Great Plains to Atlantic Coast. This proposal would leave the management of wolves in these areas to the individual states. Only three states in this region (MI, MN, and WI) currently have wolf populations or wolf management plans. Thus, delisting throughout the region in the absence of management plans in these 18 states seems directly contrary to the USFWS's Factor D (the adequacy or inadequacy of existing regulatory mechanisms). Indeed, delisting would remove any protection for gray wolves should they naturally recolonize or otherwise become established in any of these other 18 states.

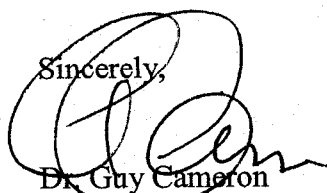
Our first major concern is that the eastern DPS, as defined in the proposed rule, is an arbitrary designation that does not follow any obvious lines of geography, modern management issues, or even species boundaries (see below). Delisting wolves across this large area is not consistent with the geographic or demographic scope of their recovery in the region. The combined populations in MN, WI, and MI represent no more than one percent of the original wolf population of the lower 48 states. Moreover, without federal protection, there is little chance for the establishment of new gray wolf populations in any of the other 18 states that do not currently have wolves, but did historically. Although suitable wolf habitat exists across the Eastern DPS, especially in the northeastern U.S. (Wydeven et al. 1998), wolves are primarily at risk from direct human actions, including activities specifically aimed at their eradication. In the absence of federal protection, persecution by a small minority of the public will likely prevent wolves from re-establishing in the northeastern U.S. The recovery of wolves locally in MN, and the establishment of small but viable populations in WI and MI, is a credit to the effectiveness of the federal Endangered Species Act and provides evidence that wolf populations can establish and persist given the appropriate protections.

Additionally, the taxonomic classification of wolves in eastern North America is still unclear (Wilson et al. 2000, Fascione et al. 2001). At a minimum, this uncertainty demands a conservative approach of maintaining protection until the issue is resolved. More to the point, some studies suggest that this region actually hosts a unique and endemic Northeastern American wolf, *Canis lycaon*, separate from the Eurasian-evolved *Canis lupus* (Grewal et al. 2004). This offers an even more compelling argument for strong federal protection of eastern wolves throughout their historic range.

We have reservations about the conservation potential for the state management plans for MI, WI, and MN. Although there are common strengths (e.g., requirement of sound animal husbandry practices in order to gain compensation for livestock losses to wolves), we believe that other aspects of these three plans err on the side of liberal lethal wolf control policies not consistent with long-term wolf conservation.

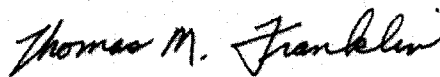
Therefore, we recommend continued protection under the Endangered Species Act for gray wolves in the Eastern DPS, as defined in the proposed rule. We thank you for the opportunity to provide comments on this very important issue.

Sincerely,



Dr. Guy Cameron  
President

American Society of Mammalogists



Thomas M. Franklin  
Executive Director (Acting)  
The Wildlife Society

## References

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