



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



DANIEL EICHINGER
DIRECTOR

July 12, 2019

Public Comments Processing
Attn: Docket No. FWS-HQ-ES-2018-0097
United States Fish and Wildlife Service Headquarters
MS: BPHC
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Re: Comments on Proposed Rule for Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife.

The Michigan Department of Natural Resources (MDNR) strongly supports the proposed rule (84 FR 9648) to remove federal protections for gray wolves in the lower 48 United States where populations have recovered. The MDNR would like to recognize the United States Fish and Wildlife Service (USFWS) for the thoroughness of the proposed rule and the opportunities afforded to provide comments.

The numerical goals for wolf recovery identified in the Recovery Plan for the Eastern Timber Wolf in 1992 (USFWS 1992) of 100 wolves in Michigan and Wisconsin for five years was achieved in 1999. The current estimated population of gray wolves in Michigan is estimated to be 662; more than six times the recovery goal for both Michigan and Wisconsin.

The MDNR recognizes the USFWS has responsibility for making sure factors that potentially threaten a species with becoming endangered or threatened have been addressed. The analysis of the factors regarding gray wolves in Michigan has been adequately addressed in the proposed rule and is further addressed by Michigan's 2015 Wolf Management Plan.

However, in several locations, the USFWS discusses the minimum viable population size identified in Michigan's Wolf Management Plan (i.e., 200 wolves). Unfortunately, in two locations, the language used may mislead readers by suggesting Michigan would manage for a minimum wolf population of 200 wolves (84 FR 9662) or Michigan's management goal is a minimum of 200 wolves (84 FR 9681). The MDNR acknowledges the USFWS understands that Michigan's plan clearly states that 200 wolves is not a target population size and the state intends to manage wolves to facilitate wolf-related benefits and minimize wolf-related conflicts, likely requiring a population larger than 200 animals to meet these goals (84 FR 9673). The MDNR recommends the USFWS clarify that Michigan is not managing for a minimum population of 200 wolves wherever the proposed rule discusses the minimum viable population number to eliminate, to the extent possible, public misunderstanding of the minimum viable population size as a targeted goal.

Another concern is the USFWS incorrectly suggests the Michigan Wolf Management plan does not address the need for wolf recovery or management in the Lower Peninsula (84 FR 9673). Our plan does address the need for wolf recovery and the strategic management direction in the Lower Peninsula. The MDNR plan clearly states we will not prevent wolves from colonizing the Lower Peninsula, but their presence is not necessary to maintain a viable population in the state (MI DNR 2015, p. 39). Additionally, if wolves occupy the Lower Peninsula, the higher density of human residences and livestock operations in that area relative to the Upper Peninsula would create a greater potential for wolf-related conflicts. The severity, immediacy and frequency of conflicts would guide management responses in the Lower Peninsula (MI DNR 2015, p.39).

The USFWS has suggested "...wolves in eastern Minnesota and much of the Great Lakes appear to be "eastern wolf," introgressed with western gray wolf to varying degrees" (84 FR 9655). Based on the discussion in the Gray Wolf Biological Report (pg. 2), we believe the USFWS is placing too much emphasis on the Mech and Paul (2008) paper which was not conclusive. The MDNR recommends the USFWS consider the findings in Heppenheimer et al. (2018) which uses advanced genetic methods and substantial sample sizes of populations of interest. The genomic results in this paper suggest wolves in the Upper Peninsula of Michigan fall within the gray wolf genetic group with a very slight introgression of the eastern wolf genetic group (see Figure 2 C).

The discussion on the potential for compensatory versus additive effects of human-caused mortality in the Gray Wolf Biological Report (pg. 6) correctly points out the uncertainty in our understanding of these relationships. However, the discussion in the proposed rule (84 FR 9661) is not consistent with the Biological Report. The MDNR recommend the USFWS review this section of the proposed rule for consistency with the Biological Report and consider the results presented by O'Neil (2017). O'Neil (2017) evaluated human-caused mortality of wolves in the Upper Peninsula of Michigan and found evidence of partial compensation using two different metrics. While the results from Michigan contrasted with the same metrics reported for the Northern Rocky Mountains (Creel and Rotella 2010) and Wisconsin (Stenglein 2014), O'Neil also noted that the evidence of compensation in the Michigan population along with reports of similar overall survival rates in populations with greater rates of human-caused mortality suggests that moderate increases in human-caused mortality may not have a large effect on annual survival.

Finally, the MDNR would like to call attention to an error in Michigan's Wolf Management Plan regarding the frequency of monitoring wolf abundance. We inadvertently substituted the word "biannual" for "biennial" in our description of monitoring frequency. We realized our error after seeing the description of monitoring frequency in the proposed rule (84 FR 9674) which should be corrected. Michigan is committed to conducting wolf abundance monitoring every other year for at least five years post-delisting.

July 12, 2019

Thank you for the opportunity to comment on the gray wolf proposed delisting rule. If the USFWS has any questions about our comments, please contact Dr. Dean Beyer, Wildlife Research Specialist, MDNR, Wildlife Division at beyerd@michigan.gov; Michigan Department of Natural Resources, P.O. Box 30444, Lansing, Michigan 48909; or you may contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Eichinger", written over a horizontal line.

Daniel Eichinger

Director

517-284-6367

Enclosure

cc: Ms. Shannon Hanna, Natural Resources Deputy, MDNR
Dr. Russ Mason, MDNR
Dr. Dean Beyer, MDNR

Literature cited:

- Creel, S., and J. J. Rotella. 2010. Meta-Analysis of relationships between human offtake, total mortality and population dynamics of gray wolves (*Canis lupus*). *Plos One* 5.
- Heppenheimer, E., R. J. Harrigan, L. Y. Rutledge, K. P. Koepfli, A. L. DeCandia, K. E. Brzeski, J. F. Benson, T. Wheeldon, B. R. Patterson, R. Kays, P. A. Hohenlohe, and B. M. Von Holdt. 2018. Population genomic analysis of North American eastern wolves (*Canis lycaon*) supports their conservation priority status. *Genes* 2018, 9, 606
- Michigan Department of Natural Resources. 2015. Michigan wolf management plan: Updated 2015. Lansing, MI. 101 pp
- O'Neil, S. T. 2017. The spatial ecology of gray wolves in the Upper Peninsula of Michigan, 1994–2013. PhD dissertation, Michigan Technological University, Houghton, MI, USA.
- Stenglein, J. L. 2014. Survival of Wisconsin's gray wolves from endangered to harvested, 1980–2013. PhD dissertation. University of Wisconsin–Madison, WI, USA.
- U.S. Fish and Wildlife Service. 1992. *Recovery Plan for the Eastern Timber Wolf*. Twin Cities, Minnesota. 73 pp.