



MICHIGAN UNITED CONSERVATION CLUBS

*Since
1937*

Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage

PO Box 30235 Lansing, MI 48909 | 800.777.6720 P | www.mucc.org

Public Comments Processing
Attn: Docket No. FWS-HQ-ES-2018-0097
U.S. Fish & Wildlife Service Headquarters
5275 Leesburg Pike
Falls Church VA
22041-3803

July 14, 2019

Re: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife; Docket No. FWS-HQ-ES-2018-0097

Michigan United Conservation Clubs is a 501(c)3, grassroots, conservation organization with more than 200 affiliate clubs and 40,000 members. Our positions on conservation-related topics are derived from our members, and they have spoken loudly on this issue.

In 2015, a member-passed resolution urged Michigan United Conservation Clubs to call on the United States Congress to enact legislation to require the U.S. Fish & Wildlife Service to reissue its 2011 rule removing the gray wolf from the Federal Endangered Species list in the states of Minnesota, Michigan and Wisconsin — known as the Great Lakes region. Michigan United Conservation Clubs is in full support of delisting the gray wolf in these states.

A longtime goal of Michigan United Conservation Clubs has been the rehabilitation and proper management of Michigan's gray wolf population. From nearly being extirpated in the '50s and '60s to the restoration and conservation of 662 wolves in Michigan's Upper Peninsula, the story has been a success.¹

When rehabilitation efforts started, Michigan set a minimum population goal, and we have far surpassed that goal. But because gray wolves are considered an endangered species, getting them delisted in order for the state to implement a proper management plan has proved to be an arduous battle.

¹ United States Fish & Wildlife Service. (2019) Wolf Numbers in Minnesota, Wisconsin, and Michigan (excluding Isle Royale) – 1976-2015. Retrieved from https://www.fws.gov/midwest/wolf/population/mi_wi_nos.html



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Specifically, the Great Lakes region has improved to a point beyond fully recovered. The USFWS recovery plan required a population of more than 100 wolves for five consecutive years in Michigan and Wisconsin in order for the species to be removed from the endangered species list. This goal has been reached each year since 1994.² Even in the harshest of Michigan winters when populations are the lowest, the gray wolf population remained above 100. The Michigan Department of Natural Resources furthered this goal in their management plan by establishing a minimum viable population of 200.³ In Michigan alone, the population of gray wolves has surpassed 600 for longer than five consecutive years. The population of gray wolves has remained above the initial goal of 200 since 1999.⁴

Michigan United Conservation Clubs believes in sound science dictating our policies. The science has proven that we have a rehabilitated gray wolf population in Michigan's Upper Peninsula that is in dire need of management. Wolf-dog conflicts now have been documented in 11 of 15 counties in the Upper Peninsula⁵. Wolf-related conflicts in Michigan pose a threat to citizens via loss of domestic animals, anxieties over the presence of wolves in residential areas and concerns over the impact wolves may be having on populations of game species.⁶ Unfortunately, individual residents are taking management into their own hands. From 2008 through 2014, DNR Law Enforcement has investigated the illegal killing of 62 wolves.⁷

Michigan residents' perception of wolves plays a large role in the management and success of the species. In a survey, 76 percent of interested respondents would support some sort of active wolf management to address strong public concerns regarding human-safety risks posed by wolves.⁸ A study examining the social carrying capacity of wolves in Michigan indicated that "the 2005 level of abundance of wolves and their associated interactions with humans...was

² United States Fish & Wildlife Service. (2019) Gray Wolf Recovery in Minnesota, Wisconsin, and Michigan. Retrieved from <https://www.fws.gov/midwest/wolf/stateplans/pdf/mi-wolf-plan.pdf>.

³ United State Fish & Wildlife Service. (1997). Michigan gray wolf recovery and management plan. Retrieved from <https://www.fws.gov/midwest/wolf/stateplans/pdf/mi-wolf-plan.pdf>.

⁴ United States Fish & Wildlife Service. (2019) Wolf Numbers in Minnesota, Wisconsin and Michigan (excluding Isle Royale) – 1976-2015. Retrieved from https://www.fws.gov/midwest/wolf/population/mi_wi_nos.html

⁵ Michigan Department of Natural Resources. (2019). Wolf - Dog Conflict. Retrieved from https://www.michigan.gov/dnr/0,4570,7-350-79135_79218_79619-287524--,00.html

⁶ Michigan Department of Natural Resources Wildlife Division. (2015) 2015 Update to the 2008 Wolf Management Plan. Page 20. Retrieved from https://www.michigan.gov/documents/dnr/wolf_management_plan_492568_7.pdf

⁷ Michigan Department of Natural Resources. (2008). Michigan 2008 Wolf Management Plan. Page 4. Retrieved from https://www.michigan.gov/documents/dnr/wolf_plan_accomplishments_482754_7.pdf

⁸ Beyer, D., T. Hogrefe, R. B. Peyton, P. Bull, J. P. Burroughs, and P. Lederle (2006) Review of social and biological science relevant to wolf management in Michigan. Retrieved from https://www.michigan.gov/documents/dnr/Wolf_White_Paper_178870_7.pdf.



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approaching an intolerant level for a majority of Michigan citizens, most especially those who lived within wolf range", and the minimum wolf population has grown 50 percent in the Upper Peninsula since that time. In a 2013 report, respondents to a public survey of Michigan residents indicated that "[d]ifferent groups consistently ranked a small number of concerns as being of high concern including wolf conflict, use of science in policy decisions, and sustainable populations." ⁹ Each study demonstrates strong social support for delisting if it is based on science and will enable and continue sustainable populations, while addressing conflicts. Failure to delist wolves yet again will continue to erode UP residents' attitudes towards wolves because of an absence of management tools and potentially damage trust in the agencies directed to collect and review the biological science.

Michigan United Conservation Clubs strongly urges the United States Fish & Wildlife Service to delist the gray wolf in Michigan, Minnesota and Wisconsin. The Western Great Lakes Region gray wolf population is beyond recovered. Science dictates the management decisions of our natural resources in Michigan, and the wolf population in our state needs management.

Delisting the gray wolves from the endangered species list in Michigan would allow the Michigan Department of Natural Resources and the Natural Resources Commission to make management decisions based on sound science in the best interest of our state's resources.

Sincerely,

Amy Trotter, Executive Director
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⁹ Gore and Lute. (2013). Attitudes About Wolf Hunting As A Tool To Manage Wolves In Michigan: Insights From 4 Public Meetings And An Online Survey. Retrieved from https://www.michigan.gov/documents/dnr/Attitudes_About_Wolf_Hunting_As_A_Tool_To_Management_419765_7.pdf

