December 13, 2013

Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

RE: Docket No. FWS-HQ-ES-2013-0073 (Gray Wolf)

Dear Secretary Jewell,

WOODLAND PARK ZOO

Deborah B. Jensen, Ph.D.
President and CEO

As a leading conservation organization that engages broad audiences in and beyond Washington State, Woodland Park Zoo (WPZ) appreciates this opportunity to comment on the proposed removal of most populations of the gray wolf (*Canis lupus)* from the List of Endangered and Threatened Wildlife. In our view, the proposed delisting is not sound. It is not supported by scientific evidence and does not align with the spirit and letter of the Endangered Species Act (ESA). It is premature to delist gray wolves.

As you know, for 114 years WPZ has helped your Northwest home community learn about animals and about advances in conservation science. For more than 50 of those years, we have cared for wolves in our living collection. Our zookeepers, educators and volunteers, many trained in biology and other life sciences, bring deep expertise in wolf biology, small population breeding, species preservation and wildlife recovery, as well as the social and psychological factors that shape humans' relationship with wildlife. They apply this knowledge to increase public understanding of wolf ecology and population dynamics, and to address the challenge of recovering *and* co-existing with wolves and other endangered species. Our four gray wolves in the award-winning Northern Trail exhibit are a sought-after learning experience for 1.2 million annual visitors, nearly 90% from Washington. Every day multitudes of families, teachers and students discover and marvel at the crucial role this apex predator plays in sustaining the health of our ecosystems.

We also maintain a longstanding interest in sustainably conserving carnivore landscapes and lead an active carnivore research program in Washington's North Cascades. Our growing Field Conservation Division employs scientists with extensive experience in endangered species conservation and carnivore science who collaborate with researchers, wildlife agencies and communities to recover wild populations. We take our knowledge on the road through popular outreach and on-site school programs, teaching people how to share natural landscapes with wildlife and how to reduce human-carnivore conflicts.

Having earned a reputation as a trusted community resource, we proudly speak to the public about wolf recovery successes in the making. However, wolves are still absent from major portions of their former range where substantial suitable habitat remains. The best available science does not support delisting yet, which would: (1) likely relegate gray wolves to a very small portion of their historic range, despite the existence of ample suitable habitat outside of places where they currently exist, (2) recognize a completely new species of wolf, the eastern wolf, based on the mixed opinions of small number of carnivore taxonomists, and (3) ignore the unique population characteristics and important conservation role of the expanding gray wolf population in our own bioregion, the Pacific Northwest.

Gray wolf populations need more time, across more of their historic range, to recover. Recovering a species in a small part of its historic range, when suitable habitat within that range is still readily available, is counter to the spirit and letter of the ESA.

WPZ in 2011 endorsed, and continues to support, Washington State's Wolf Conservation and Management Plan. This plan can achieve success if officials remain committed to the goal of species recovery and conservation as priorities. The assertion of the U.S. Fish and Wildlife

Service (USFWS), however, that recovery is complete, even in western states, and that all states have demonstrated their ability to take over the conservation and management of wolves for the species' long-term viability, disregards recent evidence to the contrary.

Lessons learned from other states with gray wolves suggest that federal delisting of this species can rapidly turn hard-won recovery gains into significant losses. As one example, the USFWS reported that for the Northern Rocky Mountain distinct population segment in 2012, "34% of the absolute minimum estimated wolf population was removed due to human-causes (sic)," such as state-permitted hunting and sanctioned killings in response to livestock damage (NRM Interagency Report, 2012). Removing such a high level of a population's demographic and genetic base within only a year of full delisting is highly disconcerting. It poses serious risks to the species' stability and capacity for resilience over time should other sources of mortality impact the population later. Such rapid resurgence of human-caused mortality in states where gray wolves have been delisted threatens their long-term survival and reduces the likelihood of dispersal from delisted states to available areas of their historic range in other states.

Long-term species viability is about more than minimal population numbers. It is about the robustness and resilience of a species to thrive into the future as it interacts with a complex web of elements, particularly human elements, in a dynamic, ever-changing ecological system. While we applaud USFWS's efforts to increase wolf numbers, we know today that recovering a population within a minor portion of its historic range is likely insufficient to maintain the genetic diversity and demographic persistence required for long-term viability.

Science must always balance uncertainties while making progress on advancing sound and reliable knowledge. Where sufficient uncertainty exists, we believe it is best to follow the precautionary principle. That is, in cases where it is scientifically plausible for human activities to lead to unacceptable harm, actions should be taken to avoid the harm. Because populations of the gray wolf are already listed under the ESA, they are entitled to the benefit of the doubt until further population recovery and human social tolerance have been achieved across a greater range of historic habitat.

The best available scientific data today do not support the conclusion that *viable* recovery for the gray wolf has been achieved across a sufficient portion of this species' historic range. What the data do suggest is that in states where the wolf's federal endangered status is removed, achieving permanent recovery may be seriously compromised. Therefore, we strongly urge that the USFWS exercise well-deserved caution in moving to delist a carnivore species with such a controversial, complex and exceedingly uncertain conservation experience. Continued ESA protection of gray wolves where they are currently still listed is warranted at least until a substantially longer period of recovery stability has been demonstrated.

The proposed recognition of a new species of wolf, *Canis lycaon*, in the Northeast is premature and potentially problematic. Despite mandates that ESA listings or delistings be made "solely on the basis of the best scientific and commercial data available," the recognition of a new species of wolf does not represent the opinion of a majority of specialists in wolf taxonomy, a still ongoing scientific debate, two points that the U.S. Fish and Wildlife Service recognized in 2011 (76 Fed Reg. 81669). Further, this premature designation would have substantial ramifications as it would instantly result in *Canis lupus* being considered recovered across substantially more of its historic range than if wolves in the Northeast are considered to be gray wolves.

Finally, not recognizing wolves in the Northwest as a distinct population segment (DPS) is scientifically unsound. As a conservation organization based in western Washington, we disagree with the USFWS's view that Northwest wolves do not meet designation criteria, which are that the population be (1) discrete, (2) significant, and (3) of conservation status consistent with ESA listing. They currently meet all three criteria.

Regarding discreteness, some northwestern wolves originated from coastal British Columbia (BC) populations, which are genetically distinct from those in the Rocky Mountains. Although some interbreeding between BC wolves and Rocky Mountain wolves has been observed in the Northwest, the assertion that the Northwest population may, over time, hybridize with Rocky Mountain wolves is highly speculative. Further, the discreteness criterion does not require complete reproductive isolation, as the USFWS itself specified that DPS status is warranted if one population "is markedly separated from other populations of the same taxon as a consequence of physical, physiological, ecological, or behavioral factors (quantitative measures of genetic or morphological discontinuity may provide evidence of this separation)" (74 FR 15070). Markedly separated and with unique genetic signatures, these populations may also be differentiated from Rocky Mountain populations by their unique behavior and food habits. For instance, gray wolves existing on the British Columbia coast make extensive use of salmon and other coastal resources, a unique attribute not present in other wolf populations to the east.

In terms of significance, wolves have been recolonizing the Pacific Northwest for less than a decade and inhabit only a very small percentage of a region with extensive suitable habitat for dispersal. Maintaining and increasing this population is critical for wolves to recover across a significant portion of their range. We disagree with the USFWS's assertion that the Pacific Northwest wolves do not qualify for DPS status. Zoo biologists have expertise in what constitutes demographically and genetically viable populations. We have successfully helped other endangered species to recover from very small populations, including California condors and western pond turtles. Finally, the status of Pacific Northwest gray wolves is such that the population would qualify for ESA protection on its own.

Secretary Jewell, your deep knowledge of and appreciation for Washington wildlife is known to many. The proposed rule is clearly too great a setback for this important species and is not sound. We strongly encourage the USFWS to maintain federal protections for the gray wolf in regions where it is currently still listed; to provide a substantial period of wolf population stability for steady, long-term recovery; and to demonstrate clearly that other, existing regulatory mechanisms are sufficient to sustain the viable recovery of this species so essential to the Northwest landscapes you, and we, so highly value.

Sincerely,

Deborah B. Jensen, Ph.D.