

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.

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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,



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:

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