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July 6, 2016

Isle Royale National Park  
Attention: Moose-Wolf-Vegetation Management Plan  
800 East Lakeshore Drive  
Houghton, MI 49931

Sent via: <http://parkplanning.nps.gov/ISROwolves>

Dear Isle Royale Staff,

The following are comments from Wilderness Watch on the scoping stage of the Isle Royale Wolves EIS Public Scoping. Wilderness Watch is the only national wilderness conservation organization solely focused on protecting the existing National Wilderness Preservation System and its individual units like the Isle Royale Wilderness. Wilderness Watch has members in every state in the country, including Michigan, and has long been interested in the Isle Royale Wilderness. Our conservation director and executive director have both visited the Island within the past year on multi-day wilderness trips.

In general, Wilderness Watch has strongly supported the presence of wolves in designated Wildernesses, and we understand the ecological roles played by such a keystone, apex predator within a wilderness ecosystem. We have fought to prevent the killing of wolves within Wildernesses to bolster prey species such as elk or moose. Most recently, for example, our litigation suspended and possibly ended the State of Idaho's program of sending a trapper deep into the Frank Church-River of No Return Wilderness to kill wolves in order to allegedly boost elk populations.

Wilderness Watch also supports scientific research in Wildernesses like Isle Royale, provided that such research is conducted in accordance with the 1964 Wilderness Act. We believe the opportunity to learn from Wilderness is one of, if not the most important wilderness values. Wilderness Watch appreciates and values the long-term wolf-moose predator-prey study that has been conducted over the past 60+ years on Isle Royale.

Wilderness Watch also understands the problems with inbreeding of the wolves on Isle Royale and the flattening of genetic diversity in that population. We also recognize the declining number of wolves in the Isle Royale Wilderness, and some of the potential changes in the Isle Royale ecosystem should wolves

become extirpated there, be it for one year, ten years, a century or forever, just as it is different today because of the extirpation of lynx and caribou decades ago.

Of the alternative concepts listed in the Spring 2016 newsletter for the Isle Royale Wolves EIS Public Scoping Newsletter, Wilderness Watch supports Alternative A, the No Action Alternative. We suggest strengthening this alternative to clarify that this alternative best upholds the wilderness designation of 99 percent of Isle Royale by Congress. We don't believe that wilderness designation is sufficiently highlighted or focused on in the public scoping newsletter.

Alternative A is also the only alternative that respects the wolves' autonomy and lets them decide whether or not they inhabit Isle Royale. For reasons known only to the wolves, they have apparently chosen to not be long-time residents of the island, having arrived fewer than 70 years ago, less than the span of a single human lifetime. Since that time, some if not many wolves that have followed the ice-bridge trail from the mainland to the island have left in short order, while others born on the island have left for the mainland, resulting in the genetically-impooverished population on the verge of extirpation. Perhaps the wolves intuitively know of the genetic downsides to island isolation, or maybe they prefer the freedom to roam beyond the confined borders of Isle Royale. Regardless of the reasons wolves have chosen to not be a permanent, continuous presence on Isle Royale, and consistent with the Wilderness Act's fundamental tenets of humility and respect, a decent respect for wolves and their right to exist free of human desires argues we should let the wolves decide whether and when to return to Isle Royale.

The heart of the issue—and an apparent bias of the National Park Service—is found in the agency's statement of purpose for the plan: “The NPS began this planning process by considering a broad range of potential management actions as part of determining how to manage the moose and wolf populations....” (2016 newsletter, p. 1). This purpose presumes that, contrary to the intent of the Wilderness Act, the Park Service needs to manage these species and their interactions. That is, the ecological and evolutionary processes that created and continue to shape the island systems need to be controlled and manipulated to conform to what the agency thinks they should be. This bias appears to pre-determine the outcome by inappropriately assuming that the National Park Service's job is to manage and manipulate the populations of wolf and moose. This agency bias must be removed in the next step of environmental review for this project.

As detailed below, Wilderness Watch believes that wilderness designation requires a non-intervention approach, and we believe a non-intervention approach must be taken even if it means that wolves might become extirpated from the Isle Royale Wilderness. Our reasons for supporting non-intervention at Isle Royale include the following:

**1. Wilderness.** In 1976, Congress designated about 99% of Isle Royale National Park as Wilderness under the 1964 Wilderness Act, Public Law 88-577; 16 U.S.C. 1131-1136. Wilderness designation is the law of the land, and wilderness designation cannot just be ignored in the case of Isle Royale. (We note that in the Spring 2016 newsletter, the word “wilderness” was used just once in reference to the island's “wilderness character,” and that the Congressional

designation of 99% of Isle Royale as Wilderness was completely missing.)

The prime directive of the Wilderness Act is to “preserve wilderness character,” not to preserve individual species, even popular or charismatic ones. The prime directive is not to artificially maintain a specific predator-prey population, but all of the ecosystem dynamics, even if that results in the extirpation of a current predator or prey species as frequently happens in island ecosystems even absent the actions of humans. Similarly, the Wilderness Act does not direct us to preserve the ecosystem function of a species that is waning, but all ecosystem functions unfettered and unmanipulated by humankind. The prime directive is to preserve wilderness character, to let nature run its course.

The Wilderness Act did not define wilderness character, though Wilderness Act author Howard Zahniser reminded us as early as 1953, “We must remember always that the essential quality of wilderness is its wildness.” The best definition of wilderness character is “the degree to which wilderness is free from deliberate human modification, control and manipulation of a character and scope that hampers the free play of natural ecological processes.” (David Cole *et al.* 2016. In press. “The ‘Keeping It Wild’ Monitoring Framework’s Definition of Wilderness Character Jeopardizes the Wildness of Wilderness,” *International Journal of Wilderness.*)

The Wilderness Act also defines Wilderness in part as “untrammled” or unmanipulated. This means that we allow Nature to call the shots in Wilderness, even if that means that Nature might make decisions that we humans may not like, such as the extirpation of wolves from the Isle Royale Wilderness, either temporary extirpation or permanent extirpation.

Dr. Robert Lucas, a pioneer wilderness researcher, could have been speaking directly to the situation with wolves on Isle Royale when he wrote, “If ecological processes operate essentially uncontrolled within the wilderness frame of reference, the results, whatever they might be, are desirable by definition. The object is not to stop change, nor to recreate conditions as of some arbitrary historical date. The object is to let nature ‘roll the dice’ and accept what results with interest and scientific curiosity.” (Lucas, R.C. 1973. Wilderness: A management framework. *Journal of Soil and Water Conservation*, 28: 150-154.) From a scientific/research standpoint, there is probably volumes more to be learned by letting nature takes its course than by artificially injecting more wolves into the Isle Royale ecosystem and trying to perpetuate the status quo of the past five or six decades.

This is the very essence of Wilderness, that we humans must treat Wilderness with humility and restraint. The current debate over the potential loss of wolves indicates the fairly short-sighted approach of most land management practices that are often based on the next few years, a career-post, or human lifetimes at best, not millennia. Because Wilderness is forever, we need to look beyond the short timeframe of human lifetimes. We need to allow these natural processes to play out over much longer time spans, “to make it possible for those areas from the eternity of the past to exist on into the eternity of the future,” as Wilderness Act author Howard Zahniser once eloquently described it.

Some people may argue that wilderness designation is a nice add-on, but it really doesn’t or shouldn’t change the way a national park should be administered. That argument, however,

doesn't hold water. In a case involving Wildernesses in the High Sierra, for example, the U.S. 9<sup>th</sup> Circuit Court of Appeals ruled in 2004 "that the Wilderness Act imposes substantive requirements on an administering agency...to protect the wilderness." (*High Sierra Hikers Ass'n v. Blackwell*, 390 F.3d 630.) In another case, a Federal District Court ruled, "[S]ubjective characterizations aside, the Wilderness Act is as close to an outcome-oriented piece of environmental legislation as exists...As such, it is as close to a 'purist manifesto' as may be found in the area of environmental law." (*High Sierra Hikers Ass'n v. U.S. Forest Service*, 436 F.Supp. 2d 1117.)

Wilderness designation therefore has significant meaning. And wilderness designation at Isle Royale strongly argues against manipulating the wolf and moose populations, against both transplanting more wolves from the mainland as well as culling the moose herd.

**2. Island Biogeography.** As the National Park Service wrote in the Summer 2015 newsletter, "Isle Royale exhibits a unique biogeography. Organisms that live on islands have more dynamic population trends and are more often subjected to extinction events with colonization and immigration occurrences depending on island size, distance to the mainland, length of isolation (time), chance events, habitat suitability and human activity, to name a few influencing factors. In other words, things come and go from islands; local extirpation is natural, as is establishment and re-establishment of new populations."

Wolves and moose are relatively recent natives to Isle Royale. Canada lynx and woodland caribou, two earlier natives, provided the predator-prey dynamic up to about the turn of the 20<sup>th</sup> century but have both become extirpated. So it may ultimately be with wolves and moose, to be replaced with other species. These are common occurrences related to island biogeography. Moose arrived in the early 1900s, and their population has fluctuated dramatically at times since then. Wolves became an even later migrant when they crossed the ice to Isle Royale between 1948-1950.

The presence of wolves and moose on Isle Royale has provided a unique and well-documented opportunity to study the predator-prey dynamics since the mid-20<sup>th</sup> century, however, a study that continues to this day.

Yet even the length of this noted study does not mean that the dynamics of island biogeography have ended. Species come, and species go. Extirpations can occur. Particularly because of wilderness designation, we must let it be Nature that makes those decisions, not us humans who want to impose human preferences on the Wilderness.

The DEIS also needs to assess whether Isle Royale can support a self-sustaining wolf population over the long-term. Isle Royale is relatively small for a wide-ranging, territorial species like the wolf. Even at its highest level of 50 or so wolves, Isle Royale has never harbored a large enough population to sustain itself, nor has inflow from the mainland been enough to avoid the detrimental effects of inbreeding after just a handful of generations. Given the average number of wolves on the island—around 20—the problem only gets worse, and even 20 wolves might be an unusually large population for such a small area. For comparison, Yellowstone National Park—at 2.2 million acres—harbors roughly 100 wolves in 10 packs.

That's one pack and 10 wolves for every 220,000 acres in an area that provides a banquet of prey species, and pack territories that in many cases extend well beyond the park. Isle Royale, wonderful as it is, provides none of these beneficial characteristics and, at best, might only sustain intermittent wolf populations. Recent history suggests this is the case, while long-term history suggests wolves might never have inhabited the island. The alternatives that contemplate translocating wolves to Isle Royale need to explain why the future will be different and why maintaining a stable wolf population on the island won't require managing Isle Royale like a zoo, where individual wolves and or packs will need be routinely captured from their native homes and exiled on Isle Royale to perpetuate an unnatural condition to appease some visitors and researchers alike.

**3. Slippery Slope of Manipulation.** As mentioned above, an essential part of wilderness designation is that humans must avoid the hubris and arrogance we often exhibit towards landscapes and wildlife. We must instead show humility and restraint, allowing untrammelled Wilderness to remain unmanipulated to chart its own ecological and evolutionary course without succumbing to human preferences and desires.

If humans start transplanting wolves to Isle Royale, we start on a slippery slope that may have no end. Additional wolves will almost certainly be needed on the island after the first installment, to "freshen up" the gene pool again. With a warming climate, Isle Royale may eventually lose its moose population, too. Will we then import moose to Isle Royale in perpetuity to keep the wolves fed, in order to perpetuate 1950s predator-prey conditions? Or will we have to control the wolves to give the moose a fighting chance? And what of the native lynx and woodland caribou that inhabited the island before the wolves and moose? Should we reintroduce them to re-create 1900s conditions?

**4. Research Can Continue.** Some people fear that a loss of wolves from Isle Royale will mean that ecological research on the archipelago will come to an end. Ecological studies on Isle Royale will continue to provide new scientific insights, however, whether or not the wolves survive or become extirpated. Wolves are not the only species to be studied on Isle Royale, even if the somewhat exaggerated symbolism of the wolf and some of its promoters might have us think otherwise.

Research will actually become even more important if the wolves do become extirpated. If the wolves die out, how will the moose population respond? Will genetic variability in moose also flatten over time? Will the moose population return to the boom-and-bust cycles of the 1920s to 1950, or will something else occur? Will wolves naturally re-colonize Isle Royale on their own, utilizing ice bridges to the mainland such as those that have formed in recent winters? How will the vegetation respond?

We have far more to learn about the ecological dynamics of Isle Royale if wolves actually do become extirpated from the archipelago, rather than re-creating a temporary wolf-moose dynamic that has already been studied for more than 60 years.

**5. Proposed Listing of Moose.** While we appreciate the NPS' desire to separate this current analysis from the larger wolf-moose analysis originally proposed, we think the current

dramatic decline of moose throughout much of the Upper Midwest and the proposed listing of moose under the Endangered Species Act (ESA) suggests we can't disentangle the issues of wolves and moose on Isle Royale. If moose begin to struggle on Isle Royale, as they are in much of the Midwest, then a decision to translocate wolves to the island could spell the moose's demise. Moose might well be listed on the endangered species list by that point. The DEIS needs to address this issue.

**6. Visitation without Wolves.** While wolves are a popular species on the island, the question of whether the absence of wolves will have an appreciable impact on the number of visitors should be addressed. Some might argue that losing this popular species will have an impact on visitation to Isle Royale and, potentially, on the economy of mainland communities. We don't think that will happen, though; people will still come to visit Isle Royale even if wolves become extirpated. But that question should also be addressed in the DEIS.

**7. Researchers Who Call for Non-Intervention.** Wilderness Watch is not alone in calling for a non-intervention approach on Isle Royale. Other highly respected researchers have also supported this approach. Their research and writings addressing the issue of wolves on Isle Royale should be reviewed and incorporated into the Isle Royale wolf analysis. Some of those writings include:

Dr. L. David Mech. 2013. "The Case for Watchful Waiting with Isle Royale's Wolf Population," *The George Wright Forum* 30(3): 326-332.

Dr. Tim Cochrane. 2013. "Island Complications: Should We Retain Wolves on Isle Royale?" *The George Wright Forum* 30(3): 313-325.

Dr. Tim Cochrane. 2014. "Rejoinder to 'Discernment and Precaution: A Response to Cochrane and Mech,'" *The George Wright Forum* 31(1): 94-95.

Dr. Franz Camenzind. 2015. "A Case Against Intervening in the Isle Royale Wolf/Moose Issue." Attached.

Please keep Wilderness Watch on your contact list for further steps in this analysis. Thank you for this opportunity to provide comments.

Sincerely,



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