

## INTRODUCTION

- I am writing to voice my opposition to U.S. Fish and Wildlife Service's (USFWS) proposed rule, "Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife," Regulation Identifier Number FWS-HQ-ES-2018-0097-0001.

## THE ENVIRONMENT NEEDS WOLVES

- Wolves are a critical keystone species in a healthy ecosystem. By regulating prey populations, wolves enable many other species of plants and animals to flourish. In this regard, wolves have a trickle-down effect on other populations, a phenomenon known as a “trophic cascade.” When present in an ecosystem, wolves “touch” songbirds, beaver, fish, and butterflies. Without predators, such as wolves, the system fails to support a natural level of biodiversity and may cease to exist altogether.
- In the places where wolves have returned like Yellowstone National Park, wolves have managed explosive deer and elk populations, which had eaten valleys barren. That helped bring back trees and shrubs. Birds and beavers, as well as the animals that live in dams, also returned. The wolves helped to provide food for other animals who scavenge like bears and raptors came back for carrion. With more trees controlling erosion, the flows of some rivers were less chaotic, forming pools that became new habitats.
- According to scientists like William Ripple, an ecologist at Oregon State University, we’re just uncovering the critical role that wolves and other predators serve in the ecosystem at the same time their populations are declining and are at risk.
- Wolves provide a protective gauntlet that can help slow the spread and prevalence of deadly diseases, including Chronic Wasting Disease, an ultra-lethal degenerative neurological illness now invading wildlife-rich ecosystems across the American landscape.
- The preponderance of scientific evidence supports the view that wolves generally kill prey that are vulnerable, such as weak, sick, old, or young animals. By killing sick prey individuals, wolves remove infectious agents from the environment, reducing transmission to other prey. The scientific community argues that in this manner, wolves help reduce the spread of Chronic Wasting Disease.

## DELISTING'S DEADLY IMPLICATIONS FOR WOLVES

- Many states, like MT, WY, and ID, where wolves have already been delisted, are not managing their wolves like other wildlife – instead, their goal is to aggressively drive wolf population numbers down to the bare minimum required by law.
- History tells us that under the states’ authority to manage wolf populations, wolves die at the hands of trophy hunters. Starting in 2011, wolf management, at one time or another, returned to the states of Montana, Idaho,

Wyoming, Minnesota, Wisconsin, and Michigan. All but one of these states opened a hunting season on wolves within the first year of having management authority. Although Michigan refrained from immediately opening a season on wolves, state representatives unabashedly altered the right of referendum for Michigan voters to allow its inaugural trophy season to begin the following year. Nearly two thousand wolves were killed in 2011-2013 alone, and thousands more since in states where protections were temporarily or permanently lifted.

- Losing federal protections would have deadly implications for wolves: in just the last few years, thousands of wolves have been shot or trapped in states where protections were temporarily or permanently lifted.

## DELISTING DECISION IS PREMATURE

- Without federal protection, wolves in historically occupied areas like the southern Rockies and Northeast may never be able to establish viable populations despite suitable habitat and availability of prey.
- USFWS's proposal to remove federal protections is premature, puts wolves at serious risk of never achieving natural recovery, and signals a disappointing shift in its commitment to endangered species recovery.
- Federal protections are still essential to help wolves return to suitable habitat, just as the bald eagle was allowed to expand before its federal protections were removed.
- Wolves are not recovered in key parts of their range. Delisting could prevent the return of wolves to CO and UT. Colorado, for example, does not have a confirmed wolf presence yet but possesses excellent wolf habitat. The federal government manages about 55% of the land in the state, including 9.5 million acres of roadless areas, and the state hosts an estimated 300,000 elk or 30% of the nation's total elk population. According to Wolf Biologist Dr. L. D. Mech, "Re-establishing wolves in western Colorado could connect the entire North American wolf population from Minnesota, Wisconsin, and Michigan through Canada and Alaska, down the Rocky Mountains into Mexico. It would be difficult to overestimate the biological and conservation value of this achievement."

## DANGEROUS PRECEDENT FOR ESA AND IMPERILLED SPECIES

- The Endangered Species Act is America's most effective law for protecting wildlife in danger of extinction. It serves as an essential safety net when state management has failed to protect imperiled plants, fish, and wildlife. Since its enactment, 99 percent of listed species have survived and hundreds more have been set on a path to recovery.
- By lowering the bar for endangered species recovery, USFWS is setting a dangerous precedent that could impact conservation and recovery efforts across the country for other imperiled species.

## CONCLUSION

- Thank you for the opportunity to oppose USFWS's proposed rule seeking to remove the gray wolf from the list of endangered and threatened wildlife.