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Public Comments Processing  
Attn: FWS-HW-ES-2013-0073  
Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive  
MS 2042-PDM  
Arlington, VA 22203

To Whom It May Concern:

I am an attorney at The Center for Wildlife Ethics, a non-profit organization comprised of attorneys advocating for improved protection of wildlife and ecological systems and promoting non-lethal solutions for perceived wildlife conflicts and management practices. On behalf of the Center for Wildlife Ethics, I am writing to urge the United States Fish and Wildlife Service (USFWS) to keep Endangered Species Act protections in place for gray wolves in the U.S.

Before enumerating the practical and scientific reasons that the Endangered Species Act (ESA) protection for gray wolves should not be lifted, we cannot overlook the crucial moral imperative that must be considered. By removing federal protection under the ESA, the USFWS is effectively leaving the fate of gray wolves to be decided by state conservation and natural resources agencies. These entities have an intrinsic pro-hunting bias and many have indicated that they intend to initiate aggressive gray wolf “management” efforts as soon as ESA protections are removed. If the USFWS takes the proposed action, the status of gray wolves will abruptly change from “endangered” and federally protected to “nuisance species,” “pest,” and “game.” Gray wolves will be, quite literally, in the crosshairs.

Wolves are sentient animals with highly developed emotional and cognitive capabilities. They are more than commodities; they are entitled to coexist with humans on their own terms; and we have an obligation to treat them as respected members of our biological community. Recreational hunting and trapping as well as institutional killing are gratuitous and cruel and should not be encouraged by the unprecedented removal of ESA protection for gray wolves. State agencies can claim that gray wolves need to be “taken,” “harvested,” or “managed” but it is important to remember the reality behind these euphemisms, i.e., the mass killing of a species that has, until now, been recognized as worthy of our protection.

By delisting the species, the USFWS is also making the assumption that the individual state agencies can be entrusted with the fate of gray wolves. This assumption is dubious at best and at worst, potentially devastating to the gray wolf. The confidence the USFWS has in the state agencies is misplaced, because the *raison d'être* of state conservation and natural resources agencies is, of course, to perpetuate and promote recreational and commercial hunting and other forms of wildlife “management.” Inherent in these agencies’ institutional approach to wildlife is the very mindset that caused the near extinction of the gray wolf in the early 20<sup>th</sup> century. The notion that state agencies are patently unfit to both protect and manage gray wolves is demonstrated by the aggressive and unsustainable killing campaigns that have been undertaken in Idaho, Montana and Wyoming. At least 1,300, and as many as 1,700 wolves have already been “officially” killed in these three states, since ESA protection was lifted in 2011 and, of course, this does not take into account the unofficial killings that have been perpetrated against wolves as the attitude and slogan “shoot, shovel, and shut up” has become an accepted norm in sportsman’s culture.

Undoubtedly, state conservation and natural resources agencies will pursue aggressive hunting campaigns against gray wolves once they are delisted. According to a recent USFWS news release, once the ESA protection is lifted, 90% of the gray wolves in Wyoming (those concentrated in the northwest portion of the state) will be vulnerable to legal hunting as “trophy game.” The remaining 10% will be classified as “predators” and can be killed with very few restrictions.

In Montana, over 6,000 wolf-hunting licenses have been sold this year. The state certainly created every incentive for residents to consider hunting wolves, allowing each license holder to kill as many as five wolves. Simultaneously, the state removed any significant economic barrier to wolf hunting by charging a mere \$19 fee for each license, for Montana residents. These policies are clearly excessive and one might argue that the state seems to be pursuing wholesale eradication as a form of wildlife management. Indeed, while 6,000 individual license holders can legally kill wolves in Montana, the current population of wolves in the state is estimated to be only 625. With states policies so clearly detrimental to the progress of gray wolf recovery already enacted or on the horizon, there is virtually no credibility to the argument that state agencies are capable of protecting the gray wolf.

In Idaho, at this very moment, the State Department of Fish and Game is preparing to for a state-wide wolf killing competition beginning just a few days after Christmas, on December 28, 2013. This event, “The Coyote and Wolf Derby” is believed to be the first competitive wolf hunt in the lower 48 states, since wolves came under ESA protection in 1974. Participants in this killing contest will be eligible for prizes for the largest wolf killed and the most female coyotes killed. Children as young as 10 years old will be eligible for the hunt. If, by allowing hunters to engage in such gratuitous violence and literally turning mass killing into a game, the state of Idaho is engaged in “responsible” wolf management, then there may be little hope for the recovery of the gray wolf.

According to a recent USFWS news release, “Our *primary goal*, and that of the states, is to ensure that gray wolf populations in the Northern Rocky Mountains remain healthy, giving future generations of Americans the chance to hear its howl echo across the area” (emphasis added). It is our sincere hope that this is not empty rhetoric. If the USFWS truly wishes for future generations of Americans to hear the howl of gray wolves who are part of a healthy population, then passing off the species’ recovery to the hands of the state agencies is misguided and counterproductive.

In the face of the destructive policies that threaten to undo decades of federal efforts for gray wolf recovery, it is natural to wonder who could possibly be driving the ill-conceived plan to delist the wolf. Who benefits if the gray wolf is no longer protected by the ESA? The answer is troubling because it seems that only those who perceive wolves as a commodity, a trophy, or an enemy would favor removing federal protection. Anti-wolf groups have normalized a deviant and violent culture of hatred and persecution towards gray wolves. They are increasingly organized as a political force that vilifies and denigrates the species, typically for no reason other than hatred and “sport.” Members of the hunting lobby, and particularly big game hunters, also favor delisting because they perceive wolves as a natural predator of the large prey animals that the hunters themselves have a vested interest in killing as prize trophies. Similarly, many ranchers and members of the livestock industry fear the predation of livestock and for them, this is reason enough to eradicate wolves. In an incredible display of anthropocentric arrogance, cattle ranchers actually believe that their right to slaughter the livestock that are their “property” is a greater right than the wolves’ right to survive in their natural habitat. The ranchers would prefer to kill the wolves, rather than using non-lethal means to protect their “property” from predation. Again, as acknowledged by the USFWS, and stated above, the primary goal of the agency should be “to ensure that the gray wolf populations in the Northern Rocky Mountains remain healthy.” The USFWS cannot forsake that goal (and the wolves themselves), by pursuing policies that are in the interest of such a narrow and peculiar group of blatantly biased stakeholders. Instead, the agency should follow sound ethical and scientific policy and give strong consideration to the prevailing public opinion that gray wolves should remain protected.

The USFWS website profile for the gray wolf acknowledges: “The Gray Wolf, being a keystone predator, is an integral component of the ecosystems to which it typically belongs.” Prominent wildlife scientists agree that gray wolves make it possible for other hundreds of other species of animals and plants to thrive and their stable presence promotes the integrity and health of their ecosystem and facilitates reforestation. In a letter written to the Department of the Interior and the USFWS earlier this year, a group of wildlife biologists offered their expert opinion that: “The gray wolf has barely begun to recover or is absent from significant portions of its former range where substantial suitable habitat remains.” The scientists added that the proposed delisting “fails to consider the importance of these areas to the long-term survival and recovery of wolves, or the importance of wolves to the ecosystems of these regions.” (Letter from Dr. Bradley Bergstrom, et al. to Sally Jewell, Secretary of the Interior (May 21, 2013) ([http://www.peer.org/assets/docs/fws/5\\_22\\_13\\_Scientists\\_letter\\_on\\_delisting.pdf](http://www.peer.org/assets/docs/fws/5_22_13_Scientists_letter_on_delisting.pdf))). A profound example of the positive effect of wolves on their ecosystem can be observed in

one region where the proposed delisting of wolves is likely to decimate their numbers and reverse their recovery. As the USFWS is surely well-aware, the reintroduction of wolves to Yellowstone National Park has helped to regenerate streamside vegetation and facilitate the return of native beavers and songbirds within the park, after decades of overbrowsing by elk.

As a final note, even if the USFWS believes that ESA protection is no longer warranted once an endangered species had fully recovered, the proposed delisting of the wolves is misguided because the species has not “recovered” in any meaningful sense. After being hunted to near extinction in the lower 48 states, the gray wolf has returned to an estimated 5-10 % of its historic range, due to the protection afforded it under the ESA. The wolf previously inhabited a vast expanse of the North American continent, and even after decades of recovery efforts by the USFWS, that recovery is still incomplete, and the gray wolf now only inhabits a tiny fraction of its historic range. Today, for example, wolves are only beginning to reenter the suitable habitats of states like Colorado, California, and Utah. By hastily truncating the recovery of the gray wolf, and allowing the individual states to race ahead with aggressive wolf “management” campaigns, the survival of the species in North America is jeopardized. Wildlife biologists warn that the long term recovery of the species depends on wolves being able to disperse between geographically-separated populations. The USFWS website boasts, “The Endangered Species Act provides a critical safety net for America’s native fish, wildlife and plants,” but by lifting ESA protection for gray wolves, the agency is pulling this “critical safety net” out from under the species at the worst possible time.

The Center for Wildlife Ethics sincerely urges the USFWS to reconsider its proposal to remove the gray wolf from its list of endangered species. Ethical, scientific, and practical considerations dictate that if ESA protection is not maintained for gray wolves, they will be hunted aggressively, biodiversity and overall ecosystem health will suffer, decades of ambitious federal recovery efforts will be reversed, and as both individuals, and as a species, the gray wolves will suffer the most of all. As the USFWS marks the 40<sup>th</sup> anniversary of the Endangered Species Act, the legislation that has protected “imperiled animals and plants since 1973,” we hope that the agency will uphold its obligation not to imperil a species by delisting the gray wolf. We urge your agency to keep ESA protection in place for the gray wolf. Thank you for considering this public submission.

Respectfully,

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Attorney  
The Center for Wildlife Ethics, Inc.

cc: Sally Jewell, Secretary of the Interior (via email)