



ESA TALKING POINTS TO GUIDE YOUR WORDS



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.

SCIENTIFIC ARTICLES TO SUPPORT TALKING POINTS

- **Aspen recruitment in the Yellowstone region linked to reduced herbivory after large carnivore restoration:** This study provides evidence of widespread changes in plant communities resulting from large carnivore restoration, extending outside a protected national park to areas with hunting, livestock grazing, and other human activities.
- **Wolf Hunting and the Ethics of Predator Control:** John Vucetich and Michael P. Nelson apply “argument analysis”, a basic tool of scholarly ethics, to the controversial concern about the appropriateness of hunting wolves. Advocates of wolf hunting offer a variety of reasons that it is appropriate. Vucetich and Nelson inspect the quality of these reasons using the principles of argument analysis. Their application of this technique indicates that wolf hunting in the coterminous United States is inappropriate.
- **Effects of Wolf Mortality on Livestock Depredations:** Concludes that increased wolf mortality leads to an increase in livestock depredation.
- **Modeling the relationship between wolf control and cattle depredation:** “The parameter estimate for wolves killed is significant and positive (0.119), indicating that as more wolves are removed, the number of cattle depredated increases, much as Wielgus and Peebles indicated.”
- **Ecological and economic benefits to cattle rangelands of restoring an apex predator:** This study analyzes dingoes’ ecological and economic impact on cattle operations in Australia: “Our simulations demonstrate that trophic cascades initiated by dingoes killing native herbivores are expected to be strong enough to improve the biomass of native pastures and, as a consequence, the gross margins of cattle enterprises. These results not only challenge the conventional perception of dingoes as an economically damaging pest species that must be controlled, they also contribute quantitative estimates of the expected ecological and financial benefits of this apex predator.”
- **Co-Adaptation Is Key to Coexisting with Large Carnivores:** “A variety of measures exist to reduce the impacts on humans of having large carnivores in shared landscapes, ranging from economic compensation and incentives, information campaigns, spatial zoning (e.g., habitat protection from human development), technical changes to livestock husbandry, the restoration of wild prey populations, and allowing limited hunting of large carnivores, among others. ... However, during humanity's long history of interacting with carnivores, we have also learned to adapt to carnivore presence, minimizing the need to reduce their population sizes.”
- **EVALUATION OF A TEST AND CULL STRATEGY FOR REDUCING PREVALENCE OF CHRONIC WASTING DISEASE IN MULE DEER (ODOCOILEUS HEMIONUS):** Re targeted culling of CWD-infected deer and concludes: “Although we detected some infected individuals well before clinical signs would have been discernible to a predator, at the herd level our testing effort likely was not as persistent or effective as that of natural predators. Our findings could

lend credence to the potential role of predation—of sufficiently high intensity and duration—in helping suppress CWD outbreaks if CWD-positive individuals are preferentially targeted by predators.”

- **Mountain lions prey selectively on prion-infected mule deer:** This study finds evidence that predators target animals infected with CWD, and suggest that predators may limit prion transmission/contamination at kill sites. “Adult mule deer killed by mountain lions were more likely to be prion-infected than were deer killed more randomly in sympatric populations, suggesting that mountain lions were selecting for infected individuals when they targeted adult deer ... Other studies indicate that coursing predators like wolves (*Canis lupus*) and coyotes (*C. latrans*) select prey disproportionately if they appear impaired by malnutrition, age or disease.”
- **A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park:** Study results suggest that predation by wolves could have potent effects on disease prevalence under certain conditions. Although non-selective predation, as might occur with culling, for example, may also be effective in eradicating the disease in a closed population, our results suggest that natural predation could substantially reduce the time required to eliminate the disease.

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.