

February 18, 2015
An Open Letter to Members of Congress
from Scientists on Federal Wolf Delisting

We, the undersigned scientists, are writing to express opposition to the prospect that Congress might act to delist gray wolves (*Canis lupus*) from the Endangered Species Act (ESA).

The best available science indicates that the gray wolf occupies a mere fraction of its historic rangeⁱ and therefore has not yet recovered from centuries of systematic persecution.ⁱⁱ For this reason, and in recognition of the ecological benefits wolves bring,ⁱⁱⁱ millions of tourism dollars to local economies,^{iv} and abundant knowledge from scientific study, we ask Congress to act to conserve the species for future generations.

The ESA requires the U.S. Fish and Wildlife Service (FWS) to base all listing decisions “solely on the basis of the best scientific and commercial data available” and that a species must be considered endangered if it is “at risk of extinction throughout all or a significant portion of its range” (Sections 3 and 4 of the ESA). A species is recovered when it no longer fits that definition and is unlikely to fit that definition in the foreseeable future. The best available science clearly indicates that wolves do not meet that standard – they occupy only a small portion of their former range—and that the species could occupy much more of its former range if the threats (primarily, human-caused mortality and inadequate regulatory mechanisms) were properly mitigated.

Despite this fact, the FWS has repeatedly removed federal ESA protections from wolves. It did so by distorting the plain meaning of the phrase, “significant portion of its range,” an important component of the ESA. Those distorted interpretations of the ESA are antithetical to what Congress intended when it enacted the ESA.^v Those distorted interpretations were also rejected by numerous federal courts that have ordered the FWS to restore federal protections to wolves, including two rulings in 2014 alone.

Currently, wolves are absent from most of the United States, with potentially secure populations in only a handful of states (Idaho, Montana, Wyoming, Wisconsin, Minnesota and Michigan). Yet, in those same states, the loss of federal protections resulted in state-sanctioned seasons on wolves at levels designed to reduce their populations to arbitrary goals, which were based on politics but not the best available science.^{vi} For instance, since delisting, in Minnesota, the population has been reduced by 20 percent, and in Wisconsin, by at least 15 percent, but likely by more.^{vii} Before a federal court intervened, the Wyoming Legislature ordered that 80 percent of the state be open to unlimited wolf killing. Killing of wolves in Montana and Wyoming has even included wolves that should enjoy protections in Yellowstone and Teton national parks^{viii} —the place where thousands of tourists go annually just to see wolves and support rural economies.

In rare circumstances, individual livestock owners suffer from wolves killing their livestock.^{ix} Assisting those livestock owners is both appropriate and readily accomplished through implementing non-lethal methods.^x Added to this, livestock growers benefit by managing wolves as “threatened” under the ESA, which permits lethal management under a Section 4(d) rule, allowing agencies to use lethal control of wolves to resolve wolf-livestock conflicts.

Some have expressed their concern for human safety, but such fears should not be an obstacle to recovery. While there has never been a record of a healthy wild wolf attacking a human in the lower 48 states, the ESA listing still allows lethal removal of wolves for human safety reasons.

For all of these reasons, we urge Congress to oppose any legislation to remove the gray wolf (*Canis lupus*) from protections under the ESA. Wolves are an enormous asset to the biological diversity of our country and are well tolerated by the American public. After decades of making excellent progress

toward recovery, it would be a shame to stop before the final goal is accomplished.

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ⁱ C. Carroll et al., "Defining Recovery Goals and Strategies for Endangered Species: The Wolf as a Case Study," *BioScience* 56, no. 1 (2006).

ⁱⁱ M.J. Robinson, *Predatory Bureaucracy: The Extermination of Wolves and Transformation of the West* (Boulder: University Press of Colorado, 2005); Bradley J. Bergstrom, "Endangered Wolves Fall Prey to Politics," *Science* 333(2011); J. T. Bruskotter, S. A.ENZLER, and A. Treves, "Rescuing Wolves from Politics: Wildlife as a Public Trust Resource," *ibid.*, no. 6051.

ⁱⁱⁱ J. A. Estes et al., "Trophic Downgrading of Planet Earth," *ibid.*, no. 6040; W. Ripple and R.L. Beschta, "Trophic Cascades in Yellowstone: The First 15 Years after Wolf Reintroduction," *Biological Conservation* 145(2012); G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (2006); J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (2005); R. Callan et al., "Recolonizing Wolves Trigger a Trophic Cascade in Wisconsin (USA)," *Journal of Ecology* 101, no. 4 (2013).

^{iv} John W. Duffield, Chris J. Neher, and David A. Patterson, "Wolf Recovery in Yellowstone: Park Visitor Attitudes, Expenditures, and Economic Impacts," *Yellowstone Science* 16, no. 1 (2008).

^v J. T. Bruskotter et al., "Removing Protections for Wolves and the Future of the Us Endangered Species Act (1973)," *Conservation Letters* 7, no. 4 (2014).

^{vi} Bradley J. Bergstrom et al., "The Northern Rocky Mountain Gray Wolf Is Not yet Recovered," *BioScience* 59, no. 11 (2009).

^{vii} Wisconsin changed its protocols in counting wolves, and may be over-counting them significantly. See: <http://faculty.nelson.wisc.edu/treves/>. Wisconsin admitted that 17 packs disappeared in one hunting season alone.

^{viii} The death of a famous Yellowstone wolf, 832F, was reported widely in the U.S. and in Europe. See: http://www.nytimes.com/2012/12/09/science/earth/famous-wolf-is-killed-outside-yellowstone.html?_r=0; see also, scientists warning to the FWS about the lack of buffer zones around national parks: Atkins, "United States Fish and Wildlife Service, Final Peer Review of Four Documents Amending and Clarifying the Wyoming Gray Wolf Management Plan," *Atkins Project No: 1000023591* (2012).

^{ix} T. B. Muhly and M. Musiani, "Livestock Depredation by Wolves and the Ranching Economy in the Northwestern U.S.," *Ecological Economics* 68, no. 8-9 (2009).

^x Adrian Treves et al., "Forecasting Environmental Hazards and the Application of Risk Maps to Predator Attacks on Livestock," *BioScience* 61, no. 6 (2011); A. Treves and K. U. Karanth, "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide," *Conservation Biology* 17, no. 6 (2003).