

November 18, 2015

Secretary Sally Jewell
Department of Interior
1849 C Street NW
Washington, DC 20240

CC: Dan Ashe, Director
U.S. Fish and Wildlife Service
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The undersigned wildlife management professionals and scientists agree with Dr. Dave Mech, Dr. Steven Fritts, Adrian Wydeven, Dr. Tom Heberlein, Ed Bangs, Dr. Scott Craven, Dr. Lu Carbyn, Dr. Tim Van Deelen, Dr. Scott Hygnstrom, Dr. Jim Peek, Dr. Paul Krausman, Dr. Mark Boyce, Dr. Bob Ream, and Dr. Evelyn Merrill, that gray wolves (*Canis lupus*) should not now be listed by the federal Endangered Species Act (ESA) in Minnesota, Wisconsin and Michigan (western Great Lakes states). This is consistent with the position of The Wildlife Society¹. For at least a decade, wolf populations have recovered in these states to the point where continued listing under the ESA is no longer necessary or beneficial to future wolf conservation².

The ESA is the world's most effective legislation to halt the slide of threatened and endangered species into extinction. In broad terms, there are 3 main components to the ESA:

1. Identifying species at risk of extinction and providing federal protections for these species ("listing");
2. Creating and implementing plans to reverse declines and identifying targets for when ESA protections can be removed and species returned to management by the states ("recovery"); and
3. Removing listed species once identified recovery targets have been achieved ("delisting").

Steps 1 and 2 have worked well for many species but step 3 has become nearly impossible to achieve for wide-ranging or high profile species like gray wolves. Four efforts by the U.S. Fish and Wildlife Service (USFWS) and its cooperators to delist or down-list gray wolves in the western Great Lakes states have been foiled or reversed by litigation typically based on legal technicalities rather than biology. For those of us who have worked on and supported wolf and wildlife conservation issues for many years, it is ironic and discouraging that wolf delisting has

¹ [Position statement](#), May 2012. See points 5 and 9, especially.

² Potentially feasible mechanisms to achieve delisting include: Overturning the 2014 Howell decision thereby "re-delisting" wolves in the Great Lakes Distinct Population Segment (DPS), congressional action delisting wolves in MN, WI, and MI, or narrowly focused congressional action clarifying that the ESA allows the Fish and Wildlife Service to identify—at the time a delisting rule is proposed— 1 or more appropriate DPS(s) where listed species have recovered. Any delisting solution that would preclude re-listing wolves, should this become necessary, is unacceptable.

not occurred in the portions of the Midwest where biological success has been achieved as a consequence of four decades of dedicated science-based work by wildlife management professionals. This success has been well documented in “*Recovery of Gray Wolves in the Great Lakes Region of the United States: An Endangered Species Success Story*” (A. Wydeven, T. Van Deelen, and E. Heske, eds. 2009, Springer) and in many other professional publications.

The efforts by Minnesota, Wisconsin and Michigan and their cooperators including the USFWS, other federal agencies, tribal governments, and some non-governmental conservation groups have succeeded in accomplishing wolf recovery that has greatly exceeded recovery criteria in recovery plans³. In 1974 when wolves were originally protected south of Canada, only about 750 wolves occurred in northeastern Minnesota. Today, wolves are found throughout northern portions of Minnesota, Michigan and Wisconsin with a midwinter (2014) count of >3,700. There are few, if any, areas in these or surrounding states where wolves could live on natural prey without exceeding socially tolerable levels of depredation on livestock and pets. We believe that failure to delist in the face of this kind of cooperative effort and biological success is detrimental to ecologically sound management and to continued progress in wolf recovery and management efforts in these states and elsewhere.

The USFWS has determined that adequate regulatory mechanisms for wolf management are in place in the western Great Lakes states. We believe it is highly unlikely that these states will allow their wolf populations to decline to the point where wolves are again threatened or endangered⁴. All 3 states have set minimum population goals that are much higher than the levels established for delisting in recovery plans and the USFWS has established post-delisting monitoring criteria for the states to follow. In the unlikely event that management efforts in these states prove to be inadequate, the proper and legally mandated course of action would be to relist the species. It is counterproductive to keep wolves as listed under the ESA because of speculation that the western Great Lakes states will not appropriately manage wolves and sustain their recovered status. There is no scientific evidence that wolf harvest systems established in Minnesota, Wisconsin and Michigan have or would reduce wolves’ ecological benefits in the areas where wolves have recovered. Neither is there scientific evidence that regulatory systems in the western Great Lakes states have or would reduce the dispersal ability of wolves⁵ or that the harvests that occurred during the period between delisting and the 2014 court-ordered relisting were inconsistent with maintaining recovered status.

The undersigned strongly believe that it is in the best interests of gray wolf conservation and for the integrity of the ESA for wolves to be delisted in the western Great Lakes states where biological recovery has occurred and where adequate regulatory mechanisms are in place to

³ Fish and Wildlife Service Recovery Plan for the Western Great Lakes set goals of 1250-1400 wolves for Minnesota and 100 for Wisconsin and Michigan combined.

⁴ This is supported by the continuing ecologically sound status of wolves and level of public acceptance for wolves in the northern Rocky Mountains where wolves were delisted in 2011 ([USFWS 2015](#)).

⁵ Since 2012, dispersing wolves have been recorded in Iowa, Illinois, Kentucky, and Missouri.

manage the species. We believe that failure to delist wolves in these states is counterproductive to wolf conservation there and elsewhere where suitable habitat may exist. The integrity and effectiveness of the ESA is undercut if delisting does not happen once science-based recovery has been achieved. When this happens, it creates disincentives for the states to continue to be active participants in recovery efforts and creates public resentments toward the species and the ESA. It is important to the overall ESA goal of maintaining biodiversity to focus available funds on species that are truly threatened or endangered.

The signers and endorsers of this letter listed below include biologists with over **1,026** years of experience as wildlife academics, researchers, and managers; those of us who have worked directly on wolves have published over thirty-three books and monographs on wolves as well as hundreds of scientific articles on this species.

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Books: *The Wolves of Isle Royale*, National Parks Fauna Series No. 7 (1966); *The Wolf: The Ecology and Behavior of an Endangered Species*, Natural History Press (Doubleday Publishing Co. (1970); *The Arctic Wolf: Living with the Pack*, Voyageur Press (1988); *The Way of the Wolf*, Voyageur Press (1991), *Wolves of the High Arctic*, Voyageur Press (1992); *The Arctic Wolf: Ten Years with the Pack*, Voyageur Press (1997); *The Wolves of Denali*, University of Minnesota Press (1998 with L. Adams, T. Meier, J. Burch, and B. Dale); *The Wolves of Minnesota: Howl in the Heartland*. Voyageur Press (2000, editor); *Wolves, Behavior, Ecology, and Conservation* (2003, co-editor with L. Boitani); *Wolf Hunting Behavior: The Behavior of Wolves Hunting Wild Prey*, University of Chicago Press (2015 with D. Smith and D. MacNulty). **Monographs:** *Ecological studies of the timber wolf in northeastern Minnesota*. USDA Forest Service Research Paper NC-52 (1971 coauthor with L. Frenzel); *Deer social organization and wolf depredation in northeastern Minnesota*, Wildlife Monographs (1981 coauthor with M. Nelson); *Dynamics, movements, and feeding ecology of a newly protected wolf population in northwestern Minnesota*, Wildlife Monographs No. 80 (1981 co-author with D. Fritts); *Elk calf survival and mortality following wolf restoration to Yellowstone National Park*, Wildlife Monographs (2008 coauthor with S. Barber-Meyer and P.J. White).

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Books: Co-editor (with T. van Deelen, and E. Heske) *Recovery of Gray Wolves in the Great Lakes Region of the United States: An Endangered Species Success Story* (2009 Springer)

Certified Wildlife Biologist (TWS); chapters in *Ecology and Conservation of Wolves in a Changing World* (Canadian Circumpolar Institute 1995), *People and Predators from Conflicts to Coexistence* (Island Press 2004), *The Vanishing Present: Wisconsin's Changing Lands, Waters and Wildlife* (U. Chicago Press, 2008), *A New Era for Wolves and People: Wolf Recovery, Human Attitudes and Policy* (U. of Calgary Press 2009), and *Wildlife Wolves We Have Known* (International Wolf Center 2013).

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Books and Monographs: *Dynamics, movements, and feeding ecology of a newly-protected wolf population in northwestern Minnesota*, Wildl. Monogr. (1981 with D. Mech); *Wolf depredation on livestock in Minnesota*, U.S. Fish and Wildl. Serv. Res. Publ. 145, (1982); *Wolves for Yellowstone? A Report to the United States Congress Volume II, Research and Analysis* (1990, USFWS team member and co-author/editor); *Trends and management of wolf-livestock conflicts in Minnesota*, U.S. Fish and Wildl. Serv. Resour. Publ. 181 (1992 with W. Paul, D. Mech, and D. Scott); *Ecology and conservation of wolves in a changing world*, Canadian Circumpolar Inst., (1995 with L. Carbyn, S. Fritts, and D. Seip, eds.).

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Books and Monographs: *Wolves in Canada and Alaska: Their status biology and management*, CWS report series #45 (1983); *Traditional knowledge and Renewable Resource Management in Northern Regions*, Boreal Inst. Occ. Pub. # 23 (1988 with M. Freeman); *Ecology and Conservation of wolves in a changing world*, Canadian Circumpolar Institute #35 (1995 with S. Fritts and D. Seip); *Wolves, bison, and the dynamics related to the Peace-Athabasca Delta in Canada's Wood Buffalo National Park* (1993 with S. Oosenbrug and D. Anions); *Wolves: an annotated bibliography*, Northern Reference Series No. 6. Canadian Circumpolar Institute (1998 with E. McClaren and E. Maloney); *The Buffalo Wolf - Predators, Prey and the Politics of Nature*. Smithsonian Institution (2003).

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Monograph: *Ecology of wolves in relations to a migratory caribou herd in Northwest Alaska*. (1997, Wildlife Monographs with W. Ballard)

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Monographs (wolf-related): *Cumulative effects of human developments on Arctic wildlife, Wildlife Monographs* (2005 with J. Johnson, R. Chase, H. Cluff, R. Gau, A. Gunn, and R. Mulders).

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