

May 13, 2019

Dear Fish and Wildlife Service,

The following comments come from Wilderness Watch, a national wilderness conservation organization based in Missoula, Montana. We have 200,000 members and supporters across the nation.

- We strongly oppose removing Endangered Species Act (ESA) protections for gray wolves in the contiguous United States. As with past delisting attempts, this action is premature and would undo gains that wolf populations have made under federal protection, which has saved them from the brink of extinction.
- Over the past four decades, we have made incredible progress toward the recovery of wolves. Today, approximately 5500 wolves inhabit approximately 15% of their historic range within the conterminous United States. While we have made substantial progress toward recovery, the job is not done. Important work remains. In particular, the ESA requires that a species be recovered throughout a larger portion of its historic range than has currently been achieved. Additionally, the proposed rule neglects adequate consideration of the impact that genetic health has on the recovery of wolves in the coterminous United States.
- The American people are supportive of wolf conservation and of the ESA, and we are more than able to handle the work entailed by completing wolf recovery. The essential issues surrounding wolves – livestock losses, interests pertaining to deer and elk hunting, perceived threats to human safety, and legal/political issues – are all quite manageable.
- In the most general terms, the FWS delisting proposal does not represent the best-available science pertaining to wolf conservation. Delisting wolves at this time would be an inappropriate shortcut. Mis-implementing the ESA in this case for wolves will set a poor precedent for hundreds of other species whose well-being depends on proper implementation of the ESA. Such intervention can seem like an expedited solution, but its larger effect is to inhibit progress on the broader issues of conservation and ESA implementation.
- With respect to wolf recovery, the two most important actions that could be taken to promote wolf recovery are for the FWS to develop: (1) a policy on “significant portion of range” that is consistent with the ESA, and (2) a robust national plan for wolf conservation and recovery.
- Even wolves that use designated Wilderness for part, or all, of their range could be killed under the agency’s delisting proposal. In Minnesota, for example, wolves survived in the heart of the 1.1 million-acre Boundary Waters Canoe Area Wilderness prior to protection under the ESA. Wolves have since expanded their

range in Minnesota, Wisconsin, and Michigan because of the sanctuary provided by the BWCAW. Under the agency's current delisting proposal, however, even wolves in the heart of the BWCAW could be killed.

- This proposed rule would cede management of the species to state agencies. In Idaho, Montana, and Wyoming, states where wolves have lost ESA protections, thousands of wolves have been killed during state hunting seasons.
- Wolves that are no longer protected under the ESA have been cruelly (and legally) snared and caught in barbaric steel-jaw leghold traps, and Wyoming went even further—allowing people to run wolves over with snowmobiles and ATVs, poison them, incinerate them in their dens with gas or dynamite, and gun them down from aircraft.
- For these reasons, we urge the U.S. Fish and Wildlife Service to keep gray wolves protected under the Endangered Species Act.