

The Honorable Deb Haaland
Secretary of the Interior
1849 C Street, N.W.
Washington DC 20240
Secretary_Haaland@ios.doi.gov

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Martha Williams, Principal Deputy Director
U.S. Fish and Wildlife Service
1849 C Street N.W.
Washington, D.C. 20240
Martha_Williams@fws.gov

Re: Citizens in Support of Reinstating Federal Protection of the Gray Wolf

Dear Secretary Haaland and Principal Deputy Director Williams,

We are honored and grateful to greet you as our first Native American Secretary of the Interior. Collectively, the undersigned organizations represent the voices of millions of U.S. citizens that stand steadfast in their support of protecting gray wolves by reinstating ESA listing protections.

Gray wolves are not only an essential component of healthy natural ecosystems but also have central importance in the cultural traditions and intrinsic valuations of many Americans. Despite the valiant effort to reintroduce gray wolves to the Northern Rockies in the mid-1990s, wolves remain endangered across the lower 48 states.

Although modest strides towards gray wolf recovery have been made, these achievements are being rapidly undone by misguided legislatures that cling to myth and misinformation to justify the extreme rates of recreational killing that has been sanctioned by premature delisting. There is no evidence that the presence of wolves has caused the livestock industry to suffer, nor any evidence that elk populations have suffered widespread declines, nor that human safety has been compromised. And there is no evidence that “Blood buys Good Will.” In other words, recreational killing has not assuaged the bloodlust of trophy hunters or recreational trappers.

There is, however, good scientific evidence from decades of reliable research that wolves, when present in ecologically effective numbers, with wide distribution and protected from human persecution, can initiate a process of ecological restoration. While all around us, biological diversity is crashing, where wolves are present and thriving, we witness the beginnings of recovery of biodiversity and ecosystem health.

Bills, such as the one recently signed by Idaho's Governor that will result in the slaughter of 90% of the gray wolf population in the state, and the 2011 Wisconsin law that eventually resulted in hunters legally killing 216 wolves (greater than 20% of the population) in 2021 during the breeding season in just three days, are a throwback to a time when we subscribed to the notion that “the only good wolf was a dead wolf.” Contemporary science tells us otherwise.

Those few individuals who are advancing the myth-based, science-less, recreational killing of gray wolves do not represent the majority of U.S. citizens. As evidenced by the recent vote in Colorado to reintroduce gray wolves to that state, we are witnessing in many communities an attitudinal

transformation regarding the relationship between humans and gray wolves and humans and the natural world.

Wolves are not recovered. The 1973 Endangered Species Act defined a species as *endangered* if it faced extinction within all or a “significant” portion of its range. Currently gray wolves occupy, at best, 15 percent of their historic range. Gray wolves continue to require the protections provided by the ESA to enable their survival and recovery.

The U.S. Fish and Wildlife Service (U.S. FWS) now uses the Species Status Assessment Framework for recovery planning. This framework follows the conservation principles of resiliency, redundancy, and representation (the “3Rs”) to evaluate the current and likely future status of a species. The 3Rs require a recovered species to be present in multiple large, resilient populations arrayed across a range of ecological contexts.

Resiliency refers to population characteristics that foster long-term survival despite stochastic environmental variation, threats, and disturbance events. Redundancy refers to multiple populations in different ecological “settings” to reduce the risk of extinction from catastrophe. Representation refers to the occurrence of the species occurs across all ecological “contexts” or communities, fulfilling the ESA’s geographic representation mandate. A recovery plan must enable the species to adequately meet these characteristics.

At the time of delisting, Gray wolves did not meet the U.S. FWS’s 3R criteria for delisting – none of the delistings were ever justified. The U.S. FWS’s 3Rs indicate what attributes are essential for a self-sustaining species – species that can be considered recovered and delisted.

Gray wolves require a national recovery plan that would enable them to meet the 3R criteria and they need that plan to be implemented under the protection of the ESA. But the U.S. FWS has never developed a science-based recovery plan for gray wolves as required by the ESA. A science-based, nationwide recovery plan would recognize and implement a strategy that enables a widely distributed but connected metapopulation of wolves – a feature essential to wolf recovery.

We need gray wolves to restore a natural balance, to restore the wild and to recover our cultural heritage. Gray wolves are not recovered and will continue to need the protections afforded by the ESA until that time when multiple populations are distributed throughout all suitable ecological contexts and are sufficiently resilient.

We, the undersigned, respectfully request that you reinstate Endangered Species Act protection to gray wolves. To achieve recovery, we ask that you direct the U.S.FWS to establish science-based recovery criteria that are founded in their own 3R principles – resiliency, redundancy and representation. We, the people, as stewards of our lands and wildlife, ask that you, as Secretary of the Interior, protect and restore the gray wolf to its rightful place in our public wildlands.

Respectfully submitted,

Rhonda Dern,

Delia G. Malone,

Gary Skiba,

Colorado Wolf Coalition Advisory Council members, and the following organizations and businesses:

A Naturalist's World (ecotourism)

James Halfpenny and Diann Thomson, Owners, tracknature.com/x/home.php

American Wild Horse Campaign

Holly Gann Bice Director of Govt. Relations, holly@americanwildhorsecampaign.org

American Welfare Institute

Nancy Blaney, Director of Govt Affairs, kate@awionline.org

Arkansas Valley Audubon Society

Peg Rooney, President, drpeg12@gmail.com

Bear Creek Council NGO

Dr. Nathan Varley President, nathan@wolftracker.com

Beaver Institute, Inc.

Mike Callahan, President, mike@beaverinstitute.org

Blaine Idaho County Commissioner

Dick Fosbury Chair, dfosbury@co.blaine.id.us

Cascade Forest Conservancy

Sean Roome Campaign Coordinator, Sean@cascadeforest.org

Center for Biological Diversity

Andrea Zaccardi Senior Attorney, azaccard@biologicaldiversity.org

Colorado Headwaters

Jerry Mallett, President, coloradoheadwaters.org

Colorado Wolf & Wildlife Center

Darlene Kobobel, Owner and Founder, darlene@wolfeducation.org

Colorado Wolf Alliance

Rhonda Dern, Founder, coloradowfalliance@gmail.com

Environmental Protection Information Center

Thomas Wheeler Executive Director, tom@wildcalifornia.org

Farmer Frog-Sprouting Simple Change

Jane Hutchinson, Wildlife Program Director, jane@farmerfrog.org

Fishpond, USA

Johnny Le Coq, CEO, johnlecoq@fishpondusa.com

Footloose Montana

Stephen Capra, Executive Director, stephen@bvconservation.org

Gail Bell

Proposition 114 Proponent, gbell@msn.com

Great Old Broads for Wilderness

Shelley Silbert, Executive Director, shelley@greatoldbroads.org

Howling for Wolves

Maureen Hackett M.D. President, hackett@howlingforwolves.org

In Our Nature Guiding Services (ecotourism),

Cara McGary Owner, <https://in-our-nature.com>

International Wildlife Coexistence Network

Suzanne Asha Stone, Executive Director, Suzanne@wildlifecoexistence.org

Klamath Forest Alliance

Kimberly Baker, Forest and Wildlife Advocate, kimberly@wildcalifornia.org

KS Wild

Joseph Vaile, Climate Director, joseph@KSWild.org

Lane County Audubon Society

Debbie Schlenoff, Ph.D. Conservation Chair, Debra Schlenoff, dschlenoff@msn.com

Living with Wolves

Garrick Dutcher, Research and Program Director, gdutcher@livingwithwolves.org

National Wildlife Foundation

Jason Baldes, Tribal Buffalo Program Manager, BaldesJ@nwf.org

National Wolfwatcher Coalition

Nancy Warren, Executive Director & Krisztina Gayler, Representative, <https://wolfwatcher.org>

Norman A. Bishop (Ret.)

Yellowstone Wolf Recovery Team, nabishop@q.com

Oceanic Preservation Society

Courtney Vail, Director of Strategic Campaigns, courtney@opsociety.org

Project Coyote

Camilla Fox, Founder and Executive Director, cfox@projectcoyote.org

Plan B to Save Wolves

Betsy Klein, Co-Founder, b@planb.foundation

Predator Defense

Brooks Fahy, Executive Director, brooks@predatordefense.org

Protect the Wolves

Roger Dobson, Director, Tribal Cultural Relations, native1919@gmail.com

Public Interest Coalition

Marilyn Jasper, Chair NP, CA Wolf Coalition, mjasper2@gmail.com

Rick Lamplugh

Author, Temple of the Wolves, ricklamplugh@gmail.com

Roaring Fork Audubon Society

Mary Harris, President, roaringforkaudubon.org

Rocky Mountain Wolf Project

Rob Edward, President, musefire@outlook.com

San Juan Citizens Alliance

Mark Pearson, Executive Director, mark@sanjuancitizens.org

The 06 Legacy

Karol Miller, President, kjhenckel@comcast.net

The Maine Wolf Coalition

John Glowa, President, jglowa@roadrunner.com

The Rewilding Institute

John Davis, Executive Director, hemlockrockconservation@gmail.com

Trap Free Montana

KC York, Founder and Executive Director, infor@tfmpl.org

W.O.L.F. Sanctuary

Shelley Coldiron, Executive Director, scoldiron@wolfsanctuary.net

Western Watersheds Project,

Erik Molvar, Executive Director, emolvar@westernwatersheds.org

Western Wildlife Conservancy

Kirk Robinson, Executive Director, lynx@xmission.com

Western Wildlife Outreach

Lynn Okita, Board Chair, westernwildlife.org

Wild Bear Adventures (ecotourism)

Barbara Ulrich, Owner, wildbearadventures.com

Wilderness Watch

Dana M. Johnson, Staff Attorney, danajohnson@wildernesswatch.org

Wolf Conservation Center

Maggie Howell, Executive Director, maggie@nywolf.org

Wolves of the Rockies

Marc Cooke, President & Kim Bean, Vice-President, wolvesoftherockies.org

Wyoming Wildlife Advocates

Kristin Coombs, Executive Director, Kristin@wyomingwildadvocates.org

Yellowstone Wolf Tracker (ecotourism)

Linda Thurston & Nathan Varley, Owners, nathan@wolftracker.com

Yellowstone Wild (ecotourism)

Emil McCain, Owner, yellowstonewildtours.com