**MEMO**
**Date:** 25 September 2020
**To:** OMB Office of Information and Regulatory Affairs
**From:** Adrian Treves, Ph.D., Professor, University of Wisconsin-Madison
**Subject:** RIN:1018-BD60 proposed rule to remove federal protections for gray wolves nationwide

Documents and a few sentences about their relevance follow.

1. **Inaccurate risk assessment: I**n the official scientific peer review of the proposed rule completed in 2019, on which I served as one of five gray wolf experts, I showed that Wisconsin and Minnesota's wolf counts did not use the best available science and led the USFWS to erroneous conclusions about the ostensible security of the gray wolves in the western Great Lakes Region (WGL, consisting of Minnesota, Wisconsin, and Michigan, and portions of surrounding states that are unoccupied by wolves). Official document here or here: https://www.fws.gov/endangered/esa-library/pdf/Final%20Gray%20Wolf%20Peer%20Review%20Summary%20Report_053119.pdf. **I predict that the consequence of the inaccurate risk assessment is that gray wolves are not secure in the WGL and the federal government will have to re-list them again, either by federal court mandate or after another wolf population crash.**
2. It is a widely accepted fact that the proposed rule will lead states and some tribes to kill more wolves. In the following peer-reviewed articles in top scientific journals, my colleagues and I showed that delisting always led to lethal management and lethal management invariably led to several negative outcomes. These findings are summarized here or here: http://faculty.nelson.wisc.edu/treves/Blood%20does%20not%20buy%20goodwill.php. **Therefore, the proposed rule will increase environmental crimes, accelerate loss of livestock, and trigger negative public opinion of government policy as we specify further below.**
3. **Environmental crimes:** legalizing wolf-killing led to sharp increases in illegal killing. For an administration running on a law and order platform, a rule that will increase environmental crimes could be embarrassing. Link to original peer-reviewed article here or here: https://rdcu.be/b6jy6
4. **Increases in livestock losses**: Lethal management of wolves in Michigan to prevent livestock losses instead increased those losses. When wolves at one farm were targeted for lethal removal, neighboring farms in the same township experienced a three-fold higher risk of subsequent cattle deaths. Link to original peer-reviewed article here or here: http://faculty.nelson.wisc.edu/treves/pubs/Santiago-Avila_etal.pdf. **Therefore, the proposed rule will cost farmers and taxpayers more money.**
5. **The above result is not isolated.** Ten worldwide reviews of the effectiveness of predator control confirm the conclusion. Gold-standard randomized, controlled experiments without bias show that non-lethal methods of predator control are effective and low-risk whereas lethal methods are either ineffective, counter-productive, or untested. Delisting gray wolves will lead to risky and ineffective lethal management that does not protect livestock. Link to

original peer-reviewed article reviewing the evidence here or here: http://faculty.nelson.wisc.edu/treves/pubs/Treves_etal_2019_RCT.pdf. **Therefore, the riskiness of lethal management is no longer only a hypothesis, it is now the majority consensus among scientists.**

6. **Predict and prevent instead of wasteful and costly reaction with ineffective lethal management:** We showed in 2004, 2011, and again in 2017 that we can predict where livestock will be attacked with >90% accuracy. That means we can predict and prevent livestock loss before it happens with farmer-based non-lethal methods. The state and federal agencies have not shown interest in this tool since 2011, preferring instead the ineffective and counter-productive lethal management that leads to environmental crimes and more livestock losses. Links to original peer-reviewed articles here or here: http://faculty.nelson.wisc.edu/treves/pubs/Treves_Rabenhorst_2017.pdf. T**herefore, non-lethal management is feasible.**
7. **The public has responded negatively to prior delisting and will do so again**: Public opinion has turned against lethal management, favors wolves, favors the Endangered Species Act (nationally), although locally in Wisconsin at least has turned more negative about wolves and more likely to poach wolves when the government legalizes wolf-killing. These findings are summarized in Bruskotter, J.T., et al., 2018. Support for the U.S. Endangered Species Act over time and space: Controversial species do not weaken public support for protective legislation. Conservation Letters; e12595, 1-7, Manfredo et al. 2020. The changing sociocultural context of wildlife conservation, B Conservation Biology OI: 10.1111/cobi.13493, and summarizing our work in Wisconsin here or here: http://faculty.nelson.wisc.edu/treves/Blood%20does%20not%20buy%20goodwill.php. **Therefore, the proposed rule will be unpopular with the broad public, only popular with a narrow minority of carnivore-hunters and a a minority of livestock owners.**
8. In my opinion, the excessive expenses associated with federal protections for wolves are the poorly designed proposed rules for delisting and past reclassifications and permits to states to kill wolves. Those premature and poorly conceived prior efforts aborted legal recovery of wolves and triggered successful litigation.
9. Addendum after the teleconference occurred (in response to a question). All four wolf populations of the contiguous lower 48 states (NRM, WGL, Mexican wolves, red wolves) show a pattern of under-estimating illegal killing and not responding to poaching (illegal killing) as the major threat to wolves; summarizing our work here or here: http://faculty.nelson.wisc.edu/treves/pubs/Treves_etal_2017b.pdf