

Saturday, December 20, 2025

**I oppose** all current efforts to alter the U.A. Endangered species Act (ESA).

**I oppose** the proposed changes to the ESA.

The ESA should be strengthened to prevent extinction and to promote legal recovery of more listed species. The best available science provision of the ESA needs strengthening to keep up with current consensus and progress in science. The significant portion of range provision of the ESA and recent court decisions affirming its interpretation of historic range should be added to FWS and NMFS regulations. Recent interpretations of adequacy of regulatory mechanisms should be added to FWS and NMFS regulations to strengthen the protective power of the ESA. Illegal take of listed species should be more effectively enforced again. Respect the original intent of the Congress of 1973 that prioritized preventing extinction over economic or development activities. Amend regulations to implement the ESA that add more public trust principles (fortify the citizen suit provision, strengthen the best available science provision, reaffirm the priority of preventing extinction and restoring listed species over current profiteering interest groups, and break the link between ESA implementation and special interests in state, tribal, and local jurisdictions).

Please include the literature in Appendix 1 in the public administrative record.

My qualifications: ADr. Treves focuses on ecology, scientific integrity, public trust principles, and agro-ecosystems where crops and domestic animals overlap carnivore habitat. He and his lab <http://faculty.nelson.wisc.edu/treves/> have authored >160 scientific articles which are free on the latter website. The Carnivore Coexistence Lab is best known for gold-standard experiments on non-lethal prevention of predation on domestic animals, estimates of illegal wolf-killing and cryptic poaching, and our work on risk maps to predict human-carnivore conflict sites. In 2025, Adrian earned the Chancellor's Distinguished Teaching Award, UW-Madison's highest honor for teaching. He earned his PhD at Harvard University in 1997 and has worked in non-profit and academic organizations ever since.

Thank you for the opportunity to comment.

### **Adrian Treves, PhD**

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### **Appendix 1 attached with**

#### **Scientific and scholarly literature addressing the points I made above**

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attitudes, behavioral intentions and behaviors. Pathways to Success Conference 2012; Breckenridge, Colorado 2012.

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6. Bruskotter JT, Vucetich JA, Slagle KM, Berardo R, Singh AS, Wilson RS. Support for the U.S. Endangered Species Act over time and space: Controversial species do not weaken public support for protective legislation. *Conservation Letters*. 2018;;e12595:1-7. <https://doi.org/10.1111/conl.12595>.
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