

MEMO

DATE: 28 December 2020

FROM: Adrian Treves, PhD, peer reviewer of the US Fish & Wildlife Service 2019 proposed rule for nationwide delisting of gray wolves

To: U.S. Fish & Wildlife Service (USFWS)

RE: Mexican wolf “Initial Release and Translocation Plan for 2021

I write to suggest improvements to the USFWS “Initial Release and Translocation Plan for 2021” for the Mexican wolf. I am a career conservation scientist with 30 years of experience and specifically 21 years publishing on wolf ecology, conservation and management of human-wolf interactions. I was also an official peer reviewer for the USFWS 2019 proposed rule for nationwide delisting of the gray wolf.

My overarching recommendation is that the USFWS implement strict protections for speedy recovery which includes three steps now:

1. Introduce entire social units of wolf family groups into the wild. I recommend that cross-fostering continue in tandem with release of well-bonded adult pairs and their offspring. The reason being that cross-fostered pups can come from genetically valuable captive adults that may not themselves be suitable candidates for release. The scientific evaluation should attempt to tease out which method contributes most to increasing gene diversity in the wild population and whether the combined release methods is superior to one or the other of the two methods.
2. Abandon the thinking behind the illegitimate geographic restriction on Mexican wolf ranging. This style of thinking is pandering to anti-wolf interests. Instead enforce strict protections including prosecution of criminal illegal take without any effort to mollify or placate wolf-hating groups.
3. Overall, it is essential that the USFWS stop pursuing the failed policy of placating anti-wolf minorities and adopting costly, unproven management interventions. All interventions are experiments and should be evaluated scientifically with the strongest inference.

The best available science supports my recommendations on strict protection of wolves and on maintaining high levels of human tolerance for endangered species, as I describe next.

**Blood does not buy goodwill.**

Our lab has published on the major source of mortality for Mexican wolves, which is illegal killing by people (1) and we are about to publish an analysis of USFWS policy on the misguided SOP13 and modified 10j rule of years past. Our analysis shows that the hazard and incidence of disappearances of radio-collared Mexican wolves went up during those two periods when the USFWS loosened ESA protections.

This result accords with our prior findings on collared Wisconsin gray wolves (2) and population dynamic analyses of Michigan and Wisconsin wolf population growths (3).

We conclude that policy to mollify anti-wolf groups threatening the USFWS (e.g., ranchers, hunters, and state agencies) have not worked and have instead resulted in the opposite effect, slowing Mexican wolf population recovery, and spawning criminal actions such as poachers using wolf radio-frequencies for illegal killing and destruction of evidence.

We document measurable waste of the precious lives and unique genetic material of individual Mexican wolves, and waste or theft of U.S. taxpayer property and investments in radio-collars, reintroductions, cross-fostering, etc. Furthermore, the social scientific research does not support the USFWS policies on human-wolf interactions.

My lab is one of the world’s leaders on attitudes to wolves and has proven beyond doubt that tolerance for gray wolves and inclination to kill gray wolves illegally increased every time the USFWS permitted killing, relaxed ESA protections or removed ESA protections (citation 4 summarizing four mail-back surveys and a pair of focus groups since 2001 and citation 5 reviewing the literature in the journal *Science*). Therefore, USFWS efforts to placate anti-wolf individuals and organizations by relaxing requirements of the ESA are an abject failure and doomed to do the opposite, worsen the illegal killing of wolves and fortify the position of intolerant people.

Our results prove that blood does not buy goodwill and appeasing haters leads to yet more violence against wolves.

Furthermore, we conclude from a combination of wolf biology and human attitude research that the USFWS has taken a disastrous policy for years and ignored better interventions and stronger scientific evidence to pursue those failed policies. Another of our conclusions is that the USFWS does not attend to information from scientists who understand human tolerance and illegal killing toward wolves, but instead repeats unreliable, unscientific, or weak inference — such as the opinions of its staff rather than the best available science, good-faith commitments by ranchers rather than strict protection of Mexican wolves, anecdotes from state agencies rather than peer-reviewed scientific evidence providing strong inference — when making its decisions about how to improve tolerance for Mexican wolves. Furthermore, we have evidence that USFWS staff on the ground may sometimes show affinity for wolf-hating groups more than the broad public, and reserve data for their own career advancement rather than the public interest.

Therefore, I am concerned that USFWS staff believe it can succeed with plans such as the present one that take half measures to recover Mexican wolves and do not invest fully in a healthy and vigorous recovery effort with the full force of federal law enforcement behind it. I see USFWS plans for cross-fostering pups - rather than introducing social groups of wolf families — as half-measures in reintroduction as yet another example of mollifying, placating, and appeasing those minority interests that appeal to USFWS staff more than the broad public and its legitimate interest in recovery of Mexican wolves.

I recommend The USFWS follow legally binding DOI policy on trusteeship (6), executive orders (7), and ESA 16 USC 1531 Sec.4(b)(1)(A) for decisions based “solely on the best available scientific and commercial data”. I also recommend retraining USFWS leadership on scientific integrity following National Academies recommendations (8), and public trust duties following peer-reviewed papers (8-11) — not illegitimate sources from interest groups that demonizes legal public and private interests to favor hunters, trappers, and hounders (12). Only then do I predict the USFWS will achieve the ESA’s mandate for swift recovery of listed wolf populations, and avoid repeated defeats in court over wolf policy.

Accordingly, I recommend against too cozy collaborations with the wildlife agencies of the States of Arizona and New Mexico because the broad public interest of the U.S. public is not well served by outdated state wildlife policies that cater to a small minority who hunt, trap, hound, or own cattle. Similarly, catering to ranching interests who are exploiting public lands for grazing profits, pits the interests of the U.S. public against a small minority of privileged individuals who do not deserve the trust of the USFWS when managing a highly endangered subspecies like the Mexican wolf. Furthermore, the mindset that erected an unlawful geographic limit on Mexican wolf reintroductions is not scientifically justified or legally defensible under the ESA and it betrays the sympathies of USFWS staff against the will of the U.S. people. Therefore, I recommend immediate, strict law enforcement to prevent illegal killing, a strong uncompromising opposition on anti-wolf individuals and organizations as a way to stand up to the legitimate interests of the U.S. public, and a science-based approach to intervening with the aim of accelerating the recovery of Mexican wolves in the wild.

Thanks for considering,



Adrian Treves, PhD

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