The Subcommittee on Water, Wildlife and Fisheries
Legislative Oversight Field Hearing on Wolf Management
Submitted by Nathan M. Roberts, PhD.
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Members of the Subcommittee on Water, Wildlife, and Fisheries:

Thank you for the opportunity to be here today to speak about wolf management. A year ago, I testified in this committee that the gray wolf in the United States is recovered, no longer in danger of extinction, and should be removed from the Endangered Species Act of 1973 (ESA). I stand by this statement still today. The wolf is recovered in the United States. The established recovery plan in Great Lakes region set clear numeric goals to serve as criteria for determining successful recovery. These goals have been exceeded every year since at least 1994, approaching three decades now, with an estimated 4,000-5,000 individuals in this region alone. Again, I note that, given the natural life span of wolves, every wolf on the landscape in the Great Lakes region was born long after recovery goals were met.

Some argue that states will eradicate wolves if management authority is returned to state jurisdiction. Some jurisdictions may continue state or tribal level protections while others may allow some regulated take. However, every state with wolves has a goal of sustaining a wolf population within their borders. While states may vary on how large the population should be, they all plan for, and set policies, to have a sustainable and secure population. The agencies charged with managing wolves in these jurisdictions will be accountable to the public they serve. Similarly, elected bodies that wade into wolf management will also be accountable to their respective electorates. While some states will reduce populations to achieve population goals, no states are suggesting they desire to remove populations altogether. In

fact, all states with wolves have a stated goal of maintaining a population that ensures the long-term viability of wolves within their state. It is critical to recognize that there is a difference between scientifically and responsibly managing wolves to established population goals which may mean less wolves on the landscape and desiring no wolves at all. Many states, based on their wolf management plans, may have the need to have fewer wolves than current numbers, but that does not mean they desire to eradicate the species.

Some argue that the number of wolves taken in recent years, in areas or times when wolves are not listed, is alarming. Hunting of any species causes a short-term decline in the population as individuals are removed. The actual number of animals removed, or percentage of the population removed, is not the important metric to consider. Rather, the population trajectory, viewed on an annual basis, is more informative when considering the long-term viability of a population. In other words, what we really want to know is if the population is increasing, declining, or remaining stable from year to year. Jurisdictions use a variety of techniques and methods to estimate the geographic range and population trajectory of wolves. State fish and wildlife agencies have successfully managed countless species this way over the past century from waterfowl to upland birds, deer, and elk. These methods are well established and supported by peer-reviewed literature. It is impossible to know the absolute number of any species, including humans, but estimates yielded from scientifically-sound methods are reliable and allow for monitoring of the species. These monitoring programs allow for evaluating population responses to management actions and changes. We can be confident that the wolf population is at least as large as estimates suggest because jurisdictions are using scientifically sound, defensible methods to produce these population estimates. Similarly, we

can be confident that the potential impacts of management actions, or changes to management programs, can be evaluated and adapted as needed.

Wolves are resilient. Peer-reviewed, scientific information can give us insight to what level of take is sustainable. Adams *et al*. (2008) is a published scientific work that found that harvest, or hunting take, rates up to 29% result in no decreases in annual population trajectory. The distribution of wolves further contributes to this resiliency as wolves in the contiguous United States are represented by several meta-populations that collectively compose the overall population. Multiple established meta-populations help ensure that the overall population is robust and resilient to unforeseen events. In the unlikely event that a meta-population were to experience severe population declines, the impact on the overall population can be mitigated by the other subpopulations. Indeed, the Department of Interior appropriately recognized this resiliency in their final rule published in 2020.

Some have concern that wolves are not found throughout their historic range. Wolves are restored in the Great Lakes and Rocky Mountain regions. However, it is true that they are not found throughout their complete historic range. This does not mean that the species is threatened. There are enough wolves in these established populations to ensure that wolves will remain in the United States. Most species are not found throughout their historic range. Elk and black bears, for example, are still absent from much of their historic range. They, like wolves, are still secure. States can restore native species in the absence of ESA protections. There are active programs in several states to restore elk and ruffed grouse – even though these species are not federally listed.

Failing to recognize that wolves are recovered undermines the intention of the ESA. The Act was intended to provide temporary protection and funding until a species met established recovery goals; at which time the states are to regain management authority following delisting. By not delisting wolves, even after they have far exceeded recovery goals, the integrity of the ESA is compromised. Funding, and other resources are encumbered for wolves, a recovered species, that could otherwise be dedicated to species in true need of assistance. Disregarding scientifically based recovery goals further disincentivizes jurisdictions from pursuing endangered species recovery or embarking on partnerships to restore species that are imperiled. Public support for imperiled species conservation erodes when citizens see abundant species classified as 'endangered' despite ample data, and scientific consensus, that suggest otherwise. The public, especially those that live in the core of wolf range, experience both the positive, and negative impacts of wolves. The public were assured in the recovery plan that wolves would be delisted once they were recovered. These citizens were further told the clear criteria used to determine if wolves have been recovered. However, after meeting these criteria for almost thirty years, the public are still waiting to see wolves delisted. We have a population that has been recovered for almost three decades and is at least an order of magnitude above established and agreed recovery goals, yet is still listed. Unfortunately, the result is that science is devalued, partnerships are avoided, the public is disillusioned, and conservation suffers.

Gray wolves are recovered in the United States. The science is clear; this species is recovered, secure, and recovery goals have been met many times over. States have the ability, and an undeniable track record of species management and recovery, to effectively and

sustainably manage this species for the benefit of the public they serve. This is why the federal government, and so many states, have appropriately supported delisting again and again. It is time to delist wolves.

Respectfully submitted.

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Citation:

ADAMS, L.G., STEPHENSON, R.O., DALE, B.W., AHGOOK, R.T. and DEMMA, D.J. (2008), Population Dynamics and Harvest Characteristics of Wolves in the Central Brooks Range, Alaska. Wildlife Monographs, 170: 1-25. https://doi.org/10.2193/2008-012