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July 11, 2019

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Public Comments Processing

Attn: Docket No. FWS-HQ-ES-2018-0097

U.S. Fish and Wildlife Service Headquarters, MS: BPHC, 5275

Leesburg Pike

Falls Church, VA 22041-3803

VETERINARY MEMO OF OPPOSITION

Docket No. FWS-HQ-ES-2018-0097

The U.S. Fish and Wildlife Service (USFWS) proposes to remove the gray wolf from the List of Endangered and Threatened Wildlife. The effect of this rulemaking action would be to remove the gray wolf from the Endangered Species Act's protections.

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The Humane Society Veterinary Medical Association (HSVMA), a veterinary professional organization of more than 9,000 members nationwide and with a focus on the health and welfare of all animals—including gray wolves—strongly opposes this rule proposed by the USFWS to remove federal Endangered Species Act (ESA) protections for them.

Wolves are vital apex carnivores that currently occupy a mere fraction of their historic range. Furthermore, wolves are a keystone species, and thus, immeasurably valuable and essential components of healthy, balanced ecosystems.

The best available science indicates that gray wolves have not yet recovered from centuries of systematic persecution. They remain missing or imperiled in many important portions of their historic range in the lower 48 states. If successful, the proposed rule will jeopardize the fragile recovery of wolves that has just begun after 40 years of taxpayer-funded federal protection.

Wolves are sentient, highly intelligent, territorial, social and family-oriented. They pair for life and raise their pups using extended family groups. Killing adult animals leaves pups and young wolves to die from predation, starvation, or exposure. Studies demonstrate that trophy hunting and trapping can be “super additive,” meaning that hunter kill

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rates on large carnivores like wolves have a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss, social disruption, and their indirect effects, including increased infanticide and decreased survival of young.

If successful, the proposed rule also leaves wolf populations to the devices of state wildlife agencies that capitulate to the trophy hunting, trapping, and agribusiness lobbies. Trophy hunters and trappers kill wolves in cruel unsporting ways, including by the use of snares, steel-jawed leg-hold traps, baiting and hounding with packs of dogs. When wolves are not protected under the federal ESA, they are routinely subjected to state-sanctioned trophy hunting and trapping seasons with quotas designed to reduce their populations to arbitrary goals, rooted in politics, and not in the best available science.

A mountain of studies and polls demonstrates that most Americans want wolves conserved, protected, and humanely treated. A 2016 study showed that across the country, the majority of Americans value or greatly value wolves. Wildlife-watching, a form of ecotourism, is increasingly popular, as hunting—particularly trophy hunting—continues to decline. In fact, USFWS’ own 2016 study indicates wildlife watchers are outspending hunters nearly 3 to 1.

The Humane Society Veterinary Medical Association believes that removing federal ESA protections for gray wolves would significantly imperil their recovery. The best available science demands that wolves continue to be protected under the ESA.

The Humane Society Veterinary Medical Association strongly opposes Docket No. FWS-HQ-ES-2018-0097 and urges the USFWS to withdraw this dangerous proposal.

Signed by the following 367 veterinary professionals:

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