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Dear Sirs,

Senator Casperson's reaction (Senate Resolution No 7) to the ninth circuit's federal court ruling reinstating protections for Great Lakes wolves is a predictable overblown politically motivated "solution" to a hyped up "problem".

The senator argues that the resolution is needed to support "scientifically-based" management of Great Lakes wolves, yet many of the region's independent scientists, such as Adrien Treves and John Vucetich, are among the numerous other national independent scientists that have staunchly defended retained federal protections for wolves in the Great Lakes, and nationally.

Grey wolves are a long persecuted species coming under fire by livestock producers and trophy hunters and used by politicians to garner votes in narrow constituencies that still retain regional and biased hatred of wolves based on inaccurate information and myth. Scientists and constituents recognize this bias and continued threat to wolves and in late 2014 voted in Michigan not to hunt wolves despite Senator Casperson's repeated attempts to derail two citizen referendums.

One of the enumerated threats within the ESA that can create a basis for a listing of a species is to ensure "that any remaining threats will be managed so that the species will not fall back below the viability threshold that led to its delisting." The continued determination to scapegoat wolves or intolerance expressed by politicians like Casperson is exactly what the drafters of the ESA envisioned when they proscribed the means to protect wolves.

Senator Casperson, has demonstrated an unusual determination to vilify wolves and to derail time honored democratic traditions in MI. Just days after the Keep Michigan Wolves campaign collected more than 265,000 signatures to bring the issue of whether to hunt wolves to a vote, Senator Casperson rammed through legislation to preempt the referendum. Prior to certification of the signatures on the citizen's referendum, Casperson publicly lied using the media to exaggerate threats about wolves to bolster his position to create a public hunt based on the "imminent" threats wolves posed to the public. You will recall, Senator Casperson was forced to apologize for his misleading wolf statements about wolves stalking a day care center. Prior to the admission, he had passed a wolf protection resolution based on falsehoods.

At, <http://www.uppermichiganssource.com/news/story.aspx?id=968656#.VMb052jF-HM> Senator Casperson continued to lie, even within his apology when he stated that the true facts about the supposed day care center "stalkings" had only recently come to his attention in November 2013. Yet a member of Wolf Watcher was notified personally that the resolution was adopted with knowledge that the information released to the press was not true. Michigan's Great Lakes wolf population is recovering but the Great Lakes wolves are still subject to serious threats from human intolerance.

The resolution proposed by Senator Casperson should be denied on a number of fronts; Senator Casperson has in the past, and continues to, greatly exaggerated the

impact of wolves in Michigan. The Senator offers no scientific data to support the resolution. The wolf management plan, which was based on peer-reviewed scientific data states, “The minimum criterion of 200 wolves does not reflect the maximum number of wolves the available habitat in Michigan can support...this minimum requirement is not necessarily sufficient to provide all of the ecological and social benefits valued by the public” (see 5.2). The scientists that developed the wolf report are arguing that 200 wolves is not the target population size but the minimum required. Scientists also agree that the Michigan wolf population shows evidence of stabilization and has actually declined since 2010-2011.

Finally, the threats to cattle are also greatly exaggerated. The Upper Peninsula of Michigan is home to about 50,000 head of cattle. In all a total of 26 livestock animals were killed by wolves in 2014 and many were lost on a farm that practiced bad husbandry. (9 animals were reported missing/ 3 injured). As a comparison 64,200 head (statewide) were lost to non-predators. Likewise the threats to pets or dogs are also greatly exaggerated. In 2014, wolves killed 16 hunting dogs. All of the dogs were either pursuing game or training to pursue game. When dogs run loose in the woods and cross coyotes or wolves with pups, the animals will try and defend themselves. Finally, the threat to humans from wolves is minuscule, if that. In the last 100+ years only one person in all of Canada and the US has been confirmed killed by a wolf, and under highly unusual circumstances. The Senator’s concerns about wolves posing a real threat to humans or livestock are already addressed in MI as they are allowed to be killed by officials.

There is good reason that the U.S. District Court for the District of Columbia returned the Western Great Lakes population of gray wolves to the federal endangered and threatened species list. The court carefully weighed the arguments by both plaintiff and defendant and determined that the USFWS rule that delisted wolves in the Great Lakes was arbitrary and capricious because it created a distinct population of wolves that should not have been carved from the general population, and that this impacted the ability of wolves to migrate and occupy their historical range. Intolerant politicians and ineffective regulatory state laws also rightly concerned the court about threats to wolves.

The court’s argument was almost identical to the argument made by the regional and national independent scientists who argued against a national delisting. In 2014 the USFWS solicited comments in a proposal to delist wolves across the nation. The USFWS solicitation for comments resulted in an astounding 1.5 million comments with more than 95% of them opposed to delisting. A large number of scientists also opposed the delisting. In a recently published paper, "Conservation Letters" independent scientists repudiated the USFWS call to delist wolves. The critique can be found published in the journal’s “Policy Perspectives” section. The authors including [Sherry Enzler](#) of the University of Minnesota and John Vucetich of Michigan Technological University, who directs the [wolf-moose population study on Isle Royale](#) argued that the service’s reasoning in support of its decision on gray wolves changes its application of the landmark wildlife law in two ways that effectively repeal it:

- By redefining the Endangered Species Act’s notion of natural range from the territory a species historically inhabited to the territory it currently occupies.
- And by deciding that human activity — especially intolerant activity — in portions of a species’ range can justify reclassification of those areas under the ESA as habitat no longer suitable for threatened animals and plants.

Senator Casperson argues for a resolution based on "The federal courts' continued interference ...in this state's rights under the Tenth Amendment to the U.S. Constitution..." He goes on to state, "the U.S. District Court's ruling must be overturned or the fundamental flaws in the federal Endangered Species Act corrected so that science and reason can prevail".

Science and reason are prevailing. The courts have consistently reaffirmed the intent of the ESA in protecting species vulnerable to threats. The threat of persecution is nowhere better evidenced than in Senator Casperson's knee-jerk legislation to bypass a legal referendum supported by hundreds of thousands of constituents, and in this new resolution with its hyped-up and erroneous charges against wolves.

The courts are the best place to determine inconsistencies and questions of constitutionality. In this instance, the federal courts judged an administrative rule to be arbitrary and capricious, and that ruling now once again protects wolves. The federal court is better equipped to adjudicate the nuances of a vitally important law such as the ESA than a politician that has demonstrated that his loyalties lie with minority special interests instead of protecting a national public trust resource or moving away from long held bias and hate for a species.

Both national and regional scientists and constituents show strong undeniable support for continued federal protections for wolves in the Great Lakes and nationally. The ESA was drafted to protect species despite political or economic inconveniences and it is the last stand for many species. Senator Casperson ought to note that Michigan voters, like those that commented to the USFWS in support of continued protections for wolves, recognize and appreciate wolves and will not be tricked into the fear mongering or scapegoating that first placed wolves on the ESA after most of their population was eradicated.

The November election allowed Michiganders to express their intentions towards wolves. The results illustrated that Michigan residents are resolved to move out of 18th and 19th century tactics to create fear and loathing of wolves and move toward a more humane and scientific approach to coexist with and appreciate the iconic and ecologically valuable wolf. Republicans and Democrats alike should respect the judiciary and our system of checks and balances and vote against any legislative attempts to overrule court rulings and the ESA by using underhanded tactics that include preventing judicial review. It is time for politicians to listen to scientists, and to stop manipulating political gain in minority constituencies by targeting wolves for continued persecution.