



US Fish and Wildlife Service
Gray Wolf Delist – EDPS
RIN 1018 – AJO
c/o Content Analysis Team
P.O. Box 221150
Salt Lake City, UT 84122

10 November 2004

RE: Proposal to Delist the Gray Wolf Eastern Distinct Population Segment

Dear Secretary Norton and members of the Gray Wolf Recovery Team,

We write to object, in the strongest terms, to the proposed delisting of eastern gray wolves from the Endangered Species Act. We urge you to reject this ill-founded proposal, to establish a distinct population segment for wolves in the Northeast, and to immediately begin preparations for the restoration of wolves in the eastern landscape. We urge these actions for three interrelated reasons -- ecological, social and ethical.

Ecologically, the natural landscape of the Northeastern United States has been severely crippled and made dysfunctional by the extirpation of its most important top predator, the wolf. As you well know, wolves perform a critical role in promoting the faunal and floristic health of wild and humanized landscapes, as well as maintaining the diversity and function of ecosystems. The evidence for this is plain wherever wolves have been either eliminated or restored. Signature events in this regard include damage done to the Kaibab Plateau when wolves (and other predators) were extirpated, as well as the recovery of native biodiversity in the Greater Yellowstone Ecosystem after the wolf's return. And wolves have little to no impact on seasonal opportunities for hunting ungulates. Indeed, wolves improve the fitness of prey populations through natural ecological dynamics. Delisting wolves will undermine efforts at restoring an ecologically rich, resilient, and biodiverse landscape in the Northeast.

Socially, wolves are considered a desirable species by the region's urban and rural residents, the majority of whom support wolf restoration. This is true despite loud and sometimes violent protests by extremist groups. Such voices should not be over-represented in the policy process, nor should they dominate or hold a veto over the more reasoned conclusions of democratic deliberation. In addition, the recovery of wolves would promote sustainable local livelihoods. Wolf education, wolf howls and wolf watching are increasingly popular in North America. These activities represent a positive trend toward ecotourism and non-consumptive wildlife recreation. Given the decline of farming and manufacturing, accompanied by the reforestation of the North Woods, the recovery of wolves in the Northeast would promote sustainable human communities. Delisting wolves forecloses on this important opportunity.

Delisting Eastern Gray Wolves

Ethically, there are as many and as good reasons to restore wolves in the Northeast as elsewhere. Simply stated, we have ethical responsibilities to both people and the natural world, and this includes wolves whether considered as individuals or a species. The Endangered Species Act is one expression of this obligation. The act embodies a direct human responsibility to the well-being of species and their habitats. It envisions a biologically rich continent and world, not a gulag of isolated, relic landscapes and species. With respect to wolves, we meet our responsibilities under the act through their fulsome recovery across their original range. We fail when wolves are restricted by predetermined boundaries, beyond which recovery is forbidden or undermined.

Unfortunately, the inadequacy of many state wolf management plans runs counter to fulfilling this ethical responsibility. With disturbing frequency, these plans are thinly veiled rationales for an open season on wolves. They fail to ensure that wolves will survive, much less thrive. It was for this reason that wolves were originally placed on the endangered species list. Delisting wolves before adequate state plans are in place, or responsible enforcement of safeguards by federal agencies is assured, is an invitation for tragedy.

The ethical reasons for wolf recovery are diverse and mutually supporting. For some, wolves are a biological heritage we ought to restore and conserve for our children, citizenry and the world. Future generations will condemn us for failing to take reasonable steps in this regard. Many see in wolves the hand of a creator for whom the natural world, including wolves, is good. Humans are thereby the stewards of creation, and wolf recovery is a sacred obligation. Others believe wolves are more than functional units of ecosystems, more than resources for humans use. Rather, wolves are self-aware and social beings. This gives wolves, as it does people, a moral standing when it comes to human actions that, for better or worse, have consequences for individuals, packs, populations and species. In this worldview, wolf restoration is an act of restitution for past harms done to creatures with which we share a common landscape. For still others, wolves are top predators contributing to the health and well-being of the larger community of life. Wolves generate a kind of ‘natural good’ that, while unintentional on their part, is indispensable to ethical adjudications of how we ought to live with the natural world. Delisting wolves side-steps these ethical issues, and impoverishes our moral relationships in a more-than-human world.

Clearly, the proposed rule to delist eastern gray wolves lacks ecological, social and ethical merit. It should be rejected and replaced by a proposal for restoration in the Northeastern United States. Such a proposal should minimally include the following:

- A distinct population segment for the Northeast, to include New England, New York, northern New Jersey, Northeastern Pennsylvania, southeastern Ontario and southern Quebec.
- A broad vision of the fulsome recovery of wolves across their original geographic range.
- Critical habitat planning that foresees an interconnected US-Canadian system of large, protected public wildlands integrated with wildlife-friendly private farms and forests.
- Modes of recovery that rely on a combination of natural recolonization and anthropogenic reintroduction.
- Cooperative agreements with state natural resource agencies that meet the ecological, social and ethical criteria mentioned above.
- Proactive measures in wolf education for the general public, as well as various interest groups.

Delisting Eastern Gray Wolves

- Proactive enforcement against the poaching of wolves, as well as the violence of extremist groups seeking to silence advocates and obstruct recovery.
- Proactive measures to help avoid wolf/human conflicts, e.g. the use of fencing, scare boxes, guard dogs, non-lethal firearms and compensation funds.
- Incentives to local communities so they may build more sustainable economies that take advantage of humanity's fascination with wolves and wildness.

There are already established precedents and workable protocols for every one of these actions from other wolf recovery zones in the west (gray wolves), southwest (Mexican gray wolves) and the southeast (red wolves). Government units and advocacy groups like the Fish and Wildlife Service, the Nez Perce Tribe, Defenders of Wildlife, and the National Wildlife Foundation have worked hard in this regard. As a result, recovery in the Northeast would be imminently practical.

Secretary Norton, wolves are an indicator not only of the health of a natural landscape, but the moral health of our culture. A society that learns to live with wolves across a wide range of wild and humanized landscapes is a society that is making substantial progress towards respecting human needs, caring for other forms of life, and living sustainably with the natural world. We urge you to embrace this vision, face the ecological, social and ethical challenges before you, and promote the recovery of wolves in the Northeast.

Sincerely,



William S. Lynn, Ph.D.
Senior Ethics Advisor
Practical Ethics
95 Liberty Street, Beacon, NY 12508
914.260.0344
williamlynn@practicaethics.net
www.practicaethics.net



Michael G. DiNunzio, M.S.
Director of Special Projects
Association for the Protection of the Adirondacks
P.O. Box 951
Schenectady, NY 12301-0951
518.377.1452
mdinunzio@together.net
<http://www.protectadks.org>

CC: Gayle Norton, Secretary, Dept of Interior
Steven Williams, Director, US FWS
Senator Hillary Rodham Clinton
Senator Charles Schumer
Governor George Pataki
Congressman John McHugh
DEC Commissioner Erin Crotty
APA Chairman Ross Whaley