



Hunters Heritage Council

PO Box 126

Republic, WA 99166-0126

www.huntsheritagecouncil.org

(509) 775-8836 (fax)

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Mr. Don Morgan, Chief
Branch of Delisting and Foreign Species, Ecological Services
US Fish and Wildlife Service, Headquarters Office, MS: ES
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Docket # FWS-HQ-ES-2018-0097
Proposed rule: Removing the Gray Wolf (*Canis lupus*) From the List of Endangered and Threatened Wildlife

Dear Mr. Morgan:

I am writing in support of docket # [FWS-HQ-ES-2018-0097], the proposed rule to remove the gray wolf from the list of endangered and threatened wildlife. The Hunters Heritage Council is Washington State's largest hunting-rights organization, composed of 11 individual organizations representing nearly 30 hunting and trapping organizations in total, with 45,000 members statewide. The Council opposes regulation of wildlife through the initiative process and political rhetoric - it supports wildlife regulation based on science.

The science is all behind the proposed rule. Wolves are well above recovery levels and they aren't going to go back down below them. Wolves are a very hardy specie and with a breeding rate between 24%-28% guarantees a bright future for them. Their populations are expanding rapidly, so the delisting rule makes perfect sense scientifically.

You hear rhetoric from the animal-rights community that delisting wolves will spell disaster for the specie, wolves will be hunted, and they will extinct. That is pure hogwash. In the Congressional delisting of wolves Montana, Idaho, Wyoming, the eastern half of Oregon, and the eastern third of Washington, wolves were delisted and turned over to state control. Wolves doing fine in all those areas. Wolf populations are growing in Idaho and they are hunting and trapping wolves. Montana and Wyoming have wolf hunts and their wolf populations are growing. In the northeast corner of Washington there are more wolves per square mile than there are anywhere in Idaho. Wolves are protected by the state's Endangered Species Act, but the Colville Nation, who are not bound the Act, are

hunting wolves, and wolf populations are still growing rapidly. Wolves should be managed by the states, not the federal government.

The most important factor in wolf recovery is social tolerance, and the only way you will get social tolerance is by implementing this proposed rule and turning over management of wolves to the states. People in rural areas are having their way of life destroyed by wolves. Their livestock is being predated on, pets and working animals are being killed. The frustration level in my state is boiling over. I talk to legislators from rural areas all the time and they are furious about the wolf situation. These people that want to keep wolves listed have no skin in the game. Their cattle aren't losing weight. Their cows aren't self-aborting due to stress from wolves. They are having fewer calves because their cattle are nervous from wolves. These are people that have lived on the land for generations. These are losses that cost more than direct kills from wolves. Rural folks aren't going to sit by idly and let wolves ruin their livelihood. They will do the three S's - shoot, shovel, and shut-up, or find other ways to harm wolves. That is why social tolerance is key. It will also help protect wolves. We need this proposed rule to keep social tolerance to let the states manage wolves, who know these people and their needs.

This proposed rule is just common sense. Wolves have recovered. Thank you for allowing me to post these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Pidgeon". The signature is fluid and cursive, with a large, stylized "P" and a long, sweeping underline.

Mark Pidgeon
President