THE HUMANE SOCIETY
OF THE UNITED STATES

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House Committee on Natural Resources and Outdoor Recreation
124 North Capitol Avenue
Lansing, MI 48933

Dear Chairman Howell and Committee members,

On behalf of the Humane Society of the United States and our Michigan supporters, I am writing to express our concerns with House Resolution No. 154. This resolution, offered by Reps. Johnson, Markkanen, LaFave and LaGrand, would encourage the National Park Service (NPS) to establish a moose tag lottery hunt purportedly to help control the moose population on Isle Royale. While the Humane Society of the United States is not opposed to subsistence hunting, we feel this resolution is premature and that it would disrupt the decades of valuable predator-prey research on the island. We also take issue with many of the assumptions put forth in the resolution.

The resolution states that, "Wolves are the only natural predator of moose on Isle Royale but the diminishing wolf population has not contained the moose population in recent years," and, "Previous attempts to introduce additional wolves to balance out the moose-to-wolf ratio have not resulted in a long-term sustainable balance of predator and prey." Yet the NPS began its recent wolf relocation efforts just over a year ago, in the fall of 2018[i]—hardly enough time to make broad, sweeping assumptions about long-term sustainability. In fact, researchers are finding that the introduced wolves, "adapted well to the island environment, feeding on the moose and beaver populations of Isle Royale. A little more than half of prey remains (54.5%) were moose, demonstrating introduced wolves had few problems adjusting to this larger prey."[ii]

Wolves, like all apex carnivores, significantly and positively influence biological diversity and ecosystem function.[iii] Ecologically-functioning populations of wolves have been instrumental in restoring biological diversity in the Northern Rocky Mountains, including increasing the number of song birds, pronghorn, lynx, and other species, while simultaneously improving the ecology of vital riparian systems.[iv] Researchers have seen similar trophic-cascading effects on ecosystems here in the Great Lakes region as well.[v] While hunters would likely target the large, fit male moose, wolves target the sick and weak, making the herd more vigorous.[vi]

Finally, allowing moose hunting would disrupt the decades of valuable scientific moose-wolf research on Isle Royale. Isle Royale provides a unique opportunity for study, as it is isolated from mainland populations and is home to a small number of mammal species, providing for a simpler system that is easier to monitor and understand.[vii] In the most recent annual report for the project, the authors stated, "[I]mportantly, human impact is limited in the sense that people do not hunt wolves or moose, or harvest the forest."[viii]

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In conclusion, the proposed resolution is premature, would disrupt scientific study, and assumes that the current endeavor to reintroduce wolves into the ecosystem will fail. We urge you to reject House Resolution 154. Thank you for the opportunity to submit these comments.

Sincerely,
Molly Tamulevich
State Director, Michigan

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[i] https://www.nps.gov/isro/learn/news/isle-royale-national-park-and-partners-release-two-wolves-on-the-island.htm

[ii] https://www.nps.gov/isro/learn/news/isle-royale-wolf-project-researchers-document-summer-predation.htm

[iii] Estes et al., "Trophic Downgrading of Planet Earth."; e.g., R. Beschta and W. Ripple, "Large Predators and Trophic Cascades in Terrestrial Ecosystems of the Western United States," *Biological Conservation* 42, no. 11 (2009); E.G Ritchie and C.N. Johnson, "Predator Interactions, Mesopredator Release and Biodiversity Conservation," *Ecology Letters* 12 (2009).

[iv] e.g., Douglas W. Smith, Peterson O. Rolf, and Douglas B. Houston, "Yellowstone after Wolves," *Bioscience* 53, no. 4 (2003); Beschta and Ripple, "Large Predators and Trophic Cascades in Terrestrial Ecosystems of the Western United States."; K.M. Berger, EM Gese, and Joel Berger, "Indirect Effects and Traditional Trophic Cascades: A Test Involving Wolves, Coyotes, and Pronghorn," *Ecology* 89, no. 3 (2008); W.J. Ripple et al., "Can Restoring Wolves Aid in Lynx Recovery?," *Wildlife Society Bulletin* 35, no. 4 (2011); D. Fortin et al., "Wolves Influence Elk Movements: Behavior Shapes a Trophic Cascade in Yellowstone National Park," *Ecology* 86, no. 5 (2005).

[v] R. Callan et al., "Recolonizing Wolves Trigger a Trophic Cascade in Wisconsin (USA)," *Journal of Ecology* 101, no. 4 (2013); R. O. Peterson et al., "Trophic Cascades in a Multicausal World: Isle Royale and Yellowstone," *Annual Review of Ecology, Evolution, and Systematics, Vol 45* 45 (2014).

[vi] J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (Nov 2005), http://dx.doi.org/10.1111/j.0030-1299.2005.14180.x; G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (Aug 2006), http://dx.doi.org/10.2193/0022-541x(2006)70[1070:sonyeb]2.0.co;2.

[vii] Hoy, S. R., Peterson, R. O., & Vucetich, J. A. (2019). Ecological studies of wolves on Isle Royale: Annual report 2018-2019. Retrieved from: https://isleroyalewolf.org/sites/default/files/annual-report-pdf/WolfReport_Pages_2019_Final_Apr29.pdf

[viii] Ibid.