

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-4704**

April 28, 2015

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

The Honorable Dan Ashe  
Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

Dear Secretary Jewell and Director Ashe:

We write to you in strong support of the proposed rule by the U.S. Fish and Wildlife Service (USFWS) and the Department of Interior (DOI) to delist the gray wolf (*Canis lupus*) nationally, though we are very concerned with the lack of progress USFWS and DOI have made on this important issue. We urge you to move forward with the implementation of the gray wolf delisting effort proposed by USFWS and ask that you deny any request seeking to rescind or modify the proposed rule. Further, we are opposed to your January 16, 2015 decision to list the Mexican wolf (*Canis lupus baileyi*) as an endangered subspecies.

On June 13, 2013, DOI and USFWS published in the *Federal Register* (FR) a proposed rule that would have removed the gray wolf from the "List of Endangered and Threatened Wildlife." This determination was made after USFWS "evaluated the classification status of gray wolves currently listed in the contiguous United States and Mexico under the Endangered Species Act of 1973" (ESA) and found the "best available scientific and commercial information indicates that the currently listed entity is not a valid species under the Act." (*Docket No. FWS-HQ-ES-2013-0073*)

The statutory purpose of ESA is to recover species to the point where they are no longer considered "endangered" or "threatened." The gray wolf is currently found in nearly fifty countries around the world and has been placed in the classification of "least concern" globally for risk of extinction by the Species Survival Commission Wolf Specialist Group of the International Union for Conservation Nature (IUCN). Despite numerous lawsuits brought by the environmental community, ample populations in the United States and Canada have already led to the delisting of the gray wolf from ESA in the Northern Rocky Mountain and Western Great Lakes region. This indication makes clear that this species is not endangered nor threatened with extinction.

The proposed rule notes that there is no distinctive genetic or behavioral difference between the wolves in Canada and the Western delisted regions in the United States, and the gray wolves that currently reside where the species is still classified as endangered. Of particular concern is the fact that there are no geographic barriers to prevent the wolves from traveling between listed and delisted areas. In the State of Washington, the gray wolf is delisted only in the eastern third of the state, forcing USFWS and the Washington Department of Fish & Wildlife (WADFW) to rely on an arbitrary political boundary when delineating a species. In fact, packs

identified in the Pacific Northwest (where the gray wolf is still listed as endangered) have been found to be descendants of those from British Columbia and the delisted Northern Rocky Mountain region – meaning they are not a "discrete" population as defined under ESA.

The need to delist is supported by your assertion in the proposed rule that ESA "does not require us to restore the gray wolf to all of its historical range or even to a majority of its current suitable habitat. Instead, the Act requires that we recover listed species such that they no longer meet the definitions of 'threatened species' or 'endangered species' ... although *C. lupus* (gray wolf) has undergone significant range contraction in portions of its historical range, the species continues to be widespread and, as a whole, stable. We have found no substantial evidence to suggest that gray wolves are at risk of extinction throughout their global range now or are likely to become so in the foreseeable future."

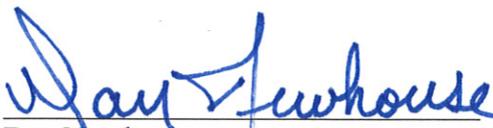
Federal environmental and species management policies must be based on the best available science. In addition to scientific data showing significant increases to the number of wolves nationally, the proposed rule also recognizes a number of significant changes in scientists' understanding of the taxonomy and historic habitat in the 37 years since the gray wolf was first listed as endangered.

As the proposed rule clearly shows, full delisting of the gray wolf is long overdue. Since wolves were first provided protections under ESA, uncontrolled and unmanaged growth of wolf populations has resulted in devastating impacts on hunting and ranching, as well as tragic losses to historically strong and healthy livestock and wildlife populations.

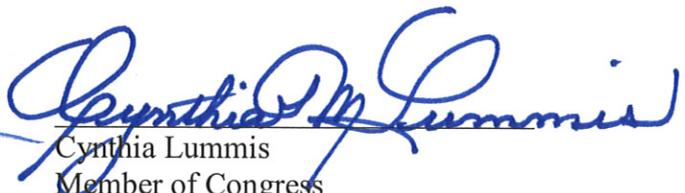
The failure by USFWS to fully delist the gray wolf has also led to decreased "social tolerance" and has hurt the ability of many states to maintain this critically-important facet of successful wolf recovery. This complex issue includes various considerations – from social to economic and political – and a state's ability to manage their gray wolf population relies on the input and buy-in of a variety of stakeholders, who can be disenfranchised by the failure to remove problem wolves (lethally or through other means).

We believe that state governments are fully qualified to responsibly manage gray wolf populations and are better able to meet the needs of local communities, ranchers, livestock, and wildlife populations. Delisting the gray wolf under ESA would allow state wildlife officials to more effectively manage wolf populations – as we have seen is possible in states such as Idaho, Montana, Wyoming, Minnesota, Wisconsin, and Michigan. We urge that you move forward with finalizing and implementing the proposed rule to nationally delist the gray wolf without further delay.

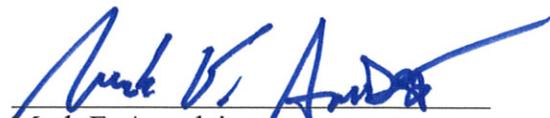
Sincerely,

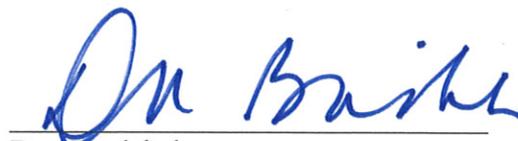


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Member of Congress

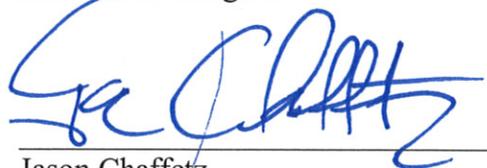


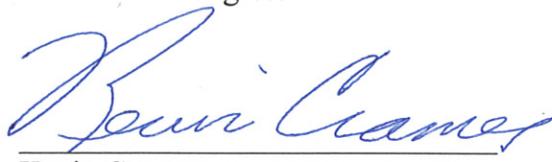
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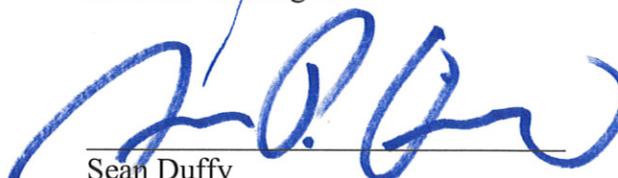
  
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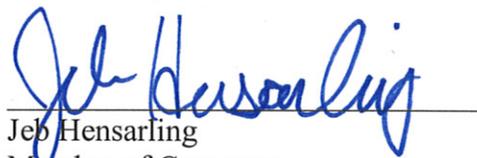
  
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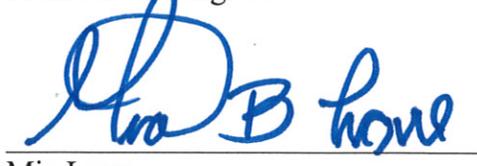
  
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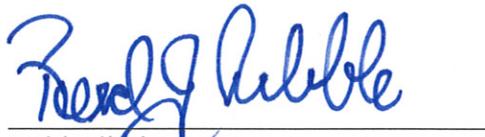
  
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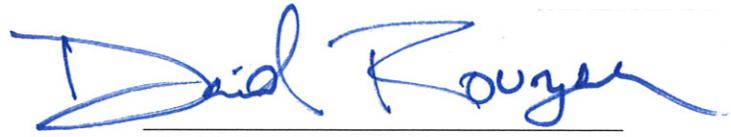
  
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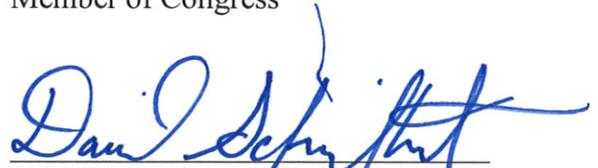
  
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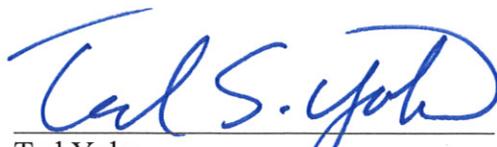
  
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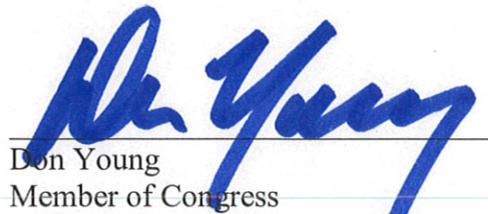
  
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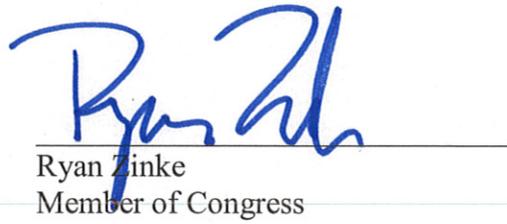
  
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