

Congress of the United States
Washington, DC 20515

September 4, 2013

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

Dear Secretary Jewell:

On June 13, 2013, the U.S. Fish and Wildlife Service (Service) published a rule to remove Endangered Species Act (ESA) protection for all gray wolves other than a small experimental population of Mexican wolves being reintroduced in Arizona and New Mexico. I write to express my opposition to the proposed rule because it is not based on the best available science, undermines decades of conservation work done to protect the gray wolf, and sets a bad precedent for future ESA delistings. Moreover, the rule is neither consistent with the ESA nor Congress' intent to protect and recover imperiled species and the ecosystems upon which they depend.

On May 21, 2013 scientists with expertise in carnivore taxonomy and biology sent a letter expressing their concern with the proposed delisting. They stated that the rule does not reflect the conclusions of their work "or the best available science concerning the recovery of wolves." I share this concern. The Service's reliance on only two studies as the best available information to support a finding of a separate - but conveniently now extinct - eastern wolf is troubling, especially given that the Service admits there is significant scientific disagreement over whether or not gray wolves in the eastern and western United States were different species. It is especially alarming that one of the two studies, Chambers *et al* 2012, was published in *North American Fauna*, an internal Service journal which has not published a single research article since 1991.

I am also troubled by the Service's management of and improper influence over the supposedly independent scientific peer review of the proposed rule. The Service set the deadline for completion of the peer review for September 11th, 2013, the last day for public comment on the proposed delisting rule. This deadline is fast approaching, and I sincerely doubt that an adequate review can be conducted within the time remaining. Even more troubling is the Service's effort to block three scientists from participating in the peer review because they cosigned the May 21 letter referenced above. These scientists are among the country's leading wolf experts, and there was absolutely nothing about their conduct that should have disqualified them from consideration as peer reviewers. The Service's attempt to bar qualified scientists from participating in the current independent evaluation of the proposed delisting, in addition to its previous choice to resurrect a long dormant journal to publish its findings, calls into question the quality, rigor, and objectivity of the initial review. The Service should continue to review the taxonomic history of wolves in the eastern United States and seek a broader scientific consensus before removing federal protection.

Aside from the reliance on questionable scientific publications and review processes, the Service has claimed that gray wolves do not have to be restored throughout their historic range or even to a majority of existing suitable habitat in their former range to declare the species recovered. Currently, gray wolves inhabit only five percent of their historic range. The proposed rule will stifle gray wolf recovery at a time when conservation gains are only nascent in the Pacific Northwest. Recovery has yet to begin in California, Colorado, Utah, and the Northeast, where scientists have identified a significant amount of suitable habitat that would support wolf populations.

The ESA does not charge the Service with restoring only as much of the endangered population as the agency deems necessary or only as much as is politically convenient; rather, the ultimate goal of the ESA is to recover species throughout a significant portion of their historic ranges, and to restore populations to the point at which they no longer need protection. Considering the small gains wolves have begun to make even while under ESA protection, removing federal protections now will make it highly unlikely that wolves will ever occupy a significant proportion of their historic range again. Therefore, continued federal protections for wolves are essential and the proposed rule is fatally flawed because it fails to consider the importance of these areas as suitable habitat.

The gray wolf is one of our most iconic American animals. As a keystone species, its presence is critical to maintaining the structure and function of native ecosystems. While we have seen success in the some areas of the West and in the Great Lakes, the species still only occupies a small portion of its former range. Recovering wolves in areas with suitable habitat such as California, Washington, Colorado, and Utah would provide significant ecological and economic benefits to local communities. This proposed rule has drawn more opposition than even the highly controversial Wyoming gray wolf delisting proposal. To date there are already nearly 18,000 comments. This massive public opposition should give us all pause. I urge the Service to rescind the proposed rule because continued federal protections are essential to the long-term survival and recovery of gray wolves.

Thank you for your consideration of this important matter. If you have questions or concerns regarding information in this letter, please have your staff contact Matt Strickler or Sarah Parker of the Natural Resources Committee Democratic Staff at (202)-225-6065.

Sincerely,



Peter DeFazio
Ranking Member
Committee on Natural Resources