

May 21, 2013

Secretary Sally Jewell  
Department of Interior  
1849 C Street NW  
Washington, DC 20240

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

Dear Secretary Jewell,

As scientists with expertise in carnivore taxonomy and conservation biology, we are writing to express serious concerns with a recent draft rule leaked to the press that proposes to remove Endangered Species Act protections for gray wolves across the Lower 48 States, excluding the range of the Mexican gray wolf. Collectively, we represent many of the scientists responsible for the research referenced in the draft rule. Based on a careful review of the rule, we do not believe that the rule reflects the conclusions of our work or the best available science concerning the recovery of wolves, or is in accordance with the fundamental purpose of the Endangered Species Act to conserve endangered species and the ecosystems upon which they depend.

The Service's draft rule proposes to: 1) "remove the gray wolf from the List of Threatened and Endangered Wildlife"; 2) "maintain endangered status for the Mexican wolf by listing it as a subspecies (*Canis lupus baileyi*)"; 3) "recognize a new species of wolf known as *Canis lycaon* [that] occurs in southeastern Canada and historically occurred in the northeastern United States and portions of the upper Midwest (eastern and western Great Lakes regions)"; and 4) deny protection to wolves in the Pacific Northwest because they do not qualify as a distinct population segment for lack of discreteness from wolves in the northern Rocky Mountains.

We find these proposals problematic both in terms of their scientific support and their consistency with the intent of the statute. Specifically:

**1) Removal of the gray wolf from the List of Threatened and Endangered Wildlife**

The gray wolf has barely begun to recover or is absent from significant portions of its former range where substantial suitable habitat remains. The Service's draft rule fails to consider science identifying extensive suitable habitat in the Pacific Northwest, California, the southern Rocky Mountains and the Northeast. It also fails to consider the importance of these areas to the long-term survival and recovery of wolves, or the importance of wolves to the ecosystems of these regions.

**2) Maintain endangered status for the Mexican wolf by listing it as a subspecies**

Although the taxonomic distinctness of the Mexican wolf is well-supported, and we thus support subspecific listing as appropriate, the draft rule fails to delineate the geographic extent of the area in which wolves would receive protection, specifying only that Mexican wolves would be

protected “where found”. Genetic analysis of historic Mexican wolves showed that the range of the Mexican wolf likely extended beyond the historic range initially inferred from limited record data. At the same time, the Service has inexplicably delayed completion of the recovery plan for the Mexican wolf, the draft of which had concluded that habitat to the north of the current recovery area may be essential for recovery of the subspecies. The lack of specificity in the rule, coupled with past actions by the Service, encourages continued efforts by stakeholders to block recovery actions essential to recover a subspecies that is among the most endangered mammals in North America.

### **3) Recognize a new species of wolf known as *Canis lycaon***

There is not sufficient information to support recognition of a new species of wolf, *C. lycaon*, and the geographic range reduction for *Canis lupus* in the eastern US as currently proposed. The Service acknowledged this problem in 2011, concluding:

While Chambers *et al.* (in prep.) provide a scientific basis for arguing the existence of eastern wolves as a distinct species, this represents neither a scientific consensus nor the majority opinion of researchers on the taxonomy of wolves, as others continue to argue that eastern wolves are forms of gray wolves (Koblmuller *et al.* 2009, vonHoldt *et al.* 2011). 76 Fed Reg. 81669.

While we encourage the Service to continue to review the taxonomic history of wolves in the eastern US, any future proposed taxonomic revision of canids should be a reflection of a more settled, broader scientific consensus rather than a premature policy decision based on ongoing and unsettled scientific debate. New evidence from complete genome sequencing efforts will likely supersede previous limited genetic evidence. Whether the Service moves forward with recognizing *C. lycaon* should have no bearing on the possibility that *C. lupus*' range may have extended into some, if not many, of the eastern states. If the Service is intent on recognition of *C. lycaon*, this new species itself needs immediate protection as an endangered species. The draft rule provides no coherent scientific or statutory basis for not protecting wolves in the northeastern United States. The rule also ignores the threat that interspecific hybridization may have on the listed wolf species.

### **4) Conclude that wolves in the Pacific Northwest do not qualify as a distinct population segment**

Finally, we cannot support the conclusion that wolves in the Pacific Northwest do not qualify as a distinct population segment due to lack of discreteness from other wolf populations. In 2007, the boundary between the northern Rocky Mountains population and the Pacific Northwest was established by the Service in order to recognize the recovery that has occurred, and delist Northern Rocky Mountain (NRM) wolves. The 2007 rule correctly stated that the “DPS policy does not require complete separation of one DPS from other U.S. packs or populations..if occasional individual wolves or packs disperse among populations, the NRM DPS could still display the required discreteness.” It defies logic for the Service to now argue that “dispersal of wolves across the NRM DPS boundary is likely to continue” and that such occasional dispersal prevents recognition of a DPS that would protect wolves that are beginning to establish in the Pacific Northwest. Additionally, genetic testing of gray wolves that have migrated naturally into the Pacific Northwest has established that some derive from British Columbia coastal wolf populations which are genetically distinct from the inland stock of wolves used as a source for reintroduction to the northern Rocky Mountains.

The extirpation of wolves and large carnivores from large portions of the landscape is a global phenomenon with broad ecological consequences. There is a growing body of scientific literature demonstrating that top predators play critical roles in maintaining a diversity of other wildlife species and as such the composition and function of ecosystems. Research in Yellowstone National Park, for example, found that reintroduction of wolves caused changes in elk numbers and behavior which then facilitated recovery of streamside vegetation, benefitting beavers, fish and songbirds. In this and other ways, wolves shape North American landscapes.

Given the importance of wolves and the fact that they have only just begun to recover in some regions and not at all in others, we hope you will reconsider the Service's proposal to remove protections across most of the United States.

Respectfully,

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