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United States Senate
WASHINGTON, DC 20510-3205

December 4, 2014

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

Dear Secretary Jewell:

I am writing with concerns about the pending issuance of a final rule to remove the protections of the Endangered Species Act (ESA) from all gray wolves, except the Mexican gray wolf. Questions remain with regards to the delisting proposal. I request you not make a decision on delisting the gray wolf until the independent scientific peer review used for the proposal can be further evaluated.

Following the proposal for delisting in 2013, the U.S. Fish and Wildlife Service (USFWS) commissioned the National Center for Ecological Analysis and Synthesis (NCEAS), to conduct an independent assessment and clarify scientific issues. The report found that USFWS determination was not based on the best available science. Although good scientific work was used for the proposed rule, questions remain about specific wolf species. According to the USFWS, the Northeast was inhabited by a different "eastern wolf", not the gray wolf. This conclusion suggests that the historic range of the gray wolf did not include the Northeast and therefore regardless of listing, wolves in this region will not be protected. This classification is not supported in other scientific literature. My concern is that the proposal would leave no protection for any wolf recovery in the Northeast.

Scientific studies show that the presence of top carnivores are beneficial to the whole ecosystem – from the vegetation along riverbanks to healthy populations of their prey. Specifically, the Northeastern ecosystems are lacking a top carnivore as evidenced by large deer populations. A necessary element for maintaining healthy ecosystems is the presence of large carnivores at ecologically effective population densities. The 2011 gray wolf delisting, specific to the Northern Rocky Mountains and Western Great lakes region, has already led to dramatic reductions in wolf populations, partially due to inadequate regulatory mechanisms and post-delisting monitoring as mandated explicitly by the ESA.

I believe complete gray wolf delisting at this time could set an unfortunate precedent for other ESA protected species, specifically with regards to uncertain species classifications. I request that you not delist the gray wolf and further evaluate the scientific material used for this determination. That review must use the best available science and consider recent federal court clarifications of adequate regulatory mechanisms before delisting. Once this protection is in place, I urge the USFWS to develop a recovery plan for wolves that includes continued legal

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protection in order to enhance restoration and recognizes the need to restore and protect the important ecological role for wolves across the United States.

Thank you for your attention to this matter, and I look forward to working with you and your Department on this issue. Should you wish to discuss this further, please do not hesitate to contact Jordan Baugh, in my Washington, DC office, at 202-224-4451.

Sincerely,

Kirsten Gillibrand

Kirsten Gillibrand
United States Senator