

# United States Senate

COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS

WASHINGTON, DC 20510-6175

December 15, 2015

The Honorable Dan Ashe  
Director  
U. S. Fish and Wildlife Service  
1849 C Street, N. W.  
Washington, D. C. 20240

Director Ashe,

In the near future, the U.S. Fish and Wildlife Service (FWS) will be making a decision regarding the petition to list the wolf in Southeast Alaska as a Threatened or Endangered species under the Endangered Species Act (ESA). As you know, the petition seeks to list the wolf as a subspecies throughout Southeast Alaska or as a distinct population segment (DPS) on Prince of Wales Island and suggests a listing as Endangered. Given that an ESA listing of wolves in Southeast Alaska will have serious consequences, particularly in regards to land management on the Tongass National Forest and on the few private, state, and Alaska Native owned lands in the region, I urge you to not make this decision lightly.

In anticipation of this decision, I am sharing with you relevant, peer-reviewed scientific publications on wolf genetics and wildlife taxonomy of which I have become aware. The results of these studies demonstrate that as applied to wolves in Southeast Alaska, subspecies and DPS are subjective categories without clear, quantitative criteria. These studies, coauthored by University of Alaska Fairbanks Professor Matt Cronin, demonstrate that federal ESA decisions are not always rigorous, especially in cases where extinction is predicted from models, or when subspecies and DPS are designated without full disclosure of their subjectivity. As he notes in a recent peer-reviewed published paper on sage grouse, "...the scientific quality of ESA listings has arguably become more speculative than empirical." After reviewing these and other materials, I have concluded that the best available scientific information does not support the designation of the wolf in Southeast Alaska as either a distinct subspecies or DPS or as a Threatened or Endangered species.

Further, the Alaska Department of Fish and Game, in coordination with the U.S. Forest Service, is conducting ongoing research and population studies that were intended to be completed to provide up-to-date information to inform a listing decision. Unfortunately, due to a court settlement with outside special interest groups the decision-making timeline has been significantly abbreviated. This abbreviation has resulted in an inability to consider information critical to ensure a decision is based on the best available information.

It is also not necessary to make an abbreviated decision given the current status of wolves in Southeast Alaska. According to the best available information from the State of Alaska, wolves in Southeast Alaska are not now endangered or threatened with extinction within the foreseeable

future. Additionally, the State of Alaska has taken regulatory actions to ensure wolf populations remain viable.

Previously, on two occasions, the FWS has found listing to be unwarranted, and with the legal standard of best scientific and commercial data in mind, I urge you to reach the same conclusion. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Dan Sullivan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Dan Sullivan, Chairman  
Senate Environment and Public Works Committee  
Subcommittee on Fisheries, Water, and Wildlife