

USFWS, Headquarters Office  
Endangered Species Program  
4401 North Fairfax Drive, Room 420  
Arlington, Virginia 22203

March 02, 2015

**RE: Letter of Support for Petition to Reclassify Gray Wolves as Threatened in the Conterminous United States under the Endangered Species Act**

Director Ashe:

On behalf of the undersigned organizations, representing more than 1.9 million collective members and supporters across the United States, we are writing in support of the January 27th, 2015 petition filed with your office, requesting that the FWS Reclassify Gray Wolves as Threatened in the Conterminous United States under the Endangered Species Act.

Since 1978, the listing of the gray wolf under the Endangered Species Act has been at the species level. In the ensuing years, the U.S. Fish and Wildlife Service's ("Service") recovery efforts for the gray wolf have been limited to the northern Rockies and Western Great Lakes and, the Mexican gray wolf subspecies, in the Southwest. As a result of Endangered Species Act protections and, in some areas, wolf reintroductions, gray wolf numbers have increased in the northern Rockies and Western Great Lakes. In the lower 48 states as a whole, however, gray wolves remain absent or have only just begun to recover in significant portions of their range and therefore recovery is incomplete by both legal and scientific standards. The Service's repeated attempts to remove protections for wolves in portions of their range despite their continued threatened status across the lower 48 states have not comported with requirements under the Endangered Species Act and have been repeatedly overturned by the courts.

We agree with petitioners that an entirely different approach is needed; a fresh approach that will comport with both science and the law, provide needed protections for wolves in areas where they have not yet recovered while simultaneously allowing some easing of protection in areas with stronger wolf populations.

With the exception of the Mexican gray wolf, which the Service already has agreed should be listed at the subspecies level as fully endangered, for the remaining conterminous United States, it is a logical step to down-list from endangered to threatened. This is not an approach which has been previously pursued by any party, it deserves honest consideration by all, and it has our full support.

Sincerely,

Chris Anderson, President and Jeremy Heft, Biologist & Sanctuary Director  
Wolf Education & Research Center

Ralph Maughan, President  
Wolf Recovery Foundation

Melanie Weberg, Founder  
Wildlife Public Trust & Coexistence, Wisconsin

John Glowa, President  
The Maine Wolf Coalition, Inc.

Mike Petersen, Executive Director  
The Lands Council

Karin Vardaman, Director, California Wolf Recovery  
California Wolf Center

Garrick Dutcher, Research & Program Director  
Living with Wolves

Steve Pedery, Conservation Director  
Oregon Wild

Nick Cady, Legal Director  
Cascadia Wildlands

Peter Bauer  
Executive Director  
Protect the Adirondacks

Marc Cooke, President  
Wolves of the Rockies

Adam DeParolesa, Outreach Coordinator  
North American Wolf Foundation

Joseph Vaile, Executive Director  
Klamath Siskiyou Wildlands Center

Melissa Smith, Executive Director  
Friends of the Wisconsin Wolf