



**California Wolf Center**  
*Conservation, Education, Research*

**Cascadia  
 WILDLANDS**  
*we like it wild.*



September 26, 2013

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

**RE: Docket # FWS-HQ-ES-2013-0073**  
**Request for Public Hearings in Seattle, Washington; Portland, Oregon; Ashland,**  
**Oregon; and Los Angeles, California on Gray Wolf Proposed Rule**

Director Ashe:

The undersigned organizations, all of which are members of the Pacific Wolf Coalition and which, combined, represent more than 1 million members and supporters in the states of Washington, Oregon and California request additional public hearings be held in the Pacific West region regarding the Service's Proposed Rule for Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife.

We appreciate the Service's recent announcement, in response to the request of many of the undersigned organizations and others across the nation, to extend the comment period until October 28<sup>th</sup>, and to hold public hearings.

However, the currently-scheduled hearing locations and number of hearings are exceedingly limited. Only three hearings will be held on the delisting proposal -- one in Washington, D.C, one in Albuquerque, New Mexico, and the other in Sacramento, California.

The hearing that is scheduled to take place in Sacramento, California is an excellent location for Northern California residents to attend and to participate in. It's also a suitable location because of the recent visit to California by a dispersing wolf from Oregon and the likelihood that more wolves will disperse to California in the future. However, the hearing in Sacramento, by itself, is not sufficient for public involvement in the Service's proposed rule and eventual decision, because it does not allow for people in Oregon and Washington, where there are currently

nascent wolf populations, to attend and participate. It is also extremely far removed from large population centers in southern California such as Los Angeles and San Diego. In both Oregon and Washington, federal protections for wolves have already been removed in the eastern one-third of each state. Federal delisting in the remaining two-thirds would lift critical protections at a time when they are most needed to remain, to ensure the continued recovery of wolves there.

The Service's proposed rule is of national significance, as it will impact the recovery of an iconic and essential native species that once ranged widely across the country. The rule is also of regional significance to the entire three-state Pacific West region. The Service has, in the past, been petitioned to designate a gray wolf Distinct Population Segment (DPS) in our region. Public support for wolf recovery and other native wildlife is overwhelming in the Pacific West states. Recent regional polling conducted by Tulchin Research shows that over two-thirds of residents in the Pacific West support wolf recovery efforts. Additionally, an overwhelming majority of respondents agreed that federal protection under the Endangered Species Act should continue until wolves are fully recovered. Extensive peer-reviewed published literature exists which demonstrate that the Pacific West contains nearly 145,000 square miles of unoccupied, prime wolf habitat. In its evaluation of the science and decision to reject a Pacific West DPS, the Service arrived at its currently pending proposal to delist the gray wolf across most of the Lower 48, including across the Pacific West. Residents of our region wish to be fully heard on this subject and request the opportunity to do so via public hearings held in Portland, Oregon; Ashland, Oregon; Seattle, Washington; and Los Angeles, California, in addition to the hearing scheduled for Sacramento.

The public cares deeply about this species and its conservation, as a part of our natural heritage and history, because of wolves' key role in wild nature, and because of the unique ecology, biology and behavior of this magnificent apex predator. Federal recovery efforts to date have been widely publicized, and state management of wolves where federal protections have already been lifted has been extremely controversial. For this reason, it is essential that there be adequate opportunity for public comment on the Service's proposed rules. We request that the hearing in Sacramento, California be supplemented by additional hearings in the following locations:

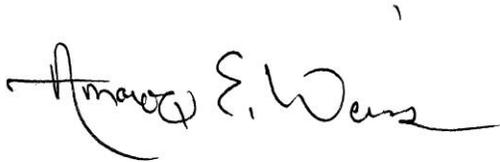
- Portland, Oregon
- Ashland, Oregon
- Seattle, Washington
- Los Angeles, California

Additionally, we request that the Service guarantee each person three minutes of speaking time for public comment. In the case where time becomes limited, we request that the Service extend the public hearing into an additional day rather than reduce the amount of speaking time allotted per commenter.

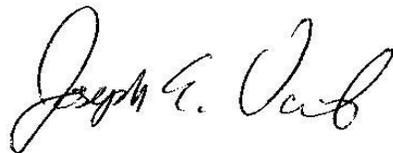
We note that Washington, D.C. does not have a wolf population nor is it likely to in the future. Since the delisting proposal would remove federal protections for gray wolves in the northeastern states of Maine, New Hampshire, Vermont and New York – a region the Service itself previously identified as suitable for designating a gray wolf DPS -- a hearing held in one of those states would have been a more appropriate location than in Washington, D.C. We urge you to consider additional hearings in other states where wolves may return after being long absent.

We look forward to hearing from you regarding our request.

Sincerely,



Amaroq Weiss  
West Coast Wolf Organizer  
**Center for Biological Diversity**  
[aweiss@biologicaldiversity.org](mailto:aweiss@biologicaldiversity.org)  
[www.biologicaldiversity.org](http://www.biologicaldiversity.org)  
138,000



Joseph Vaile  
Executive Director  
**Klamath-Siskiyou Wildlands Center**  
[joseph@kswild.org](mailto:joseph@kswild.org)  
[www.kswild.org](http://www.kswild.org)  
9,000



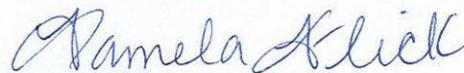
Lauren Richie  
Associate Director, Northern California  
**California Wolf Center**  
[lauren.richie@californiawolfcenter.org](mailto:lauren.richie@californiawolfcenter.org)  
[www.californiawolfcenter.org](http://www.californiawolfcenter.org)  
9,499



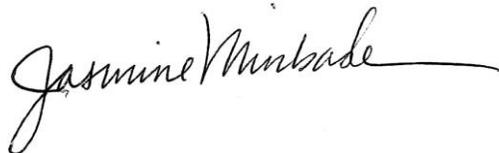
Josh Laughlin  
Campaign Director  
**Cascadia Wildlands**  
[jlaughlin@caswild.org](mailto:jlaughlin@caswild.org)  
[www.CascWild.org](http://www.CascWild.org)  
10,000



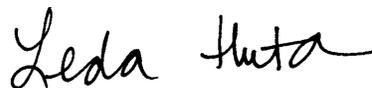
Rob Klavins  
Wildlife Advocate  
**Oregon Wild**  
[rob@oregonwild.org](mailto:rob@oregonwild.org)  
[www.oregonwild.org](http://www.oregonwild.org)  
10,000



Pamela Flick  
California Representatives  
**Defenders of Wildlife**  
[pflick@defenders.org](mailto:pflick@defenders.org)  
[www.defenders.org](http://www.defenders.org)  
238,300



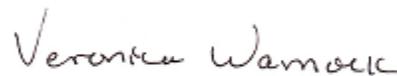
Jasmine Minbashian  
Communications Director  
**Conservation Northwest**  
[jasmine@conservationnw.org](mailto:jasmine@conservationnw.org)  
[www.conservationnw.org](http://www.conservationnw.org)  
4,900



Leda Huta  
Executive Director  
**Endangered Species Coalition**  
[lhuta@stopextinction.org](mailto:lhuta@stopextinction.org)  
[www.stopextinction.org](http://www.stopextinction.org)  
7,500



Lisa Moscinski  
Deputy Director  
**Gifford Pinchot Task Force**  
[lisa@gptaskforce.org](mailto:lisa@gptaskforce.org)  
[www.gptaskforce.org](http://www.gptaskforce.org)  
6,000



Veronica Warnock  
Conservation Director  
**Hells Canyon Preservation Council**  
[veronica@hellscanyon.org](mailto:veronica@hellscanyon.org)  
[www.hellscanyon.org](http://www.hellscanyon.org)  
1,000

Jim and Jamie Dutcher  
Founders  
**Living with Wolves**  
[gdutcher@livingwithwolves.org](mailto:gdutcher@livingwithwolves.org)  
[www.livingwithwolves.org](http://www.livingwithwolves.org)

David G. Graves  
Northwest Program Manager  
**National Parks Conservation Association**  
[dgraves@npca.org](mailto:dgraves@npca.org)  
[www.npca.org](http://www.npca.org)  
156,679

Sylvia Fallon  
Director, Wildlife Conservation Project  
**National Resource Defense Council**  
[sfallon@nrdc.org](mailto:sfallon@nrdc.org)  
[www.nrdc.org](http://www.nrdc.org)  
83,282

Wally Sykes  
Co-founder  
**Northeast Oregon Ecosystems**  
[captmayo@eoni.com](mailto:captmayo@eoni.com)  
68

Brooks Fahy  
Executive Director  
**Predator Defense**  
[brooks@predatordefense.org](mailto:brooks@predatordefense.org)  
[www.predatordefense.org](http://www.predatordefense.org)  
1,500

Camilla Fox  
Executive Director  
**Project Coyote**  
[cfox@projectcoyote.org](mailto:cfox@projectcoyote.org)  
[www.projectcoyote.org](http://www.projectcoyote.org)  
250

Edward Moreno  
Policy Advocate  
**Sierra Club, California Chapter**  
[Edward.moreno@sierraclub.org](mailto:Edward.moreno@sierraclub.org)  
[www.California2.sierraclub.org](http://www.California2.sierraclub.org)  
380,000

Michael J. Connor, PhD  
California Director  
**Western Watershed Project**  
[mjconnor@westernwatersheds.org](mailto:mjconnor@westernwatersheds.org)  
[www.westernwatersheds.org](http://www.westernwatersheds.org)  
300

*Diane K. Gallegos*

Diane Gallegos

Executive Director

**Wolf Haven International**

[director@wolfhaven.org](mailto:director@wolfhaven.org)

[www.wolfhaven.org](http://www.wolfhaven.org)

3,000