

Congress of the United States
Washington, DC 20515

March 27, 2024

The Honorable Martha Williams
Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Director Williams,

We begin by thanking you for taking the time to share with me the U.S. Fish and Wildlife's Service's (Service) decision not to relist the wolf in the Northern Rocky Mountains (NRM). That said, we write today to ask that the Service immediately issue a rule de-listing the wolf as a listed species under the Endangered Species Act (ESA) for the entirety of the Western United States. The Service's decision to reject the petition to re-list the gray wolf in the NRM in the recently published Notification Of Finding entitled "Endangered and Threatened Wildlife and Plants; Finding for the Gray Wolf in the Northern Rocky Mountains and the Western United States" was a clear acknowledgment of the species' recovery, and these findings compel a delisting of the gray wolf across the entirety of the Western United States.

Protection merely for the sake of protection is not a purpose of the ESA. Instead, the Service should focus its conservation efforts on species that are in danger of extinction or are likely to become an endangered species within the foreseeable future, as required by the ESA. And, in fact, the data presented in the Notification of Finding states that "the gray wolf in the Western United States does not meet the definition of an endangered species or a threatened species."¹ Instead, the data presents the gray wolf as an ESA success story.

The Notification Of Finding clearly states that the gray wolf in the Western United States is "likely to retain a healthy level of abundance" and is not "in danger of extinction, or likely to become in danger of extinction in the foreseeable future, throughout all of its range or in any significant portion of its range."² The range of the gray wolf includes areas where the species is managed by state governments. Wolves in these areas have thrived, even without ESA's protection. For instance, in the eastern one-third of the state of Oregon gray wolves are managed by the Oregon Department of Fish and Wildlife while, oddly and unnecessarily, wolves in the western part of the state are protected under the ESA.³ Yet despite a lack of federal protection, the gray wolf in the eastern third of Oregon may have reached its "ecological limit," and in the

¹ Federal Register, Endangered and Threatened Wildlife and Plants; Finding for the Gray Wolf in the Northern Rocky Mountains and the Western United States, Notification of finding, 89 FR 8391, U.S. Fish and Wildlife Service, Department of the Interior, February 7, 2024.

² Id.

³ [ODFW says wolf management west of Hwy 395 has challenges](#), Elkhorn Media Group, (2024)

future packs “will probably spread out to the west and south in greater numbers.”⁴ The continued growth of gray wolf populations under both state and federal management clearly calls into question the need for federal protection of the species throughout the Western United States.

Unsurprisingly, the substantial growth in gray wolf populations has led to increased conflict between wolves and people. The impact of gray wolves on livestock herds is not, and cannot, be limited to just depredation. Wolves inflict much greater damage to herds than can be measured by simply counting carcasses. Wolves have an immense psychological impact on livestock herds that does result in losses for producers. These losses can manifest as “stress, sickness, and reduced weight gain and pregnancy rates when wolves scare, chase or attack livestock.”⁵ Too often ranchers are put in the impossible situation of choosing between obeying the law and protecting their livelihoods.

The Notification of Finding published by the Service indicates that the gray wolf throughout the Western United States does not meet the definition of an endangered or threatened species and is not in danger of extinction. Ranchers throughout the Western United States must be able to protect their livestock. They should not continue to be hamstrung by unnecessary regulations that over-protect a species that is thriving. The Service should act upon its own findings and immediately issue a rule de-listing the gray wolf in the Western United States.

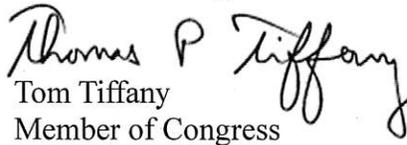
Sincerely,



Cliff Bentz
Member of Congress
Chairman, Subcommittee on Water,
Wildlife and Fisheries



August Pfluger
Member of Congress



Tom Tiffany
Member of Congress



Dan Newhouse
Member of Congress



Mark Amodei
Member of Congress



Tom McClintock
Member of Congress

⁴ [Oregon wolves expected to spread west and south](#), Oregon Capital Chronicle, (2023)

⁵ [Wolves and Livestock – 8.010](#), Colorado State University Extension, (2020).



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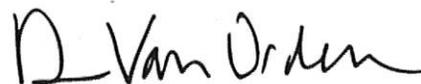
Russ Fulcher
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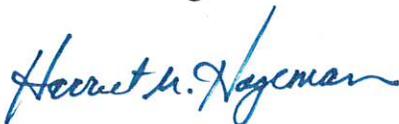
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