



Society for Conservation Biology

The North America Section of a global community of conservation professionals

March 18, 2009

The Honorable Ken Salazar
Secretary of the Interior
1849 C St. N.W.,
Washington, D.C.

By E-Mail c/o Ms. Roslyn Sellars, FWS

RE: Delay the delisting of gray wolves pending a further review by a technical advisory team.

Dear Mr. Secretary:

As we understand it, you are considering publishing a rule delisting certain populations of gray wolves any day now. SCB has not developed an in-depth evaluation or policy statement of the yet unpublished revised delisting rule. However, SCB has evaluated previous iterations of the delisting rule and found them substantively at odds with best available science. Therefore, consistent with those past SCB policy statements, I write this letter to urge you not to delist at this time until these scientific concerns have been thoroughly evaluated and resolved.

On behalf of the North America Section of the Society for Conservation Biology (SCB-NA), we offer the following comments on the current effort by the new administration to re-evaluate proposed regulatory actions related to recovery of the gray wolf under the Endangered Species Act for their consistency with law and relevant science. These regulatory actions may be among the decisions made by the outgoing administration related to endangered and threatened species recovery that departed from the standards of scientific integrity expected under the applicable laws. We believe that this re-evaluation offers the opportunity to restore scientific integrity to the regulatory process and strengthen the scientific basis and efficacy of recovery efforts.

The Society for Conservation Biology (SCB) is an international professional organization dedicated to promoting the scientific study of the phenomena that affect the maintenance, loss, and restoration of biological diversity. The Society's membership comprises a wide range of people interested in the conservation and study of biological diversity: resource managers, educators, government and private conservation workers, and students make up the more than 10,000 members world-wide. SCB's mission is to advance the science and practice of conserving the Earth's biological diversity. We provide the following comments as part of our efforts to inform decision makers on the best available science relevant to endangered species recovery planning.

SCB-NA has previously submitted comments on two occasions relevant to this issue; both of these documents are included here. In May 2007, SCB-NA submitted comments on the Proposed Rule to Delist the Northern Rocky Mountain Population of Gray Wolf (50 CFR Part 17, 72 FR 6106). In December 2007, SCBNA provided comments on the Scope of the Environmental Impact Statement and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of the Gray Wolf (72 Fed. Reg. 151: 44065). In March 2008, SCB-NA sponsored an interdisciplinary workshop on applying conservation science to wolf recovery goals under the Endangered Species Act.

In the case of regulations pertaining to the Northern Rocky Mountain Population of Gray Wolf, comments submitted by SCB-NA highlighted unresolved scientific issues regarding genetic health and connectivity of the regional wolf population. The rule was subsequently voided by the courts due to this and other issues. The current administration has recently announced its intent to proceed with publication of a revised delisting rule developed in the final days of the Bush administration. As the attached policy statement describes, SCB-NA believes that the treatment of these issues in both the original and it seems, the revised rule, is likely to be too cursory to form a basis for long-term recovery of the species, both in the Northern Rocky Mountains and in adjacent regions of the western US where these issues will arise in the future. *As you have not yet published a delisting rule in the Federal Register, you still have an opportunity to move forward in a more science-informed manner to craft an overarching wolf recovery framework for the Western United States.* A technical team, including both agency personnel and independent scientists with relevant expertise in genetics, wildlife population dynamics, and recovery planning, could be convened to address the issues we have noted and other related issues and to devise a recovery strategy and delisting process that is consistent with the best available science and relevant legal standards. Such an approach would provide a strong scientific basis for future status and delisting determinations for wolves in the western US.

In regard to the Southwestern population of gray wolf (or Mexican wolf), members of SCB-NA have participated as part of the technical team charged with developing a scientifically-sound recovery plan for this population. In 2003, the outgoing administration halted the recovery planning process and disbanded the technical team and pursued a policy of lethal removals when many experts believed there were far better methods of easing tensions between the wolf recovery program and others using the public lands. This issue was the subject of testimony in an investigative and oversight hearing on potential abuses of the Endangered Species Act held by the House Natural Resources Committee in the Spring of 2008 by one of our members who was the former Mexican wolf recovery team leader under the Clinton Administration. In order to recover this highly threatened population, it is imperative that a scientifically-credible recovery planning and management process be reinitiated as soon as is practicable, preferably within this year.

SCB-NA as an organization and the individual scientists who comprise our membership are available to assist in both of these efforts. As an organization, we have substantial experience providing peer review of recovery plans, such as that provided twice for the Northern Spotted Owl in the past two years. The organization has identified the larger issue of restoring scientific integrity to endangered species management and helping to modernize the implementation of that law in the light of new science as a key organizational priority.

We look forward to hearing from you or your appointees at the earliest opportunity so that we can discuss how we can provide assistance with this effort.

Sincerely,

John Fitzgerald, J.D., Policy Director, Society for Conservation Biology
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Carlos Carroll, Ph.D.
Director, Klamath Center for Conservation Research, Orleans, CA
Member, Board of North America Section of SCB

Attachments (to be forwarded tomorrow):

Comments on the Proposed Rule to Delist the Northern Rocky Mountain Population of Gray Wolf

Comments on the Scope of the Environmental Impact Statement and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of the Gray Wolf