

United States Senate

March 31, 2023

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

Dear Director Williams:

The U.S. Fish and Wildlife Service (FWS) is again considering action to list the Alexander Archipelago wolf in Southeast Alaska as a Threatened or Endangered species under the Endangered Species Act (ESA). Such a step by the FWS would be ill-suited and subjective, ignoring the best conclusive scientific data available from the Alaska Department of Fish and Game (ADF&G), which does not support such a listing being necessary. For the significant implications this would have in Alaska, particularly regarding land management in the Southeast region, I urge the FWS to – once again – decline to list the Alexander Archipelago wolf.

The FWS in not consulting or conducting a partner review with the State of Alaska, as the expert manager of wildlife on the state, on this petition is troubling and invalidates years of collaboration and research the state has done to ensure meaningful management of its wildlife resources – particularly on the Alexander Archipelago wolf. Had the FWS consulted with the State, you would have found that Southeast Alaska is the most densely populated area of wolves in Alaska due to the abundance of food sources available. As a result, the wolf is not a species endangered or threatened with extinction. ADF&G Commissioner Vincent-Lang echoes this point, noting an “ESA listing is not needed and not warranted.”¹ Further, according to research published by the University of Alaska Fairbanks on wildlife taxonomy, as it relates to wolves in Southeast Alaska, subspecies or distinct population segments (DPS) are subjective categories without clear, quantitative criteria.² The State of Alaska has also taken the necessary regulatory actions to ensure wolf populations remain viable, such that an ESA listing is not warranted. As is it the mission of the FWS to “work with *others* to conserve, protect, and enhance fish, wildlife, and plants and their habitats,” I urge the FWS to hold itself to these high standards and incorporate input from ADF&G experts.

ESA listings must be empirical, not speculative. For the FWS to consider an ESA listing without the best available science raises serious concerns. As it has on two previous occasions, the FWS has found listing of the Alexander Archipelago wolf unwarranted, and while currently not

¹ February 11, 2022 Letter to Douglass Cooper, FWS Ecological Services Branch Chief in the Anchorage Fish and Wildlife Conservation Office Re: FWS-R7-ES-2020-0147: Initiation of Status Review, Alexander Archipelago Wolf.

² Cronin, Matthew A., et al. "Single nucleotide polymorphism (SNP) variation of wolves (*Canis lupus*) in Southeast Alaska and comparison with wolves, dogs, and coyotes in North America." *Journal of Heredity* 106.1 (2015): 26-36.

meeting the statute's standard of utilizing the best scientific data, I urge the agency to reach the same conclusion. I appreciate 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
United States Senator