

December 18, 2012

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Re: Request for Emergency Buffer Zones on Wyoming's Special Lands to Conserve Wolves

Dear Madam and Sirs:

On behalf of the 33 undersigned scientists and groups, as well as our tens of thousands of members, we request that you immediately establish no-hunting, buffer zones around Wyoming's special lands in order to ensure that the Northern Rocky Mountain gray wolf (*Canis lupus*) population goes unharmed. In particular, we request that your offices protect wolves with sufficient no-hunting, buffer zones around Yellowstone National Park, Grand Teton National Park, and the Wind River Indian Reservation. We further request that you close the John D. Rockefeller Jr. Memorial Parkway and all movement corridors from the Parks and the Parkway into Idaho to all wolf hunting so as to maintain connectivity between subpopulations of wolves.

The U.S. Forest Service, under the National Forest Management Act, can and, in the past has, enforced shooting closures. This federal law enables the Forest Service to protect its natural resources including wildlife such as wolves.

Wyoming's "wolf management plan" allows for unregulated wolf killing in over 80 percent of the State, while it allows "trophy hunting" in twelve small hunting zones (where quotas have nearly filled in just two months' time). Already, Wyoming's wolf population has experienced substantial mortality in the weeks following their "delisting" from the Endangered Species Act.

Right now, more than 4,400 well-armed hunters can pursue Wyoming's dwindling population of what was 330 wolves at the end of 2011. The U.S. Fish and Wildlife Service reports that 44 wolf

mortalities prior to delisting in September (FWS 2012)¹. Added to that, hunters have shot at least 58 wolves, 39 in the trophy zones and 19 in the predator zone for a total of 102 wolves, or nearly one-third of the State's population. Of particular note, hunters have killed at least 15 Yellowstone National Park wolves and at least 2 Grand Teton National Park wolves. Due to their repeated exposure to park visitors, Yellowstone wolves have learned to tolerate people, which makes them easy prey for human hunters.

The numbers of wolves killed by poachers is unknown, and not all the livestock protection kills for the year are known at this time. This means that it is likely the Wyoming population will fall below the trigger for re-listing under the Endangered Species Act (150) if only another 50 or 60 wolves are killed this winter, possibly even fewer.

These wolf mortalities disrupt pack structure and can cause indirect mortality to pack mates (and especially to young, vulnerable individuals). Hunting wolves can reduce the wolf population to less-than resilient levels; hinder long-term wolf study projects; and harm wolf-watching tourism in the Parks.

Biologists have warned that wolf hunting threatens the viability of wolf populations even inside the national parks (and the sovereign nation) because with the loss of vital breeding pairs, genetic diversity inside the parks and reservation will decline. Unregulated killing of Wyoming's wolves will prevent wolf recovery in Wyoming, the Northern Rockies, and even affect restoration in the Southern Rockies (including southern Wyoming, Colorado, Utah, and northern New Mexico).

Before it delisted Wyoming's wolves from the Endangered Species Act, the U.S. Fish and Wildlife Service employed a panel of biologists to review Wyoming's wolf plan (Atkins 2012). Panelists Drs. Scott Mills and John Vucetich, non-agency biologists, were both highly critical of the Service's failure to secure buffer zones around Wyoming's special lands so as to conserve wolves. Dr. Mills wrote:

. . . the commitment to a buffer should be stated in the revised documents in terms that are both compelling and scientifically credible. Unfortunately, they are not. The revised documents do not provide a scientifically based response that articulates a commitment to a meaningful population buffer (Atkins 2012, p. 64).

Dr. Vucetich likewise believed that the Wyoming wolf plan was unscientific and failed to provide buffer zones. In one example, he said that the wolves that reside in Grand Teton National Park will be killed when they spend "non-trivial amounts of time outside of the protected area" (Atkins 2012, p. 72). To emphasize, even supposedly protected national park and Wind River Reservation wolves go unprotected because animals are lured out, or they step out from protected lands and are killed.

While Wyoming has claimed it will intensely monitor its wolf population to *obtain and maintain minimum population numbers* (Atkins 2012, p. 14), it failed to describe how the State can accurately census Wyoming's wolves. Wyoming's counting methods involve large amounts of

¹ FWS reports that 44 wolves died before delisting: 36 from livestock protection actions; 2 natural; 2 under investigation; and 4 "other."

speculation, especially because not all wolves are radio collared. It is not easy to determine how much hunting will affect Wyoming wolves because wolf hunting and trapping create indirect mortality on wolf populations by disrupting pack structure (Creel and Rotella 2010).

Right now, both the nation and the world are witnessing a completely unfair situation: far fewer than 330 wolves pitted against more than four thousand well-armed hunters, who can hunt with no restrictions on most of Wyoming's lands all the year round. This situation is simply deplorable.

Because Wyoming has failed to provide adequate protections for its wolf population, we request that federal agencies step into manage wolves on their lands. Wyoming Game and Fish Department has demonstrated extremely poor stewardship of a rare, recently delisted species. Yet, wolves are important in their ecosystems and to Americans; and despite the rhetoric, they do not decimate livestock inventories or elk populations:

1) As apex, native carnivores, wolves hold enormous ecological value. The presence of wolves creates better ecosystem function and greater biological diversity – the literature on this topic is extensive, thanks to two decades of research.

2) Wolf hunting wastes American taxpayers funds; citizens have invested approximately \$40 million over 17 years to restore and research wolves in the West. Moreover, the States of Idaho, Montana, and Wyoming have enjoyed the investment of tens of millions of tourism dollars annually from wolf-watching tourists.

3) Wolves kill precious few livestock. Even in Idaho, Montana, and Wyoming (and before the NRM wolf hunts) wolves killed less than one percent of cattle (0.07% cattle) and sheep (0.22% sheep). These numbers are based on *unverified* claims. Verified numbers are even lower. (For more information see (Keefover 2012 at 31-32).

4) Wolves benefit their prey populations. Numerous elk predation studies in the vicinity of northern Yellowstone Park and the Park's boundary show:

- ❖ Human hunters exert the greatest pressure on elk populations of any species. Humans kill prime age breeding animals, whereas wolves kill old, non-breeding elk. Wolves make elk populations stronger by removing the weak and sick animals (i.e., brucellosis and chronic wasting disease).
- ❖ Wolves naturally regulate elk populations, which prevents mass elk starvation from stochastic events such as drought or too much snowfall.

While hunters complain wolves compete with them for elk, the States of Idaho, Montana, and Wyoming each host elk populations that exceed management objectives. Wyoming's elk population is 24 percent over its objective of 85,000 animals. Wyoming's 2010 elk count yielded 104,000 individuals.

Federal taxpayers have spent tens of millions of tax dollars over the last two decades to restore and study wolves of the Northern Rocky Mountains. Compare 94,000 wolf-watchers in the

Northern Rockies who spent \$35.5 million in one year (Duffield et al. 2008) to a few thousand hunters and trappers who paid Idaho and Montana \$1 million for hunting tags for one year. Yet, this minority of vociferous citizens who kill wolves has trumped all others who hold far different values around this rare species. Moreover, these wolf hunters are facilitated by a state that charges a shocking pittance for the privilege to kill a wolf. Wyoming, like Idaho and Montana, charges a nominal fee for wolf-hunting/trapping tags so as to maximize wolf mortality and to further devalue this species. These low-cost tag fees illustrate that this state cannot be trusted to manage this rare mammal for the American public. (Wyoming charges \$18 for residents and \$180 for non-resident hunters.)

Yet, wolves belong to all of us. Please act immediately and create appropriate buffers and migration corridors, as delineated in the opening paragraph of this letter, to prevent the second extermination of wolves in the Northern Rocky Mountain region.

Sincerely yours,

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References:

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