



January 19, 2022

The Honorable Thomas J. Vilsack  
Secretary, Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Dear Secretary Vilsack:

On behalf of the undersigned wildlife protection and conservation organizations, we urge you to take immediate action in response to the derelict decisions of state legislatures in Idaho and Montana and state fish and wildlife commissions and agencies. We ask you to prohibit the hunting and trapping of wolves in the National Forests (Caribou-Targhee, Bridger-Teton, Custer Gallatin, and Shoshone) surrounding Yellowstone National Park in Idaho, Montana, and Wyoming to protect wolves from an unprecedented assault by the states. Their new reckless hunting and trapping programs, authorized by state legislatures in Idaho and Montana, are decimating wolf populations, with at least 20 wolves from Yellowstone already killed by trappers and hunters in Wyoming, Idaho, and Montana. Reports state hunters and trappers have killed 44 wolves in Montana's units (310, 313, 316, and 390) directly bordering the park, leaving only 94 wolves in Yellowstone. The Phantom Lake Pack has been eliminated. Your immediate action will provide a safety buffer for the remaining wolves and the packs living primarily inside Yellowstone National Park.

The U.S. Forest Service (USFS) must not be a passive actor when it comes to wildlife management when native wildlife species are threatened by external threats. Indeed, under 36 CFR § 261.50 the agency has the legal authority to close or restrict uses of national forests, while § 261.53 allows for "special closures" to protect "[t]hreatened, endangered, rare, unique, or vanishing species of plants, animals, birds or fish."

The USFS should not allow states to reduce wolf populations to unsustainable, remnant levels. Lands under your stewardship are core habitat for wolves, and the USFS has a critical role to play in maintaining protections for wolves on these federal public lands. State access to national forests comes with responsibilities, and when those responsibilities go unfilled and states let loose extreme acts of violence against rare species, then the federal government has a duty to intervene. State hunting and trapping in national forests is a privilege, not a right.

In large part, it's been politicians, not state wildlife management professionals, who mandated these wolf-killing strategies. The Idaho Fish and Game Commission opposed the legislature's maneuver because it removed wildlife management decisions from the Commission and the Department's wolf experts. The Legislature even authorized the use of hounds to hunt wolves – a de facto animal fighting situation. Montana also adopted expanded regulations removing management quotas from units bordering the National Parks, allowing a range of inhumane hunting methods at odds with state prohibitions against cruelty to animals and accepted codes of hunting ethics, including the use of bait to lure wolves outside the park. These states also allow de facto bounty programs, allowing hunters and trappers deploying the most inhumane and unsporting methods to profit from their use.

As the USFS has acknowledged in some past circumstances, the use of hounds to hunt in national forests can have adverse consequences on local ecosystems. In 2012, the USFS issued a decision banning the use of dogs to hunt deer in the Kistachie National Forest in Louisiana, citing "a variety of nuisances...due to the presence of dog-deer hunters" and finding that the elimination of dog-deer hunting will reduce

conflict or risk to other activities such as hiking and bird-watching. These hounds will often chase any wildlife they detect, sometimes attacking native species and causing stress, energy loss, and social dislocation. However, the Idaho legislature voted to allow the use of dogs to pursue wolves.

The Montana legislature voted to prohibit a no-hunting buffer zone outside of Yellowstone ignoring an explicit National Park Service request. In the absence of responsible state action, the USFS should prohibit wolf hunting and trapping in Caribou-Targhee, Bridger-Teton, Custer Gallatin, and Shoshone National Forests. Forbidding this specific wolf killing, as a logical response to the arrogant political maneuvering of state lawmakers that ignores the judgment of professional wildlife managers and the norms of 21<sup>st</sup>-century wildlife management, is well within your discretion, even as you generally defer to the states on customary and routine wildlife management regulations.

The United States Department of Agriculture (USDA) already conducts wildlife management programs on these National Forests and other areas within these states through its Wildlife Services' Program. If USDA can elect to take and kill wolves, or engage in non-lethal management, it can certainly respond to very detailed plans to nearly wipe out wolves in these states.

Wolves bring extraordinary ecological benefits to ecosystems. Dozens of world-renowned wildlife biologists and scientists attest to the cascade effects of the ecological services wolves provide. A recently released study pointed out that wolves control deer populations and reduce the frequency of deer-auto collisions, saving human lives and reducing the economic costs of these collisions. Yellowstone biologists have found that wolves move sedentary deer and elk populations from overgrazed areas, enabling aspen and willow to reclaim ground for the first time in more than half a century.

What's more, businesses in gateway communities around Yellowstone recently wrote to federal authorities asking for a relisting of gray wolves under the Endangered Species Act due to the negative economic consequences of the substantial wolf killing; with wolves drastically reduced in number and any survivors having learned to fear and avoid people, tourists may stop coming. As the Bozeman Daily Chronicle wrote over the weekend, the situation in Montana "doesn't just make Montana look bad to the rest of the nation; it is threatening the viability of the species within the park..."

We ask you to take emergency action, close these public lands to wolf hunting and trapping immediately, and notify the states and the public of your decision.

Sincerely,



Wayne Pacelle, president  
Animal Wellness Action

On behalf of:

Predator Defense  
ZooMontana  
Western Watersheds Project  
Footloose Montana  
WildEarth Guardians  
Wyoming Untrapped

Living With Wolves  
Gallatin Wildlife Association  
EcoFlight  
Trap Free Montana  
Trap Free Montana Public Lands  
Timberline TREE  
Wildlife For All  
Wyoming Wildlife Advocates  
Sawtooth Science Institute  
Wolves of the Rockies  
The Plan B Foundation  
Gallatin Yellowstone Wilderness Alliance  
Great Old Broads for Wilderness – Broadband Chapters of Boise, Northwest Montana, Tucson, Teton  
Valley ID/WY, Bozeman, Wood River Valley, Palouse, Sonoran, Middle Gila, South Sound, North  
Olympic Peninsula, Cascade, and Willamette Valley  
Center for a Humane Economy  
Animal Wellness Foundation  
Partners in Animal Protection and Conservation  
SPCA International  
Michelson Center for Public Policy

cc: Homer Wilkes, Under Secretary of Agriculture for Natural Resources and Environment  
Randy Moore, Chief, USDA Forest Service  
Mel Bolling, Forest Supervisor, Caribou-Targhee National Forest  
Kathy Minor, Acting Forest Supervisor, Custer Gallatin National Forest  
Tricia O'Connor, Forest Supervisor, Bridger-Teton National Forest  
Lisa Timchak, Forest Supervisor, Shoshone National Forest