

# Congress of the United States

Washington, DC 20515

December 19, 2007

Honorable Dirk Kempthorne  
Secretary of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Mr. Secretary:

We are writing to express our strong opposition to removing wolves in the northern Rocky Mountains from the endangered species list and transferring management to states that do not have adequate management plans for the continued conservation of wolves. It has taken tremendous public effort and expense to help wolves rebound from total elimination from the Rocky Mountain region to a point where they are beginning to once again fulfill their important ecological role in nature.

This remarkable recovery is threatened, however, by the unnecessary push to remove federal protection of the region's wolves. If federal protection is removed now, states with plans hostile to wolf conservation could eliminate most of the region's approximately 1,500 wolves, killing hundreds of wolves and effectively reducing the region-wide population at as few as 300 wolves. We support state management of wolves, but only under plans that ensure healthy wolf populations over the long-term, and do not squander the considerable investment the nation has made to restore this top carnivore.

Several factors still threaten wolves in the Northern Rockies, making delisting at this time premature. The most significant threats are the quality of Wyoming's and Idaho's state plans.

#### Problems with Wyoming's Plan:

The Fish and Wildlife Service rejected Wyoming's wolf management plan in 2004 because it would allow wolves to be shot-on-sight in nearly 90 percent of the state, among other reasons. Wyoming made minor changes to its plan but did not change the predator status of wolves or agree to maintain wolves much above minimum levels. The Fish and Wildlife Service recently accepted Wyoming's slightly revised plan even though Wyoming did not address the Service's main concerns. Wyoming's current plan:

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- 1) Continues to classify wolves as “predators” in nearly 90 percent of the state, allowing wolves to be killed on sight, including in important wolf habitats such as wilderness areas and national forests.
- 2) Restricts wolves to only seven breeding pairs outside Yellowstone and Grand Teton national parks and John D. Rockefeller Memorial Parkway, and requires wildlife managers to kill wolves whenever the population grows beyond this number.
- 3) Prohibits wildlife managers from expanding protected areas even to prevent the population from dropping below minimum recovery numbers.

**Problems with Idaho’s Plan:**

- 1) Reaffirms that Idaho’s official position calls for the removal of all wolves by “whatever means necessary,” based on the state’s House Joint Memorial Resolution 5 enacted in 2001.
- 2) Lacks sufficient conservation objectives and management strategies.
- 3) Allows the eradication of all but 104 wolves in the state, a more than 80 percent reduction; more than 700 wolves could be killed to meet this target.

Additionally, there is a 2008 ballot initiative underway in Idaho that, if successful, would overturn the Idaho wolf management plan and eliminate the state’s role in wolf management, likely forcing the federal government to intercede.

The Service’s delisting plan ignores current science as well as the original goals of the wolf recovery plan, and is deficient in the following ways:

- **Insufficient Numbers:** The Fish and Wildlife Service in the 1987 recovery plan and the environmental impact statement for the 1994 wolf reintroduction plan identified a minimum recovery target for wolves in the U.S. Northern Rockies as ten breeding pairs in three recovery areas for three consecutive years, for a total of 30 breeding pairs (approximately 300 wolves). This number has been exceeded but was never intended to be a level at or near which wolves would be maintained in perpetuity but rather a point at which wolf delisting would be evaluated. More recent research indicates the population should be at least 2,000 wolves to remain viable over the long term.

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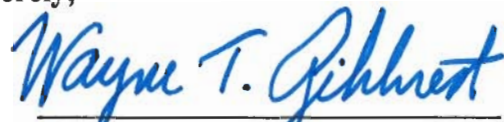
- **Isolated Populations:** The original recovery goals contemplated the U.S. wolf population interbreeding with, and functioning as, a subpopulation of the larger Canadian wolf population. Regular interbreeding of the populations never occurred. Without routine connectivity to Canadian wolves, the original recovery goal is scientifically invalid.
- **Prevents Further Recovery:** The delisting proposal includes significant portions of Oregon, Washington and Utah, where no wolves are currently known to reside. By allowing the wolf population to be reduced to bare minimum numbers within Idaho, Montana, and Wyoming, the proposal would isolate the existing population, effectively drawing a moat around the Northern Rockies recovery area that prevents wolves from reaching other important historic habitat.

Delisting wolves under existing conditions would violate the ESA, and likely lead to a need to relist them in the near future. We look forward to the day when states resume management of wolves, but that day has not arrived. Until reasonable, sustainable state management plans are in place, we urge you to not delist the northern Rocky mountain wolves.

Sincerely,



Nick J. Rahall, II  
Member of Congress




Wayne T. Gilchrest  
Member of Congress



George Miller  
Member of Congress

Jim Saxton  
Member of Congress



Norm Dicks  
Member of Congress