



animal wellness foundation

January 7, 2022

Charles F. "Chuck" Sams III, Director National Park Service 1849 C Street NW Washington, DC 20240

Dear Director Sams:

We, the undersigned organizations, ask you to urge Interior Secretary Deb Haaland to exercise her authority with immediate effect to spare the lives of the remaining wolf packs of Yellowstone National Park by making an emergency listing of wolves in the Northern Rockies. With additional killing in progress and to continue through the winter, wolf hunters and trappers have already killed at least 20 wolves who typically reside in the park – roughly 20 percent of Yellowstone wolves.¹

The assault on wolves, and this sudden reduction in their numbers in the Greater Yellowstone Ecosystem, is one very ugly feature of the larger assault on wolves in the Northern Rockies range. These coordinated efforts to eliminate 80-90 percent of Northern Rockies wolves demand a response in the form of an emergency listing action. A pause in the killing will protect surviving wolves and allow the wildlife professionals within the U.S. Fish and Wildlife Service to review the devastating impact of Montana and Idaho's expanded killing programs. A failure to act will leave a genetically depleted community of wolves, destroy pack social structures, and unwind a quarter-century-long effort to restore wolves in America's best-known national park and most closely studied and observed wolf community.

As the world's first national park attracting five million visitors a year and a major driver of the rural economy in Idaho, Montana, and Wyoming, Yellowstone holds a singular place in the heart of Americans and citizens across the globe. It is a UNESCO World Heritage site, and it is considered one of the world's most intact ecosystems in the Earth's northern temperate region. Often referred to as "America's Serengeti," the park hosts a restored population of wolves who are widely cited for their critical role in delivering ecological and economic services to the region.

Under the National Park Service Organic Act of 1916, you are tasked with promoting and protecting the scenery, natural and historical objects, and wildlife of our National Parks for generations to come. In your recent interview with Oregon Public Broadcasting, you spoke of "a great, immense responsibility we have as American Indians to be stewards of our resources" and "to protect these lands and these resources for the next seven generations." Now is precisely the time for you to exert your influence with your most senior colleagues at the Department of the Interior and sound the alarm about the existential threat to wolves in Yellowstone National Park. If these wolves were facing a disease, a major geological hazard, or a poaching network bent on all-out destruction of wolves, you would not hesitate to act to protect the survivors. Here, the Department of the Interior has an emergency-listing remedy that exists precisely for a circumstance like the one you confront now.

¹ Current reports indicate that the number of wolves killed from the Yellowstone National Park packs in Montana, Idaho and Wyoming are 16, 2 and 2 respectively. The actual number of wolves killed is likely higher.

There are no buffer areas for the wolves around the park, and wolves roam across the arbitrary park boundaries into the larger ecosystem that constitutes their range. Montana Fish & Wildlife Commission removed the quotas for wolves killed adjacent the park and Idaho allows unlimited wolf hunting year-round. In both states, hunters and trappers can legally bait the wolves away from the protection of the park to be killed. These two states have also established de facto bounty programs for wolves – an astonishing act given how widely discredited bounty programs are viewed in contemporary wildlife management.

The wolves of Yellowstone are known, observed, photographed, studied, and valued. Yellowstone National Park was the second most visited park in 2020 with people traveling from points throughout the world to see the interplay between wolves, grizzlies, bison, elk, and other species that inhabit the park. At a time when the world community is confronted by the complexity of dealing with climate change, habitat loss, and larger macro-ecological challenges, here is a challenge with a solution: list the wolves on an emergency basis under the Endangered Species Act and halt the unprecedented state and federal killing of wolves around the park and across the remainder of their Northern Rockies range.

The collective actions of Idaho and Montana present a greater threat to wolves than at any time in more than a century in the West.

Thank you for your attention to this matter.

Sincerely,

Wayne Puelle

Wayne Pacelle President, Animal Wellness Action

On behalf of

Animal Wellness Action Animal Wellness Foundation Center for a Humane Economy Great Old Broads for Wilderness – Boise Broadband Idaho Conservation League International Wildlife Coexistence Network Kirkpatrick Foundation Living With Wolves Michelson Center for Public Policy Partners in Animal Protection and Conservation Sawtooth Science Institute SPCA International Trap Free Montana Trap Free Montana Public Lands Wolves of the Rockies ZooMontana

cc: Mike Reynolds, NPS Regional Director (6,7, and 8) Cam Sholly, Superintendent, Yellowstone National Park