



August 31, 2016

U.S. Department of the Interior
Attn: Sally Jewell, Secretary
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U.S. Fish and Wildlife Service
Attn: Dan Ashe, Director
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Dear Secretary Jewell and Director Ashe,

We recently learned that the U.S. Fish and Wildlife Service (“Service”) has authorized U.S. Department of Agriculture’s Wildlife Services to kill four wolves of the Pinnacle Peak Pack in Wyoming. According to reports, the four wolves have been involved in cattle depredations on private land south of Grand Teton National Park and four miles north of Jackson. The Service’s spokesman and Wyoming field representative, Tyler Abbott, stated that depredations in the area started in April this year. However, he did not state what, if any, nonlethal techniques were being used by the ranchers before or after those April incidents. Reports also noted that two ranching operations were involved in the recent depredations but failed to note the exact locations of those ranches, who owned the ranching operations, and what, if any, nonlethal techniques have been employed on those ranches. Unless and until nonlethal methods have been utilized and exhausted, we do not believe that removing these four wolves from the population will be effective in reducing livestock conflicts in the area.

Without this information, the public cannot determine if there were nonlethal techniques that could have been used to prevent these conflicts. For example, do the ranches lie adjacent to public lands that are part of any grazing allotments? If so, what are the sanitation conditions of

those allotments -- are carcasses removed in a timely manner; are range riders used on those allotments?

The Pinnacle Peak Pack was estimated to have 14 individuals at the end of 2015, though current estimates of the pack size are unavailable. Although the Service has authorized the killing of four individuals, it is unclear if the Service believes that only four individuals were involved in the livestock conflicts and how the Service will determine which wolves were involved. Without the exhaustion of nonlethal techniques, we believe that removal of these four wolves will be a temporary fix and livestock conflicts in this area are likely to occur again in the future. In fact, science has shown that lethal removal of wolves from the landscape can actually increase the potential for future conflicts.¹

Moreover, we are concerned that given the proximity of this wolf pack to Grand Teton National Park, it is safe to assume that these wolves likely spend some of their time within park boundaries. The economy of Jackson Hole is largely supported by tourists that come from all over the world to view wolves and bears in Grand Teton and Yellowstone National Parks, and science has shown that the presence of wolves on the landscape creates benefits to local economies.² Recent research, however, shows that if wolves spend most of their time in the Park but are killed once they leave Park boundaries, opportunities to view these wolves in the Park are likely to decrease which may in turn impact visitation and associated economic benefits to the local communities.³ Will these wolves be trapped or killed on public lands, or is removal restricted to private lands?

The reintroduction of wolves to Yellowstone National Park resulted in a range of ecosystem benefits. For example, wolves in Yellowstone and Grand Teton national parks have been found to benefit a host of species, including aspen, songbirds, beavers, bison, fish, pronghorn, foxes, and grizzly bears.⁴ By reducing numbers and inducing elk to move, wolves have reduced browsing on aspen and other streamside vegetation, which has benefitted beavers, songbirds and fish populations.⁵ Studies have also shown how wolves and coyotes interact, and how wolves can aid pronghorn populations because “wolves suppress[] coyotes and consequently fawn depredation.”⁶ Wolves also benefit scavengers by leaving carrion derived from predation; hence, wolf removal leads to reduced abundance of carrion for scavengers in specific areas.⁷ For instance, the extirpation of wolves works to the detriment of grizzly bears, which are listed as a

¹ Wielgus & Peebles (2014).

² Richardson & Loomis (2009).

³ Borg *et al.* (2016).

⁴ Ripple and Beschta (2011); Bergstrom *et al.* (2013); Estes *et al.* (2011).

⁵ *Id.*

⁶ Berger & Gese (2007); Smith *et al.* (2003); Berger *et al.* (2008); Prugh *et al.* (2009); Bergstrom *et al.* (2013).

⁷ Ripple and Beschta (2011); Wilmers *et al.* (2003)(1); Wilmers *et al.* (2003)(2).

threatened species and which, in addition to acting as apex predators, can scavenge carrion left by wolves. A 2013 study shows that wolves benefit grizzly bears in Yellowstone through another trophic mechanism as well – specifically, wolf predation on elk has led to less elk browsing of berry-producing shrubs, providing grizzlies with access to larger quantities of fruit.⁸ Thus, removal of wolves that use Grand Teton National Park, even when they leave the Park, may nevertheless negatively impact ecosystem health in the Park itself.

For these reasons, we hereby request a full investigation and report into the killing of wolves in the Pinnacle Peak Pack in Wyoming, where wolves are still protected under the Endangered Species Act. The report should include information that is missing from recent news reports, including what ranching operations were involved, the location of those operations, whether wolves will be killed on public lands, and what nonlethal techniques were used prior to authorizing lethal removal of the wolves.

Sincerely,

/s/ Andrea Santarsiere
Senior Attorney
Center for Biological Diversity

/s/ Greta Anderson
Interim Executive Director
Western Watersheds Project

Cc: Tyler Abbott, FWS, tyler_abbott@fws.gov

⁸ Ripple *et al.* 2013.

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