

**Defenders of Wildlife ♦ Center for Biological Diversity ♦ Clean Water Action
Conservation Northwest ♦ Friends of the Clearwater ♦ Greater Yellowstone Coalition
Hells Canyon Preservation Council ♦ Jackson Hole Conservation Alliance
Keystone Conservation ♦ National Parks Conservation Association
Natural Resources Defense Council ♦ Oregon Wild Selkirk Conservation Alliance
Sierra Club ♦ Western Wildlife Conservancy ♦ Western Watersheds
Wilderness Watch ♦ Wolf Education & Research Center ♦ Wolf Haven International
Wolf Recovery Foundation ♦ Wolftown**

March 4, 2009

The Honorable Ken Salazar
Secretary
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Salazar:

On behalf of millions of Americans across the country including over 100,000 residents of the northern Rockies and northwestern states, we appreciate the opportunity to work with you to address key environmental issues facing our nation. We are writing to you concerning the Bush administration's last-ditch attempt to promulgate a new rule delisting portions of the Northern Rocky Mountain distinct population segment ("DPS") of the gray wolf from the list of federal endangered species. At the direction of President Obama's Chief of Staff, Rahm Emanuel, the Northern Rockies wolf delisting rule was withdrawn from publication on January 20, 2009. For the reasons outlined below, we urge you to abandon the Bush rule and instead develop a wolf recovery plan to support delisting that is based on the best available science.

The reintroduction of the wolf into the Northern Rocky Mountains has been extremely successful. Due to tremendous public effort, wolves have rebounded from total elimination from the Rocky Mountain region and are once again fulfilling their ecological role. This remarkable recovery story would be threatened, however, by adopting the Bush administration's Northern Rockies wolf delisting rule.

As you know, the Bush administration's first delisting rule was overturned in court. Its most recent rule fails to address the problems identified in the federal court ruling. Moreover, contrary to the requirements of the Endangered Species Act, as well as long established Fish and Wildlife Service (FWS) policies governing the listing and delisting of species by DPS(s), the most recent delisting rule excludes Wyoming and splits the proposed northern Rocky Mountain DPS. Most fundamentally, the current population target of 300 wolves for the entire Northern Rockies region from the now decades old recovery plan is not based on the best available science. Many scientists believe the target falls below the minimum numbers needed to sustain a viable regional wolf metapopulation, and is far too low to ensure long term recovery for wolves in this region.

If wolves were to be delisted under the Bush rule, states in the northern Rockies would be allowed to eradicate all but 300-450 wolves from the current population of about 1,500 individuals. Based on existing state laws and experience to date, we believe the states would be likely to take full advantage of this opportunity to suppress wolves. Wyoming's current wolf law classifies wolves as predators in nearly 90 percent of the state, a classification which a federal judge found to be illegal last summer.

The official state policy of Idaho, as approved by its legislature in 2002 and referenced in the state's current wolf management plan, is the removal of all wolves within its borders "by any means necessary." And under Montana's wolf management plan, the state has been overly aggressive in reducing wolf numbers, to the point of raising concern about genetic exchange within the northern Rockies population and with the Canadian wolf population, one of the long standing essential ingredients for recovery. While we are working to recover wolves so that they will ultimately be delisted in the region, federal Endangered Species Act protection for wolves should only be removed when wolves have achieved full recovery and when adequate state management laws and plans to ensure a viable regional wolf metapopulation are in place.

Since their re-introduction, wolves have proven to be important to the ecology and economy of the Northern Rockies. They have helped restore the natural balance to areas they are reoccupying by culling weak and diseased elk, deer, and other prey, and dispersing elk away from sensitive wetlands and meadows they were overbrowsing. Elk populations remain high, often at numbers greater than state management objectives, and are more than sufficient to meet hunter demand. Ranchers are successfully learning to reduce limited but inevitable wolf predation on livestock to manageable levels, and are compensated for wolf-related losses that occur by reimbursement programs established by Defenders of Wildlife or the states. Wolf-related tourism in the Yellowstone region has generated more than \$35 million annually for local communities in recent years. Most of the conflict over wolves is based on emotion, not facts, science or economics. For example, wolves account for less than one percent of livestock losses in the region; as already noted, there are programs in place that aid livestock owners with compensation for losses and methods to help them reduce losses proactively through effective deterrents.

We strongly urge you not to move forward with the Bush administration's failed delisting rule. Instead, we urge you to ensure wolf recovery by developing a wolf recovery plan that uses the best available science and fully engages the public. We believe there should be a vigorous public involvement process including a regional stakeholder component; we would be happy to discuss our ideas for such a public process with you at your convenience.

We are committed to working with you to help reinforce Department of the Interior's renewed commitment under your leadership to science, transparency, and ethical decision-making. While challenging, following the right path to ensure the recovery of the northern Rockies gray wolf is an important opportunity to demonstrate a conservation success that all Americans can be proud of. We look forward to working with you and other stakeholders to develop and support a scientifically and legally defensible wolf recovery and delisting plan that ensures the long-term health of the northern Rockies gray wolf.

Sincerely,

Rodger Schlickeisen
President
Defenders of Wildlife
1130 17th Street, NW
Washington, DC 20036

John DeCock
President
Clean Water Action
1010 Vermont Ave. NW
Washington, DC 20005

Kierán Suckling
Executive Director
Center for Biological Diversity
P.O. Box 53166
Pinos Altos, NM 88053

Mitch Friedman
Executive Director
Conservation Northwest
1208 Bay St. Suite 201
Bellingham, WA 98225

Gary Macfarlane
Director
Friends of the Clearwater
P.O. Box 9241
Moscow, Idaho 83843

Rick Reese
Interim Executive Director
Greater Yellowstone Coalition
P.O. Box 1874
Bozeman, MT 59771

Greg Dyson
Executive Director
Hells Canyon Preservation Council
PO Box 2768
La Grande, OR 97850

Franz J. Camenzind
Executive Director
Jackson Hole Conservation Alliance
P.O. Box 2728
Jackson, WY 83001

Jacqueline Hud
Executive Director
Keystone Conservation
P.O. Box 6733
Bozeman, Montana 59771

Theresa Pierno
Executive Vice President
National Parks Conservation Association
1300 19th Street, NW, Suite 300
Washington, DC 20036

Peter Lehner
Executive Director
Natural Resources Defense Council
40 West 20th Street
New York, NY 10011

Regna Merritt
Executive Director
Oregon Wild
5825 N Greeley
Portland, OR 97217

Jerry R. Boggs
Executive Director
Selkirk Conservation Alliance

PO Box 1809
Priest River, Idaho 83854

Carl Pope
Executive Director
Sierra Club
National Headquarters
85 Second Street, 2nd Floor
San Francisco, CA 94105

Jon Marvel
Executive Director
Western Watersheds Project
P.O. Box 1770
Hailey, Idaho 83333

Kirk C Robinson
Executive Director
Western Wildlife Conservancy
68 S. Main St., Suite 4
Salt Lake City, UT 84101

George Nickas
Executive Director
Wilderness Watch
Box 9175
Missoula, Montana 59807

Chris Anderson
Executive Director
Wolf Education & Research Center
3909 NE MLK Blvd, Suite 202
Portland, Oregon 97212

John Blankenship
Executive Director
Wolf Haven International
3111 Offut Lake Road SE
Tenino, Washington 98589

Ralph Maughan
President
Wolf Recovery Foundation
P.O. Box 444
Pocatello, ID 83204

T Martino Yamamoto
Director
Wolftown
P.O. Box 13115
Burton, Washington 98013