

# At a Crossroads:

## *The Wolf and its Place in the Northern Rockies*



*“Only the mountain has lived long enough to listen  
objectively to the howl of a wolf.”*

*— Aldo Leopold*



A Report by Predator Project, Bozeman, Montana  
Spring 1999

# EXECUTIVE SUMMARY

**P**redator Project offers a critical assessment of past and ongoing wolf recovery efforts in the U.S. northern Rockies, and looks to the challenges that lie ahead. First we examine commitments already made to recover wolves in the northern Rockies: their listing for protection under the Endangered Species Act in 1973, the Northern Rockies Wolf Recovery Plan in 1987, and the plan to reintroduce wolves into Greater Yellowstone and central Idaho in 1994. Next we review how well these commitments have been upheld, organized into four major issues facing wolf recovery:

1. Achieving adequate wolf numbers and distribution within each of the three populations;
2. Connecting wolves from the three populations across the northern Rockies landscape;
3. Maintaining adequate legal protections for all wolves; and
4. Protecting wolves across administrative boundaries.

For each of these issues, Predator Project assesses the progress made, identifies major obstacles to reaching recovery goals, and offers some recommendations for how to overcome these obstacles. We conclude by presenting two alternatives for wolf recovery and management into the future, making a case for maintaining a commitment toward wolf recovery throughout the northern Rockies region.

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*Cover photo courtesy National Park Service*

# INTRODUCTION

Wolves in the northern Rockies of the U.S. are at a crossroads: there has been tremendous progress to date in getting wolves on the ground in three areas of the northern Rockies — northwestern Montana, central Idaho, and the Greater Yellowstone Ecosystem — yet, much of the challenge still lies ahead to ensure that full recovery of wolves is achieved in the region. While the wolves have proven to be remarkably adaptive to the northern Rockies environment, where wolf populations have grown faster than perhaps anywhere else in the world, there is increasing political pressure against allowing these wolves to recolonize areas of suitable habitat, especially outside of the core recovery areas already protected as national parks and Wilderness.

If the wolves can be largely left alone, and tolerated to live in areas where they can find sufficient territory and prey to reach recovery targets, wolf recovery appears to be within our grasp, ahead of schedule, and under budget. This would constitute a true endangered species success story — Americans made a commitment to recovering wolves in the northern Rockies and we would see it through to completion. But if we intervene by aggressively controlling wolf distribution and wolf behavior, we

will hobble recovery efforts and jeopardize all of the success attained to date. To allow just a few token wolves in isolated protected areas would mean a perpetual struggle, where wolves are never far from the edge of extinction. Thus, the wolf and its place in the northern Rockies are at a crossroads, and the decisions we make now are critical to achieving what has the potential to be one of the greatest conservation success stories of the 20th century.

Predator Project has closely followed wolf recovery efforts in the northern Rockies since its founding in 1991, and offers a unique “ear to the ground” analysis of past and ongoing recovery efforts and the challenges that lie ahead. We structure this analysis by starting with “Where We Have Been,” reviewing the past commitments made to wolf recovery in Part I; we assess subsequent and ongoing actions with “Where We Are” in Part II; and we conclude with a look into the future with “Where We Are Headed” in Part III. Due to its immediacy and direct relevance to wolf recovery in the northern Rockies, appended to this report is an analysis and critique of an expected proposal by the U.S. Fish and Wildlife Service to “down-list” wolves in the northern Rockies from “endangered” to “threatened” under the Endangered Species Act.



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# PART I. WHERE WE HAVE BEEN:

## COMMITMENTS MADE TO WOLF RECOVERY

**W**olves were extirpated from the U.S. Northern Rockies region by the 1930's. Americans committed to restore them to the region by taking several actions:

- Listing the wolf for protection under the Endangered Species Act in 1973,
- The release of the Northern Rocky Mountain Wolf Recovery Plan in 1987, and
- “Jump starting” recovery in Yellowstone and central Idaho with a 1994 plan to “reintroduce” wolves to these areas.

### Endangered Species Act listing

Wolves were listed for protection as an endangered species in 1973. The Act directs that the Secretary of Interior:

*“... provide a program for the conservation of such endangered and threatened species as well as a means whereby the ecosystems upon which species depend may be conserved...”*

### The Northern Rocky Mountain Wolf Recovery Plan

More than a decade later, the U.S. Fish and Wildlife Service (FWS) described the specific actions to be taken to recover wolves in the Northern Rocky Mountain Wolf Recovery Plan, which in its own words “represents a ‘road map’ to the recovery of the gray wolf in the Rocky Mountains.”

The plan identified three recovery areas in the northern Rockies — Greater Yellowstone, central Idaho, and Northwest Montana (Fig. 1).

The plan established minimum population targets for each of these areas to fulfill recovery goals:

*“The primary goal of the plan is to remove the Northern Rocky Mountain wolf from the endangered and threatened species list by securing and maintaining a minimum of 10 breeding pairs of wolves in each of the three recovery areas for a minimum of three successive years. (v)”*

In addition, the plan acknowledged the need to allow for some interchange between these wolf populations. The plan directs that connections be maintained both between the U.S. and Canada...

*“Promote wolf conservation in the central Idaho recovery area via natural recolonization from southwestern Canada, northwestern Montana, and possibly Yellowstone National Park... Delineate movement corridors between Canada and the Idaho and the northwestern Montana recovery areas” (p. 13)*

... and that connections be maintained between the U.S. populations.

*“Develop management guidelines for wolf management zones and dispersal corridors. (p. 14)”*

To achieve recovery goals, the recovery plan directs protections for wolves against the following potential threats:

- Livestock operations, USDA Animal Damage Control predator control operations (now called “Wildlife Services”), logging and fire management, mining and energy operations, recreational activities, and activities requiring special use permits must all be made compatible with wolf recovery;

- Multiple-use activities within a given area of wolf habitat must be coordinated to avoid adverse cumulative impacts (the combined effects of many different human activities within a given area); and

*(continued)*



- Private lands that may be necessary for the survival and recovery of the wolf should be protected by whatever means are available. (*FWS Recovery Plan*, pp. 37-38)

The recovery plan also protects wolves that conflict with livestock, with the following direction:

- The goal of any wolf control is to reduce and prevent conflicts and to minimize the number of wolves that must be killed to resolve conflicts;

- Clear evidence must be present that wolves were responsible for livestock damage, and there must be a threat that additional losses may occur before any actions can be taken to kill or relocate wolves; and

- Control actions should be limited to specific offending wolves rather than local populations (*FWS Recovery Plan*, pp. 33-34).

### The Northern Rockies Wolf Reintroduction Environmental Impact Statement

In 1994, FWS completed an Environmental Impact Statement on the translocation of wolves from Canada to Yellowstone and central Idaho. In an effort to temper opposition to the project, an “experimental, non-essential” status replaced the endangered status for wolves south of Interstate 90 in Idaho and western Montana, south of the Missouri River in eastern Montana, and in all of Wyoming, meaning that those wolves would not receive full protections as an endangered species. Following the completion of this plan and the denial of some last-minute appeals by the American Farm Bureau, starting in 1995, FWS translocated a total of 31 and 35 wolves from Canada into Yellowstone and central Idaho, respectively.

This EIS provided some additional evidence that the recovery plan target of 10 breeding pairs in each of the three populations is a minimum target, and that the three populations should be connected. FWS queried 25 scientists about the number of wolves that would be necessary for a population to be considered “recovered” under the Endangered Species Act. From their responses, FWS concluded the 10 breeding pairs target is only adequate as long as there is periodic interchange between the three populations:

*“The importance of movement of individuals between sub-populations cannot be overemphasized... It is fairly clear that 10 breeding pairs in isolation will not comprise a ‘viable’ population (i.e. have a high probability of survival for a long period without human intervention). Thirty or more breeding pairs comprising some 300+ wolves in a metapopulation with genetic exchange between sub-populations should have a high probability of long-term persistence.” (FEIS, Appendix 9, 6-74, 6-75)*

When the “10 breeding pair” target was deemed too high during a politically organized “wolf summit” in 1997, FWS Wolf Recovery Coordinator Ed Bangs referred back to these findings:

*“Although his agency can review those [recovery plan] targets, Bangs cautioned that scientific research suggests the numbers should actually be higher to sustain a wolf population.”*

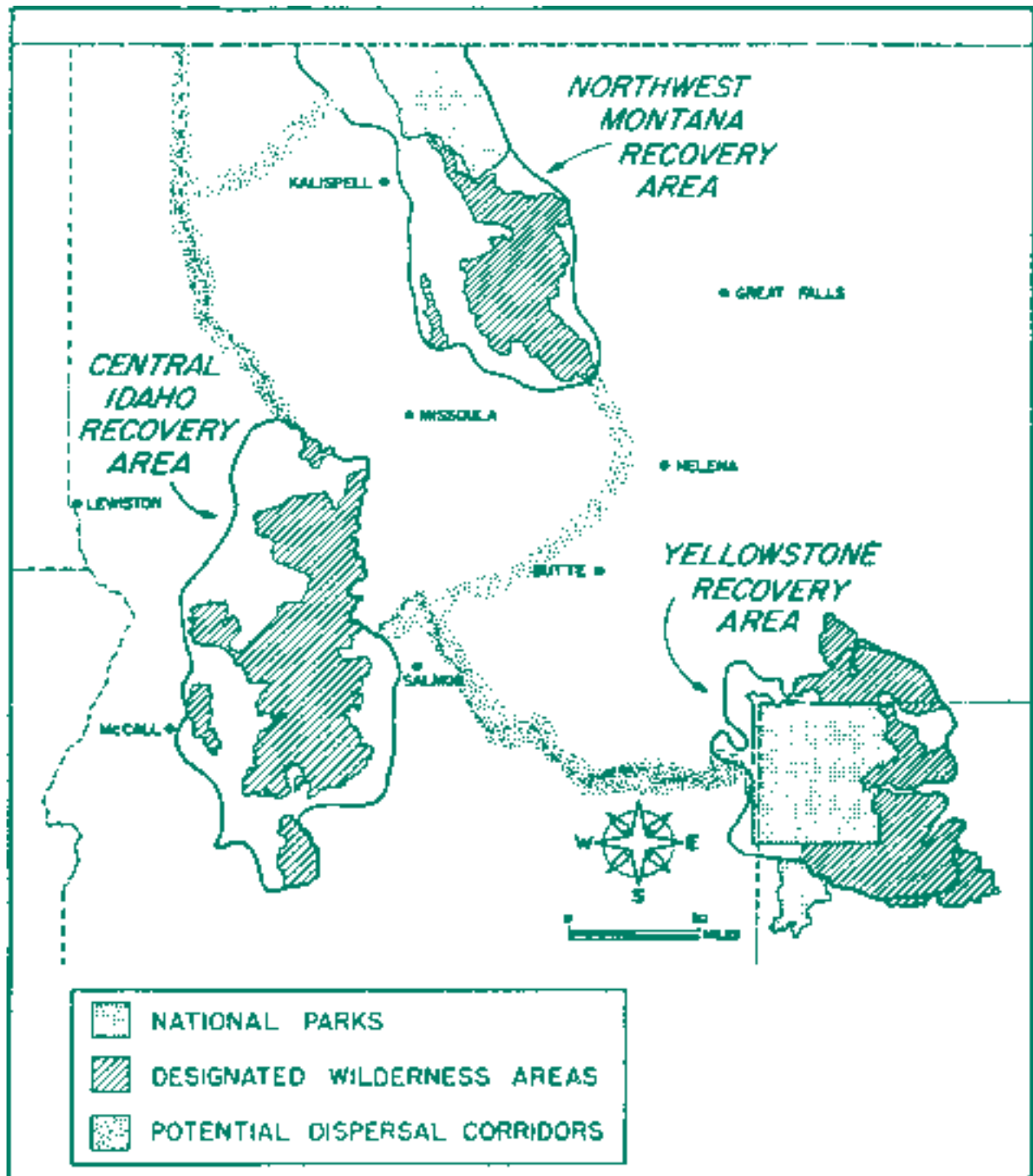
— Helena Independent Record, 11/22/97

### Conclusion

In sum, Americans committed to recovering the wolf to the northern Rockies. This recovery was defined as achieving a minimum of 10 breeding pairs in each of three populations — Greater Yellowstone, central Idaho, and Northwest Montana — that are connected across the northern Rockies landscape.



## Wolf Recovery Areas in the Northern Rockies



map courtesy U.S. Fish and Wildlife Service

Figure 1

## PART II. WHERE WE ARE NOW: PROGRESS, OBSTACLES AND RECOMMENDATIONS

**T**wenty-five years since the wolf was listed for protection under the Endangered Species Act (1973), more than a decade since the Northern Rocky Mountain Wolf Recovery Plan was released (1987), and four years since wolves were first translocated from Canada into Yellowstone and central Idaho, Predator Project believes the time is right to assess the progress to date, identify current obstacles to achieving recovery goals, and propose recommendations to overcome these obstacles.

We have organized this section around four major issues facing wolf recovery:

1. Achieving adequate wolf numbers and distribution within each of the three populations;
2. Connecting wolves from the three populations across the northern Rockies landscape;
3. Maintaining adequate legal protections for all wolves; and
4. Protecting wolves across administrative boundaries.

### Issue #1. Achieving adequate wolf numbers and distribution



NPS photo

**F**or wolves or any other imperiled species to recover and be restored to healthy numbers, there must be enough of them, enough habitat for them, and enough protection for both. A good way to begin is to re-establish a “critical mass” of the species in the most promising areas, and protect them and their habitat so that they not only survive, but also reproduce and grow to

recolonize adjacent areas of suitable habitat. The Wolf Recovery Plan identified three such areas in the northern Rockies — Greater Yellowstone, Central Idaho, and Northwest Montana — and efforts have been underway to re-establish wolves in these areas ever since.

### PROGRESS

Recovery efforts have been extraordinarily successful in meeting the fundamental challenge of getting wolves established on the ground within the three recovery areas. Notwithstanding some recent

setbacks to the Northwest Montana wolf population, the U.S. Fish and Wildlife Service’s proud refrain is that the project is “ahead of schedule and under budget” (see Figs. 2 & 3).

*“These wolves are growing at near-maximum range... this is off the chart for wolf weights.”*

— Yellowstone wolf project leader Doug Smith (Bozeman Daily Chronicle, 8/14/98)

### OBSTACLES

Despite the tremendous gains made to date, a careful examination of wolf recovery gives some cause for concern. Protection of wolves and their habitat quickly declines outside of our national parks and Wilderness areas, which in turn limits wolf numbers and distribution. This is because wolf numbers are self-regulating within a given area, so the core recovery areas are limited in the number of wolves they can support. Just four years after the reintroduction, Yellowstone Park may be already at capacity for wolves, according to Yellowstone wolf project leader Doug Smith (*Billings Gazette*, 3/1/99). Only in Idaho — where wolves can roam throughout the largest contiguous roadless area in the lower-48 states — have wolves readily reached the

(continued)

recovery plan target of 10 breeding pairs. In Northwest Montana and the Greater Yellowstone Ecosystem, wolves have had to disperse outside of the core recovery areas, and many of these wolves have been killed.

#### **A. Failure to implement habitat protections is a problem.**

The “carrying capacity” of a certain area for wolves also fluctuates due to changes in climate and prey abundance. When the wolves’ prey base is reduced — such as following the hard winter of 1996, when whitetail deer populations crashed in northwestern Montana — wolves are forced to range farther than usual in search of food. In 1996, because no habitat protections were implemented in these areas, conflicts with people and livestock reduced wolf numbers by an estimated 20% (from 100 to 80 wolves or fewer).

Another glaring example of how wolves are not protected outside of the core recovery areas is the recent announcement that even in Grand Teton National Park, livestock grazing may take precedence over wolf recovery:

*“Wolves that move into Grand Teton National Park may be killed if they repeatedly prey on livestock, according to a federal wolf biologist.”*

— Casper Star Tribune, 1/24/99

#### **B. Wolf numbers may be hitting an invisible ceiling.**

There is increasing evidence that wolf numbers may be starting to hit an invisible ceiling of 6-8 breeding pairs in Northwest Montana and perhaps also in the Greater Yellowstone Ecosystem (Fig. 4). For example, more than two-thirds (22 out of 30) of the human-caused mortalities of the Yellowstone wolves have occurred outside of the national park borders, despite the fact that they have spent the vast majority of their lives within the park borders. One-half of the wolves (11 of 22) killed outside Yellowstone Park are known to have preyed on livestock; the other half were illegally shot or died in an M-44 trap. Within Yellowstone Park, the only major threat to wolves are its highways, where vehicle collisions accounted for 7 out of the 8 human-caused wolf mortalities.

## **RECOMMENDATIONS**

**In order to achieve the minimum recovery target of ten breeding pairs in each of the three northern Rockies populations, wolves should be allowed to live in all areas of suitable habitat where they can avoid conflicts with people and livestock. This means all areas of undeveloped lands, including private lands where landowners will tolerate them.**

Where there is evidence that failure to implement *habitat protections* is limiting wolf distribution on public lands, provisions in the recovery plan to protect habitat must be implemented. Given the threat they pose to wolves, the following activities must be made

compatible with wolf recovery:

- livestock operations,
- logging and road-building,
- mining and oil/gas exploration and development,
- recreational activities and other special uses, and
- cumulative effects from multiple

uses within given areas of wolf habitat (see Part I of this report).

Where wolf numbers appear to be hitting an invisible ceiling due to high *human-caused mortalities* outside of the core protected areas, provisions in the recovery plan to reduce and eliminate mortality threats must be implemented, such as direction in the plan to make federal predator control efforts compatible with wolf recovery objectives. Support for aggressive enforcement against illegal wolf kills is necessary as well.

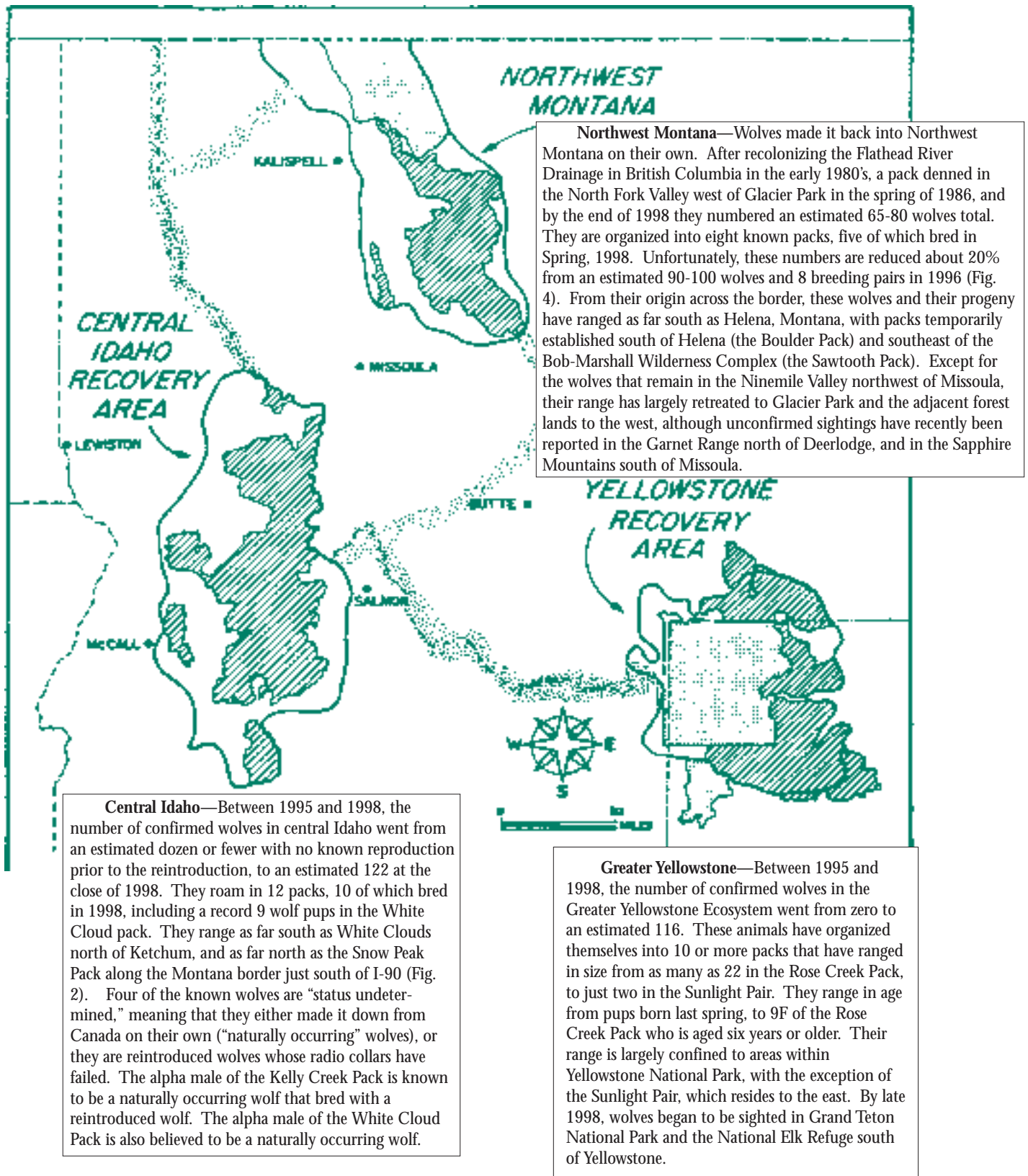
On private lands, more creative approaches are needed to prevent, reduce, and resolve conflicts. Examples include:

- “Predator Friendly” ranching operations, which employ non-lethal means of addressing livestock conflicts, and
- incentives for private landowners who tolerate wolves on their property, including tax breaks for conservation easements, and Defenders of Wildlife’s compensation program for landowners who tolerate wolf dens on their property.

*...wolves should be allowed to live in all areas of suitable habitat where they can avoid conflicts with people and livestock.*



# Wolf Recovery Progress in the Northern Rockies (1986-1998)



map courtesy U.S. Fish and Wildlife Service

Figure 2

# Northern Rockies Wolf Pack Locations January 1999

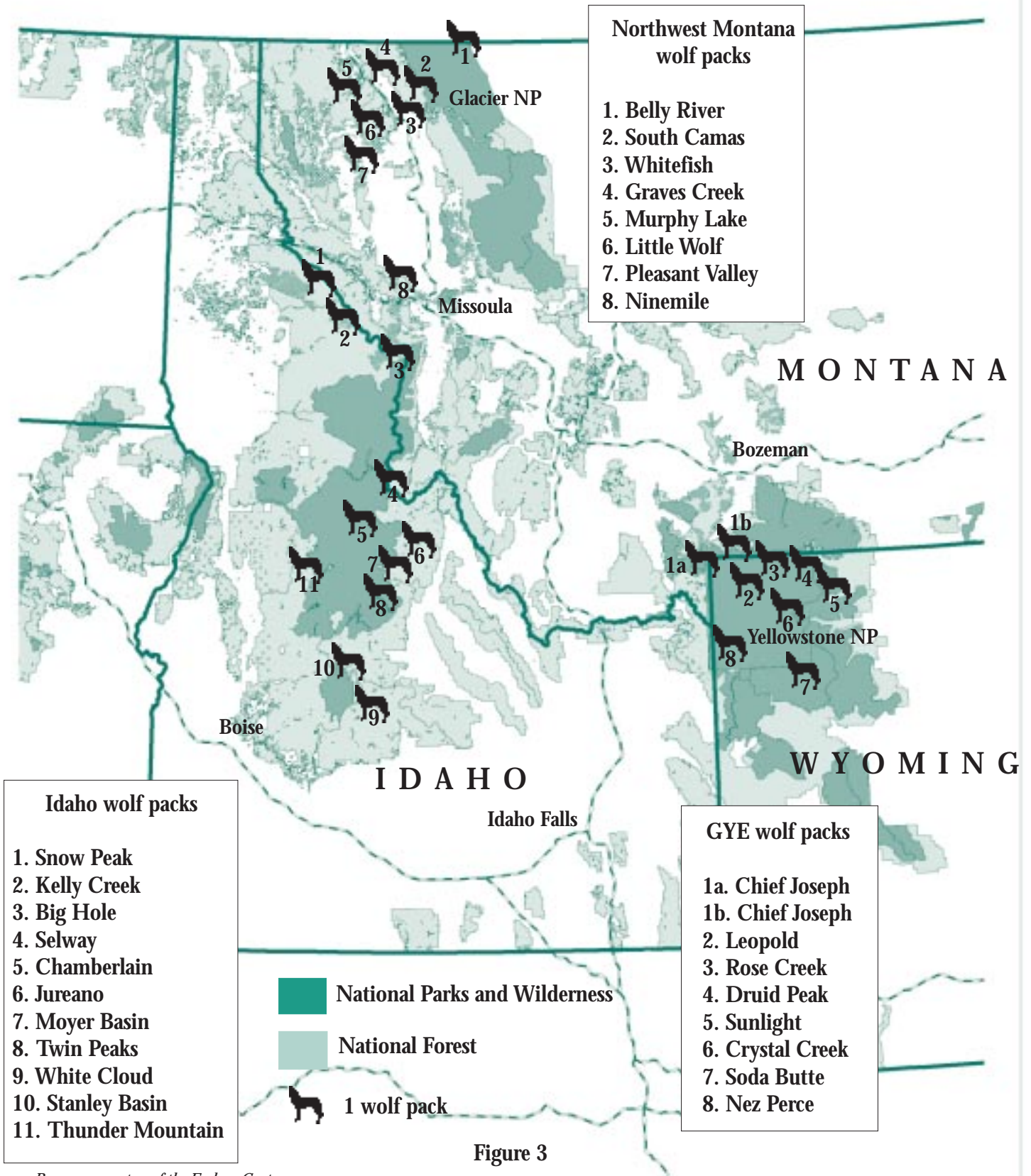


Figure 3

Base map courtesy of the Ecology Center  
Data courtesy of Ed Bangs and Ralph Maughan

## Known Numbers of Successfully Breeding Pairs of Wolves Over Time

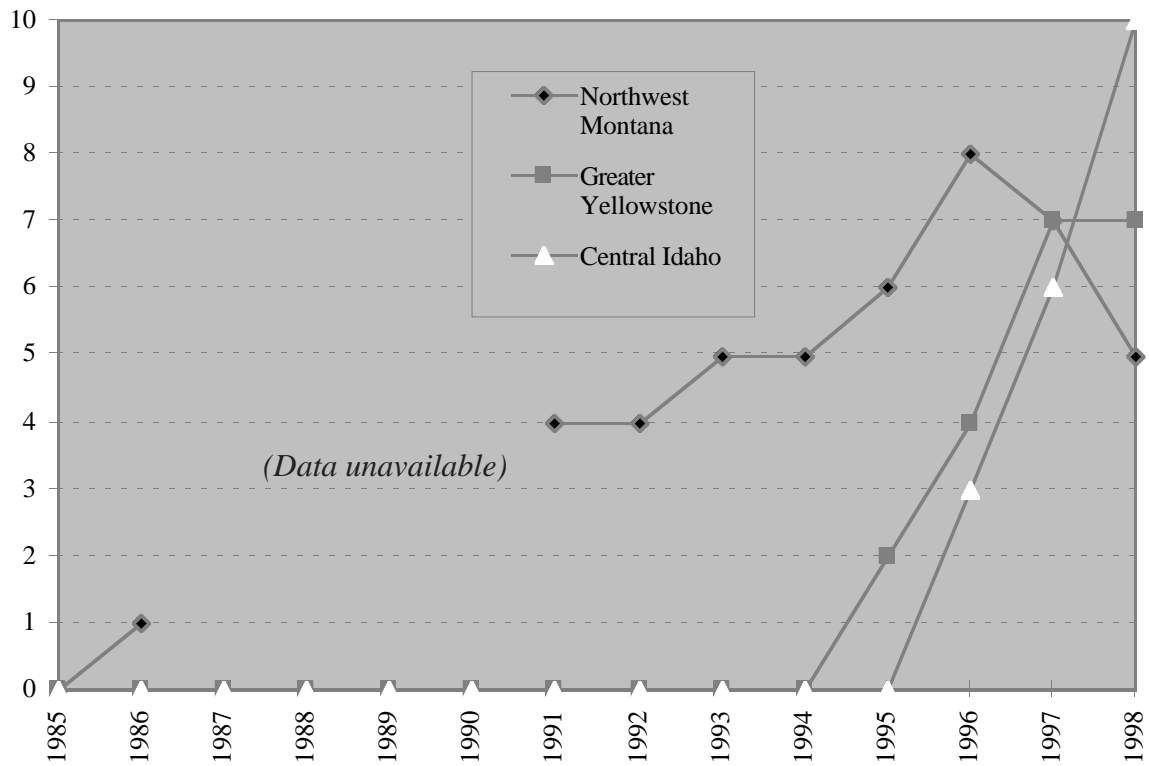


Figure 4

Data courtesy U.S. Fish and Wildlife Service

## Issue #2. Connecting Wolves Across the Northern Rockies

A central principle of conservation biology — the science of conserving wildlife species and the wildland habitat that supports them — is that small, isolated populations of any animal are vulnerable to extinction. Wolves in the northern Rockies are no exception. In both the recovery plan and the reintroduction EIS, the U.S. Fish and Wildlife Service came to the conclusion that to achieve recovery, efforts must be made not only to achieve the “10 breeding pairs” target for each of the three populations, but also to connect the three populations such that it may function as one large “metapopulation,” meaning there is some interchange between them.

### PROGRESS

- Lots of land in the region is suitable for wolves. Depending on where you draw its boundaries, from 70% to 85% of the northern Rockies landscape is in public ownership. The vast majority of this land remains undeveloped as does much of the adjacent private land, and could provide habitat for wolf recovery.

- These undeveloped lands provide connections between the three core populations. Indeed, wolves have already made impressive movements across these lands, showing that they are willing and able to do so successfully (Fig. 5).

### OBSTACLES

Even though undeveloped land is available, wolves often find that they “can’t get there from here.”

- Although the recovery plan directs that potential linkages between the three populations be identified and protected, this has never been done.

- Not even the most basic habitat protections have been implemented for wolves outside of the three core recovery areas. As mentioned in Part I of this report,



NPS photo

the recovery plan directs that livestock operations should be made “compatible” with wolf recovery (p. 37). This has not happened. Livestock conflicts that may have been prevented by managing livestock differently instead resulted in the elimination of many wolves and even entire wolf packs, including the

Washakie Pack that denned southeast of Yellowstone Park in the Dunoir area of Wyoming, and the Sawtooth and Boulder Packs that denned east and south of the Bob Marshall Wilderness complex in northwestern Montana.

- Measures to reduce the mortality risk to wolves are not upheld outside of the core recovery areas. For example, the recovery plan states that “use of toxicants should be limited to

those that avoid killing wolves” (p. 37). Yet, in the past 2 years, sodium-cyanide “M-44” traps set to kill coyotes have accounted for 10% of all human-caused mortalities of the Yellowstone wolves — one wolf on public land east of Yellowstone Park outside of Cody, Wyoming, and two wolves northwest of Yellowstone Park near Dillon, Montana.

In sum, the impressive wolf movements outside of the core recovery areas to date (Fig. 5) typically result in the relocation or death of those wolves (Fig. 6).

(continued)

*“The importance of movement of individuals between sub-populations cannot be overemphasized... It is fairly clear that 10 breeding pairs in isolation will not comprise a ‘viable’ population (i.e. have a high probability of survival for a long period without human intervention.)”*

— Final Environmental Impact Statement,  
U.S. Fish and Wildlife Service



## RECOMMENDATIONS

In order to connect the three currently isolated wolf populations, habitat and mortality protections must be implemented beyond the core recovery areas, to all undeveloped areas that could function as suitable wolf habitat.

- Provisions in the recovery plan to delineate and protect important movement corridors must be implemented, starting with those areas where wolves have been known to disperse already.

*Just like other wildlife — including deer, elk, eagles and trout — wolves should be allowed to roam anywhere they can survive and stay out of trouble.*

- Where conflicts with livestock operations and other activities have set back wolf recovery, direction in the recovery plan to make them compatible with wolf recovery should be implemented. For example, livestock could be more tightly herded and moved, attractants minimized, and aversive control measures tried where conflicts have occurred.

Although the recovery plan has limited authority over private lands, many private landowners do not object to wolves traveling across or even residing on their property. Just like other wildlife — including deer, elk, eagles, and trout — wolves should be allowed to roam anywhere they can survive and stay out of trouble.



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## Wolf Movements in the Northern Rockies, 1986-early 1999

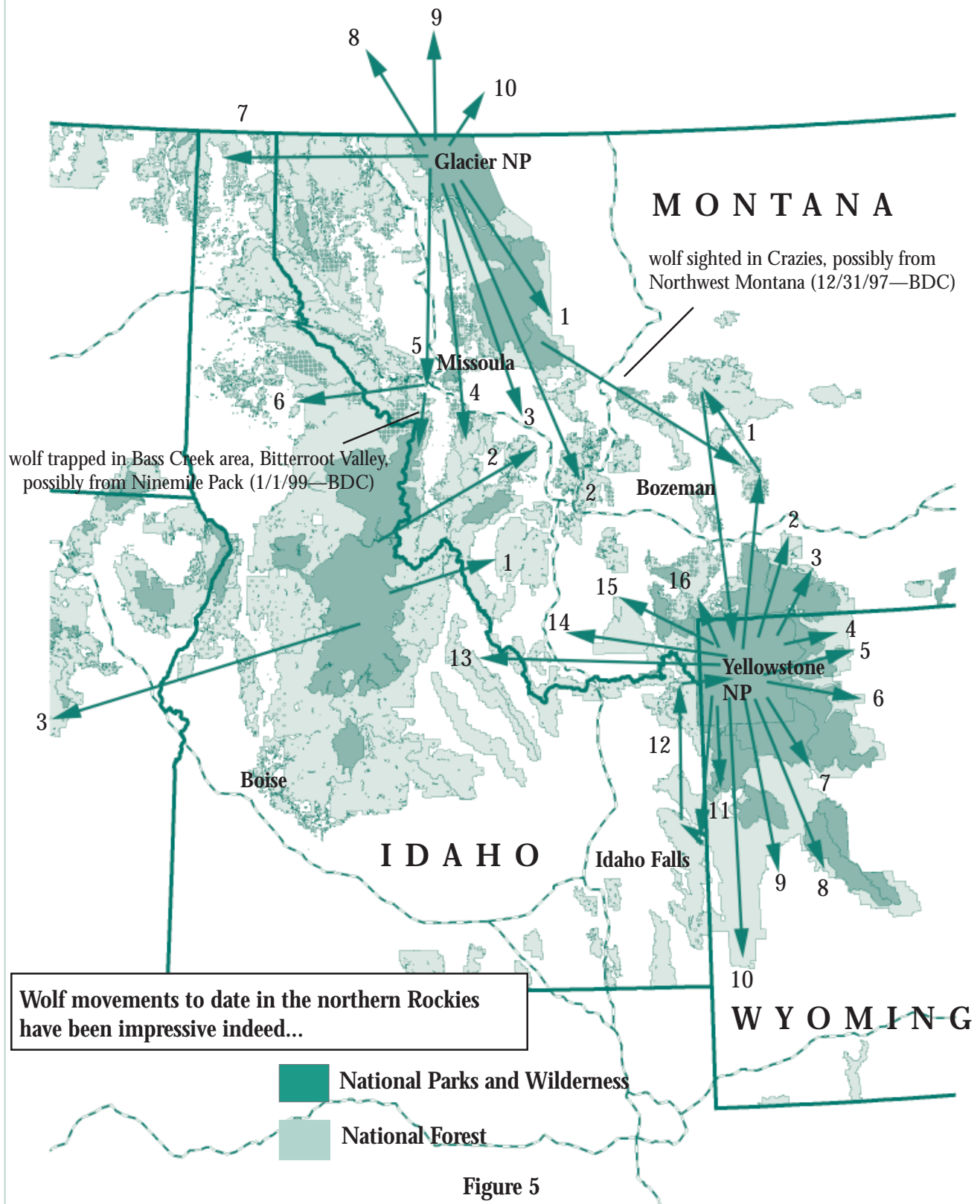


Figure 5

Base map courtesy The Ecology Center

# Wolf movements in the Northern Rockies, 1986-early 1999

(Figure 5)

*Compiled by Dave Gaillard, Predator Project, 2/99*

*Sources include Ralph Maughan's web site, U.S. Fish and Wildlife Service updates, an article by Carolyn Callaghan (11/98), personal communication with Kent Laudon of the Nez Perce Tribe (1/99), and newspaper reports from:*

*BG—Billings Gazette*

*CST—Casper Star Tribune*

*LE—Livingston Enterprise*

*TM—The Missoulian*

*BDC—Bozeman Daily Chronicle*

*GFT—Great Falls Tribune*

*NYT—New York Times*

*SR—Spokane Spokesman-Review*

## **From the Greater Yellowstone Ecosystem:**

- 1 to Crazies, Castle Mountains, Little Belts and back to YNP (12/31/97—BDC)
- 2 to Big Timber (6/12/97—BDC)
- 3 to Reedpoint, Nye, Fishtail (12/24/95—NYT, etc.)
- 4 to Sunlight Basin
- 5 to north of Cody, WY (12/16/98—BG)
- 6 to Meeteetse, WY (4/3/96—CST)
- 7 to Togwotee Pass, DuNoir area (1/19/96—BDC)
- 8 to Upper Green River area
- 9 to Daniel, WY, 40 mi. southeast of Jackson (2/13/96—CST)
- 10 to Kemmerer, WY (10/12/98—LE)
- 11 to Grand Teton NP (12/1/98—CST)
- 12 to Snake R. Range, south of Island Park, and back (Lone Star male, Maughan)
- 13 to Lemhi County, outside Leodore, ID (7/3/97—Maughan)
- 14 to Dillon, MT area (10/8/97, 11/26/97—Maughan)
- 15 to Alder, MT (5/9/97, 4/15/98—Maughan)
- 16 to Paradise Valley, near Emigrant (4/23/96—BDC)

## **From Central Idaho:**

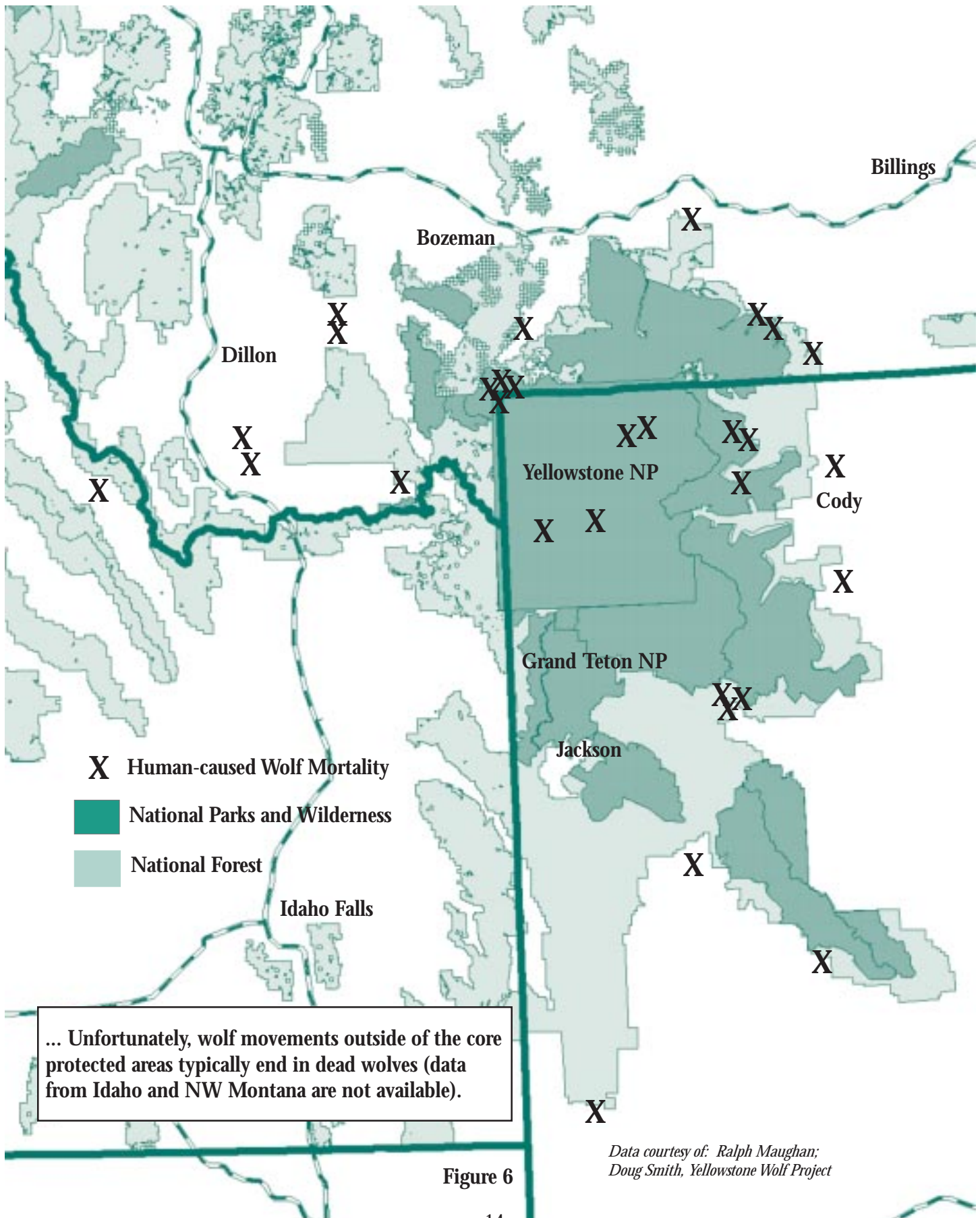
- 1 to the Big Hole Valley
- 2 to Deerlodge, Avon (Laudon, pers.comm.)
- 3 to the Blue Mountains of northeastern Oregon (2/21/99—BDC)

## **From Northwest Montana:**

- 1 Sawtooth Pack
- 2 Boulder Pack
- 3 Garnet Range (FWS update, 11/6/98)
- 4 Sapphires (FWS update, 11/6/98)
- 5 to Ninemile Valley
- 6 to Elk River, Idaho (collared Ninemile wolf, 9/97—Laudon pers. comm.)
- 7 to Priest Lake area (2/1/95—SR)
- 8 to Sparwood, BC (Callaghan article)
- 9 to Pincher Creek, Alberta (5/5/97—GFT)
- 10 to east of Kananaskis Country and Cochrane, Alberta (Callaghan article)



# Human-caused Wolf Mortality in the Greater Yellowstone Ecosystem 1995 - 1998





### Issue #3. Maintaining Adequate Legal Protections for Wolves



NPS photo

**I**n order to provide wolves with what they need to recover — large areas of secure habitat where they will not be killed by people — wolves need strong laws that are strictly enforced.

#### PROGRESS

Much of the progress toward gaining adequate legal protections for wolves and translating them into specific recovery actions was described in Part I of this report: the Endangered Species Act listing, in which Americans committed to recovering wolves in the northern Rockies and elsewhere in the U.S.; followed by the Northern Rocky Mountain Wolf Recovery Plan, which details specific recovery targets, and the steps to be taken to achieve those targets. The plan to reintroduce wolves to Greater Yellowstone and central Idaho then “jump started” recovery in the Greater Yellowstone Ecosystem and central Idaho by artificially importing wolves from Canada.

#### OBSTACLES

Wolf protections started strong with the wolf’s listing for protection under the ESA and the subsequent Northern Rocky Mountain Wolf Recovery Plan in 1987, but have been in decline ever since, with increasing instances of wolf policy being driven by politics rather than science.

#### Montana’s “Interim” Wolf Control Plan

The recovery plan was immediately followed by the Interim Wolf Control Plan in 1988. Despite the fact that the interim control plan addresses the Northwest Montana wolves that are still fully protected as endangered — and thus should receive the highest level of protections — it has never gone through a formal review process and it contains some of the most lenient of all written regulations affecting wolves. For example, although the recovery plan directs that wolves that conflict with livestock must be given a second chance by relocating them rather than killing them, the interim control plan directs that wolves may be killed at the first offense against livestock once the Northwest Montana population attains the arbitrary number of six breeding pairs—well short of the recovery plan target of ten breeding pairs. Despite its “interim” status, no efforts are underway to revise or finalize the plan.

#### Once Conflicts Occur

In cases where livestock conflicts have occurred, there is extreme political pressure to weaken wolf protections. Despite the FWS policy to protect and promote wolf use of dispersal areas between the three populations, agency statements in response to these conflicts reveal that outside core recovery areas, wolves are typically assumed guilty, and both relocations and killings occur more readily than written policy allows. Wolves are relocated or killed for simply being outside their “normal” ranges, whether or not any damage has been done, and whether or not any changes in livestock management have been tried in order to make it more compatible with wolf recovery.

#### Political Interference

Despite the scientific consensus that the “10 breeding pairs” target is a bare minimum, a politically

*“Although his agency can review those [recovery plan] targets, [FWS Biologist] Bangs cautioned that scientific research suggests that numbers should actually be higher to sustain a wolf population.”*

— *Helena Independent Record*, Nov. 22, 1997

(continued)

organized wolf “summit” in 1997 prompted FWS to consider lowering this target:

*“The federal agency running the three-state wolf recovery program will consider giving ranchers more freedom to kill wolves threatening their herds, a U.S. Fish and Wildlife Service official said Friday. Paul Gertler, assistant regional director, also said the number of wolf packs needed before the animal can be removed from the list of endangered species might be reduced.”*

— Helena Independent Record, 11/22/97

At even higher levels within the FWS, there is pressure to create an ESA “success story” and declare premature recovery for wolves in the northern Rockies. Even though the recovery plan criteria for “down-listing” wolves in the northern Rockies from “Endangered” to “Threatened” have not been met, FWS announced that it will propose to do so in 1999. That FWS is motivated by politics rather than science in this decision is evident in the following quote:

*“Fish and Wildlife Director Jamie Clark also hopes the move [to reduce or remove ESA protections for wolves in the northern Rockies and elsewhere in the U.S.] will help convince Congress to reauthorize the Endangered Species Act of 1973. ‘It is languishing right now,’ she said. ‘This announcement today I think demonstrates that the Endangered Species Act works.’”*

— Casper Star Tribune, 6/30/98

(For more information, see the “Down-listing” Appendix to this report).

(continued)

***“We don’t know that he’s killed anything but the fact that he’s back there is disturbing.” [a FWS official] said. “He needs to be removed from the program.”***

— From a newspaper article regarding a wolf that had wandered north from Yellowstone Park to Paradise Valley (Bozeman Daily Chronicle, 2/5/96).

***“Biologists... may capture the wolves if opportunities present themselves... ‘We’ve had no reports of damage,’ said [a Yellowstone spokesperson].”***

***“‘It’s not our intent to let them stay there...’ said Yellowstone biologist Mike Phillips.”***

— From newspaper articles regarding two wolves near Emigrant in the vicinity of cattle (Bozeman Daily Chronicle, 4/21/96, 4/23/96).

***“The U.S. Fish and Wildlife Service wants the wolf back in Idaho and is using radio telemetry to monitor its movements, said [a FWS spokesperson].”***

— From an Associated Press article regarding an Idaho wolf. The wolf’s only offense was to roam into the Blue Mountains of northeastern Oregon (Bozeman Daily Chronicle, 2/21/99).



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## RECOMMENDATIONS

**We must maintain and restore proper legal protections for wolves until recovery is indeed secured.**

- Now that we have a decade of experience with the “Interim Control Plan,” it is time to open it up to a full public and scientific review, to investigate its role in the progress and setbacks to date, including the 20% decline in the northwestern Montana wolf population;
- Ensure that written protections are implemented on the ground, and that there is full public disclosure of all management actions in response to wolf movements and

livestock conflicts, such as the management actions that have resulted in the total or near-destruction of the Sawtooth, Boulder, Ninemile, and Washakie Packs;

- Uphold the recovery plan criteria of ten breeding pairs in each of the three northern Rockies populations as a *minimum* population target, and implement legal protections outside of the core recovery areas to allow wolves to achieve and maintain those numbers, even during poor food years;
- Re-affirm that the reintroduction plan is indeed legal by reversing Judge Downes’ removal order, and re-instating full ESA protections for those wolves and their offspring that are known to have made it south from Canada on their own (see box below).

### Update on Wolf Lawsuits

Legal protections for wolves are in jeopardy due to the “Experimental Non-Essential” designation that accompanied the importation of Canadian wolves into Yellowstone and Idaho.

- **Farm Bureau case**

The American Farm Bureau filed suit to thwart wolf recovery efforts in Greater Yellowstone and Central Idaho by declaring the reintroduction program illegal and forcing the removal of all imported wolves. The Farm Bureau found a sympathetic U.S. District Court Judge who not only agreed that the program was illegal, but also took the extraordinary step of prescribing the Farm Bureau’s remedy—ordering the removal of all reintroduced wolves—rather than the more conventional remedy of remanding the case back to FWS to resolve the problem. Judge Downes did have the foresight to put a “stay” on his removal order, meaning his order is not to be implemented until any and all appeals of his ruling are resolved.

Predator Project, several other conservation groups, and FWS have since appealed the ruling, and these appeals should be resolved within the next year. A

rejection of Judge Downes’ ruling by the Ninth Circuit Court of Appeals in a related case offers hope that the ruling will be rejected and reversed by the 10th Circuit as well. Even if the unthinkable happens and the order withstands the appeals, there is still the option for relief from an act by either Congress or the Clinton Administration. Interior Secretary Bruce Babbitt has vowed that he will not allow the wolves to be removed from Yellowstone “on my watch.”

- **Earthjustice Legal Defense Fund case**

Represented by Earthjustice Legal Defense Fund attorneys (formerly, “Sierra Club Legal Defense Fund”), Predator Project and several other conservation groups filed a lawsuit to challenge the removal of ESA protections for naturally occurring wolves in Idaho, for fear that it would jeopardize wolf recovery in Idaho and create a dangerous ESA precedent. Judge William Downes ruled for Earthjustice, but this was overshadowed by the Farm Bureau’s victory described above. Predator Project’s co-plaintiffs in the original lawsuit included: National Audubon Society, Sinapu, and Gray Wolf Committee.

## Issue #4. Protecting Wolves Across Administrative Boundaries

*“Seven radio-collared wolves have dispersed from northern Montana to southern Alberta. All were female, and five colonized new packs, and produced at least one litter of pups. Each of these wolves was shot or trapped by humans.”*

— Carolyn Callaghan, *Howlings* (Wolf Awareness, Inc. publication), 11/8/98



NPS Photo

Wide-ranging species like wolves need to be protected across various jurisdictions, including the state, national, and even international levels. While some progress has been made, this aspect of the recovery and management of wolves and other wide-ranging species presents a tremendous challenge for the future.

### PROGRESS

Coordination of efforts to protect and recover wolves across jurisdictional boundaries began with the ESA listing of the wolf in 1973. The wolf recovery plan that followed identified the involvement by the states as a critical component of wolf recovery, and a prerequisite to removal from ESA protections.

*“Delisting the Northern Rocky Mountain wolf will be contingent upon the species being classified as a game animal, furbearer, or other protected status by the States.”* (p. 19)

The wolf recovery plan also acknowledged the need for international coordination:

*“Protection and improvement of habitat in recovery and corridor areas and north of the border is fundamental to the recovery effort as it will enhance wolf dispersal from western Canada as well as reintroduction efforts.”* (p. 10)

Since then, there has been increased public awareness and a building crescendo led by the conservation community in support of a landscape-scale approach to wildlife management and conservation in the northern Rockies. A conservation initiative called “Yellowstone-to-Yukon” is generating a great deal of interest as people see the ecological and social connections across the entire Rocky Mountain cordillera of the U.S. and Canada.

### OBSTACLES

**A. State bias against wolves remains strong, and presents a serious obstacle to removing federal protections.**

Federal protections first came about because wolves were extirpated under state management. In order for federal protections to be removed, this problem must be remedied.

- Idaho has refused to take any part in the reintroduction effort. While the Nez Perce Tribe has done an excellent job leading the reintroduction program in Idaho, many have testified that the state must have a role in the future management of the Idaho wolf population, including the program leader himself:

*“A lead biologist in the wolf recovery program who was fired by the Nez Perce Tribe says the Idaho Department of Fish and Game would be more effective in managing the growing packs in the central Mountains... the Fish and Game Department was barred from that role in 1995 when angry members of the legislature refused to authorize the agency [to manage] the program”*

— Bozeman Daily Chronicle, March 20, 1998

As further evidence of its animosity toward wolves, Idaho Department of Fish and Game’s Commissioner recently proposed that FWS issue 5-10 wolf killing permits to the state, to begin an endangered wolf hunt! (*Transcript, Predator-Prey Symposium, Boise, Idaho, 1/5/99, p. 195*).



- Wyoming still classifies wolves as “predators,” meaning they receive no state protections. Wyoming drafted a state wolf recovery and management plan in 1997 that would limit wolf numbers to the threshold of extinction, and offer limited protections that would decrease with distance from Yellowstone National Park. The draft plan has never been finalized.

- Montana has historically shown comparatively more support for wolf recovery, perhaps in part because wolves are making it back to northwestern Montana on their own. Montana reclassified the wolf from “predator” to “endangered” in 1973, the same year that wolves were listed as federally endangered. More recently, however, Montana has completed a draft state wolf recovery and management plan (1995) that does not provide for any habitat protections for wolves. Further, a state law was passed in 1995 that would reclassify wolves as a “predator” immediately upon their delisting from the federal ESA. Language in the bill goes so far as to direct the very actions that led to their extirpation from the northern Rockies:

*“The department [of livestock] shall adopt rules applicable to predatory animal control which are necessary and proper for the systematic destruction of the wild animals by hunting, trapping, and poisoning operations and payments of bounties.”*

— Montana Code Annotated 81-7-102

## **B. Canada’s anti-wolf bias remains strong.**

Despite the increasing awareness of ecological and social connections between the U.S. and Canadian Rocky Mountains, very little progress has been made at reforming policies that ignore and thereby jeopardize these connections. Unfortunately, the direction in the wolf recovery plan to coordinate U.S. wolf recovery efforts with Canada’s wolf management policy has never been implemented.

Wolves that are fully protected as an endangered species in Montana can be legally killed nine months of the year on public lands (and all year on private lands) just across the border in Alberta. This has resulted in a serious mortality “sink” that jeopardizes U.S. recovery efforts. Canadian wolf researcher Carolyn Callaghan offers some startling statistics:

*“Seven radio-collared wolves have dispersed from northern Montana to southern Alberta. All were female, and five colonized new packs, and produced at least one litter of pups. Each of these wolves was shot or trapped by humans.”*

— Carolyn Callaghan, *Howlings* (Wolf Awareness, Inc. publication), 11/8/98

Wolves are widely hunted throughout British Columbia as well. For example, Wolf #83 from the Murphy Lake pack in northwestern Montana was killed on Nov. 1, 1998 by a hunter near Sparwood, British Columbia about 60 miles north of the Canadian border (*FWS report*, 11/6/98).

## **RECOMMENDATIONS**

**Commitment to wolves must be secured at all jurisdictional levels to attain wolf recovery, and to ensure adequate protections will continue once recovery is achieved and federal authority is lessened.**

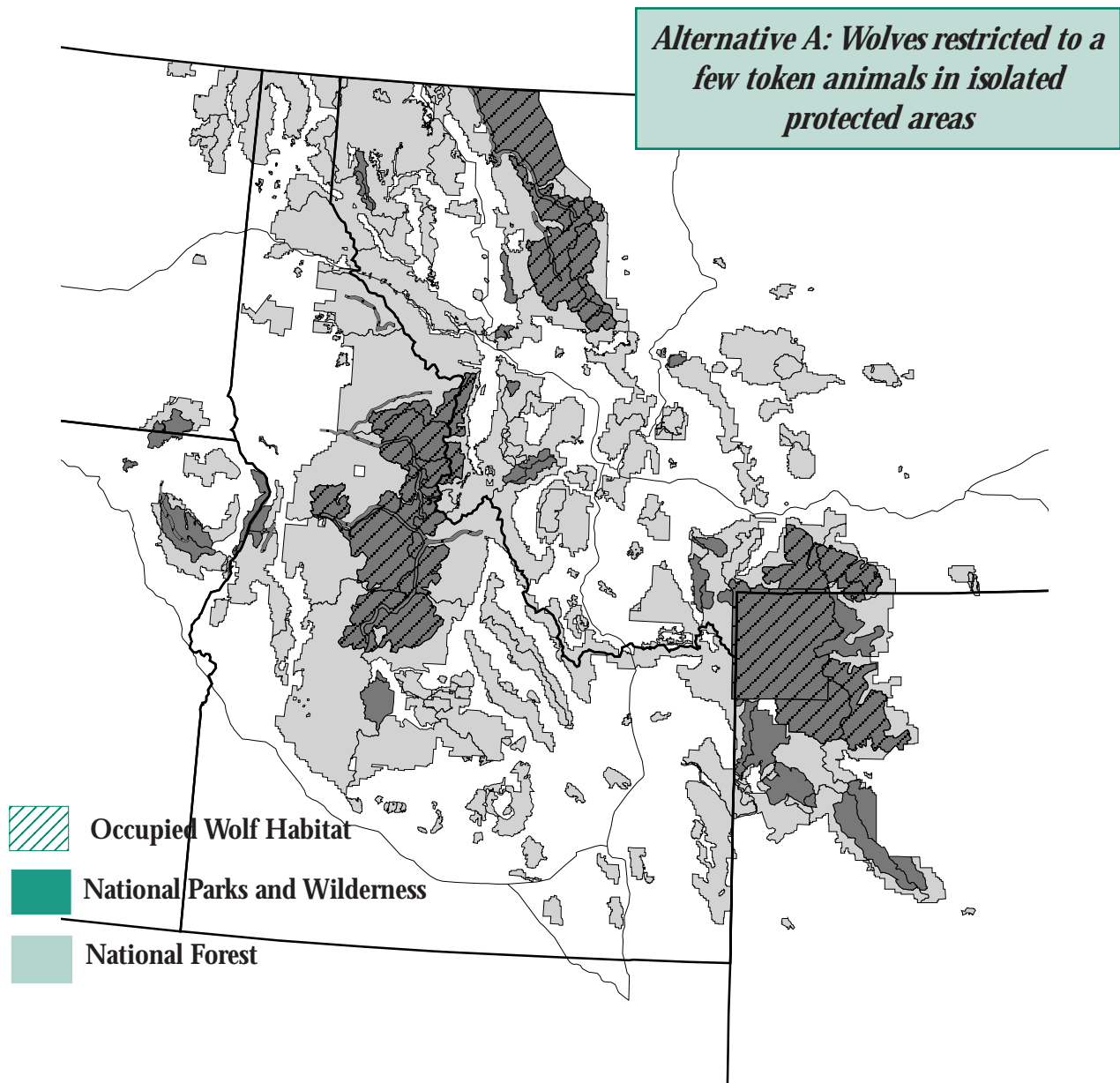
- For the states to resume their authority over wolf management, they need to commit to wolf recovery. Only through state cooperation will: (1) wolf recovery objectives and “de-listing” from the ESA be achieved, and (2) wolves achieve sufficient numbers and distribution such that restrictions can be lessened without risk of their re-extirpation from the northern Rockies.

- Given the tremendous impact to wolf packs on both sides of the international border, Alberta and British Columbia must reduce the number of wolves shot in those provinces. Only through international cooperation will long-term recovery of wolves be achieved, not just in isolated “islands” of habitat, but as a contiguous metapopulation resilient against further threats along the entire Rocky Mountain cordillera of North America.

# PART III. WHERE WE ARE HEADED — ALTERNATIVE FUTURES FOR WOLVES IN THE NORTHERN ROCKIES

## Alternative A: Our Current Direction — Betraying Past Commitments

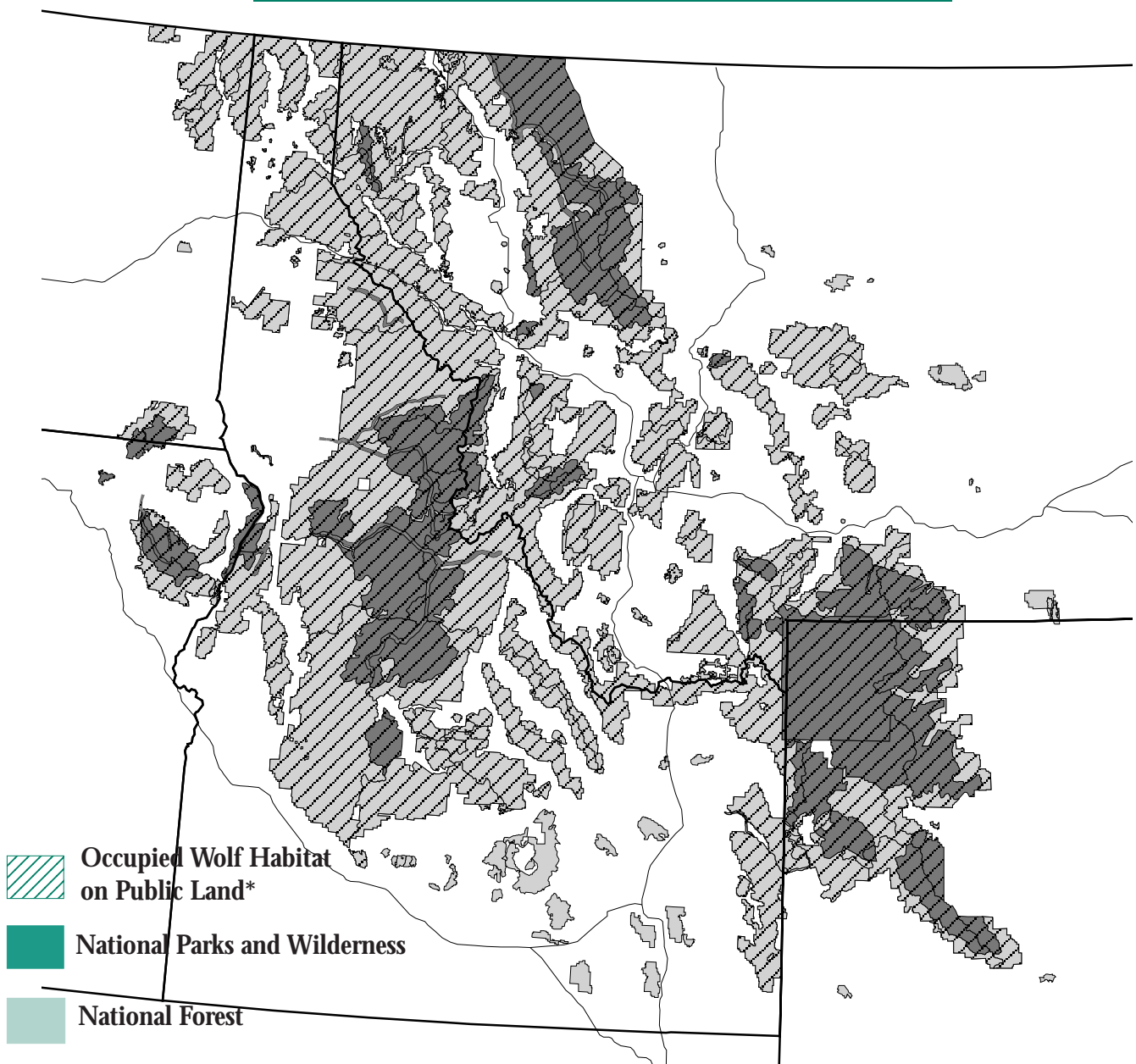
- No more than 10 breeding pairs exist in each of the three populations, restricted to the core recovery areas
- Managed on the brink of re-extirpation, wolves have limited impact on ecological health in the region, benefits to the public are limited to the small, isolated areas where they are allowed to exist, and public land users will face perpetual restrictions
- States institute hunts to restrict wolves to 10 pairs or fewer
- No efforts are made to maintain connections with Canada, isolating the US populations
- Long-term wolf survival requires expensive, intrusive and risky artificial translocations between the three populations.



### Alternative B: Wolves Restored to the Northern Rockies — Fulfilling Past Commitments

- Ten breeding pairs as a minimum is upheld, and wolves are allowed to occupy all areas of suitable habitat where they do not get into trouble with people
- Wolves naturally disperse between the three recovery areas, providing a low maintenance, low cost and highly effective way of maintaining demographic and genetic vigor over time.
- The benefits of wolves are felt throughout their range — healthy and abundant populations of both predators and prey, enhancing people's lives throughout the northern Rockies.

*Alternative B: Wild and free-ranging populations free to determine their natural patterns of abundance and distribution across the northern Rockies*



*\* Private lands that could provide suitable habitat for wolves, with landowner acceptance, are not shown.*

# CONCLUSION:

## A CASE FOR MAINTAINING OUR COMMITMENT TO WOLF RECOVERY

*"I can't overestimate how important wolves are to the Yellowstone experience... For some people, seeing a wolf is a pinnacle experience in their lives."*

— Doug Smith, Yellowstone Wolf Project Leader  
(Bozeman Daily Chronicle, 1/3/99)

Achieving wolf recovery makes sense for wolves, for other wildlife, for the people of the northern Rockies, and for the northern Rockies region overall.

### Ecological Benefits

Our recent experience with wolf recovery in the northern Rockies has already shown that wolf recovery not only benefits wolves, but a whole host of wildlife species native to the northern Rockies. This has been easiest to observe and study in Yellowstone, and the evidence that wolves benefit other species is overwhelming. A quote from the chief scientist of Yellowstone Park John Varley says it well:

*"A lot of other predators and scavengers have a seat at the wolf kill table... When the sun comes up on the [wolf] kill it can be stunning. You can see a grizzly bear, four or five ravens, coyotes, a fox, bald eagles and golden eagles on the carcass. All at once."*

— New York Times, 12/30/97

Fears about declines in prey species have proven to be unfounded. For example, in Yellowstone's Northern Range, wolves are now well-established and not expected to increase in number. The area supports approximately 20,000 elk, and wolves are killing an estimated 700 elk each year. By contrast, hunters kill

approximately 1,100 to 1,400 elk from this herd each year just north of the park. Yellowstone Wolf Project Leader Doug Smith's evidence clearly shows that the majority of the wolf kills are either very young (calves) or old females (*New York Times*, 12/30/97; *pers. comm.*,

11/98). By Spring 1999, Montana Department of Fish, Wildlife and Parks biologist Tom Lemke said, "hunter success rates have been higher than average since 1995," the year the wolves were first reintroduced: "At this point, we are not expecting any reduction in late season [elk hunting] permits of any significant amount due to wolves." (*Bozeman Daily Chronicle*, 3/25/99). What's more, Yellowstone's elk are acting more watchful than they have in fifty years — moving in tight herds and exhibiting other wary behavior that defines their wild and beautiful nature.



© Joan Pain

### Benefits to People

It is beyond the scope of this report to describe the countless ways in which wolves enhance the lives of people in the northern Rockies. Just to be able to take a walk in Yellowstone, in the Bitterroots, in the Sapphires, in the Big Belts, and know that wolves may be in the next drainage—and perhaps to even hear the howlings of a pack—cannot help but heighten our life experience.

The economic benefits of the wolf's return to the northern Rockies have far outweighed costs. The

(continued)



total amount to be spent on recovery is an estimated \$15 million over 30 years. In return, the presence of wolves is expected to generate more than \$20 million each year within the northern Rockies economy due to expenditures from increased visitation (*FEIS*, p. 4-26). Wolves have eclipsed even grizzly bears as the most-asked about animals by visitors to Yellowstone, and in just four years, Yellowstone has gone from zero known wolves to now being described as “far and away the best place in the world to see wolves” (*Bozeman Daily Chronicle*, 1/3/99). The 3-year average of entrance receipts from Cooke City, the best park access point to view the wolves, increased by nearly 25% following the reintroduction. The benefits to Yellowstone can be extended to the entire northern Rockies region if only we allow wolves to live in more places.

***Wolves have eclipsed even grizzly bears as the most-asked about animals by visitors to Yellowstone, and in just four years, Yellowstone has gone from zero known wolves to now being described as ‘far and away the best place in the world to see wolves.’***

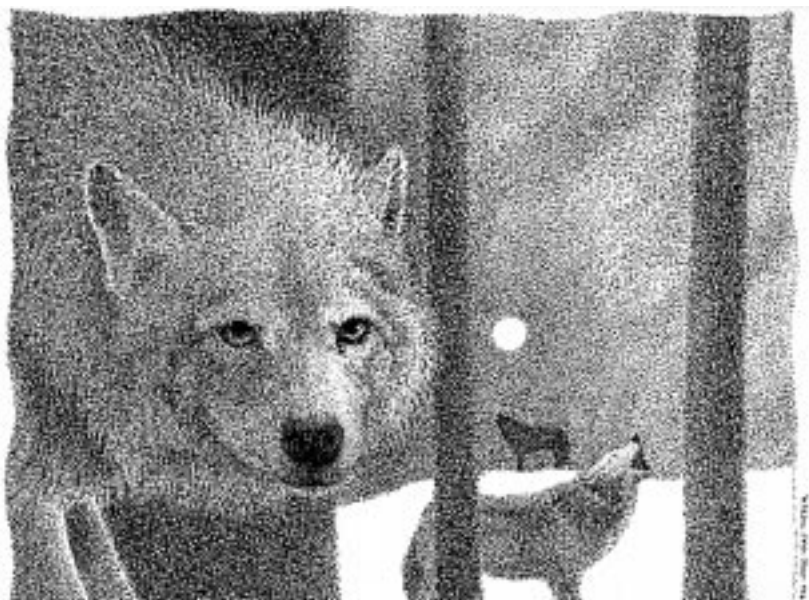
The costs of wolf recovery to the livestock industry have been smaller than expected. By the end of 1997, the total amount of livestock losses known to be due to wolves throughout the entire greater Yellowstone region was about 50 cattle and about 200 sheep. Near

the close of 1998, the value of these animals plus one half the value of probable but unconfirmed wolf kills totaled less than \$70,000, all of which was compensated by the conservation group Defenders of Wildlife. This is less than one-third of expected losses, less than 2% of all reported livestock losses due to predators, and less than one-half of one percent of all livestock losses in the region. That the losses are small is further underscored by the fact that in Greater Yellowstone, two-thirds of the livestock kills were due to 10 orphaned wolves from Northwest Montana that were

released in Yellowstone having never been taught how to hunt natural prey. (*Maughan, pers. comm.*)

Wolf recovery is more than just a good idea. The northern Rockies region and all of us who live here, visit here, or simply care about this place are not complete without them.

What is best for the wolf is best for the northern Rockies overall — wild, free-ranging wolf populations free to determine their natural patterns of abundance and distribution across the northern Rockies landscape.



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# APPENDIX:

## THE U.S. FISH AND WILDLIFE SERVICE'S "DOWN-LISTING" PROPOSAL — BETRAYING PAST COMMITMENTS

In June 1998, the U.S. Fish and Wildlife Service announced that it would propose to “down-list” wolves in the northern Rockies and northeastern U.S., meaning wolf protections would decrease by changing the wolf’s status from “endangered” to “threatened” under the Endangered Species Act. The announcement came not as a result of any new science about the number of wolves that constitute a viable (recovered) population, nor in the wake of any new information showing an increase of wolves in the northern Rockies. Instead it came during a press conference at Forest Lake, Minnesota, from Secretary of the Interior Bruce Babbitt.\*

### The Science

The current recovery plan for wolves in the northern Rockies directs that “a minimum of 10 breeding pairs in the recovery area for a minimum of 3 successive years” must be achieved before down-listing to “threatened” can occur. As described in Part I of this report, this target is considered to be a bare minimum: FWS polled 25 scientists about the number of breeding pairs required for a wolf population to be considered viable (no longer threatened or endangered) and found that while a majority (64%) believed that 10 pairs are enough, the remaining third believed that more than that are necessary (see Issue #2 in this report). Yet, even the low target of 10 pairs has been met for only one year in just one of the three recovery areas — central Idaho in 1998 (see Fig. 4). Despite this shortfall, FWS still intends to proceed with the down-listing now, and change the recovery plan criteria later.

### The Politics

Quotes that accompanied the down-listing proposal by leading officials within the U.S. Department of Interior provide further evidence that the proposal has far less to do with science than politics:

*“Fish and Wildlife Director Jamie Clark also hopes the move [to reduce or remove ESA protections for wolves in the northern Rockies and elsewhere in the U.S.] will help convince Congress to reauthorize the Endangered Species Act of 1973. ‘It is languishing right now,’ she said. ‘This announcement today I think demonstrates that the Endangered Species Act works.’”*

— Casper Star Tribune, 6/30/98

While Predator Project very much shares the goal of achieving Endangered Species Act successes, including wolf recovery, these successes must be measured using sound science.

### Why Down-listing Matters

Down-listing the Northern Rocky Mountain wolf from “endangered” to “threatened” would allow FWS to write a “special rule” for naturally occurring wolves in Montana and Idaho. Specifically, we can expect decreased habitat protections for these wolves and a more liberal control policy, under which the government would be more likely to kill wolves that conflict with livestock instead of using the non-lethal methods that have been employed in the past. This would be a clear example of FWS “moving the goal posts in mid-game” rather than standing behind a recovery plan that went through public and scientific review. It may also set a dangerous precedent for the recovery of other species, including the grizzly bear and the lynx.

*(continued)*

\* Note: The down-listing would not change the “experimental, non-essential” designation of wolves in Yellowstone and central Idaho. It would only affect the management of naturally occurring populations in northwestern Montana, northern Idaho, and the northeastern U.S.

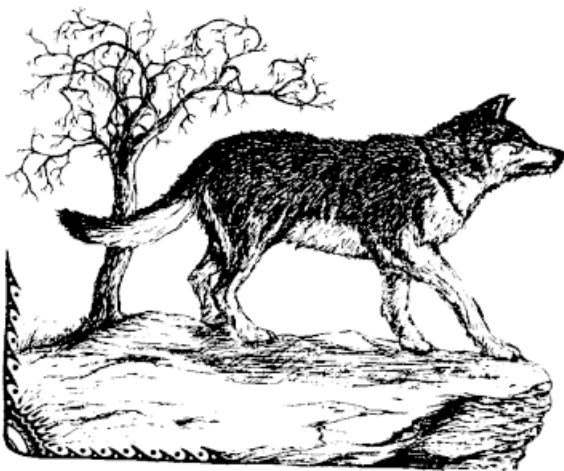
# The Down-listing Proposal

## THE GOOD

The U.S. Fish and Wildlife Service could not propose downlisting wolves without first having achieved some important gains toward their recovery. Reproducing wolf populations now occur in three areas of the northern Rockies — Northwest Montana, central Idaho, and Greater Yellowstone — and thus wolves have made important progress toward recovery.

## THE BAD

Yet, the FWS downlisting proposal also clearly shows a major obstacle to achieving real wolf recovery — “recovery” is suddenly being defined as narrowly as possible, both in terms of wolf numbers and wolf range. The recovery plan criteria are already at risk of becoming the desired target instead of a bare minimum. In this case, the recovery plan’s criteria have been replaced outright with a much lower arbitrary target for what constitutes a “threatened” vs. “endangered” wolf population. It is the latest and most powerful example of how the best available science — contained in the wolf recovery plan and elsewhere — has been abandoned in pursuit of short-term political goals, to the detriment of both the wolves and the people of the northern Rockies.



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## PREDATOR PROJECT’S ANSWER

Our answer is simple. Let’s not propose downlisting or de-listing wolves in the northern Rockies before the wolves are ready. Why jeopardize the terrific success to date? To prematurely lower wolf protections will only prolong the length of time before real wolf recovery is achieved, which is contrary to the best interests of both the wolves and the people of the northern Rockies. Wolves are making great progress toward recovery, and they deserve and require full legal protections until their recovery is secured, as defined by biologists and not by politicians.

Along with Predator Project, the following conservation groups active in the northern Rockies region are co-signators to a letter sent to Interior Secretary Bruce Babbitt opposing the proposed down-listing of the Northern Rocky Mountain wolf:

*American Wildlands*  
*Biodiversity Associates*  
*Clearwater Biodiversity Project*  
*Deerlodge Conservation Coalition*  
*Friends of the Bitterroot*  
*Friends of the Clearwater*  
*Friends of the West*  
*Greater Yellowstone Coalition*  
*Hells Canyon Preservation Council*  
*Idaho Chapter of Sierra Club*  
*Idaho Environmental Council*  
*Native Forest Network*  
*Northwest Ecosystem Alliance*  
*Sinapu*  
*The Lands Council*  
*The Wilderness Society*  
*Women’s Voices for the Earth*  
*Wyoming Chapter of Sierra Club*  
*Wyoming Outdoor Council*



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The authors gratefully acknowledge Ralph Maughan, whose website was an invaluable source of information for this report — <http://www.poky.srv.net/~jjmrm> — and U.S. Fish and Wildlife Service Northern Rocky Mountain Wolf Recovery Coordinator Ed Bangs, who graciously shared much of his data with us.

We would also like to thank the following reviewers for giving us valuable feedback on earlier drafts of this report: Jim Angell, Steve Forrest, Ed Lewis, Mollie Matteson, Jennifer Mitchell, Brian Peck, Tim Stevens, Jim Stoltz, Meredith Taylor, and Steve Thompson.

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*Predator Project, since 1991, has been dedicated to saving a place for America's predators.  
We work to conserve and restore ecosystem integrity by protecting predators and their habitats.*

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