

Wrong Wolf & Environmental Train Wreck

Editor's note: The following letter was shared by Jack Jones, who wrote: "This is an excellent letter by Dr. Richard Mitchell and all the facts on the larger wolf from Canada we have here now. Consider printing this in *Western Ag Reporter* as it is very factual." Dr. Mitchell's letter, as follows, was printed in the March 7, 2013, issue of the *Western Ag Reporter*, a weekly ag paper printed in Billings, MT. LG

March 3, 2013

Attn: Megan DeBates

Office of the Honorable Peter DeFazio

Re: The introduction of the wrong wolf into the Greater Yellowstone Ecosystem (GYE) has caused "an environmental train wreck"

Dear Ms. DeBates:

I wish to respond to the letter from Rep. Fazio's office urging the U.S. Fish & Wildlife Service (USFWS) to keep existing protections for gray wolves.

Since 1995, I have followed the fiasco of the introduction of tundra gray wolves (*Canis lupus occidentalis*) taken from the Yukon, Canada, and released into the GYE (mainly portions of Idaho, Montana, and Wyoming). The GYE, at that time, was already inhabited by a rare and unique species of wolf, the Rocky Mountain Timber Wolf (*Canis lupus irremotus*). This animal was first listed as "endangered" in 1967.

The Rocky Mountain Timber Wolf was much smaller in size (75-85 lbs.) than its Yukon and Alaskan cousins and ran in small packs of 4-6 animals. They were uniform gray (coyote gray) in color, and there were never any black-colored animals in the population. They lived in harmony with wild ungulate and tame livestock populations.

I do have a vast historical knowledge on the wolf issue. From 1979 to 1997, I worked as Staff Biologist for the Offices of Endangered Species (OES) and the Scientific Authority (OSA) USFWS. In 1993-95, I was on loan to the Museum of Natural History-Smithsonian Institution. I was in charge of implementing the Joint Sino-Smithsonian Ecological Surveys of Mammals in China. Since moving to Montana in 2001, I have kept records of all wolf sightings - both past and present.

I wish to point out that the release of gray wolves into Montana has been a "bane, not a boom" to local economies. Wildlife populations of large ungulates (elk and moose) have been severely impacted, and ranchers have suffered large losses of livestock. The ranching (\$1 billion) and hunting (\$170 million) businesses annually generate much more revenue than the reported \$5 million for "wolf watching."

The Paradise Valley (Yellowstone) herd of elk has dropped from over 20,000 animals in 1995 to less than 4,000 today - mostly caused by wolf predation. The elk cow/calf ratio has fallen from 33-40 calves per 100 cows to less than 6-10 calves per 100 cows. Livestock growers have lost large numbers of sheep and calves, and many guides and outfitters have gone out of business. The sales of big game licenses have dropped tremendously, leaving the Montana Department of Fish, Wildlife & Parks with a shortfall of \$12 million. At the current rate of wildlife loss due to wolf depredation, Montana will probably have to petition the USFWS to list their populations of elk and moose as "endangered."

The real tragedy in this "wolf debacle" is the loss (extinction) of the highly endangered and rare Rocky Mountain Timber Wolf that once inhabited the GYE. The very agency (USFWS) entrusted with the responsibility to protect and conserve "Endangered Species" caused the extinction of a rare and unique creature (Rocky Mountain Timber Wolf) by introducing a non-native critter (Tundra Wolf) into its existing territory (GYE). This so-called reintroduction of gray wolves in 1995 was in direct violation of the Endangered Species Act of 1973 itself.

In an email dated 13 February 2013, Keith Kubista, President of the Montana Sportsmen for Fish & Wildlife, pointed out that "the recovery of the wolf in the Northern Rockies, an area generally comprised of wolf populations in Montana, Idaho, and Wyoming, remains one of the fastest endangered species comeback on record. Today at least 1,774 wolves in 287 packs and about 109 breeding pairs live in the region."

One marvels at the rapid recovery of gray wolf populations in Montana, Idaho, and Wyoming. From a "non-essential experimental population" of only 66 animals released into the GYE in 1995, wolves have completely expanded their range in the above three states and have now spilled over into the neighboring states of Utah, Oregon, and Washington.

But there is a reason for this rapid recovery and expansion of wolf populations throughout the GYE and neighboring states. In the early 1970s, several federal agencies with the assistance of state wildlife departments released Arctic wolves (*Canis lupus arctos*) taken from McKinley National Park in Alaska into Yellowstone National Park and the surrounding area. In the late 1970s and early 1980s, mystery packs of wolves began appearing in the GYE. Ranchers, hunters, guides, and outfitters started seeing large (up to 160 lbs.) black wolves in the wilds of Montana.

In 1970, Glen Cole (Chief Wildlife Biologist, Yellowstone National Park, National Park Service) mentioned in a conversation with Jay Ward (a professional wildlife photographer): "You should have been here last week. We released eight wolves in Lamar Valley." (Note: Personal conversation JD King, 23 May 2012.)

In the 1970s, Jack Jones, a range biologist with the Bureau of Land Management, visited Glen at his office in Yellowstone. Jack was surprised to see pictures of wolves, wolf cages, and a helicopter on the walls of Glen's office (Personal Conversation Jack Jones, 24 Feb. 2013.)

In 1976, Dr. Bart O'Gara (Head of the Cooperative Wildlife Research Unit, USFWS at the University of Montana, Missoula) told Jack Atcheson, Jr., and me about his involvement with these early releases of wolves in Yellowstone and the surrounding area. In 1976, there were

reports of wolves occurring in 9 Mile, the next valley over from the University. In 1982, a rancher from the Deer Lodge area found five wolves (including two large black ones) in his calving pens. I have six records of wolf sightings from as early as 1971 to 1982. This was long before the release of 66 wolves in 1995 (non-essential experimental population) into the GYE.

The Department of the Interior (DOI) in their wolf recovery plan called for the re-establishment of gray wolves in the GYE. In their Environmental Impact Statement (EIS), the Interior failed to address the status of the already listed (as endangered) Rocky Mountain Timber Wolf that inhabited the GYE. Their EIS also failed to address the difference in speciation of the wolves (taken from the Yukon of Canada) that were to be released. Canadian Wildlife biologists warned the Interior of the looming environmental train-wreck by releasing tundra wolves into the Rocky Mountains.

In 1995, 66 tundra gray wolves (*Canis lupus occidentalis*) taken from the Yukon of Canada were released into the wilds of Idaho, Montana, and Wyoming (the GYE). At the time of the release, the Secretary of the Interior deemed these wolves to be a "non-essential experimental population," which means these animals were not essential to the continued existence of the species in the wild. Under the Endangered Species Act of 1973, all experimental populations are to be treated as a "Threatened Species." This blatant act of releasing non-native wolves into the wilds of Montana, Idaho, and Wyoming was also in violation of both the ESA (Sec.10 (j)) and the National Environmental Policy Act (NEPA) and their implementing regulations.

Under Section 10 (j) of the Act, the term "experimental population" means an introduced and/or designated population (including any offspring arising solely therefrom) that has been so designated in accordance with the procedures of this subpart but only when and at such times as the population is wholly separate geographically from non-experimental populations of the same species. Simply stated, it means that the Secretary of the Interior cannot approve the release of an experimental population (Yukon Tundra Wolf) into the existing range (GYE) of an already listed species (Rocky Mountain Timber Wolf).

Since both the early releases (1970s) of the arctic wolves (mystery packs) and the tundra wolves (1995) as a non-essential experimental population into the GYE were highly illegal, every last wolf including any offspring arising solely therefrom should be removed from the wilds of Montana, Idaho, and Wyoming and neighboring states (Utah, Oregon, and Washington) where these non-native, alien wolves have expanded their range.

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