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September 12, 2014

Secretary Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

Defenders of Wildlife has recently learned that Wildlife Services has been granted \$225,000 by the state of Idaho's Wolf Control Board to be used exclusively for the accelerated lethal control of wolves within that state. For the reasons that follow, we strongly urge you to personally intervene and terminate this new agreement with Idaho.

Idaho's archaic and discredited wolf management policies present a significant threat to the continued recovery of wolves in the Northern Rockies. It is shocking that Wildlife Services has agreed to participate in this reckless and unscientific assault on such an important apex predator. Idaho has set its sights on reducing its wolf population by 80%. We are seriously concerned that an agency under your control would willingly agree to act as a hired gun for Idaho in this ecological tragedy.

A primary driver behind this \$225,000 contract is not the need to expand lethal control of wolves in Idaho because of some spike in livestock depredation, since such a spike has not occurred. Rather, it is the desire of Idaho to dramatically reduce wolves in order to boost elk populations for sport hunting. Given the millions of dollars that the federal government spent to reestablish wolves in the Northern Rockies, Wildlife Services should not be allowed to help Idaho accelerate its killing of wolves, merely because they are relying upon their natural prey base, ungulates. Ironically, some of the elk populations in the state of Idaho are at or above management objectives and science has shown that declining populations in other areas are due to habitat conditions and other factors unrelated to wolves.

Wildlife Services' involvement in wolf removal to boost game populations is completely inappropriate and not at all scientifically grounded. The agency's role is supposed to be to mitigate human-wildlife conflict, not wildlife-wildlife conflict. It is equally clear that participation in an eradication program of this magnitude with its broad biological implications constitutes a major federal action significantly affecting the quality of the human environment. Accordingly, if Wildlife Services is allowed to continue on this path, they are obligated under the National Environmental Policy Act (NEPA) to first prepare an Environmental Impact Statement (EIS) on the Wolf Control Board's proposal, before entering into a new and dramatically accelerated wolf killing program with Idaho. Having failed thus far to prepare an EIS and comply with its obligations under NEPA,

Wildlife Service's continued participation in the Control Board's new eradication program is a clear violation of federal law.

There is a compelling scientific basis for our request that you terminate any further involvement of your department with the Idaho Wolf Control Board. The 2013 end-of-year estimate of the number of wolves in Idaho indicated that within the last five years, there has been a steep 60% decline in the number of breeding pairs of wolves in the state, leaving only an estimated 20 breeding pairs in Idaho, the lowest number in any of the Northern Rockies states. It is also only five pairs above the minimum number of breeding pairs required by the Fish and Wildlife Service to be sustained for three consecutive years under the 2009 final wolf delisting rule. This means that Idaho is already perilously close to going below a preliminary minimum threshold for breeding pairs in the state under the wolf delisting rule. Ultimately, this alarming downward trend should set in motion a reassessment of the status of gray wolves under the Endangered Species Act (ESA). The Wolf Control Board's new multi-year eradication program will dramatically accelerate this downward spiral in the number of breeding pairs in the state, almost guaranteeing that the relisting reassessment thresholds will be triggered. To avoid a biologically shameful case of history repeating itself, Wildlife Services should not be allowed to repeat the same mistake of excessive predator control that its predecessors were guilty of at the turn of the last century that led to the listing of gray wolves in the first place.

Additionally, as we have seen with the recent and unfortunate lethal control action involving the Huckleberry pack in Washington, where Wildlife Services agents mistakenly shot a breeding alpha female, it is nearly impossible for agents to distinguish between breeding animals and non-breeding animals, dramatically increasing the chance of disrupting the limited remaining breeding pairs and wolf pack structure and fidelity. As it is, Idaho has a nearly year-round hunting season on wolves and has very liberal lethal take permission for landowners, so federal involvement in aggressive wolf control in that state is completely unnecessary and without merit.

As the head of the federal department in which Wildlife Services operates, we urge you to direct Wildlife Services to immediately halt any further involvement with the Idaho Wolf Control Board's wolf killing program. Specifically, we request that you immediately direct Wildlife Services to return any funding that it has received from the Control Board and to impose the following restrictions on the agency's actions in Idaho:

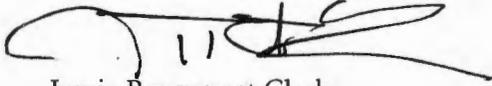
- It should take immediate action to update and ensure full compliance for its predator control actions in Idaho with its environmental analyses responsibilities under NEPA;
- It should not conduct any further lethal control actions against wolves for the purpose of managing ungulate populations; and
- It should not conduct any lethal control actions against wolves for livestock depredation unless non-lethal deterrents and tools have first been correctly implemented and have been proven to be ineffective.

In closing, I would appreciate having an opportunity to meet with you to discuss the above requested changes to Wildlife Services current policy that would prevent both Idaho and Wildlife

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Services from undermining decades of work and investment to restore the gray wolf to the Northern Rockies. I can be reached via email at jclark@defenders.org or via telephone at (202) 682-9400.

Very truly yours,



Jamie Rappaport Clark
President and Chief Executive Officer

cc: Mr. Mike Boots, Council on Environmental Quality
Mr. Kevin Shea, Animal and Plant Health Inspection Services
✓ Mr. William H. Clay, Wildlife Services