

ROCKY MOUNTAIN ELK FOUNDATION

5705 Grant Creek Rd Missoula, MT 59808 PO Box 8249 Missoula, MT 59807-8249 Phone: (406) 523-4500 Toll Free: (800) 225-5355 Email: rmef@rmef.org Website: www.elkfoundation.org

April 8, 2010

Mike Leahy Director, Rocky Mountain Region Defenders of Wildlife 303 W Mendenhall Suite 3 Bozeman, MT 59715

Kirk Robinson Executive Director Western Wildlife Conservancy 68 Main Street Suite 4 Salt Lake City, UT 84101

Dear Mr. Leahy & Mr. Robinson:

I am in receipt of your letter of March 30, 2010. I will address your points factually and straightforward.

We would be happy to meet with you to discuss conservation issues and the destruction of specific herds of elk in North America. We believe; however, that your organizations and others are contributing greatly to perhaps one of the worst wildlife management disasters since the destruction of bison herds in the 19th century. Until the lawsuit relative to re-listing the wolves is settled or until you withdraw your support for such, there really isn't much need to meet as we continue to be at opposite ends of this issue.

Once again, I will state that elk are not flourishing where wolves are present. Contrary to what you have suggested many times to claim otherwise is disingenuous and "cherry picking" data. Elk populations are being exploited at a high rate by predators, primarily wolves and somewhat by grizzly bears. However, since the introduction of the Canadian gray wolf into Yellowstone this exploitation has become worse for elk numbers in the same areas. Yet, you would have the public believe otherwise.

The numbers and facts do not lie and they are as follows:

- The Northern Yellowstone herd, trend count has dropped from nearly 19,000 elk in 1995 before the introduction of the Canadian gray wolf to just over 6,000 elk in 2008. At the same time wolf numbers in this same area are on a steady increase. Nowhere can I find where a 60% reduction of this herd was a goal of the wolf introduction. (Source: 2009 Wolf-Ungulate Study Montana Fish, Wildlife & Parks)
- The Moose population in Yellowstone National Park trend count shows a decrease to almost zero. (Source: 2009 Wolf-Ungulate Study Montana Fish, Wildlife & Parks)

- The Gallatin Canyon elk herd trend count between Bozeman and Big Sky has dropped from around 1,048 to 338 in 2008. (Source: Montana Fish, Wildlife & Parks)
- The Madison Firehole elk herd trend count has dropped from 700 to 108 in 2008. (Source: Montana Fish, Wildlife & Parks)
- The calf survival rate for those same elk herds mentioned above, where wolves (and bears) are present, is extremely low amounting to as little as 10% or less recruitment or survival rate. Nearly any wildlife professional will tell you this is an unacceptable recruitment or survival rate. Acceptable wildlife science tells us that a 25-40% survival rate is necessary for herd sustainability.

Further, a recent MSU study shows those elk that remain in the Northern Yellowstone herd are in below standard health as they are not feeding where and how they normally do and the females are not getting pregnant as they should, due to hormonal imbalances. How and why did this behavior change?

(See Montana State University Study by Professor Scott Creel in July 2009; funded by the National Science Foundation)

• Wolf numbers have far exceeded what sportsmen, ranchers, wildlife conservationists and the public at-large were told was a desirable goal. Specifically, 30 breeding pairs and 300 total wolves was the goal line when wolves were released in 1995. The minimum number of wolves is now over 1,700 according to Montana Fish, Wildlife & Parks and a number of animal rights groups such as yours believe those numbers should be 2,000 to 5,000.

This is the most disingenuous and deceiving issue relative to the entire Canadian gray wolf introduction and your groups and others perpetuate this every chance you get. We call it, "keep moving the goal line" politics. It is doubtful even you believe that 2,000-5,000 wolves in this area is sustainable. However, this allows you to keep saying "We haven't reached the goal line yet". It is sad wildlife management has to come such political posturing.

Wolf population goals established at the introduction in 1995 have been surpassed by some 300-500%. Yet groups like yours continue to move the goal line and yes, continue to cherry pick your facts to push an agenda.

- Studies show that each wolf kills up to 23 elk from November through April; that equates to up to 40,000 elk killed in six months. This number does not include those elk killed for food by wolves from May through October. While the number of elk killed per wolf from May through October is less than the number from November through April, it is still considerable; and that is just the elk killed for food. These numbers do not account for those elk simply killed by wolves (surplus killing) and yes, that does happen. Nowhere near the majority of these elk kills are simply the sick and the old.
- The habitat loss that you cite in your letter is yet another critical reason why wolves must be properly managed and managed now. As elk ranges shrink and are encroached upon, the elk have less chance for survival in areas where wolves are concentrated. Elk become trapped with less habitat available. Your organization talks about elk and wolves coexisting on the same terms as if it were the Old West again. It clearly is not and that is why man must manage wildlife as we have for over a century.

- Canadian gray wolves introduced in Yellowstone in 1995, simply are not endangered, it is quite the opposite. There are thousands of these wolves in North America. <u>Remember this re-</u> <u>introduction was classified as an experimental, non-essential re-introduction in the first place.</u> Your groups would have today's public believe that it is essential. These wolves are not endangered.
- You contradict yourself as you point out in your letter how there is a "legitimate federal role in ensuring states manage wildlife in the best interests of all Americans...", yet you circumvent and disagree with the federal opinion (USFWS) that the wolves are recovered. Further, you disagree that these wolves should not be listed as endangered and be managed by the states at this time. You can't have it both ways but you continue to try as long as you can get away with it. Do the federal authorities know what they are talking about or not?
- It is likely that your groups have reaped large donations from your campaign to keep wolves on the endangered species list. This is a common tactic for animal rights groups. It is apparent that if the entire wolf controversy went away it would represent a considerable revenue loss for you.

I don't see what your costs are relative to the wolf recovery program as it is likely you are getting federal funds to pay some or all of your legal fees under the Judgment Fund or EAJA funds. Could you confirm for us and the public at large if you are receiving such federal funds (taxpayer funds) to offset your legal fees? Frankly, I don't believe most of the public know about or understand the Judgment Fund or EAJA but they should. It sheds light on potential motives and tactics.

Idaho's elk numbers in units where wolves exist are far worse, with two units showing over 80% decline since wolves were introduced. If wildlife conservation was your true agenda you would not stand for such losses of any species. The facts are there – the numbers do not lie! Our elk herds cannot be sustained if wolf numbers continue to expand without proper management. What is happening now is not sound management, it is simply an assault. Re-listing wolves will worsen the issue dramatically.

Your letter states, "(Defenders) position is not one of opposition to sustainable hunting practices or to the important role that hunting plays in conservation. Responsible hunters are some of the most knowledgeable wildlife conservationists and we seek and find common ground with them regularly. It is unfortunate we have not been able to do so with RMEF recently but would like to work together in the future." You have never sought common ground with us once that I recall.

Let's consider those words a moment. We do not believe that your organizations subscribe to hunting as a viable conservation tool; in fact we believe you and other animal rights groups have an overriding agenda to decrease hunting until there is none. If you truly want to "work together" as your letter suggests, then you will step forward and show a sincere willingness to manage wildlife as they should be managed and not continue to promote a hidden agenda or continue to move the goal line. In fact, I invite you to come to my office and let's resolve this issue for the sake of those responsible hunters and those responsible non-hunters you reference. Enough of the legal maneuvering and posturing, let's resolve this now.

Plain and simple, wolves are predators, nothing more and nothing less. They need to be managed like other predators by the folks who manage the rest of our wildlife, the state wildlife agencies. This wolf amnesty program is poor wildlife management. The American sportsmen deserve better respect for all they have contributed to wildlife while groups like yours play games with the system.

Your letter states you have called for a scientific review of the wolf recovery program. Who are your scientists conducting the review? We have never heard of this scientific review? We can find no announcement of such nor can we confirm it. Why isn't the wildlife science of three of the leading western states (Wyoming, Montana and Idaho) and the USFWS credible? Is it that you are not getting the answers you are looking for? If so, that is not subscribing to science that is manipulating it to get a desired answer.

We live within the rules and game management policies of all the state agencies and when we have differences of opinion we go to them and work it out like adults. The United States has the best system of wildlife management in the world, yet you reject the system of states managing their wildlife. Among your tactics are filing lawsuits to stall and extend the process and then point fingers at others like RMEF and say we are polarizing the conflict! <u>Managing wildlife in court is a recipe for disaster</u>.

Again, you seem to contradict yourselves in your letter; on one hand you trumpet the success of the overall elk populations in these three states (which are managed by those states, I might add); and on the other hand you reject those same three states' ability to manage wolves. That is a curious contradiction. Either these states know what they are doing or they don't.

No one is promoting an annihilation of wolves, so let's stop pretending such exists. However, there is a great need for sensible balance and the current wolf numbers have long since crossed over the tipping point. If your organizations do not begin to subscribe to sound wildlife management soon, this disaster will lay squarely on your hands for history and the public to judge. Feel free to use the data enclosed in this letter when talking to media and legislatures in the future. As I said at the beginning, the numbers and the facts do not lie.

Respectfully submitted.

M Jam Allen

M. David Allen President & CEO Rocky Mountain Elk Foundation