

February 7, 2011

The Honorable Orrin Hatch
U.S. Senate
104 Hart Office Building
Washington, DC 20510

Re: S. 249, A Bill to amend the Endangered Species Act of 1973 to provide that Act shall not apply to any gray wolf (canis lupus)

Dear Senator Hatch:

The Public Lands Council (PLC) and undersigned livestock producer organizations strongly support your legislation, S. 249, to amend the Endangered Species Act of 1973 to provide that Act shall not apply to any gray wolf (*canis lupus*). Today, the wolf populations in the Northern Rocky Mountain (NRM) and the Western Great Lakes (WGL) Distinct Population Segments far exceed the ESA Recovery Plan goals for delisting. According to statute, this should place those populations under state management. By contrast, Mexican wolf populations in the Southwest region remain stubbornly below FWS goals, regardless of persistent and costly recovery efforts. Despite these failings, in the case of wolf introduction, public pressure and legal challenges seem to be promoting the “status quo” and preventing FWS from applying reasonable delisting criteria as Congress had intended. S. 249 would properly reset FWS’ priorities with respect to wolf management throughout the United States, ending unwarranted federal protection and eliminating failed attempts to create an unnaturally high wolf population in the Southwest and other parts of the United States.

Your amendment, as we see it, is proposed under exceptional circumstances and is by no means meant to hamper the ESA. The introduction of wolves is special for several reasons. First, unlike most species listed under the ESA, wolves pose a serious threat to wildlife, humans, and private property—namely, livestock—even in cases where wolf populations are sparse, as in the Southwest. The result: economic hardship and the possibility of a need to list yet another species, such as the moose. Secondly, the high profile nature of the wolf has raised a great deal of public support for its unlimited protection, indefinitely. Thus, instead of delisting a population when it reaches recovery goals, FWS yields to public pressure and simply sets new, higher population goals, effectively making recovery unattainable. For the same reasons, goals proven to be unachievable, as with Mexican wolf recovery, are not revised. Given the public’s and activist groups’ ability to sway FWS and the courts in this instance, we believe that a congressional remedy is in order.

Many wolf populations are quickly attaining the newly set recovery goals. The resulting pressures are both ecologically and economically damaging. Among the various problems, such as disease transfer, big game die-off, and ungulate herd bunching leading to resource damage, and even validated threats to human safety, livestock depredation and stress is among the most burdensome. For example, in the NRM region, where there exists more than five times the number of wolves called for in the reintroduction plan, ranchers are reporting huge losses. Confirmed livestock depredations by wolves for the NRM region in 2009 reached nearly 1,000. However, these numbers are likely a fraction of the actual total. Studies have shown, for example, that for every confirmed killing of a calf or sheep in the NRM, there are likely 7-8 unconfirmed kills.

As suspected wolf kills become increasingly frequent, agency officials are unable to promptly make on-site visits to confirm kills. Nonetheless, confirmed kills have been so many that reimbursement programs are being exhausted, even while many cases are classified as “non-conclusive”, resulting in no-payment for the rancher incurring the loss. Furthermore, no compensation is given for financial losses brought on by stress-induced weight-loss, abortions, and cows and ewes that don’t breed back. This is affecting ranch incomes and local economies tremendously.

When wolf depredations begin to threaten our ranchers’ livelihood, they also threaten our rural economies, an important source of food and fiber, and our nation’s open spaces, kept free of development thanks to ranching. We appreciate your efforts to legislatively correct this—and to help keep our nation’s landscapes vibrant, healthy, and productive.

Sincerely,

American Sheep Industry Association
National Cattlemen’s Beef Association
Public Lands Council

Arizona Cattle Feeders Association
Arizona Cattle Growers’ Association
Arizona Wool Producers Association
California Cattlemen’s Association
California Public Lands Council
California Wool Growers Association
Colorado Cattlemen’s Association
Colorado Wool Growers Association
Florida Cattlemen’s Association
Georgia Cattlemen’s Association
Idaho Cattle Association
Idaho Wool Growers Association
Independent Cattlemen’s Association of Texas
Kansas Livestock Association
Maryland Sheep Breeders Association
Michigan Cattlemen’s Association
Minnesota Farm Bureau Federation
Minnesota Lamb and Wool Producers Association
Minnesota State Cattlemen’s Association
Montana Association of State Grazing Districts
Montana Public Lands Council
Montana Stockgrowers Association
Nebraska Sheep & Goat Association
Nevada Cattlemen’s Association
North Carolina Sheep Producers Association Inc.
Oregon Cattlemen’s Association
Oregon Sheep Growers Association
Utah Cattlemen’s Association
Utah Wool Growers Association
Virginia Cattlemen’s Association
Washington Cattlemen’s Association
Wyoming Stock Growers Association

Cc: Senators John Barrasso (R-Wyo.); Mike Crapo (R-Idaho); Michael Enzi (R-Wyo.); John Kyl (R-Ariz.); Mike Lee (R-Utah); John McCain (R-Ariz.); Lisa Murkowski (R-Alaska); James Risch (R-Idaho)

February 7, 2011

The Honorable Denny Rehberg
U.S. House of Representatives
2448 Rayburn HOB
Washington, DC, 20515

Re: H.R. 509, A Bill to amend the Endangered Species Act of 1973 to provide that Act shall not apply to the gray wolf (canis lupus)

Dear Congressman Rehberg:

The Public Lands Council (PLC) and undersigned livestock producer organizations strongly support your legislation, H.R. 509, to amend the Endangered Species Act of 1973 to provide that Act shall not apply to the gray wolf (*canis lupus*). Today, the wolf populations in the Northern Rocky Mountain (NRM) and the Western Great Lakes (WGL) Distinct Population Segments far exceed the ESA Recovery Plan goals for delisting. According to statute, this should place those populations under state management. By contrast, Mexican wolf populations in the Southwest region remain stubbornly below FWS goals, regardless of persistent and costly recovery efforts. Despite these failings, in the case of wolf introduction, public pressure and legal challenges seem to be promoting the “status quo” and preventing FWS from applying reasonable delisting criteria as Congress had intended. H.R. 509 would properly reset FWS’ priorities with respect to wolf management throughout the United States, ending unwarranted federal protection and eliminating failed attempts to create an unnaturally high wolf population in the Southwest and other parts of the United States.

Your amendment, as we see it, is proposed under exceptional circumstances and is by no means meant to hamper the ESA. The introduction of wolves is special for several reasons. First, unlike most species listed under the ESA, wolves pose a serious threat to wildlife, humans, and private property—namely, livestock—even in cases where wolf populations are sparse, as in the Southwest. The result: economic hardship and the possibility of a need to list yet another species, such as the moose. Secondly, the high profile nature of the wolf has raised a great deal of public support for its unlimited protection, indefinitely. Thus, instead of delisting a population when it reaches recovery goals, FWS yields to public pressure and simply sets new, higher population goals, effectively making recovery unattainable. For the same reasons, goals proven to be unachievable, as with Mexican wolf recovery, are not revised. Given the public’s and activist groups’ ability to sway FWS and the courts in this instance, we believe that a congressional remedy is in order.

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Oregon Sheep Growers Association
Utah Cattlemen’s Association
Utah Wool Growers Association
Virginia Cattlemen’s Association
Washington Cattlemen’s Association
Wyoming Stock Growers Association

Cc: Representatives Rob Bishop (R-Utah); Dan Boren (D-Okla.); Leonard Boswell (D-Iowa); Paul Broun (R-Georgia); Dennis Cardoza (D-Calif.); Jason Chaffetz (R-Utah); Dean Heller (R-Nev.); John Kline (R-Minn.); Raul Labrador (R-Idaho); Cynthia Lummis (R-Wyo.); Jim Matheson (D-Utah); Mike Ross (D-Ark.); Mike Simpson (R-Idaho); Greg Walden (R-Oreg.); Don Young (R-Alaska).