

October 25, 2021

The Honorable Thomas J. Vilsack  
U.S. Department of Agriculture  
1400 Independence Ave. S.W.  
Washington, D.C. 20250

**RE: Request for five-mile setback for wolf hunting and trapping on U.S. Forest Service lands surrounding Yellowstone and Grand Teton National Parks for public safety and national park wolf protection.**

Dear Secretary Vilsack:

Yellowstone and Grand Teton National Parks are among the most iconic national parks in the world. This year they once again broke records for visitation. They form the core of the recovery zone for the wolf reintroduction. Currently, the boundaries between U.S. Forest Service land and both national parks represent an ecologically abrupt transition that goes from an area of full protection to an area of maximum exploitation. Tens of thousands of people use trails in these boundary areas to view wildlife, especially wolves. Hunters and trappers use the same trails to kill wolves who step outside the parks. With year-round recreation at record levels, the conflict between hunters and trappers on the one hand, and wildlife watchers on the other hand, is a high public safety risk and could lead to serious injury or death.

For instance, a Montana outfitter who guides people to see wolves uses the popular Slough Creek Trail into North Yellowstone. As the wolf watchers hike, they come into contact with armed wolf hunters using the same trail to line up along the boundary. The potential for conflict is of great concern for the outfitter. When people visit these National Parks and take a trail that goes over the border into a National Forest they will be in a zone where there could be random bullets flying around by hunters shooting at wolves. Hikers could also step into a wolf foothold trap or even a snare and not be able to get out. Any one of those possibilities could be fatal.

Furthermore, eliminating wolf hunting and trapping within five miles of the Parks will reduce human-grizzly bear conflict and mortality in important core grizzly habitat, thus furthering the shared goals of wildlife managers across jurisdictions. The current effort underway to end wolf hunting and trapping in wilderness areas—essential to protecting wilderness character—does not apply to National Forest land surrounding Yellowstone and Grand Teton National Parks where protections are essential for wolves and recreationalists.

We believe that a transition zone would be an appropriate way to address the protection of wolves and public safety. Record visitation this year speaks to the level of interest in the parks and their wildlife. While many species can be found within the park's 2.5 million acres, one species has drawn people from across the globe to view it—the wolf (*Canis lupus*).

Recent actions by the legislatures of both Montana and Idaho have allowed for extreme measures to kill sufficiently large numbers of wolves so as to potentially destabilize wolf populations in both states. Wyoming encourages liberal wolf killing. Nowhere is this reckless behavior more on display than on

Forest Service lands that border Yellowstone and Teton Parks. Now that quotas have been removed, fifty percent of the wolves killed by hunters so far this year in Montana have been killed in Wolf Management Units that directly border Yellowstone National Park. After three wolves in the most viewed wolf pack in the world were killed in the first week of hunting season, YNP Superintendent Cam Sholly criticized the wolf season: “Sholly went on record Monday advocating for greater protection of the Parks’ wolves, saying they were “extremely vulnerable” under the state’s newly enacted hunting regulations.” (Billings Gazette, Sept. 27, 2021)

In Idaho, wolves can be trapped and hunted year-round right up to the Yellowstone boundary line. The by-catch of wolf traps and snares is enormous and should be considered: 47% of animals caught by Idaho wolf trappers are non-target species.

In Montana, for six months a year, hunters now bait and night hunt with night scopes and artificial lights on private lands and use electronic calling devices on public lands to lure wolves over the boundary line. Beginning Nov. 27, trappers will set unlimited numbers of snares and traps along boundary lines until March 15. This is not a sport, let’s be clear; these are the actions of people that seek to pull innocent animals out of their protected confines to slaughter. It is disgraceful. It also creates bad public relations for the Forest Service, which appears to approve aggressive targeting of the protected wildlife within national parks’ borders.

While allowing hunting around these parks, Wyoming has already adopted a setback for trapping from park boundaries. A five-mile buffer zone closed to hunting and trapping around Yellowstone and Grand Teton National Parks would provide consistency and public safety. Wolves can hear calls five miles away depending on terrain. Understanding that the Dingell Act requires “only the smallest amount of lands to be removed for hunting,” we feel that a five-mile setback for wolf hunting and trapping is quite limited. This setback will stop the ability to lure wolves out of the parks so easily and ensure public safety. A safety corridor termed a setback would not defy the Dingell Act.

The groups below and Americans across the nation who own these public lands have come together to request launching the procedure for a swift management change creating a five-mile setback around Yellowstone and Grand Teton National Parks on all bordering Forest Service lands, in which the hunting and trapping of wolves would be banned.

These are important actions at the federal level which are vital to wolves’ survival. The Forest Service does indeed play a role in wildlife management. Previous successful USFS actions include bear containers and storage for campers, closing Forest Service lands to hunting and trapping due to recreational usage, altering or choosing not to log areas of critical wildlife habitat and closing roads that can impact fisheries and trails for critical wildlife breeding or winter needs.

The following four U.S. National Forests should move quickly to implement these actions: Custer-Gallatin, Caribou-Targhee, Bridger-Teton, and Shoshone National Forests. The U.S. National Forest lands surrounding Yellowstone and Grand Teton National Parks are some of the most beautiful in the nation. Coordinating with the National Park Service to ensure that wildlife is not needlessly slaughtered is important at this time, as the US Fish and Wildlife Service reviews the wolf’s endangered species status in Montana, Idaho, and Wyoming. A setback is a tool that could protect these important wolves until such time as the agency has made a final decision on their status.

The wolves of Yellowstone and Grand Teton are iconic. People around the world come to see them. Wolves contribute to the economies of communities and states that border the park-- approximately \$500 million in 2020 alone, according to the National Park Service. One recent analysis

estimated revenue from the wolf-watching industry at \$65.5 million annually. Allowing the killing of Yellowstone and Grand Teton Park wolves right on the border can seriously harm the economies of surrounding communities.

It is irresponsible to acquiesce to state officials, who in many cases have little or no experience in wildlife or forestry management, dictating wolf policy. The federal government has the power and public support to create common-sense measures which allow sportsmen to hunt while creating a safety zone that will protect wolves that have grown up within the protection of the park and are unwary of humans.

This five-mile setback is an important step in recognizing the importance of keystone species such as wolves and the cooperative relationship between the National Park Service and the U.S. Forest Service.

We ask that you move with haste, as the fate of wolves depends on your swift actions. Thank you for your consideration of this urgent request.

Respectfully,

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