### Wilson, John

#### Alta, WY

My name is John Meredith Wilson and I am a full-time resident of Alta, Wyoming and a life-time resident of the same. I own and operate a working sheep ranch that was settled by my great-grandfather in 1890. I have been against wolf reintroduction since it was first proposed during the 1990's. Now I discover that my sheep ranch will be included in the northwest corner of the state where wolves will be considered trophy-game animals, rather than predators. I appreciate that the line our Wyoming officials would have preferred to have followed are the Forest Service boundaries adjacent to the National Parks. I also appreciate the work you have done to try to make a manageable plan for our state and am grateful for our states officials work on this over the past several years. However, I am still against my property being lumped into the area where wolves are protected. I am having someone else's agenda forced upon me and upon my property that could have grave economic effects for me personally and upon my business. That is what I resent. Thank you for your consideration.

Respectfully submitted, John Meredith Wilson 140 Alta North Rd. Alta, WY 83414 wilsonranch@tetontel.com

## Miller, Jennifer

We are concerned that Wyoming's plan will try to bring the wolf population in the state down to a bare minimum and not let the wolf population grow. We want our WG&F to manage wolves as a valuable wildlife resource instead of public enemy #1. We want the WG&F to research & develop non-lethal methods to resolve conflicts between wolves and humans. Wolves in Grant Teton National Park that spend much of their time there should not be shot. Wolves that prey on our elk herds should not be shot. We should pattern our Wolf Management Plan after Montana's plan. Thank you for the opportunity to comment. Jennifer S. Miller

### **Oneil**, Jerry

**Big Horn, WY** 

**Basin**, WY

Since the Game & Fish has been financially burdened by this whole Wolf Reintroduction Plan, why can't they sell tags and create a waiting list to allow hunters to kill problem wolves? This would create income for the Game & Fish. Why pay government hunters to do the same job real hunters would pay good money to do?

## Fowlkes, Mary

I agree with present Wolf Managment Plan as written. Wolves will be managed by WG&F Dept. in that portion of the state where wolves are classified as Trophy game animals. In the rest of the state they will be classified as predatory animals. Thank you, Mary Fowlkes

## Johnson, Craig

## **Buffalo, WY**

I guess we've gotten to the point of chicken shit to where we can't possibly have anything in the state that's as deadly as we are... Not that there's much chance of that. Leave the damn wolves alone, there's little enough that left wild in Wyoming!

Craig Johnson

## Kalus, Tim

## Buffalo, WY

On page 19 the proposed draft states that the WGFD will not compensate livestock producers for livestock that are killed by wolves. This seems to contradict other management practices related to Big Game in the state. How is this different than a herd of elk destroying a haystack? Infact, a pack of wolves could cause more damage (economic) faster if preying on livestock. The WGFD should strongly consider removing that language so they have the flexibility to treat predation of livestock on a case by case basis.

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# Buffalo, WY

After all the only reason this potentially will be a problem is because the wolves were reintroduced without the support of Wyoming's Livestock Growers.

Thank you for the opportunity to comment.

#### lyle, lori

It is apparent that we should follow the scientist's opinion and keep at least fifteen pairs of wolves. Game and Fish has clearly stated that fifteen pairs is the minimum required to keep the population at a healthy, non-endangered number. Why does Wyoming want to cut the number?? It is obvious that cutting the number of breeding pairs of wolves down to seven will limit their chances of survival...I cannot believe that wolves are that much of a threat to Wyoming's citizens! I'm afraid that this is another example of the Bush administration's "use and abuse" policy. On a side note, my husband was on a camping trip this summer and was lucky enough to see a white wolf. It was MILES and MILES away from any dwelling, or RANCH, and the wolf was completely minding his own business.

Sincerely,

Lori A. Lyle

#### Jennings, Kit

yes accept the proposal

#### Morrison, Mary Lou

I find it ridiculous that you plan to kill wolves that get out of THE PARK AND WANDER INTO TETON NATIONAL PARK. DO YOU PLAN TO TEACH THEM HOW TO READ MAPS AND ROAD SIGNS? No ofcourse not, just shoot them, trap them or poison or whatever. Wyoming will not improve its reputation by wholesale killing of wolves from the governors plane!!!! Lethal methods should be used only as a last resort. Defenders of Wildlife have reimbursed ranchers losing stock. Is this not working well enough? DO WE WANT TO GO THROUGH THIS PROCESS AGAIN IN 10-15 YEARS???

You are giving highest priority to hunters by trying to kill wolves that might prey on game that some hunter wants to shoot. Well, frankly you are taking away the general publics desire to perhaps....just maybe viewing a wolf in its habitat. Try using more creative problem solving to resolve and prevent conflicts. I have watched this process since its inception and find that my state is so far behind Montana in really trying to allow wolves to function in the greater ecological sense. I have never thought that I would be disappointed in my wonderful Game and Fish Department.....but I am at this point. TOO DAMN MUCH POLITICS..NOT ENOUGH SCIENCE!!!!!!

[PLEASE GO BACK TO THE DRAWING BOARD AND COME UP WITH A PLAN THAT MANAGES WOLVES AT THEIR CURRENT POPULATION INSTEAD OF SOME ARBITRARY NUMBER THAT INVOLVES SHOOTING PACKS OF WOLVES.

FOR THOSE THAT PERSONALLY FEAR WOLVES. .. I BELIEVE AUDUBON MAGAZINE QUOTED THAT CHANCES OF BEING ATTACKED BY A WOLF ARE LESS THAN BEING HIT BY A METEORITE!!! SOUNDS LOGICAL TO ME......MLM

#### murphy, sabrey

#### casper, WY

yes, accept this plan and move forward!

#### Reece, Bryce

Casper, WY

Wolf Comments Wyoming Game and Fish Department 5400 Bishop Blvd.

Printed: Thursday, October 18, 2007

## Casper, WY

Casper, WY

**Buffalo**, WY

Chevenne, WY 82006

To Whom It May Concern:

Due to the fact that the Game and Fish Department has chosen to limit the amount of space that a person can comment here, we will be submitting our comments in written form through the USPS mail.

In the future, if the Department wishes to receive comments electronically, it should be amenable to allowing as much space as needed by the commenter.

Brvce Reece WY Wool Growers Association Casper, WY

## Slaght-Burris, Randette

You will have an inbred population and that leads to defective pups! The wolf is a very important part of the ecosystem. Take a good look at the portions of the river side in Yellowstone that were so deterioated and now have repaired themselves. This alone shows how valuable the wolf is to the ecosystem! If allowed to roam free they will only take a domestic animal if they are starving. I spent 20 years in Alaska so I know we desperately need the wolves back in the entire USA. Humans have done a very BAD job of managing this planet and it's resorces so far. Please show that we have learned something along the way. Release the woves out of Yellowstone with the proviso that if one trys to take a human life you can shoot it ! Otherwise they should remain protected until we have wolves all over the state.

## VonSeggern, Jody

# Casper, WY

Casper, WY

If wolves were not so vicious, everybody would want to have some running around! Just the other day I suggested to the NRDC that we put some wolves in, maybe Central Park. New York State used to have wolves didn't they?

Thanks for all your hard work! ~~peace, Jody VonSeggern

### Dorrence, Sam & Marilyn

## Centennial, WY

Cheyenne, WY

We believe that the gray wolf population should be maintained at a level at least 3 times that which is proposed. The current plan appears to suit the interests of the livestock industry, not that of conservation.

## Ashser-Davis, Monica

#### Let's stop playing politics with Mother Nature and seriously consider what the wildlife biologist's many studies have found to be the necessary role the wolf plays in the total ecosystem. The importance of the wolf is obvious in maintaining healthy game herds as-well-as a healthy range which are now being overgrazed by the over- abundance of these herds. Extremists and Special Interest groups should not be given the bully club to determine the future of such an important animal in the western biosystem. Way too much tax-payer's money is being dedicated to killing-off the beneficial wolf.

Wyoming needs to get honest about how it advertises it's resources to the world. If the wolf is used in attracting tourists to the state then we need to do away with this stupid program of killing as many wolves as possible. What a hypocritical and blood thursty image Wyoming is presenting to the world.

Stop the over-control and over-regulatory approach to everything including Mother Nature and stop getting your shorts in a bunch over the wolf. Point your guns at the abundant game that you can eat instead.

Open your eyes and View the wolf as your ally and teacher and not your enemy. Allow the wolf it's fair share as you certainly are taking yours. Yes, it is possible to live in harmony with all of God's creatures but it takes some clear, unselfish and creative thinking to do that. Live and let live and walk this path in

We would all be happier. peace.

#### Brown, Joshua

## Chevenne, WY

As a Wyoming resident I am offended by the lack of open, democratic process at public hearings to allow citizens of Wyoming to consider and make verbal comments about this plan. I also find it troubling that a public hearing was not held in Jackson to provide those resident most closely affected an opportunity to provide input.

A wildlife plan proposed by politicians is the wrong thing to do. We need a plan devised by naturalists who provide a plan devised by sound science rather than lobbiest group influence.

This population should not be managed exclusively at minimal levals, but at levels that will ensure health genetic diversity.

We sould follow the lead of Montana and Idaho and mange the grey wolf as a trophy game animal, not a predator. Managing these creatures as a "predator" only encourages the mindset that led these animals to reach the brink of extinction. It is hypocritical to advertise as a refuge for wolve to encourage tourism while trying to kill off as maney wolve as possible.

Wyoming needs to be more proactive in wolf management and emphasize non-leathal methods of control rather than the barbaric killing of thes animals. Many other big game populations are more than welcome to far excede minimum level, and the wolf should be one of these.

## Cardillo, Robert

## Chevenne, WY

There can be a better way. There are too many people who have a hatred of these great animals. Wolves are part of nature!!!

## Joy, Margot

Chevenne, WY

I am a Wyoming resident, and I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, those who reside near Jackson have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to, and then managed at, minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator"

status reflects the same mindset that resulted in the elimination of the wolf across the West. Please do not follow this outdated and susperstitious way of thinking about wolves.

Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming. Ranchers can fend for themselves. Who, in business, does not face some threat?

Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at alltime highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

It's an 18th-century mentality that has to stop.

Wyoming's proposed budget for wolf management -- more than \$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves. Get a different priority and start defending wildlife, please.

## Kean, Kelsey

Chevenne, WY

Cheyenne, WY

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not kill Grand Teton's wolves.

### Lemerich, R. Warren

Your plan intends to classify its wolves as "predatory animals," allowing them to be shot on sight, anywhere, anytime, in most of the state. This is wrong. This threatens to reverse the remarkable comeback of Yellowstone's wolves, jeopardizing the health of the entire ecosystem, as well as the economic well being of local communities.

## Magagna, Jim

Chevenne, WY The Wyoming Stock Growers Association (WSGA) continues to support the original Wyoming wolf

legislation and plan as adequate to support a viable wolf population and in the best interests of the 

### Page 5 of 74

citizens of the state. We fully support the ongoing litigation to compel delisting under that plan.

At the same time, WSGA recognizes that the USFWS is recalcitrant in their determination to force the state to accept a larger trophy game area and a new definition of a breeding pair. Therefore, WSGA reluctantly endorses the September 2007 Draft Plan subject to the following conditions:

1. This plan becomes null and void if the wolf is not fully delisted in Wyoming not later than February 29, 2008. Any implementation of this plan following that date would require promulgation of a new draft and further opportunity for public input.

2. WSGA's aceptance of this plan is subject to adoption of regulations for hunting of wolves, managemen of wolf predation and compensation for loss of privat property that are substantively unaltered from the draft regulations that have been presented to the Commission and to two legislative committees.

Regarding specific language in the plan, WSGA offers only one comment. Language at the top of page 20 implies that the Defenders of Wildlife have paid fair market value for all confirmed kills fo livestock by wolves. We have unrefutable evidence that this has not been the case. In addition, we believe that it is improper for the state plan to address compensation by specific private entities. WSGA requests that all references to the Defenders compensation program be removed from the document.

Finally, we note that the legislation adopted in 2007 (HB 213) provided for a range within which the Governor could direct the Commission to modify the boundary. It is our reading of HB 213 that the act does not become effective until the conditions set forth in W. S. 23-1-109 have been fully met. Therefore, the Governor, in our view, did not have the authority on September 4, 2007, to direct the adoption of the outermost boundary. While this boundary may well have been the only one acceptable to the USFWS, this premature directive effectively removes the opportunity for meaningful public comment on any other potential boundary within the confines established by HB 213.

We appreciate this opportunity to comment.

### Passehl, John

### Chevenne, WY

I think the State of Wyoming and the Wyoming Game and Fish Department need to move towards a Yellowstone National Park (YNP) model regarding the introduction of wolves and grizzly bears state-wide.

What we have now is a fairly balanced ecosystem defined within the confines of YNP (minus the elk feeding grounds which are absurdly artificial and disease prone). Game animals freely mix with natural predators - just as God planned. The remainder of the forested ecosystems in the State are glorified 'Jellystones'. They have been 'cleansed or sanitized' of the wolf and grizzly bear.

We must not be surprised that there are documented increases in Chronic Wasting Disease of Elk, Deer, and now Moose since the removal of these natural predators (1930's). Is it coincidental that CWD does not occur in YNP - yet proliferates elsewhere? Almost everytime we try to micromanage ecosystems we get it wrong. I watched a recent episode of National Geographic regarding the wolf in YNP. The biologists were perplexed that a wolf pack 'brought down' a bison in only 12 minutes. After careful research they determined that the bison had damaged bone marrow (red rather than white). This is the kind of natural predation that is needed state-wide - cull the weak - strengthen the elk and deer herds. Simply put Darwinism.

Regarding the classification of wolves as trophy or predator depending on where they reside is illogical. Either the animal is a predator or a trophy. As for myself if I can't eat it, it does not qualify as a 'trophy'. I don't know anyone in this State that eats dogs. Does this logic apply to the Grizzly and Bald Eagle - if not why not?

There is a great unspoken mystery as to where the breeding pairs outside YNP will reside. Do we locate them in the Snowy Range? Maybe not because it would offend Colorado since they are certain to migrate there. Do we locate them in the Laramie Range? Maybe not it could upset Cheyenne or Casper residents. Do we locate them in the Wind River Indian Reservation? Has anyone asked their permission? Equitable and uniform distribution means to me at least one breeding pair (maybe two for larger forests) in each National forest within the State. Has anyone checked with the State of Alaska on how they 'manage' wolves?

Regarding the issue of predation. If a wolf takes a domestic dog I see no issue there. Wolves generally reside in forests and if they come across an unleased dog its Darwinism at its very best. I have seen many dogs chasing deer. The wolf could be the answer to that problem. If I were to construct a new chicken farm right next to a wolf trophy area would it be reasonable for me to claim damages when my chickens got eaten by wolves? Are there better and safer areas to raise chickens - like maybe Georgia or Tennessee?

I have a great concern regarding the funding issue. Certainly selling trophy licenses will not even cover the purchase of vehicles. The Wyoming Game and Fish Department is strapped for cash now and to ask them or the tax payers of Wyoming to foot the bill for this National project is not right. Wyoming's mineral boom will bust eventually and just because the money may be there to throw at this effort now does not mean it will be there tomorrow. Funding this project will certainly be seen as 'optional' when the money runs out. Long term funding at the National level is required for long term success.

Thank you.

#### Spencer, Karen

#### Chevenne, WY

I live in Wyoming and have been privileged to see and hear wolves in the wild. Wyoming's amazing wildlife is one of the reasons I choose to live here, but Fish and Game's continued attacks on wild life is appalling! If it is not one species, it is another. I started a website a few minutes ago to discourage tourism to a state that behaves so poorly towards its wildlife. I will make sure that website is connected to every major tourism site with documentation about the wolves, wild horses, bears, etc. Enough is enough

 Wolves are native to Wyoming and play a crucial role in big game management, protecting the overall health of deer and elk populations by culling their weak and sick members, and in enhancing native biodiversity and healthy ecosystems.

 Wyoming's wolf management plan would undermine wolf recovery. The state plan to kill all but seven breeding pairs outside Yellowstone and Grand Teton National Parks is not sustainable for a long-term recovery of wolves in the state or region nor is this brutality justified. We need more wolves and statewide protection for them in Wyoming to secure their long term recovery.

 Wolves are not decimating Wyoming's elk herds; the elk in the state are 54.3% above population objectives this year. In fact, recent reports show populations of elk and other wildlife at near all-time high population levels. There is no good scientific reason to justify killing this many wolves.

 Wolves play an increasingly important role in the Northern Rocky Mountain region's economy. According to a recent study, the roughly 151,000 people who visit Yellowstone National Park each year to see wolves bring in \$35 million annually to Wyoming, Montana and Idaho, with the benefits of this spending multiplied several times within the local economies.

Sensible wolf management should be based on sound science -- not myths or misconceptions.

· The Wyoming Department Game & Fish should help Wyoming ranchers adopt non-lethal methods to reduce or avoid wolf-livestock conflicts, such as carcass removal, human supervision of livestock, the use of guard animals and improved lighting and fencing around livestock areas.

 It's important that the Wyoming Department of Game & Fish increase Wyomingites' understanding of these predators by educating the public about wolf ecology and providing trainings about how to coexist

with wolves.

 Wolves are responsible for less than 0.2% of all cattle losses in Wyoming in 2005 and less than 1% of all sheep losses in Wyoming. In 1987, Defenders initiated the first privately-funded, livestock compensation program to reimburse livestock owners for wolf-related losses. Now in its 20th year, we have paid for most verified livestock losses to wolves, reimbursing ranchers in the northern Rockies with more than \$800,000 so far.

#### **Bales**, Shirley

## Cody, WY

Get wolves delisted ASAP. Plan seems okay to meet USFWS demands. The rules and regulations will give us a better idea of how well they will be controlled. Hopefully private property will be efficiently protected as well as wildlife. Moose and Elk cow-calf ratios monitored closely.

## Clouse, Chip

## Cody, WY

Thank you for allowing me to comment. I support no wolves,,,but if there is no way to fufill my wishes then i support your plan

## Hay, Anne

Codv. WY

I am a Cody. Wyoming resident who is very disturbed by a wolf plan that will allow people to kill wolves until they are down to a minimum number in our state. Wolf numbers should be based on biological carrying capacity, not on special interest group's desires. A robust population of wolves is necessary to a healthy functioning ecosystem, as well as to promote genetic exchange between wolves. This plan was largely crafted by politicians rather than by wildlife biologists who have a better understanding of the subject. Wolves are still considered endangered, and the Endangered Species Act requires that the species management be determined by sound science. Our state's plan should be revised to reflect the importance of wolves and the Greater Yellowstone ecosystem. This current wolf plan undermines the enormous value that many Wyoming citizens and Americans nationwide place on Yellowstone and its wolves. Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as a predator status. This Predator status designation is shameful, reflecting the same mindset that resulted in the elimination of the wolf in the west. This approach to wolf management is also hypocritical. The tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. Many tourists are drawn to our state partially in the hopes of seeing a wolf. Our current attitude of reducing their numbers is very disturbing to many people throughout the country, including me. I am ashamed, that my state has developed such an irresponsible plan. Big game herds are above desired levels across the state, and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. So wolves do not need to be killed to protect game herds. In fact, studies have shown that wolves actually increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals. I realize that ranchers are very concerned about wolf - livestock conflicts, and I can sympathize with this concern. Wyoming plan should be revised to be more proactive in its approach in wolf - livestock conflicts and should be expanded to use non-lethal prevention techniques. Also the proposed budget in Wyoming for wolf management is more than \$2 million annually, and is an excessive and inappropriate use of our tax dollars. Wolves should be looked at as a positive animal in our state, one that helps to brings millions tourist dollars a year into the state. Let's protect our wolves, let's protect our western heritage, lets make Wyoming a state that everyone in the country will hold in high regard, let's revise this plan according to good science, not interest groups that still cling to the "big bad wolf" beliefs and can not see the good in anv wolf.

Sincerely, a concerned citizen of Wyoming, Anne Hay

### Housel, Secretary, John O.

### Cody, WY

From 91 Ranch, Inc. Meeteetse, Wyoming 82435

Printed: Thursday, October 18, 2007

C/O John O. Housel, Secretary 1100 Rumsey Avenue Cody, Wyoming 82414

To Wolf Comments Wyoming Game and Fish Department 5400 Bishop Blvd. Cheyenne, WY 82006Wyoming Game and Fish Department

By Electronic Transmission http://gf.state.wy.us/WGFD\_WebSurvey/SurveySignup.aspx

Dear Members of the Wyoming Game and Fish Commission and Grey Wolf Recovery Team:

91 Ranch, Inc., one of the oldest family owned ranches in northwest Wyoming, is located approximately 30 miles east of Yellowstone National Park. Since the time 91 Ranch was first settled in the 1890's it has been used as a cattle ranch. The owners of 91 Ranch, Inc. consider the expanding wolf population in northwest Wyoming to be a serious threat to the ongoing cattle calf operation of 91 Ranch. Therefore 91 Ranch is opposed to any wolf recovery zone being located beyond the wilderness boundaries which surround Yellowstone Park. This spring alone on 91 Ranch wolves have killed one horse and at least two calves on 91 Ranch lands, and the continual presence of wolves on 91 Ranch lands menaces and worries the 91 Ranch cow herd. We consider the action of the federal government foisting these unwanted wolf packs on the private landowners near Yellowstone Park to be an unconstitutional taking of our private property and our livelihood. We hope the State of Wyoming will not make the same or similar mistakes as the federal government.

In the mid 1990's when the process to reintroduce the gray wolf to Yellowstone Park was formally started, the recovery area was stated to be Yellowstone Park. And in keeping with this representation, the first wolf packs were introduced and closely monitored in the northern part of Yellowstone Park. Now, approximately ten years later, the gray wolf has expanded well beyond the area originally planned for the reintroduction, but the US Fish and Wildlife Service does not want allow the wolf to be closely controlled in Wyoming. As Ed Bangs said at the public meeting in Cody, Wyoming on April 19, 2007, "the ranchers who are in the wolf recovery area will get the short end of the stick." This is tantamount to an admission by an official of the federal government that its acceptable for the federal government to take property without just compensation as proscribed by our federal constitution.

Very soon after the wolf was introduced, the recovery area was called the Greater Yellowstone Recovery Area, anticipating the wolf would populate the wilderness areas surrounding Yellowstone Park. Wyoming officials were very clear during the pre-reintroduction process that State of Wyoming does not have the resources or funds to manage any wolves which may migrate to Wyoming lands outside the Yellowstone Park boundary. Now, however, the name of the recovery area has been changed to the Wyoming Recovery Area. -- Yet another attempt by the Fish and Wildlife Service to foist upon Wyoming and private landowners near Yellowstone Park the responsibility of dealing with and managing a savage species which neither Wyoming nor the affected landowners wanted in the first place. From 2004 to 2005 the population of the Gray Wolf in Wyoming increased by 33%. From 2005 to 2006 the population of the gray wolf in Wyoming increased by 31%. Even Ed Bangs himself has admitted the population of the gray wolf has increased at a rate well beyond the predictions of wolf biologists when the wolf was reintroduced. Nonetheless, the federal government continues to ignore the alarming statistics about the pervasive recovery of the gray wolf, and therefore will not allow Wyoming the ability to control the wolf outside Yellowstone Park. Wyoming Statute Section 23 -1 - 304 has clear procedures in place to monitor the wolf population in Wyoming and to take corrective action in the event the population should ever decline to minimal acceptable population numbers. Yet the Fish and Wildlife Service will not accept

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the Wyoming Plan. This is an outrage to those of us who live in northwest Wyoming and depend, directly and indirectly, on the livestock and outfitting industries. Wyoming should not deviate from the procedure set forth in Wyoming Statute Section 23 -1 - 304, except the recovery area should be no greater than the national forest boundary. - Any wolves outside the U.S. Forest boundaries should be considered undesirable predators. The 91 Ranch, therefore, is opposed to the boundaries suggested for Units 1 and 2 in Appendix 2, page 40 of the draft Wyoming wolf recovery plan. We emphasize again: The wolf recovery area in northwest Wyoming should be no greater than the boundaries of the national forests which surround Yellowstone National Park, with the federal wilderness boundaries being the preferred boundary.

As Wyoming was not in favor of housing an unwanted predator but now is federally mandated to do so, the federal government should also pay the State of Wyoming all extra costs of wolf management to be incurred by the state of Wyoming. Page 31 of the Draft Wyoming Wolf Management Plan projects that costs to the state of Wyoming for wolf management during the fiscal years 2008 - 09 are \$4,550,000. This is an outrage. These costs should be born in their entirety by the federal government. Additionally, the federal government should pay each landowner affected by the presence of the gray wolf an annual predator fee for the taking of land and property created by an unwanted carnivore which is inimical to a successful livestock operation.

Finally, page 31 of the Draft Plan indicates there may some positive economic impact to northwest Wyoming because of increased tourism which come to this area for the specific purpose of observing/viewing wolves. This is laughable. Wolves simply will not be seen along the highways in northwest Wyoming. Rather, the wolves will be guided by their instincts to prey upon livestock and wildlife which commonly are well away from any highway corridor.

Thank you for the opportunity to comment.

Sincerely,

Helen Hassan President, 91 Ranch, Inc., a Wyoming Corporation

#### Mees, Virginia

Cody, WY

This plan the Wyoming Game and Fish is proposing is just the next step to a total destruction of the wolf population in Wyoming. This is not what the people of Wyoming or the United States want. It totally disregards the opinions of the majority of the population. It is based on the opinions of the hunters and ranchers in this state, and they are not the only people living in Wyoming. It is disgraceful that the Game and Fish is catering to these special interest groups and not taking into consideration the opinions of others. It appears to be a total disregard of anyone who opposes this plan. Game and Fish should not just indiscriminately kill hundreds of wolves just to maintain a population that is popular with hunters. How on earth can a policy be based on the desires of the people who plan to kill the games animals preved upon by the wolves? Surely, there are other ways of addressing this situation. These wolves were re-introducec to Wyoming in order to balance the natural plan of nature, after they were completely destroyed many years ago. There have to be ways to manage the wolves without just deciding to kill most of them. This must be the last resort to resolve this problem. The wolves are obviously not aware that they are intruding upon the hunters' rights and are only trying to survive. With so many of our animals going toward extinction, please don't push the wolves in that direction. Listen to us, too, PLEASE !!

### Neal, Chuck

## Cody, WY

It is UNACCEPTABLE that Wyoming be allowed to kill wolves for impacts on big game without proving that the state is effectively dealing with other impacts such as loss or degradation of habitat, diseases

caused by feedgrounds, etc. It is not only acceptable but desirable for the health of ecosystems for ungulate populations to periodically decline. The concept of a steady-state high sustained yield of ungulates is an agrarian concept, NOT an ecological one.

It is UNACCEPTABLE that wolves be designated predators across most of the state when about 50 percent of Wyoming is public land belonging to all the people, not a handful of livestock operators or ecologically illerate and unskilled "sportsmen" who wish to keep game numbers artificially high. Wyoming can not be permitted to return to a 19th Century mentality that regards every native carnivore that represents a potential threat to livestock or big game as predators to be killed on sight. In summary the gray wolf must be recognized as the legitimate member of the state's wildlife community

that he is and be managed as trophy game STATEWIDE.

## Troxel, Jeff

## Cody, WY

Cody, WY

Wolves need to be managed on the current population. Writing the slaughter of wolves into a plan is wrong. Killing them should be a tool of last resort instead of the "go-to" method. Any wolves inside the borders of Yellowstone and Grand Teton Parks should be automatically protected under the state's plan.

## Vanderhoff, Dewey

Wyoming's approach to wolf management is all wrong - because WY G&F does not consider wolves to be wildlife; does not accord wolves their rightful and necessary status in the landscape; does not intend to "manage" wolves for positive ecological values; WY G&F is treating wolves in their entirety outside Yellowstone as a financial burden rather than a rightful wildlife species, and by focussing on money issues the Department advocates its science and game conservation imperatives (I'm sorry that WY G&F depends on license revenues and conditional funding from the legislature, but please don't hold wolves hostage for your money problems). A handful of viable wolf packs amounting to a (conveniently contrived) number of 100 wolves is no where near the numbers that should be allowed. (Try 500). All of my once great and considerable respect for Wyoming Game and Fish as antonomous and conscientious game managers has vanished because of wolves. You went political, and that's a shame.

### Walter. Jackie

## Codv. WY

I think that the number of breeding pairs outside of the park should be increased to at least 20 pairs. I think the idea that the number of game animal has decline due to wolf predation is out of line. From everything i've read in the local media indicates are much higher than what is manageble. Also in past history when the wolf population was much larger than it is today game herds were more than abundant.furthermore state tourism is growing year in and yearout largely as a result of people coming here to see our wildlife and especially wolves. many of them have never seen a wolf in there life. Thank you for the opportunity to express my views...Jackie Walter

## Walter, Jr., John G.

## Cody, WY

I believe the current population should should be maintained and that non lethal methods be used to resolve conflicts between wolves, livestock and wildlife. I think lethal methods should only be used as a last resort.

## white, Dan

## cody, WY

I agree w/ the management plan in all aspects. It's time to activily manage our wolves, the reintroduction has been a success! Dan White, Cody

## **Price, Charles**

## Daniel, WY

My wife and I have our family ranch in the Upper Green River valley, and pasture our cattle on the Forest Service's Upper Green River Allotment. We had the first confirmed wolf kill, a calf in 2000, in the Upper Green River allotment. Last year, 2006, we had 8 calves confirmed as wolf kills, and the number of missing cattle, primarily calves, has increased dramatacially. We have also noted a marked decrease in

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the moose population in the areas that wolves are present in. I have heard many explanations for this decrease in moose population; but it is easy to observe that where wolves are established there are few cow moose with calves, while in areas where wolves are absent most cow moose have calves at their side and quite few have twins. My specific comments are: (1) Wyoming needs to stand by it's current "Wolf Management Plan"!! The USFWS has played the game of bait-and-switch too long. (2) If the USFWS does not accept the current plan, the state of Wyoming needs to return to the court and vigoursly pursue its "wolf law suit" immediatly. (3) The state of Wyoming needs to retain the use of arial gunning as one tool in wolf management. The use of arial gunning for wolf management should not be comprmised in any way, because it will be essential to selective management of the wolf population. (4) Please realize that in that portion of Wyoming where the wolf is, correctly, designated as a predator, the people are forgoing the opportunity for compensation for wolf damage in order to maintain their independance and self sufficiency. (5) The predator status of the wolf over a large portion of Wyoming will be beneficial to the WGFD in two ways: First and most obvious is that there will be no compensation cost, second and maybe less obvious, there will be no management cost. Compensation and management costs in the current designated predator area could be very burdensome because the primary wolf prey will be domestic livestock. Sincerely, Charles C. Price

### Walker, Ronald P.

### Daniel, WY

I am a member of two environmental organizations in Wyoming and reside in northwestern part of the state. However, on the issue of wolf itroduction and management, I believe these organizations and others are on the wrong side of the issue. Their arguments are too idealistic and simplistic and as such are ultimately impractical for all animal owners in the region that will become and has become to some extent too populated by this species. Your management plan is an imperfect solution but one that should be executed.

## Neveaux, Patricia

## **Dubois**, WY

-- I am a Wyoming resident, and am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, those who reside near Jackson or Dubois have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson or Dubois.

-- Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

-- Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

-- Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

-- Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator" status reflects the same mindset that resulted in the elimination of the wolf across the West.

-- Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

-- Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

-- Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

-- Wyoming's proposed budget for wolf management -- more than \$2 million annually -- is excessive and an inappropriate use of taxpaver dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves.

## Schroeder, James

## **Dubois**, WY

The wolves are obviously fully recovered and now are a very real threat to our other big game. Please proceed with whatever it takes to get them delisted and let our game and fish dept start to regulate their numbers. The Wyoming Game and Fish Dept manage the rest of our abundant wildlife in an exemplary manner and they now need to do the same with the wolves before the elk and moose become the endangered ones.

### Chavez, Don

### Ethete, WY

Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to and then managed at minimum

levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

### Stinnette, Vonnie

Evansville, WY

Let's get it done!

## Houser, Lorraine

### Gillette, WY

EVERYONE WAS IN SUCH A SNIT ABOUT PUTTING THE GRAY WOLF BACK INTO WYOMING. I COULD HAVE GONE EITHER WAY ON THE PROJECT AT THE TIME. HOWEVER YOU PRESENTED IT VERY WELL. THE WOLF WAS A LOST ECOSYSTEM THAT HELPS PROMOTE A HEALTHIER AND MORE NATURAL ENVIRONMENT. THE COST OF INTRODUCING THE WOLF, GOD ONLY KNOWS HOW MUCH MONEY TO DO SO AND MAINTAIN. NOW YOU WANT TO CUT THE PACKS DOWN BY OVER HALF. WHAT PART OF THIS DOES NOT MAKE SENSE? WHAT IT LOOKS LIKE TO ME AND PROBABLY OTHERS IS THAT, YOU WANTED THAT PUPPY REALLY BAD BUT AFTER THE "PUPPY" IS GONE YOUR TIRED OF MESSING WITH HAVING TO FEED, WATER AND MAINTAIN THAT PUPPY. SO IT SOUNDS LIKE THE WOLF PROGRAM WILL BE MANAGED AS THE BUFFALO....OVER POPULATE...MASS KILLING. IF THAT IS THE DIRECTION YOU ARE HEADED...FOR GOD'S SAKE, NEUTER SOME OF THOSE WOLVES INSTEAD OF LETTING THEM HAVE PUPS AND THEN KILL THEM. YOU NEVER KNOW IT MIGHT BRING SOMETHING DIFFERENT TO THE TABLE WITH THE ECOSYSTEM, STABILITY AND MORE BALANCE WITH "MATURE" WOLVES ROAMING AROUND INSTEAD OF THEM ALL HAVING A LIFE SPAN OF 5 YEARS (OR LESS) AND NOT SETTLING DOWN AS OLDER WOLVES. I AM NOT THE SORT TO STAND ON A SOAP BOX, YES I AM A DEMOCRAT BUT WHEN SOMETHING IS NOT RINGING TRUE...I FEEL I NEED TO SAY SOMETHING. THIS WILL PROBABLY LAND ON DEAF EARS BUT AT LEAST I TRIED. WHO KNOWS, SOMETIMES JUST THAT "ONE" PERSON CAN MAKE A DIFFERENCE.

#### nichols, darrel

### gillette, WY

We should politically show the people of virginia and such, that we are not interested in their envolvment. Wyoming didn't ask for such a cituation in the first place. Now we are having to deal with the mess. What

would the good citizens of N.Y. think if Wyoming was allowed to be the key roll of putting wolves and grizzlies in Central Park? After all, are they sure that those speices weren't native. I invite any U.S. Senator or Congressman that is legally allowed to carry a fire arm, and can aquire a Wyoming elk tag to get a hold of me. I can't stand the thought of hunting in grizzly bear country, nor do i appreciate the wolves, but I'll be their field partner in Wyomings wildernesses.

## Keevert, Simone FiveHawks

I can't believe that you will kill so many of these wolves and then when people have open license to murder even more of them, that you will then place them back on the endangered list. Then, they will do what wolves do and breed until there are too many for people's taste and then you will murder them again and then they will be placed back on the endangered list. You people are amazing.... I commend you on most of the things you do, but this is wrong. First you protect them and then when your protection causes too many to be "convenient" for ranchers and such, you wipe 'em out again. Why don't you people just leave it to Mother Nature to decide? Afterall, we are the intruders in THEIR backyard, not the other way around. WOW! Unbelievable ...

## LEASOR, BILL

## **GREEN RIVER, WY**

**Green River, WY** 

Let's get this done so the people of Wyoming will have a say in how many wolves our state can handle. Our livestock, pets and our wildlife have been hit hard enough. Please approve this draft.

### Sherwood, Michele

#### Green River, WY

I do not oppose delisting but would support the wolf being managed as a trophy big game animal. I also would like to see the Game and Fish take a larger ecosystem approach to wildlife management, rather than a species by species approach. Bringing bison back as the keystone species of Wyoming's various ecosystems would also help species like the wolf succeed.

### Thoman, Mary

### **Green River, WY**

As a ranching family in Southwest Wyoming, we have personally experienced the predation that can be caused by the gray wolf. They have slaughtered innocent ewes and lambs as well as Great Pyrenees guard dogs in the Upper Green River area of the Bridger Teton Forest. The wollves are difficult to control due to the wide range of territory they can cover in one night.

We do feel it is time to delist this nonessential experimental class of animal, "gray wolf," and begin to have the Wyoming Game and Fish assume management. The Federal Government definitely should have to pay for any losses of livestock or pets due to the wolves.

We support the comments submitted by Wyoming Farm B ureau. We feel the Federal Government should have to live up to the promises made to the people of this State and country prior to introduction of the wolf. While it is important to get the wolf delisted, Wyoming is being asked to make many more concessions than originally promised by the US Fish and Wildlife Service.

Our family will be operating in an area of trophy game animal as well as predator. This may be confusing at times as the wolves chase animals across the wolf boundaries. It will be important for the Forest Service to be able to manage the Gros Ventre Wilderness area under valid existing rights, i.e. allowing the use of helicopters to manage predatory wolves in this area. The expanded trophy area may also pose problems with interminaled land patterns.

Relocation of wolves may be necessary before we enter an area to lamb or calve. After the damage is done and the newborn animals are killed is too late to begin management of predating wolves. We lost over 300 newborn lambs in 2006 northeast of Farson in less than a month due to wolves. Finding the bones of the dead in the stomaches or dens of wolves does not allow us to claim for damages. In addition, the stress created on the domestic cow and sheep herds as well as wildlife is just as critical as

the death losses.

Thank you for the opportunity to comment.

## Adams, Stephanie

jackson, WY

The proposed plan is a smack in the face to those who worked hard to reimplement wolves into the Greater Yellowstone Ecosystem, as well as to the tax payers who supported the plan. Those who feel that wolves should be reduced or emliminated are the same people who feel that the wolves are competing with them for elk. The theory that wolves are going to reduce the elk population to numbers that will make them to low to hunt is laughable. If there is a program in place to monitor "problem" wolves and a reimbusement program than ranchers should not be suffering. The wolve has taken on such a symbolic role that people have lost sight of what they truly are, which is an essential part of a healthy ecosystem. If the numbers need to be reduced then they certainly should be done so in a controlled scientific manner, not by allowing an open trophy hunting season. The packs are so depended on their interal relationships and heigherachy that the shooting of a single animal could destory a pack. This plan seems reactionary.

### **Bishop**, Andrew

Jackson, WY

I strongly disagree with the proposed status of predator for the gray wolf outside of the recovery zone. Wolves are an important regulatory part of Wyoming ecosystems and deserve to have trophy status through out the state. They play an active role in regulating game populations so that forage is not over grazed.

Do not bow to the pressure of hunters and ranchers in determining the status of gray wolves. Act upon what is best for Wyomings wildlife and habitats and designate gray wolves as trophy game across the entire state.

I want my children to grow up knowing that Wyoming did all it could to ensure the survival of gray wolves and the quality of Wyomings ecosystems.

## Cedarholm, Susan

### Jackson, WY

I certainly hope that if the WGFD allows the hunting of wolves they will NEVER allow aerial hunting under any circumstances. also I frimly do not believe in any one being able to shoot a wolf on sight if they wander out of the portected areas. If they are not causing any problems they should be allowed to live their life.

## Cook, Ty

## Jackson, WY

As a resident of Jackson I am firstly upset that no hearings have been scheduled in this part of the state for residents to provide input. Wtih that, I believe the current proposed plan will only end up putting the grey wolf back on the endangered species list in Wyoming after their numbers are culled. 15 breeding pairs is not a genetically viable number for any species. Wyoming prides itself in its natural resources and wild lands. Historicaly, wolves have ben part of this land, and as such serve a natural role in controlling ungulate populations. We cannot claim to have intact eco-systems when in fact they are missing a key species such these predators. It should also be pointed out that ungulate feeding grounds artificially impact our environment by concentrating herds in fixed locations which encourages disease and of course attracts predators.

In short, wolves are a draw for tourism in our state and the number of allowed breeding pairs should be increased to an sustainable level determined by science, not politics. The designation as trophy and regulating the number of hunting licenses for them would bring in revenue and guarantee a more respectable means of population control over an open-season policy.

#### Thank you,

Ty Cook Jackson

#### Daly, Matthew

#### Jackson, WY

I fear that there will be far too many wolves killed under the plan as written. I feel that misperceptions regarding the dangers wolves present have misguided public opinion. Unfortunately, it seems the Governor shares the misperception that wolves are dangers to humans and must be aggressively controlled. Living in the part of the state with thriving wolf populations, I am pleased by their recovery and would like to see wolf populations expand into their historic range,

## Daly, Meg

#### Jackson, WY

I am a Wyoming resident, and are offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. As a resident of Jackson, I have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines asother valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals. More importantly, wolves are essential to maintaining healthy ecosystems in Wyoming.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves

Wyoming's proposed budget for wolf management -- more than \$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves.

Too many of America's wild places have been damaged beyond repair. Wyoming could be a leader in the nation by taking proactive measures to protect and expand wilderness and support the healthy lives of all the creatures naturally occuring there.

Sincerely, Meg Daly

### DiPaola, Diana

#### Jackson, WY

The plan as it stands seems arbitrary and not based on the all the facts. Why 15 pairs? Meanwhile, elk herd numbers continue to rise, bringing forth ghastly management plans like the proposed open shooting on the refuge. Our ecosystem needs more predators and less "management." If ranchers and private

citizens have a problem with that, THEY are the ones who need to go. Like noxious weeds, they are the ones who don't belong.

## Firmin, Andrew

## Jackson, WY

I feel that classifying the wolves as preditory animals outside the Northwestern region of Wyoming is a poor choice as it will allow the public to shoot wolves on sight. The public is supposed to report these killings to the WY Game and Fish Department (WGFD) so they can keep accurate records of the number of wolves in the state, but I doubt that those killings will be reported. There is no mention of any penalty for failing to report these killings and most of the people who would want to shoot a wolf most likely don't want wolves in the state at all and therefore probably wouldn't be inclined to report the incident. If the wolf population needs to be controlled then control it with regulated hunting or other forms of population control.

The number of wolves allowed under this management plan is too low. Start small with the population reduction and monitor the effects on Elk and Cattle predation and then if necessary continue to reduce the wolf population. If you screw things up and you don't have even the 15 breeding pairs in the state how will you bring the numbers back up? It takes a lot longer to increase wolf numbers than it does to reduce wolf numbers. There is not a huge problem with wolves killing livestock when there are only 123 cattle killed in a year. I find it hard to believe that there were 23 confirmed livestock kills in a year and 44 wolves killed. That is twice as many wolves as cattle. How does that math work? Overall if you kept the wolf population where it is today is the amount of predation on livestock a huge problem? Are there not reimbursement programs in place to cover those costs? Do the ranchers really need to kill a wolf because it ate one cow? The vast majority of the animals killed by wolves is elk. We know that we have too many elk on the NER and need to control numbers. What better way then to have a natural predator putting pressure on the herd to help reduce numbers and strengthen the population.

I hope that you think about reclassifying the wolves strictly as trophy game and not a predetory animal. I also hope you increase the number of wolves allowed in the state.

Thank you for the opportunity to comment on this Wolf Management Plan.

Andrew Firmin

## Fustos, Gail

### Jackson, WY

Native predators are essential for a heathy natural environment. The economic bonus to Wyoming's economy by having a truely sustainable number of wolves is huge. In the forty seven-and-a-half years living in Wyoming, with twenty-one of those years in or near Jackson Wyoming. I have never seen a wolf, I want to expect to see wolves on a regular basis everywhere in the state where they may thrive.

## Herman, Judy

### Jackson, WY

Since there are no public hearings in Jackson on the wolf management plan, I assume you are not interested in our opinion, though it's unlikely any opposing comments would be considered anyway. Wyoming's wolf management plan must include input from wildlife biologist based on factual science as required by the Endangered Species Act & not just be based on political beliefs.

If this state can not understand the importance of wildness, it can at least understand the financial implications of the value of its wildlife. Wolves generate millions of dollars annually for Wyoming through tourism. The plan must be revised to take into account the biological carrying capacity to allow for genetic exchange between wolf populations necessary to create a healthy fucntioning ecosystem, not be based on special interests. Wyoming has the opportunity to do the right thing: To keep the Greater Yellowstone ecosystem intact. It would be a huge step backward to proceed with the new proposal.

It is unthinkable that Wyoming would implement a plan that is so obviously hypocritical, unethical & unintelligent. Mt & ID have come up with plans to manage wolves as trophy game rather than predators. Wyoming can do the same. Wolves should be managed according to the same guidelines as other

valued wildlife species. Elk numbers are at all time highs in most hunting areas. Wolves, elk & elkhunters can all coexist & benefit from each other if humans act intelligently. We can not afford to revert to the mindset that resulted in the elimination of wolves across the West. Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing

wolves. Tax dollars must be more wisely spent. Education is still one of the best policies. If people know the facts, they can make the right decision based on these facts not opinions.

Do the right thing, don't degrade the intelligence of Wyomingites.

### Hoglund, Peter

### Jackson, WY

State must manage wolves based on maintaining current population.

Must use non-lethat methods to prevent conflicts.

Do not kill Grand Teton wolves.

### Julien. Roberta

### Jackson, WY

We've become a country of murderer's, first Iraq now the wolves, Leave them alone.

### Maddex, Bonita

## Jackson, WY

I strongly oppose Wyoming's Wolf Management Plan. I do not agree with the killing of wolves to maintain big game populations, there are too many other factors affecting their levels. I oppose the killing of wolves as predators anywhere in the state. If they must be shot, it should only be as Trophy Animals. Wyoming needs to adopt a plan similar to Montana's whose plan is based on maintaining a viable long term population. Wolves are an integral part of our environment and an should be allowed to flourish. People come from all over the country to visit Wyoming to see wolves, please protect these magnificant animals, please change Wyoming's plan to at least maintain current populations and not the destruction of hundreds of these animals. Thanks for allowing comments. Bonnie Maddex

## Maddex, Paul

### Jackson, WY

I oppose the current wolf management plan.

Wolves should be managed at a carrying capacity, not minimal levels.

Shooting wolves to protect big game levels without first mitigating every other possible reason for big game animal level fluxuations is irresponsible and poor science. It does not address the many other factors that affect big game numbers.

Wolves should only be hunted as trophy animals, thereby controlling all out slaughter and creating economic benefits for Wyoming through licenses, fees, and business benefits ( both hunting and tourism) for communities.

Wolves are an intregal part of a healthy Wyoming ecosystem. In addition the plan as presented is economic and financial irresponsibility. Consider the millions of dollars spent to re-introduce them that will be wasted. Consider the millions of dollars spent in tourism to view them. Consider the millions of dollars in revenue by visiting big game trophy hunters. Consider the tourism backlash that will occur if the population levels are reduced and the PR nightmare that Wyoming businesses will suffer as a result of this poorly designed plan.

Please base a wolf management plan on sound science, maintaining or increasing current populations and respect for improving the Wyoming ecosytems and economy.

Sincerely, Paul Maddex

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#### Miller, John

#### Jackson, WY

I strongly urge acceptance of this plan so that the State of Wyoming can assume appropriate management of the gray wolf.

### Monson, Bart

## Jackson, WY

As a Jackson resident, I am outraged that this management plan was crafted without having a hearing in our community. We choose to live near wolves and one of the few wild places left in this country. Our views should be heard. Overwhelmingly, we want greater protection for the Gray Wold. 15 Breeding pairs is not enough, it leaves them on the brink of extinction. With increased pressure and decreased habitat, it simply is not a large enough population to be sustainable in the long term. In addition, Gray Wolves should be managed as trophy game animals, not as predators.

## Moran, Chris

### Jackson, WY

As a Wyoming resident it is obvious to me that the State plan is inadequate and based more on politics and outdated beliefs and fears of the wolf as a part of our wildlife than on sound biological science, not to mention the overwhelming economical boom to the state in tourist dollars. The wolf is a major part of the our dwindling wilderness. There is no scientific proof of wolves alone decimating herds of elk, bison deer etc.. On the contrary in northwest Wyoming we have more elk than the ecosystem can naturally support! Please revisit the State's wild west attitude of open season on this spectacular animal. An abundance of living wildlife, all species, is worth more to Wyoming (and the country) than dead wolves will ever be worth!!

Thank you Chris Moran PO Box 12593 Jackson, Wyoming 83002

## Patno, Mary

## Jackson, WY

The Draft Wy Gray Wolf Managment Plan creates great concern for the viability of such small number of breeding pairs. Will these numbers provide enough genetic diversity to sustain healthy wolf packs? It is also my concern that these wolves be managed by maintaining the current population and not based on arbitrary numbers. Reduction of wolf numbers should not be included in the plan especially the goal of shooting humdreds of wolves.

I would also encourage non-lethal methods to prevent wolf conflicts and resolve conflicts with more sensitive measures, using lethal methods as a last effort.

I am absolute in my opinion that NO Grand Teton wolves be killed. Sincerely, Mary Patno

## Quinlivan, Laura

## Jackson, WY

As a Wyoming resident, I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, those who reside near Jackson have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan

undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

#### roberts, van

## Jackson, WY

The wolf has an unfair reputation. There is no documentation of a single wolf attack on humans; and what do ranchers expect when they choose to raise their cattle in wolf territory? Why should wolves be punished for doing what they were meant to do? Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals. I certainly do not want 2 million dollars of taxpayer money to go towards murdering an animal that is on the Endangered Species list. Why should we strive for the bare minimum number possible for survival? Marking wolves as "predators" to be shot on sight will only revert the population back to unhealthily low numbers.

## Shea, Nancy

### Jackson, WY

As a Wyoming resident, I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, as a Jackson resident, I have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson. I can not drive to Pinedale. Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators, "Predator" status reflects the same mindset that resulted in the elimination of the wolf across the West.

Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

Wyoming's proposed budget for wolf management -- more than \$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive

measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves.

#### Stein, Melanie

#### Jackson, WY

To whom it may concern:

On behalf of the Sierra Club, we submit the following comments on the Revised Draft Wyoming Gray Wolf Management Plan, released September 10, 2007.

The area proposed for trophy game management in the draft plan, although larger than the area proposed in the 2003 Wyoming plan, is still not adequate to ensure that unregulated wolf-killing in Wyoming will not: a) cause the population to drop below U.S. Fish and Wildlife's inadequate recovery levels; or b) prevent the population from attaining legitimate demographic recovery standards.

Through dual status as predators and trophy game animals under the 2007 draft Wyoming plan, most of Wyoming provides no protection for wolves and even within the trophy game area the Commission may allow unlimited wolf killing in certain areas. For these reasons, the 2007 draft Wyoming plan fails to provide adequate regulatory protection for wolves.¬

The Wyoming law guiding the management plan aggressively promotes the killing of wolves. Designating wolves as predators gives individuals the right to kill wolves under nearly any circumstance and without a license. Outside of the trophy game area, it will be open season on wolves. Wyoming law not only lacks restrictions on the taking of wolves deemed predators, it actively encourages it.

We are also concerned about genetics/connectivity between sub-populations and the effects that aggressive control of wolf populations will have on connectivity. Wolf packs could become genetically isolated, threatening their long-term survival.

We would ask Wyoming Game and Fish to manage wolves based on science, not politics. Killing wolves though aerial gunning, or other means, and managing them at minimum levels will throw their population viability into jeopardy once more. In conclusion, we oppose the Wyoming wolf management plan, and the Wyoming law on which it is based. Neither will support wolf recovery.

Sincerely, Melanie Stein Associate Regional Representative Sierra Club PO Box 12047 Jackson, WY 83002

## Stines, Jeff

### Jackson, WY

I believe trophy status should be given statewide. Regulated take is a requisite in modern wildlife management. I have serious concerns regarding ulimited take and unlimited means of killing for wolves.

## Thompson, Tenley

### Jackson, WY

I am a wolf and bear guide in Yellowstone and Grand Teton national park, so for me this is an economical issue as much as it is for any cattle rancher. I belive most strongly that in wyoming we CAN have wolves and we can have cattle. Wolves have as much of a right to live in this state as we do, it is our responsibility to ensure they can do so in a sustainable manner, this plan simply calls for too few wolves to be sustainable in the state, a host of diffrent studys have shown we need more breeding pairs than the plan allows.

We have a responsibility in this state to care for our wildlife. Wyoming is mocked around the country for

our poor management, I hear it every day, our reputation will suffer as surely as the wolf populations unless more breeding pairs are allowed.

Having extensivley studied cattle management in college yet majoring in wildlife ecology I come from a unique perspective in that I really do understand all sides of this issue. As long as wyoming commits to a strong response to problem wolves there is no reason we should not be able to have the economic benifit of cattle and wolf ecotourism. I am in favor of a boundary for trophy game status but why not incude vital wolf habitat, expand the boundry and allow for more packs and you will satisfy the requirement wolves need to be sustainable and you will satisfy cattle rancher with a nedd to protect livestock.

Half measures will not work, this is a half neasure, we need wolves in this state to "bless wyoming and keep it wild" using some boudary that wolves will not respect because there is viable habitat beyond it is not fair to the wolves and will not work beacuse they will not respect the boundry. Placing a boundry at the edge of all good habitiat in NW wyoming make much more sense. Wolves dont belong in cattle country, I agree but expand the boundry in to forested habitat near the edge of the current proposed boundry and management will be chaper easier and allow for more wolves.

My income relies on wolves far more than a ranchers income relies on the lack of wolves. Without wolves I dont have a job. People pay my company thousands of dollars everyday just for a glimpse of a wolf, that money goes straight into wyoming. The monetary benifits from haing wolves in the state cannot be underestimated, wolves make a lot of money and keep a lot of people in buisness. All we ask of the state is to continue to allow us to improve that economy, enlarge the boundry, allow more breeding pairs. Come up with a REAL management plan not just the bare minnimum, its not fair to people like me and its not fair to wolves otherwise, lets put the wild back in wyoming wildlife, lets find a compromise that will work for everyone, lets get a real plan on the table.

Thank you.

### Trejo, Bonnie

Jackson, WY

To Whom It May Concern:

Decades of debate, research, and planning by the USFWS and others has resulted in one of the greatest ecological success stories of our times; wolves once again roam the Rocky Mountains. The majority of Americans support wolf recovery efforts and will be dismayed to say the least if the state of Wyoming mismanages and squanders the achievements of the past decade. I have many concerns regarding the environmental integrity of the Wyoming Wolf Plan; I regret that I only have time to express three:

1). Wolf packs within Grand Teton National Park (GTNP) regularly use adjacent lands outside of the park and its protective boundaries. How does the Wyoming Game and Fish Department plan to manage GTNP wolf packs when they are outside of the park; particularly, when wolves wander onto elk feedgrounds?

2). For centuries wolves were relentlessly prosecuted by man for reasons that have been greatly exaggerated. Perception is reality for many people. From a sociological standpoint, the state of Wyoming is promoting the vilification of wolves by classifying wolves outside of the DAU as predatory animals. By refusing to manage all wolves in a responsible manner, the state is instead proposing to perpetuate the type of behavior that led to the extinction of wolves in the first place. The states of Montana and Idaho have rejected this dual classification for good reason. How can the state of Wyoming insist the wolf management plan is adequate when it does not manage all wolves in the state? Why should anyone support the Wyoming Wolf Plan when it refuses to manage all wolves responsibly?

3). The livestock industry has a rich history in Wyoming; however, today it only represents around 2% of the gross state product. Why is the state of Wyoming giving preferential treatment to a group that in reality makes little economic contribution? Why is the state allowing livestock lobby groups to have disproportionate influence on the management of wolves? The state should rely on sound sciences not

hobby ranchers.

Thank you for your time and consideration,

Bonnie S. Trejo

#### Varilone, Michael

Jackson, WY

Wyomings wolf plan should be based on maintaining the current population of wolves within the state and not on an arbritrary goal of shooting hundreds of wolves. Also, non-lethal methods to resolve and prevent conflicts should be the first option and lethal methods should only be used as a last resort. The current population of wolves in GTNP should be maintained and no wolves within either of the parks boundries should be killed. Wolves are a vital part to Wyoming's ecosystems and the current populations should be maintained rather than killing them off to near endangered levels. Thank you.

Michael Varilone

#### viau, carol

jackson, WY

As a Wyoming resident I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings.

For those of us who reside near Jackson - we've have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

This plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. A large population size is needed to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator" status reflects the same mindset that resulted in the elimination of the wolf across the West in the first place!

Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, on the other hand, the state is trying to kill off as many wolves as possible. The plan MUST be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

Big-game herds are above ideal levels across the state; and hunters have many opportunities to kill elk, which are at all time highs in many hunting areas. Wolves don't need to be killed for big game herds to stay healthy. Wolves actually increase the vitality of big game herds, giving hunters more chances to hunt healthy animals.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, instead of just killing wolves!

Wyoming's proposed budget for wolf management -- over \$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Too much emphasis is being placed on collaring and killing wolves.

## Wilkinson, David

## Jackson, WY

As a citizen of the state of Wyoming, I oppose the "predator" status designation that results in a dual status for Wyoming's wolf population. Wyoming needs to set a higher ethical bar and develop a wolf plan that is consistent with both Montana and Idaho's, one that determines wolves exclusively as a Trophy game animal only. In addition, the Trophy game boundary is definately too small in size. There is no reason to exclude the Snake Rver Range (Palisades Wilderness Study Area). This area currently holds the elk herd farthest above the WG&F's own statistical analysis on herd size and heath. This is a remote and lightly used (human recreation) region of the BTNF and is very suitable for wolf habitat. Also, wolves should be able to use the excellent region of the Wyoming Range and the entire Wind Rver Range. The validity and benefits of continued livestock sheep grazing in these regions is negligible to our state and degrades the vegetative habitat and should be removed if considered an obsticle to wolf introduction in these two important mountainess regions of western wyoming. The GYE is incredably unique and unequal with regards to its diversified and abundance of wildlife, including both prey and predator species. Most Wyoming citizens, as well as the entire world, greatly values this one-of-a-kind resource region. Since wolves have been returned to the northern Rocky Mountain region, including western Wyoming, over all large game and the resource in general have benifited. Reduced numbers of large game, primarily elk have created a more robust vegetation from being over browsed. Elk herds have had the weak and diseased removed from the populations, by wolf predation resulting in a more robust and intelligent herds. It will always be difficult to "manage" wild and dynamic animals such as wolves in a limited ecosystem, however WG&F should recognize the importance, both economically and biologically a Wyoming with sustained and healthy wolf populations. Please take in to account the many citizens of Wyoming who do not represent the livestock and hunting outfitting coalitions. These two groups do not represent most Wyoming citizens and unfortunatly have a extreme view that to date has been given a diminat role regarding wolf management and has drivien this wolf plan and its "predator" status that lacks any scientific support. Finally, as a concerned citizen of the state of Wyoming, I would be in favor of some form of use tax that would directly go to management costs for the WG&F to help offset the additional needed costs to provide responsible management that will allow the continued existence of healthy wolf populations and other unique and vital predator species such as grizzly bears.

Sincerely,

David Wilkinson

### Gallagher, Nora

## Jackson Hole, WY

Wolves are being blamed for those few cases where elk herds have shrunk, even though these declines were caused by drought, shrinking habitat and human hunters -- not just wolves.

### Wadsworth, Don and Gwenn

### Jackson Hole, WY

Thank you for listening to our comments. We want to ensure a viable healthy wolf population. We do not believe in shooting wolves and want to maintain at least the current population. Killing should be the absolute last resort. We do not support the just released wolf management plan.

Thank you,

Don and Gwenn Wadsworth

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### Hayes, Bruce

The management plan is egregiously unscientific and biased. Wyoming Game & Fish is simply cutting one more foundation from under big game hunting by its hysterical approach to wolves. I know personally already of hunters who feel it is no longer worth hunting as they assume wolves have killed off most of the game. This tactic of hysteria by the state is counterproductive and self defeating. The state needs instead to maintain the current wolf population and emphasize that big game populations are generally doing very well. No wolves that spend time in Grand Teton Park should be killed. This would be a travesty and a huge black eye for the state of Wyoming. Aerial gunning of wolves should not be an option - this would likewise be a public relations disaster. In general, there should be emphasis on using non-lethal methods to decrease problems, evem though this may take more intelligence than other methods.

### boynton, beverly

#### kelly, WY

GTNP should have complete protection for wolves; there have been few problems in the park, and they are a source of much enjoyment and interest to large numbers of people, both those who live in the area and tourists. as a Kelly resident, i fully support wolves, who not infrequently are within 1/2 mile of my house (and closer for all i know).

no aerial hunting of wolves at all--this is completely unethical. furthermore, non-lethal methods to resolve and prevent conflicts should be used whenever possible, and lethal methods used only as a last resort. wolves should be managed to maintain packs much closer to the current population. this should be part of the reduction plan for the elk herds, which are great to be so large, but the habitat is just too small for the size elk herds currently.

## Kerasote, Ted

I strongly disagree with making wolves a predatory animal in areas of Wyoming outside the northwestern corner of the state. Neither Idaho or Montana felt compelled to create a dual listing. Wolves should be managed throughout the state as trophy game animals (except in the national parks), just as the rest of our game animals are managed. We don't make cougars or black bears predators nor should we do so with wolves. This is a benighted plan.

## Roberts, Tedde

## Kinnear, WY

I feel the Wyoming plan is more then generous to the wolf, but if we're to get delisting and move on with control lets do it. But no more concessions! I feel that there comes a point where it may be better not to have the wolf delisted than to keep being bullied by the feds and environmental groups.

Thank you for letting me air my opion.

Tedde Roberts PO Box 270 Kinnear, Wy. 82516 307-850-6070

## Blair, Andy

Lander, WY

I remain concerned that the trophy game area designated in this plan will not be enough to maintain a viable wolf population in the state of Wyoming. I acknowledge that a lot of hard work has gone into the development of this plan and that the Wyoming Game and Fish Commission has faced a large challenge in coming up with a plan that the electorate of Wyoming will be willing to accept.

While I have concerns over the ability of this plan to manage a viable wolf population, I believe that now is the time to move forward on this issue and to implement this plan.

I remain unconvinced that wolf predation is the leading cause of decreased recruitment of elk calves in and around the Greater Yellowstone Ecosystem as, I believe, the WYGF Commission has implied.

# Kelly, WY

**Nelly, w f** 

Jackxon, WY

Wolves and elk have spent at least the last 100,000 years together on this continent and have evolved together in a complex predator/prey relationship. I would suggest we look elsewhere for reasons for this decreased recruitment. When I have spoken to WYGF biologists, who I eminently respect, and asked them what they see as the greatest threat to wildlife and wildlife habitat they listed oil and gas development, the growth in rural subdivisions, and grazing. They alluded to the increased pressure that many species are experiencing due to the ongoing drought that we find ourselves in. Not one of them mentioned the wolf as a factor.

Thank you for your time, Andv Blair 344 Amoretti Lander, WY 82520

ablair344@bresnan.net

### Campbell, Bruce

#### Lander, WY

Hooray for the Wyoming Game and Fish Department! I am proud of the leadership in our state for standing firm on the issue of wolf manafement. The wolf management plan being submitted makes the best of a situation that the federal government put us in. The citizens and the wildlife in Wyomming are protected and provided for under this plan. Thank you.

## Cundy, Scott

## Lander, WY

Lander, WY

I 100% support a HEALTHY population of wolves in Wyoming.

#### Escudero, Michelle L.

As a Wyoming citizen I would like to be log my commets regardin the proposal:

1. The plan should have been crafted through the The Endangered Species Act requirement of species management to be determined by sound science NOT politics.

2. Jackson was NOT given a public hearing. This is against the premise that the plan requires/permits public comment.

3. Wolf numbers should be based on biological carrying capacity, not on special interests, or minimum viable numbers.

4. Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator" status reflects the same mindset that resulted in the elimination of the wolf across the West.

5. A proactive plan that allows for the coexisting of domestic animals and the wolf ratehr then the one solution with is killing of wolves should be pursued.

Michelle Escudero 801 S 3rd ST, LAnder, WY 82520

### Kail, Elizabeth

## Lander, WY

I favor the plan but would hope the Fed. Govt. would assume part of the management cost.

### Kenney, Joe

## Lander, WY

If you want more people to attend the public meetings perhaps you should consider advertising those meetings on the radio stations in the communities where the meetings are being held.

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## Laden, Juan

### Lander, WY

I find it difficult to believe that in a society where we can't control our own population, and this is by the way a root to most problems on this earth, including the wolf/human conflict, that we think that we can control the population of the wolves. !5 breeding pairs is much too little of a population. Rather than classify the wolf as a "trophy" game animal, make them a game animal and enforce the regulation that requires hunters not to waste the main portions of meat from the animal. If it isn't going to eat you or you eat it, then don't kill it.

## Lemm, Doug

## Lander, WY

The Wyoming Game and Fish Commission and Department (WGFC and WGFD) both need to realize that the decision to not record oral comments at the four meetings around the state concerning this revised pkan was a big mistake. It was even a bigger mistake to publicise that decision before those meetings. That's why the public attendant at those meetings was so low. You basically told the public you did not want to hear what they had to say .... Why to to all the time, trouble and expense to conduct such meetings without accepting public input? The WGFC and WGFD along with the State Legislature did the righ thing by insisting in predaror status for wolves in most of the state, but the trophy area being proposed is way to large. Yellowstone and Grand Teton National Parks, the Rockerfeller Parkway and the actual (wilderness) areas immediately adjacent to those parks are all that should be in the trophy area. No private property should be included in the trophy area for wolves. Such an unjustified and noncompensated takings is wrong. Each and every livestock or domestic pet loss logically attributable to wolves in the trophy area needs to be promptly paid for in full - without any debate over "confirmed" verses "probable" situations due to later discoveries. The requirement that wolf kills outside the trophy game area must be reported to the WGFD is ridiculous. If they are going to be classed as a predator then treat them as such. We don't have to report every covote or jackrabbit we kill - and we shouldn't have to report every wolf. As far as the requirement for 7 packs in Wyoming - outside Yellowstone - and 8 packs inside Yellowstone goes the WGFC and WGFD need to make sure that the state is not liable for making sure 8 packs actually do exist in Yellowstone. There may come a time when the prey base inside the Park will no longer support that many packs. And finally, you folks need to allow wider spacing on these comment forms - so you can more easily read what fols like me take the time to write.

## Morse, Richard

## Lander, WY

As a long-term resident of the greater Yellowstone area, and as an avid observer of wildlife management and mis-management over the years, I strongly object to the "management" proposed by the state. Instead, I believe Wyoming should manage wolves based on maintaining the current population, not based on an arbitrary goal, which would involve - and seemingly encourage - the indiscriminate shooting of wolves. I believe non-lethal methods should be used as the first resort to resolve and prevent conflicts between wolves and wildlife, and lethal methods should only be used as a last resort. Finally, as a citizen and park user particularly partial to the well-rounded wilderness gualities of Grand Teton National Park, I believe Wyoming should NOT kill Grand Teton's wolves, but rather encourage a new balance to be struck between the elk, moose, bison and other prey animals of the park with the wolves.

## Phillips, Judy A.

## Lander, WY

This is the best plan that could be established to meet the goals of all parties involved; environmentalists and stock growers, besides the average private citizen who lives out in subdivisions/ranchettes and has livestock as pets or hobby animals. I myself have horses and goats on a small acreage, and this plan would ensure my rights to protect my livestock from predators such as wolves. Thanks you for working so hard on this and working for the taxpayers of the State of Wyoming. God Bless!

## Pitt, Orley

## Lander, WY

I strongly oppose using only revenue from the sale of hunting and fishing licenses to support wolf research and management. Except those fees collected for hunting wolves. Somehow those people who wanted the wolfves shoyld have to pay for their research and maintance.

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#### Porter, Cynthia

### Lander, WY

I am a Wyoming resident, and I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, those who reside near Jackson have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

-- Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

-- Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

-- Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

-- Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator" status reflects the same mindset that resulted in the elimination of the wolf across the West.

-- Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

-- Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

-- Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

-- Wyoming's proposed budget for wolf management -- more than

\$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves.

## Sain, Laurie

## Lander, WY

I object to classifying the grey wolf as a predatory animal anywhere in the state. I have no objection to making the wolf a trophy animal, which should be sufficient to control wolf populations as it has been to control ungulate and other wild populations.

### Swanson, Jeff

## Lander, WY

Upon reading this plan it is apparant that the Wyoming Game and Fish see absolutely no benefit of having wolves in the Greater Yellowstone Ecosystem. This plan is extremely one sided and seems to put the ranchers who graze their subsidized cattle on our public lands interests well above the health of the ecosystem.

Beginning immediately, the plan focuses on the negative impacts that wolves may have on ranching and hunting in the area. These are then expanded upon throughout the entire plan. Not once does the plan mention positive benefits to the natural environment. It does briefly mention the possibility of a positive economic impact via tourism, but it is countered by the blurb that visitation to Grand Teton has dropped since the re-introduction.

Where is the mention of a healthy ecosystem needing top predators? Where is the wording about improved aspen forests due to wolves moving ungulate populations? Where is the wording about the primary prey being the weak and sick of the herds?

The Wyoming Game and Fish obviously does not care about sustainable populations, Wyoming feeds more elk than any other state, this is a problem.

I am also concerend about the educational programs that are to be implemented. It appears that this "education" is going to be aimed at telling ranchers when they can and cannot kill wolves. I would like to see some evidence that this "education" will be aimed at changing the backward view that many Wyomingites have concerning the environment.

Finally, I am extremely concerned with the plans concrete numbers. It is stated that the WGFD will attempt to keep only 7 breeding pairs outside of the park. It is listed that currently there are 15 breeding pairs outside of the park. This will lead to a mass killing of over half of the current population of wolves in the area as soon as the plan is approved. The WGFD then has the tenacity to urge the federal government to maintain or even increase the amount of funding for wolf management. The WGFD will only be managing 1/2 of the current population, therefore the funding should follow suit. If the WGFD wants funding, base the funding on breeding pairs, then a sustainable population may be achievable. I am strongly opposed to this current plan and demand that the WGFD rethink their stance on wolves in the Greater Yellowstone Ecosystem and guit caving in to rancher pressure.

## Vaughan, Darlene

## Lander, WY

The boundary of the trophy game area still takes in a huge amount of privately owned land. If we are forced by the federal government to have this huge amount of area, the WGF MUST be liberal in letting private property owners take back control of their land with kill permits. Land owners should be able to take wolves the instant they step onto private land! The state of Wyoming must continue to pursue our orginal lawsuit and also to demand money from congress to cover this wolf program.

## Vaughan, David

### Lander, WY

We have far exceeded the recovery goal of the Rocky Mountain Grey Wold. Currently the USFWS estimates more than 1300 wolves in Idaho, Montana and Wyoming. That is 1000 more than required. It is time to delist and the Wyoming Gray Wolf Management Plan will achieve the goal. If the peiople of the United States want wolves, then they should help foot the bill - not just the people of Idaho, Montana and

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Wyoming. Delist the wolf immediately and turn control over to the states that have wolves.

## Clarke, Pamela

## Laramie, WY

-- Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

-- Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

-- Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

-- Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator"

status reflects the same mindset that resulted in the elimination of the wolf across the West.

-- Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

-- Big-game herds are above desired levels across the state; and hunters have ample opportunities to kill elk, which are at all time highs in most hunting areas. Wolves do not need to be killed for big game herds to stay healthy. In fact, wolves increase the vitality of big game herds, thus giving hunters more opportunity to hunt healthy animals.

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-- Wyoming's proposed budget for wolf management -- more than

\$2 million annually -- is excessive and an inappropriate use of taxpaver dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves. Far too little effort is being made to co-habitate peacefully with wolves.

I went to the hearing in Cheyenne and it was very apparent that the number of people in favor of protecting wolves far outnumbered those in favor of killing wolves.

### Door, Anneka

### Laramie, WY

Wolves are an important part of the Wyoming ecosystem. Without predators, herds of animals such as elk and deer become unhealthy. What is the point of trying to recover wolves if you're just going to go back and kill them?

### Estes, Karen

## Laramie, WY

On balance, the Wyoming plan does not appear to offer sufficient protection for wolves. I would like it to put more emphasis on that priority.

## Jenkins, Mark

Wake up! Wolves are far more important to the Wyoming economy than cattle. You are once again caving to pressures from ranchers. Pay them their damn money for each cow verifiably killed by a wolf, but do not kill wolves. Not one. Simple question. Is the Wyoming Game and Fish in the business of protecting our game and fish? Or protecting radical interest groups (the ranchers). The elk herds are already so large they need thinning. Leave the wolves alone. Ranchers now represent less than 2% of the working population in Wyoming. After energy, tourism is our largest income generator. Wolves increase tourism and help maintain a healthy, functioning ecosystem. Get out of the 1950's and start recognizing what our real resources are in Wyoming. As a writer for National Geographic Magazine, I have traveled extensively around the world. We have something precious in Wyoming that bureaucrats and politicians, both often incapable of thinking for themselves, are in danger of destroying.

## Klingerr, David

## Laramie, WY

Laramie, WY

Wolves will help maintain the health of the elk herds by killing the weak and ill, unlike hunters who kill the biggest and strongest. Wyoming is looking for any excuse to kill wolves. The ranchers feel that the national forest land is there to provide cheep grazing and nothing else.

## Luhr, Suzanne

The plan as it's proposed at this point is too restrictive of wolf numbers in my opinion. Dropping numbers to 15 pairs would be unjustifiable. I can't tell you how many people I know that go to NW Wyoming mainly to see the wolves. They're extremely important for Wyoming's need for economic diversity, and as a predator. Livestock losses are negligible, and dealt with monetarily. I am strongly opposed to the plan as it sits. I hope it can be improved upon.

## Short, Duane

## Laramie, WY

Laramie. WY

Biodiversity Conservation Alliance has read and agrees with the Jackson Hole Conservation Alliance Comments. We wish to be officially recorded as being in agreement with Jackson Hole Conservation Alliance concerning the Draft Wyoming Wolf Management Plan.

## Stout, Mary Ann

I oppose removing the grey wolf from the endangerd species list and permitting hunting or other means of exterminating wolves. There is a great deal of wolf hysteria in Wyoming and little rationality. Killing the wolves will just feed the frenzy.

## Taylor, Paul

I support the scientific view that this proposal will seriously weaken the entire ecosystem of the region and the great recovery that wolves have already made. I firmly believe it is in our long term environmental and economic interests to keep Wyoming as wild as possible to ensure it's unique wilderness status in the world.

## Tidhar, David

I strongly oppose this draft wolf management plan. I find the plan highly politicized and lacking biological support and merit. The Wyoming wolf management plan calls for the regulation of wolves as a "trophy game animal" and as a "predatory animal" The plan allows for the "take" (or depredation) of up to 600 wolves should elk populations within Northwest Wyoming show declines attributal to wolves. The wolf is an ecosystem driver and is indeed responsible for stabilizing elk populations within the Greater Yellowstone Ecosystem. This is a nice little legal caveat to allow WGFD to respond to livestock and hunting group pressures to NOT allow wolves to expand their range beyond National Park boundaries. Indeed, the draft management plan calls for only 7 pairs of wolves to be sustained beyond NPS jurisdictions. Biologically and socially wolves do not interact on a "pair" basis but through the complex interactions of a "pack". The management plan will allow for the complete depredation of packs.

Laramie, WY

## Laramie, WY

Laramie, WY

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Moreover, the public will be allowed to "take" wolves with WGFD responding in a monitoring capacity.

What are the biological ramifications an genetic consequences of such actions? Where in the draft management plan does it address the facts that wolves may a) increase performance in elk populations and produce higher size-classed, trophy worthy elk as a result of decreased intraspecific competetion; and b) the indirect benefits of elk population deduction and/or decreased elk use of sites on vegetation communities - including grasslands valuable for livestock?

What have US citizens spent millions of dollars in tax revenue and thousands of hours of effort on in reestablishing wolves to the Yellowstone Ecosystem when we will then be faced with state management strategies such as the one currently proposed in Wyoming, after the reintroduction has been deemed a success? The wolves of Greater Yellowstone are the conservation success of ALL Americans, not simply the residents of Wyoming, Montana and Idaho. The objectives of any wolf management plan should rest with the whole of America and not simply those expressed by a state legislature.

The biological and economic benefits of wolves within Greater Yellowstone are undisputed. Thousands of tourists and millions of dollars are spent on wolf watching and howling trips in the US each year, yet the wolf management plan characterises the only economic force of wolves as one of loss - for the livestock industry. Where is the economic cost/benefit analysis of wolves as tourist attractions vs. impacts (despite compensation to livestock owners) to the livestock and huntiing industries? Why does the draft management plan does not address these issues?

Thank you,

David Tidhar

#### Wischmann, Lesley

Laramie, WY

As a Wyoming resident, I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings. Moreover, those who reside near Jackson have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

Wyoming's plan has largely been crafted by politicians rather than wildlife biologists. The Endangered Species Act requires species management to be determined by sound science.

Wyoming's plan should be revised to reflect the national importance of wolves and the Greater Yellowstone ecosystem, one of the last remaining intact ecosystems in the lower 48 states. Wolves should be managed according to the same guidelines as other valued wildlife species. Wyoming's current wolf plan undermines the enormous value that Wyoming citizens and Americans nationwide place on Yellowstone and its wolves.

Wolves should not be killed to and then managed at minimum levels. Wolf numbers should be based on biological carrying capacity, not on special interests. Further, a robust population size is necessary to contribute to a healthy functioning ecosystem, and to promote opportunities for genetic exchange between wolf populations.

Wyoming should follow Idaho and Montana and manage wolves statewide as trophy game animals, not as predators. "Predator" status reflects the same historic mindset that resulted in the shameful elimination of the wolf across the West back in the 19th century.

Wyoming's approach to wolf management is hypocritical. On the one hand, the tourism bureau is advertising Wyoming as a refuge for wolves, while on the other hand, the state is trying to kill off as many

wolves as possible. The plan must be revised to reflect the fact that wolves generate millions of dollars annually for Wyoming.

Wyoming should revise its plan to be more proactive in its approach in wolf -livestock conflicts and to expand the use of non-lethal prevention techniques, rather than simply killing wolves.

Wyoming's proposed budget for wolf management -- more than \$2 million annually -- is excessive and an inappropriate use of taxpayer dollars. It will either be unattainable, in which case education and proactive measures will be cut, or unsustainable. Far too much emphasis is being placed on collaring and killing wolves.

Sincerely,

Lesley Wischmann

## Elliott, Mary

Meeteetse, WY

I really do not understand why ranchers are so incredibly upset about the behavior of the wolves since the wolves are only doing what is natural. I understand the ranchers are reimbursed for any cattle lost. In discussing this subject with local ranchers the replies on the shortage of moose, elk, deer, beaver, fox, coyote, antelope is 'because of the wolves'. If that is the case why are we so eager to issue hunting licenses for these animals? On the Wood River alone there are very few moose left this year yet 4 mature bull moose were seen headed out of town on trucks feet in the air last hunting season. What is wrong with allowing the game to rebuild their groups (without interfering with the wolves) for a few years and limiting the hunting licenses for the area? Is the game and fish so greedy that they are happy to see these animals 'shot out'? I am told by ranchers that it's the Game and Fish Department who are to blame and it's all about money and corruption, cash in hand etc. What am I to believe? I moved here to watch the animals like the hundreds of thousands who visit Yellowstone every year. The 'watchers' spend their money here, stay in hotels, eat in local restaurants, shop at Walmart, buy their gasoline, shop in all the stores, the local 'watchers' pay taxes and spend pretty well everything locally. So, why do the hunters have more rights than the rest of us? Why does it matter if the wolves do what wolves do? Why not just limit hunting, reimburse the ranchers and let it go at that? I pay your wages too through taxes, is my money less good than others? There seems to be a desparate need for people to go kill things and feel pretty good about themselves for shooting trophy animals. It would be more fair if the animals were also armed and could take trophy heads. Oh what an outcry that would bring! Why don't you people prove how decent you are and can be. Here in Meeteetse the word "management" in relation to wild animals is mass slaughter. Get over yourselves and take up chess.

## Graham, Kelly

### Meeteetse, WY

After reviewing the Draft Wyoming Gray Wolf Management Plan, I have a couple of concerns. My first concern is with the plan for compensation for livestock losses in the Trophy area, but no compensation in the Predator area. Up to the present, the U.S. Fish and Wildlife Services has demonstrated limited success with control measures on wolves that are known to be killing livestock, even though they are able to use aerial tracking and shooting of wolves. It will be impossible for ranches in the Predator area to staff and fund similar control measures. It is also ridiculous to implement a program that will pay for livestock losses on one side of an arbitrary line that seems to be right in the center of known wolf territory, but not on the other side. Most of the catte ranches are operating on very thin margins and can't afford to go uncompensated for wolf depredation nor can they afford the time and money to run a full scale wolf control program. It seems that the Wyoming Game & Fish department expects ranches to not only feed the wildlife (provide habitat for hundreds of elk, deer, and entelope), but they also expect the ranches to feed and manage wolves. My other concern is with the funding for the entire plan. The Wyoming Game & Fish is constantly suffering from budget shortfalls. They raise hunting license fees almost every year, and yet still don't have enough money. I don't see how it will be possible to fund the wolf program.

#### Herman, Linda

#### Meeteetse, WY

My main concern with this plan is that we as ranchers in the predator status area will have no form of compensation for our livestock losses. Larsen Ranch Company has been hit hard by wolf kills of our livestock the last four years. Our cattle have been harassed and weight loss has been significant. In addition the cattle have become more difficult to handle. All of this is costing us thousands of dollars. These cattle are our only source of income. Furthermore, in all these years we have rarely seen wolves or been close enough to have destroyed them. I feel the arbitrary line up the Wood River has left us in an extremely bad situation with no compensation for wolf kills and no feasible or affordable way to stop the predation.

## Kruger, Randy

### Meeteetse, WY

As I understand the Wyoming Game & Fish plan for managing wolves after delisting, the trophy game wolf area lies north and west of Wood River. The predator wolf area lies south of Wood River. I understand ranches that suffer depredation in the trophy hunt area will be compensated and also helped with wolf control. Apparently, the predator wolf area ranches are expected to allow the general public to control their wolves and will receive no compensation for wolf damage to livestock.

The Larsen Ranch Company and our immediate neighbors; the Antler's Ranch, The LU Ranch, PAR Ranch, Baird Cattle Company, and others primarily lie south of Wood River. Historically two herds of 300+/-elk, 600+/- total, are wintered and spend close to 8 months per year on these particular ranches. Also numerous deer and antelope herds annually migrate through these ranches' range, much of which is deeded land.

Apparently the Larsen Ranch Company and our neighbors in the predator wolf area are expected to support the game herds to feed wolf packs. The Wyomong Game and Fish has to be willing to compensate us for maintaining the game herds for the benefit of the wolf program or else compensate us for livestock losses and help with the control of wolves.

I can honestly state the wolf program has cost the Larsen Ranch Company 4 unconfirmed dead calves in 2004, 1 uncomfirmed dead calf and 1 confirmed (by Wildlife Services) in 2005, 4 unconfirmed dead calves and 2 confirmed (by Wildlife Services) in 2006, 2 unconfirmed dead calves and 3 confirmed (by Wildlife Services) in 2007 for a total of 11 unconfirmed dead calves and 6 confirmed dead calves. Also, 1 cow was crippled in 2005 and 1 bull rendered unsound for breeding in 2007. There have been numerous stress situation on our cow herds when attacked or harassed by wolves. Wolves have run them though fences on many occasions. This occurred often during the winter of 2006/2007 on the W - ranch we lease on Wood River. We have attended numerous meetings, written letters and had our property rights violated by USF&W and have received no consideration from the United States Government.

Upon interviewing our neighbors, the LU Ranch has had 1 cow and 2 calves confirmed killed by wolves by Wildlife Services. The PAR Ranch has had 7 calves and 2 cows confirmed by Wildlife Services. The Baird Cattle Company has had 2 yearlings and 2 calves confirmed by Wildlife Services.

Keep in mind the last crop off the ranch is real estate. Take a look at what was formerly big game habitat around Bozeman, MT that is now covered over with houses and you will see what the Meeteetse foothills will look like when you put the old-time ranches out of the livestock business.

## Placzkowski, Pauline

### Meeteetse, WY

I am writing to voice my opposition to the delisitng of the wolf, it is much to soon to do this, also to the hunting of hundreds of wolves in Wyoming, including the Teton Wolves. I am constantly amazed by the comments I hear that the wolves are killing Elk, when thousands are hunted annually, by hunters, many for their antlers and heads to mount on walls. Many thousands of visitors from the US and all over the world come to Wyoming in the hope of observing a wolf, the millions of dollars spent by these visitors, in

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the local communities should be taken into consideration. This decision should not be made to appease the hunters and ranchers of Wyoming, this decision effects the whole nation. I do not however, object to the removal of a wolf if it is found killing livestock. I hope that the management of the wolves will be based on maintaining the current population, and that non lethal methods will be used to resolve and prevent conflicts.

## Renner, Paddy

Meeteetse, WY

The draft Wyoming Gray Wolf Management Plan states the Department will become responsible for compensation for livestock killed by wolves where wolves are classified as trophy game animals. The plan also states the Department will not be liable for compensation of livestock lost to wolves in any portion of the State where wolves are classified as predatory animals.

Currently, Wildlife Services (WS) mitigates livestock-wolf conflicts. Wildlife Services has numerous control measures at their disposal, including an agent largely responsible for lethal wolf control specific to Park County, radio telemetry, and aerial gunning. According to WS aerial gunning accounts for 70% of lethal wolf control in Wyoming. Once wolves are classified as predators, we as livestock producers outside the trophy grame area lose access to these critically important wolf control measures. As well, we lose the ability to be considered for compensation.

This is grossly unfair. Wolves will continue to depredate livestock regardless of where the trophy gamepredator boundary is established. No member of our family has seen wolves actively attacking or killing livestock, yet we have had one stock dog and nine cattle deaths confirmed as wolf kills, eight of which were outside the trophy game boundary. We have had numerous "unconfirmed" losses which are likely attributable to wolf predation. The Department admits there are two confirmed wolf packs, Gooseberry and Owl Creek, and at least one unconfirmed pack in our livestock grazing area, consisting largely of private land.

In the five years our family operation has been directly impacted by wolves, we have had physical sightings of wolves less than a dozen times and would have had the opportunity to actually kill a wolf on maybe five occasions. Under this plan, all resources available to us for lethal wolf control are removed, yet the wolf population is growing at nearly an exponential rate. Livestock producers outside the trophy game boundary will not be able to adequately protect their livestock under this management plan.

## Chouinard, Fletcher

### Moose, WY

Culling highly social predators is dangerous and stupid. Please let the wolf population find its own natural density and behave like wild apex predators.

## JOHNSON, COURTNEY

### MOOSE, WY

i AM OPPOSED TO THE "PREDATORY" CLASSIFICATION. WOLVES SHOULD RECEIVE, AT MINIMUM, "TROPHY GAME" CLASSIFICATION THROUGHOUT THEIR RANGE. THEY SHOULD BE MANAGED SIMILARLY TO MOUNTAIN LIONS, WITH A SET LIMIT OF 1 WOLF PER HUNTER PER YEAR & A SET HUNTING SEASON THAT IS OUTSIDE OF PUPPING SEASON. FURTHERMORE, MT, ID, & WY SHOULD COORDINATE A PERMITTING SYSTEM THAT DOES NOT ALLOW HUNTERS TO TAKE MORE THAN 1 WOLF PER HUNTER PER YEAR IN THE ENTIRE GREY WOLF RANGE.

I ALSO DISAGREE WITH THE BREEDING PAIR THRESHOLD. IF CURRENTLY THERE ARE 15 BREEDING PAIRS PRESENT OUTSIDE OF FEDERAL LANDS IN WYOMING. THEN THAT SHOULD BE THE MINIMUM STANDARD FOR BREEDING PAIRS. 7 BREEDING PAIRS IS FAR TOO FEW.

### Stoy, Damian

### Moose, WY

I believe the Wyoming GWMP is missing some key points. I do not agree with it. I think the number of breeding pairs is way too low, the number of packs is too low. We need a higher number of packs for

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genetic variability. Also, wolves should NOT be labeled as Predatory animal. Why not keep the numbers at current levels?

#### Patla, Debra

#### Moran, WY

The wolf pack quota is politically driven, it is not based on modern ecological understanding. I think the plan reflects an irrational but deep-seated hatred of wolves on the part of ranchers, outfitters and antipredator hunters. Allowing only 7 packs of wolves outside the national parks is a travesty of 'wildlife management'. It may lead to the eventual loss of wolves, undermining the long, expensive recovery effort.

The over-abundance of elk and bison in northwest Wyoming makes it hard to understand why the state is so anxious to kill and control wolves. Existing winter range for wild ungulates is in very poor condition, exacerbated by livestock grazing, and by feedgrounds which attract large numbers of animals to the same early-winter and spring habitat and travel routes.

The area where wolves would be tolerated in Wyoming under the Plan is much too restrictive. For example, the entire Snake River/Palisades Range, Wyoming Range, Salt River Range, Wind River Mountains, and Absaroka Mountains should be included. It is a travesty to label wolves a 'predator' as soon as they cross a road or invisible line.

I am sickened by the brutality toward wolves this plan would endorse. Poison bait and aerial gunning should never be approved. These barbaric practices are banned in many states and countries of the world. Implementing them against wolves in Wyoming brings shame to our state.

Finally, I am opposed to intensive radio-collaring and tracking of wolves. This vastly inflates the cost of management. Wolves are wild, not the 'pets' of federal and state agencies to be controlled at your will. They are a natural and valuable part of the wild ecosystem that we are so lucky to have retained here in Wyoming (and which enriches our state greatly through tourism).

Livestock on public lands are heavily subsidized by low grazing fees and the sacrifice of natural forage, riparian guality, and wildlife habitat. Wild wolves should not be killed for the benefit of the livestock industry. The focus should be on non-lethal methods of discouraging wolf predation, and more intensive oversight of livestock by their owners (e.g. calving areas surrounded by solar electric fence).

#### Ausmann, Craig

#### Newcastle, WY

15 Breeding pairs would be fine if they are all spaid and neutered...

#### Zimmerman, Scott

#### Pine Bluffs, WY

Our organization has the following comments on the Draft Plan: we strongly urge the Department to indentify a single position to notify for legal wolf take where landowners, trappers are required to notify the department of takes. This would simplify the process for all parties. Point 2: We also feel damage compensation should include animals used in livestock protection i.e. guard dogs. These animals have substansual value and wolf caused losses and damages need to be compensated in the same way livestock losses would be.

We feel area designated as "Trophy Game" should be reviewed every three years to determine if the private lands currently included can be removed. If the wolf numbers are greater than 150% of the minimum needed for recovery, we would strongly urge a revision of the trophy game area to exclude all private lands.

#### Duerr, D.J.

#### Pinedale, WY

I have been commenting on wolf conservation issues for more than 15 years. In particular, at a formal public hearing in the early 90's -- convened in Chevenne by the U.S. Fish and Wildlife Service -- my testimony pointed out the conflict between the U.S. Endangered Species Act protections for the wolf and Wyoming's classification of this species as a "predatory" animal that could by killed at any time, by any

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means, by any person without a license.

The State's asinine and arrogant refusal to change the "predatory" classification ended up preventing the species from being delisted. This, in turn, prompted the State to claim the federal government was to blame. See, e.g., Governor Freudenthal's September 4, 2007 letter to the Commission (asserting the State's "past experience with the Endangered Species Act has been a case study in frustration"). The State even filed a frivolous lawsuit in an attempt to defend its indefensible wolf policy.

After the FWS justifiably refused to delist the species so long as the wolf was classified as a predatory animal in Wyoming, the State finally, albeit reluctantly, passed a new law reclassifying the wolf as a "trophy" animal in a small portion of Wyoming, mostly in two adjacent National Parks where it could not be legally hunted anyway. The wolf will remain classified as a predatory animal throughout the rest of the State, where it could again be killed at any time, by any means, by any person without a license.

I have reviewed the draft wolf management plan that was made available on the G&F website. Having worked on endangered species issues for nearly 20 years, and having familiarity with the ESA, it is my assessment this draft plan will still be inconsistent with the spirit, if not the letter, of the nation's preeminent wildlife conservation law. In particular, Wyoming's proposed wolf plan will not ensure the wolf is recovered from extirpated or endangered status throughout all or a significant portion of its range.

Frankly, I cannot believe this "management" plan was produced by an agency charged with being the trustee for all wildlife in the State. A population objective of fifteen breeding pairs? This is not even a viable population that will ensure long term survival from genetic inbreeding and stochastic events that could effect the population (e.g., canine distemper).

Moreover, the plan proposes maintaining only 7 breeding pairs (14 individuals) outside outside of Yellowstone and Grant Teton National Parks (and the intervening Parkway). This makes Wyoming Game & Fish a laughing stock of the wildlife conservation profession. G&F has the discretion to set population objectives much higher than 15 total breeding pairs statewide. And it has the discretion to classify the wolf as a predatory animal throughout a much larger portion of its historic range in Wyoming.

The proposed conditions for when wolves can be killed are also revealing. For instance, wolves will be eradicated if they are causing disturbance to elk at G&F feed grounds, even if there is little or no elk mortality. Artificial feeding areas not only manipulate the ungulate populations in deleterious ways, they also serve as natural attractors for wolves. Why is G&F prioritizing a very common species (elk) with an artificially inflated population over the needs of a native species that is very uncommon? Because elk generate substantial funding for the agency through the sale of hunting licenses. G&F has ethical, fiducial and common law obligations to help conserve all species throughout their historic ranges in the state, not just those species the agency can exploit to make a buck.

The bottom line: after more than 15 years participating in the public process on wolf conservation, myself -- and many other people who genuinely care about the species -- now find this species will still be managed by the State Game & Fish as a nuisance species with a population so small as to make wolf encounters highly unlikely throughout Wyoming. Not because this will be good for Wyoming ecosystems, but because livestock producers want the animal managed this way. And because wolves may cause a minor reduction in potential G&F revenues from big game hunting license sales. And because G&F is too cowardly to do the right thing for the benefit of the wolf.

The FWS should reject the proposed plan as being biologically and legally indefensible. The plan will also give FWS grounds to strip federal funding away from the State and exclude G&F from managing other federally listed species in the future. If the federal government accepts the proposed wolf plan, the reason will not be that the plan is valid or sensible; it will be due to political horse trading with a federal administration that has shown complete contempt for the ESA and for conserving biological diversity ...

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the same contempt being shown by the State G&F.

I have no doubt Wyoming G&F will ignore these comments, just as it has ignored the comments I have submitted on other species in the past -- the shameful cougar kill quotas recently increased, the legalization of bear baiting and other unethical hunting practices, etc. As a matter of conscience, however, I believe it is necessary for citizens to voice objections to ill-conceived government policies, if for no other reason than to document the wrong doing. And so I am speaking out against the proposed wolf plan.

I will just add this: If the State is not going to adopt sensible and ecologically defensible plans to help recover federally listed species, please do not blame the federal government for the resulting conflicts. If the State is going to act in ways that frustrate the recovery of listed species, the State is the only one to blame for any frustration it experiences in dealing with the ESA.

The wolf is a remarkable species ... a species that is part of Wyoming's natural heritage ... a species that belongs in Wyoming ... a species that is bringing considerable economic gains to the State. Perhaps one day the Commission will recognize these things. Sadly, it appears that day is still a long way off.

D.J. Duerr P.O. Box 1668 Pinedale, WY 82941

#### Hagenstein, Paul

The cost of managing the wolves should be borne by the federal government, not by the state of Wyoming. USFWS originally wanted 30 breeding pairs in the three state area. Now Wyoming is to have 15 breeding pairs in the state and the parks. Will the ink get dry before it is changed again? I do not see anything that says that the wolves have been told which side of US 191 is the better side to stay on. Please advise us of the meeting with the wolves when you tell them of this problem.

#### Ratner, Jonathan

#### Pinedale, WY

Pinedale, WY

The plan fails to recover the species and only allows a token few to survive. The wolf can never recover its former keystone role in the ecosystem. The plan is not science-based it is rancher-politics based.

Predator status outside of the parks is excessive and will guickly lead to the re-extirpation of the species. The ruse of killing wolves for big game herd increases must be removed.

#### Urbigkit, Jim

#### Pinedale, WY

First, the plan should provide a short introduction, explaining the planning process used thusfar, and acknowledging that the current plan was the creation of the U.S. Fish and Wildlife Service.

Sublette County Farm Bureau has two major concerns with the plan:

• We need strong assurance that wolves will not be relisted as a threatened or endangered species as the result of state management. To forego the management flexibility, federal funds and federal responsibility associated with the non-essential, experimental status of the current management scheme is too high of a risk for livestock producers who have to deal with wolves.

 We want an assurance of continued funding for the control of wolves that prev on livestock. WG&F should be responsible for all wolf control costs in Sublette County, regardless of whether wolves are harvested from predator or trophy game areas.

Currently, ranches struggling with chronic wolf predation problems can call the U.S. Fish and Wildlife Service and that federal agency has a responsibility to get in and take care of the problem. If this state plan goes into effect as written, some of these ranches will be left out in the cold, told to take care of it on

their own. Shooting and killing a wolf can be a very, very difficult task, especially if it's been shot at before Most ranchers don't have the luxury of aerial gunning for wolves.

So the state's solution is to let WG&F off the hook and force local predator districts to deal with the issue. Our local predator boards can't afford to manage wolves, and we doubt if WG&F can afford it either. And for local predator boards to even qualify for the new state funding pool, they first must agree to tax to the max on their local livestock producers who are already going broke because of continued drought. Once again, your putting the burden on the livestock industry.

Livestock producers should not have to bear this burden. WG&F wants wolf management responsibility, so let that agency actually fully step up and handle all these wolf conflicts and control issues, regardless of where the line is drawn on classification.

Federal agencies have already denied the state access or authority in other wildlife conflicts on public land, so we have no assurance that wolf control will be allowed on public lands.

We can already see problems with future wolf control. Even though listed by the state as predators, land management agencies can impose restrictions on their take on public lands. The BLM's Pinedale Resource Management Plan draft came out, complete with restrictions designed to protect wolves. We have no assurance that wolf control will continue to be allowed on federal lands, so the importance of control of private lands is critical. There is currently a big push to ban aerial gunning of wolves – something already prohibited in wilderness areas of the trophy game areas.

The state plan's requirement that a person taking a wolf must present the unfrozen pelt and skull to WG&F during business hours should be deleted. State statute requires only that such take be recorded: "In all areas of the state, except where otherwise provided, any person who harvests a wolf shall notify the department where the harvest occurred within ten (10) days."

While WG&F is accustomed to hunters checking in with their harvest in hand, this is a ridiculous requirement for a sheepherder tending a flock, or a cowboy at cow camp, to have to comply with. Much as we do with coyotes, livestock producers will kill an animal and leave the carcass on the ground. What may be a "trophy" to some people is a very unpleasant animal to others.

Our view is that if this plan is implemented, it's more likely than not that wolves will once again be listed as a threatened or endangered species – something none of us want.

We believe that once this plan goes into effect, hunters will flood areas where wolves are known to occur and are listed as predators. There will be plenty of shooting at wolves, and just as happened in the past with previous wolf populations, the wolves will become elusive, and you'll never be able to find them to count them, which will lead to relisting even though the wolves are still present and preying on livestock and big game.

Wolves that are shot at cannot be found to be counted,

Sincerely, James R. Urbigkit, President Sublette County Farm Bureau

#### Jeffries, Judith

#### Powell, WY

My ranch lies west of WY 120. It appears that this lies within the zone where wolf populations will be flourishing.

It is unfair to expect me to sit on my lease ground and pasture ground 24 hrs a day with a rifle and a camera so I can protect my horses and cattle from wolf attacks and proving with the photo that the wolves really did attack.

There were good reasons why our forefathers erradicated the wolf from the area a century ago. Today

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with more population it is ludicrous to have them back.

There are plenty of wolves in the world. Limit them to the national parks - NOT LAND THAT IS RANCH LAND!

#### Kriewaldt, John

#### **Riverton**, WY

Given the political realities, I think this is about the best deal that Wyoming can get. I would encourage the State to move forward with the proposal as fast as possible.

#### Wolfer, Alex

#### **Riverton**, WY

I support the plan.

#### Harrison, Sean

#### **Rock Springs, WY**

I commend the WGFD for it's work on the GWMP. I'm particulary proud of the way the State (including the legislature and the Governor) has supported the G&F in it's plan. The G&F manages our wildlife with great professionalism and integrity. Managing wolves with specific objectives will be no different. The dual classification is important and I'm happy to see this portion of the plan has not changed.

I applaud the section of the plan giving landowners "kill permits" for constant wolf conflicts. The only portion of regulated public take I would disagree with is the trapping of gray wolves. No other trophy game animal can be taken by trapping, so why would gray wolves be any different? The only time a gray wolf should be trapped by public take while deemded a trophy animal is during the issuance of a "kill permit". There will be plenty of people gunning for wolves once they are delisted. For the sake of clarity in the state statute, I believe trapping of ALL trophy game animals should be unlawful. Wolves should still be governed by stipulations set forth for predators in areas they are deemed a predator.

I hope the Fish and Wildlife recognized the fact that the WGFD manages all of its wildlife adeptly. They should accept the plan and move forward with delisting so that gray wolves can be managed closer to their recovery goal. Thank you for your hard work

Sean

#### McCarron, Dan

#### **Rock Springs, WY**

If wolves eventually become delisted, it will be imperative that Wyoming has a long range plan for funding its wolf management program. As stated in the state's draft management plan, the wolf is of national interest and therefore the American public should ultimately share in the financial cost of managing the wolf.

The reintroduction of the wolf into Yellowstone National Park and central Idaho has proven to be extremely successful. It also appears that Wyoming has developed a state management plan that is acceptable to the USFWS. Wildlife managers should be given the freedom and flexibility to manage the animal within the currently accepted and agreed upon population objectives using sound biology, without frivolous lawsuits, political interference, or the rules changing at the last minute.

Thank you for the opportunity to comment.

Dan McCarron Science Teacher, Biologist Rock Springs, Wyoming

#### Peternell, Judy

#### **Rock Springs, WY**

I commend the Game & Fish and the Governor of Wyoming by holding firm on the wolf management

plan. We hope the Game & Fish Commission approves this plan.

#### Savage, Dorothy

#### **Rock Springs, WY**

I am opposed to the killing of ANY wolves within Yellowstone National Park and Grand Teton National Park. I also believe lethal means should only be used as a last resort.

#### Thoman, Chairman, M.

# Rock Springs, WY

At their October 4, 2007, Board meeting, the Sweetwater County Conservation District, approved the submission of comments on the nonessential, experiemental gray wolf management plan. At that time they concurred with the research and comments submitted by Wyoming Farm Bureau Federation. While not involved in the initial hearings as was Farm Bureau, the Board feels strongly about the need to "manage" the wolves so as to protect our agricultural as well as wildlife resources of the State. Please refer to comments submitted by Farm Bureau.

Thank you for the opportunity to comment.

#### Rader, Timothy

#### Saratoga, WY

Gentlemen,

It is my belief, and factual knowledge that the plan that you have will do nothing except worsen the wildlife situation here in Wyoming. Wolves, (and Grizzly Bears), were put here for a reason, by a higher authority than ourselves. That reason being to keep "Prey Animals" in check! All I hear about the "Over Population" of Deer and Elk, the diseases they have, and carry to other animals such as "Livestock"! Wolves my friends take care of the sick, diseased animals, and the old ones who can no longer care for themselves. Let nature take it's course if you don't mind, it is a much better plan, than yours. We have deer, elk, and moose running across our roads and highways creating traffic hazards, and DEATHS to the human population here in Wyoming, when was the last time you heard of a Wolf being a traffic hazard, or killing a human being?? Of late I have heard that the hunters in this state are way down this year, meaning the elk and deer populations will go up. So, what are you going to do?, have another elk shooting match, and divey up the meat? Let the wolves take care of it if you would. In my opinion they have as much right to be here as we do, after all we were all put here by a higher intelligence than us, what right do we as humans have to commit genocide on anything or anyone?? Let the Wolves (and Bears) live as they were meant to live if you please. I can handle it, CAN YOU?

#### Heyward, Edith

## Sheridan, WY

Wolves should not be killed and managed at such low levels. Use sound science to manage them, not as predators but as critical to healthy ecosystems. My family has witnessed the change in Yellowstone Park as wolves have restored balance to areas that were long overused and overpopulated by elk. This state is overrun by deer, there are plenty elk and even moose but we show outdated attitudes, even hysteria toward the wild canine natives. We've never known a thrill like last summer, when we saw a wolf's massive tracks along the Greybull River, and heard his howl the next morning. He is one of the reasons Wyoming is "like no (other) place on Earth".

#### Heyward, Joslin

Sheridan, WY

I grew up in Wyoming and have always loved the fact that people here respect wildlife, including hunters, environmentalists, and all citizens alike. To naturally maintain the elk and deer populations, we must allow wolves to prosper. In addition, wolves should not be reduced because of rancher's demands. In the highly creative society that we live in today, we can find a solution that does not require the eliminatior of native wolves to save a few non-native cattle.

#### Huston, Paul

### Sheridan, WY

I've seen your management plan, and I'm against the full out slaughter of the wolves, just so you can reach your target goal. Your doing it mainly to satisfy abunch of hunters whom want to hunt Elk. The

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wolves have every right to live also.

#### **Richards**, Larry

#### Sheridan, WY

While I realize that my opinions will be deemed offensive to the environmental community, here they are. 1) Environmental groups wanted these animals reintroduced they need to pay to keep them. The people in our state should not be saddled with the cost of a poor decision hoisted on us by out of state interests. 2) If a wolf enters a yard to attack any animal beyond its normal prey (i.e. deer, elk, etc.) it should be a likely target for the landowner. My dog is my friend and I will protect him from these predators. 3) And finally. I appreciate the way the Game and Fish Department has attempted to handle a difficult situation. I also hope that we will have the opportunity to control wolf populations soon.

#### thomas, steve

#### Sheridan, WY

All wolves in Wyoming should be classified as "trophy game animals" no matter where they are located. Wolves should be managed of optimun numbers NOT for the lowest numbers as are all other game animals. Aerial gunning should not be allowed by non-government hunters. the should be a hunting season, but not unlimited take.

#### Reading, Harvey

Shoshoni, WY

This is just another rancher welfare program. Game and Fish is being used as a pawn by the livestock owning powers that be. Amazing how much power welfare ranchers have considering their paltry contribution to the state domestic product, an amount that is even less considering all the welfare they get at the state and federal levels.

It's not a wildlife issue. It's a welfare for an anacronism of an "industry", wiithout which Wyoming would be a better place ... with a LOT more wildlife, and rules that make livestock owners liable for damages when their damned stock trespasses or when it gets hit on public highways (by the way, 150 years of habitat abuse does not constitute a tradition, nor is it a heritage; it's nothing more than time enough for some really bad habits to become ingrained). Wildlife did just fine when there were wolves and no damned livestock, and would do so again. Why aren't we getting rid of the welfare ranching system instead of getting rid of wolves? A sorry state of affairs.

#### Fenton, Wendell

### Teton Village, WY

Gray Wolves have recovered and are very beneficial to the balance of nature. Lets give the recovery more time and develop more data before a plan such as proposed is implemented.

#### Harkness, Carol

### **Teton Village, WY**

If the objective is indeed to maintain a permanent population of wolves in northwestern Wyoming, setting an arbitrary minimum number is asking for failure of the plan. Wolves will be killed until that minimum number is met, then there'll be a serious incident which requires killing the wolves involved, and we'll be below the minimum and arguing about re-listing. The objective should be to maintain the current population, and care should be taken with a plan for what to do if the population falls below that, or grows above it. This would allow a more gradual response.

There are many non-lethal methods which have been proven to deter many wolves from conflict with humans. The plan should require that non-lethal methods be tried first and that lethal methods should only be a last resort. This goes along with the comment above, that the objective should be to maintain numbers, not reduce them.

I believe that Wyoming's current approach to wolf management has delayed their removal from the endangered species list. I realize that Game and Fish has been directed by the legislature in many of these directions and thus has limited freedom to move in other directions. However, limiting wolves to Yellowstone isn't the answer. In particular, the Grand Teton Park area, where I live, should also shelter

them. The larger their approved range, the more likely it is that their re-introduction will prove successful in the long term.

#### Harkness, John

#### **Teton Village, WY**

The proposed plan is unnecessarily confrontational. The ensuing legal challenges will be a waste of our state's resources.

Furthermore, our elk herd populations are over target and the hunting population is declining. We need the wolves to cull the weak, old, and sick elk from our elk herds more selectively than hunters will. How many hunters would take an elk that's acting strangely? Wolves would since they won't waste their energies chasing strong, healthy animals. Think Chronic Wasting Disease — the wolves should be our allies in combating the spread of this epidemic.

#### Sheahan, Casey

#### **Teton Village, WY**

Wyoming's Revised Wolf Management Plan would allow Wyoming and Idaho to gun down nearly 600 wolves. Proposing this revision while they're still on the endangered species list reveals the disregard the state and national administrations have for the protection of our national treasures. As top predators in the Rocky Mountain ecosystem, the wolves maintain balance in several vital ways: they regulate the population of prey species, they force the fitness and health of lesser species and they serve as an indicator of the health of the entire ecosystem including flora and fauna. As stewards of the planet, it's our responsibility to do all we can to enable an ecosystem like the Northern Rockies to thrive. Allowing the grey wolf population to hover on the brink of extinction is wielding the immense power we have with negligence and ignorant disregard to the balance of nature.

#### LARSEN, KEVAN

#### Thayne, WY

I've been a big-game guide / life-long resident and also hunted NW Wyoming for over 50 years, and I've seen first-hand the devastation caused by the re-introduction of this damnable species. Our pioneer ancestors understood that we'd have NO game unless they eliminated this terrible "scourge of the earth," hence the bounty on wolves until that difficult task was accomplished. Your report is also in error when statements such as "impact of livestock and wildlife would be minimal." What a crock! How misinformed! What biologist (from the East, "flying a desk," & never spent years in the woods observing first-hand as I have done) could come to such outrageous stretch of real scientific data. We have observed wolves at 5 different places in Star Valley - when they're supposedly "not out of the parks" - not a mile from our home in the Caribou National Forest, Strawberry Canyon, McCoy Creek, Willow Creek Canyon, and Allred Flat. If, and when these animals may be delisted, PLEASE do not burden the taxpayers of Wyoming further by charging more than ONE DOLLAR for the permits - since they'll be controlled on a draw anyway. They are no more that a dog on steroids, so who would want a mutt's head mounted on the wall? I hope the WY G&F Dept gets this plan pushed through soon & gets these animals under control so that those elk herds we saw in so many areas we hunted in the past, can recover and come back. My last comment would be that I've visited with a lot of State of WY employees & way too many non-hunters, yes I really mean NON-HUNTERS (some claim to be, but obviously cannot document any license) helped assemble the "data" and write the plan. We also feel from these visits that they are foreign to farming and ranching concerns & barely give lip service (small predation numbers) to a huge problem that very few will acknowledge. Thank you. These reasons should justify some of my requests.

#### stansill, margaret

### thermopolis, WY

Where to begin? It is with such saddness that I observe day after day of so many efforts to rid Wyoming of what IS Wyoming: things that are wild and free. Our rep Cubin has stated that the "easterners" are trying to "run Wyoming"....I hope they do because they are the only ones lately that seem able to value what once was valuable here. The lack of concern about all the environment in Wyoming, including wolves, is deeply troubling.

Let's not let POLITICIANS make decisions about our wildlife! Where is the SCIENCE that best determines wolf populations?? People travel from all around the WORLD for the opportunity to view and hear wolves in Yellowstone; wolves in their natural ecosystem. If we only think that 15 pair is "enough", then we should just put them in a zoo. Every high school biology class says that healthy populations require a significant number in order to properly survive. (ie genetics, disease resistance, etc) Of course, wolves are predatory.....but since they can't go to McDonald's, they eat elk, etc. A PROPER management of ALL species is in order. How can we be so proud to have successfully reintroduced wolves from extinction by human hunting (Wyoming tourism promotions) and now seek to almost erradicate them again (State G and F, Wyoming Farm Bureau., etc)?

I would ask that we have a SCIENTIFIC approach to wolf managment; not such an interest-based version depending upon who's interest has the most political weight.

It seems that only the smallest opportunity has been given for full public input. I find it curious that Jackson is not even on the public hearing forum and those citizens LIVE right in the middle of wolves and national Parks? What's with that?

If, indeed, the SCIENTISTS determine that wolves must be culled for GOOD REASON then let's look at something like trophy hunting where there would be regulations and hopefully, some hunting ethics. Being shot from a plane, trapped, poisoned and whatever other torturous means will be used is NOT something I'd ever support. In 2007, there has to be more humane ways to deal with animals.

Let's also keep in mind that HUMAN NATURE is very greedy and selfish. Let's look at the anti-wolf advocates and examine their "real" purposes. Let's please seek a BALANCE for ALL CITIZENS and in the end, let's not forget your proper role: the Wyoming GAME and Fish office. You, most of all should be NOT in the hands of the FEDS, but working for the good of animal populations and survival in our state. I'd expect us to be a MODEL of wildlife managment; for heaven's sake.

Thanks for this opportunity for comment.

Sincerely,

Margaret Stansill Thermopolis, Wyoming

#### Tuffner, Kenneth

Thermopolis, WY

I do not support Wyomings plan. Too much time, money and effort have went into getting these magnificent animals back into the eco system. I believe that Wyoming can come up with a better plan, and know that they are being pressured by the Farm Bureau and ranchers. These animals have a right to be here as the State wiped them out completely in the past and they will do so inthe future if something isn't done now. I believe that Wyoming can come up with a better plan if given time, but there plan today has to many loopholes and they do not benefit the wolf.

#### Williams, Page

#### Wapiti, WY

I don't like this plan. Wolves should not be killed in any of our National Parks. I don't think we should only be trying to mantain the minimun number of wolves that the Federal government tells us we have to. I think there should be as many wolves in the ecosystem as it can hold, with the caveat that problem wolves should be deterred, and if this doesn't work, killed. Tourism is more important finacially to this State than ranching. A few trophy wolf tags can bring WY alot of money. Please don't let a few people decide this conflict for the whole State. By the way, I have wolves on our property many times through-out the year.

Allbright, Taylor	Wheatland, WY
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With the Management Bill there sould also be an admendment to allow a low guota draw such as with big horn sheep ar moose. This i belive would also help keep the populations to a managable level and would appease many ranchers around the state and would hopefully stop unlawfully killing of the wolves with the so called 3 s's rule(Shoot, Shovel, and Shut Up).

#### Barbour, Dail

#### Wilson, WY

I am very disappointed that there are no public hearings in Jackson as we are certainly some of the wolves closest neighbors. I believe the plan to be a political plan not a biological one and much too expensive. The wolf population will be reduced to a dangerously low number under the plan unable to withstand bad winters or disease and especially not humans! It seems that a large number of people, including the Game & Fish department have forgetten how we got in this mess to start with-people killing ALL the wolves. If anybody thinks human nature has changed about slaughter, you have only to watch the nightly news. I strongly oppose the draft plan and urge the Game & Fish to reconsider.

#### **Carson, Andrew and Nancy**

Wilson, WY

Good morning -- we'd like to share our views concerning wolf management in the state of Wyoming, as the plan being considered falls far short of a balanced, fair approach regarding the future of wolves here.

We have been residents of Teton County for more than forty years, and the outdoor pursuits have always been fundamental to our lifestyle. We hunt and fish, hike, ski, and climb throughout the state, but we chose Teton County for the obvious advantages it offers if such recreational opportunities are ones that a person finds most rewarding. A viable wolf population throughout the state will further the overall health of all animals and will add immeasurably to the vitality of an outdoor lifestyle.

We believe the plan presently being considered is too politically motivated and will result in the elimination of all wolves in Wyoming in very short order. Some of our major concerns are noted below.

Predators are an integral part of any ecosystem, and wolves will play that role more effectively than any other animal. It is clear that relying solely on humans to limit ungulate populations is unrealistic.

Wolf recovery in the state will fail under the proposed plan, resulting in the wolf being reclassified as endangered. Once the gunning starts, it won't stop till all wolves have been killed, or populations will be so degraded that the remaining wolves will not present a sustainable population for reproduction.

Further, wildlife such as elk and deer are not suffering drastic declines, but rather are showing historically high numbers. In addition, wolves play an increasingly important role in our state's economy.

Sensible wolf management should be based on sound science -- not the wishes of powerful special interests.

The Wyoming Department Game & Fish should help Wyoming ranchers adopt non-lethal methods to reduce or avoid wolf-livestock conflicts, such as carcass removal, human supervision of livestock, the use of guard animals and improved lighting and fencing around livestock areas. .

Wolves are responsible for less than 0.2% of all cattle losses in Wyoming in 2005 and less than 1% of all sheep losses in Wyoming, according to records we have been able to locate as part of the public record. There is also a national program that reimburses livestock owners for losses due to wolf predation. Thus, the hysteria coming from ranching interests rings hollow to our ears.

We believe a better way to manage wolves can be crafted, one that won't require us to revisit this issue every few years. Please consider taking the time to do it right.

And thanks for giving us a chance to share our views with G and F.

Sincerely, Andrew and Nancy Carson Wilson, Wyoming

#### Clark, Mark

#### Wilson, WY

As a Wyoming resident I am offended by the lack of an open, democratic process for Wyoming citizens to consider and provide verbal comments on this new plan at public hearings.

Moreover, those of us who reside near Jackson have had no opportunity to provide input on this or any past wolf proposal, due to the fact that no hearings are being held in Jackson.

#### Erb, Barbara

I don't know if my original form went through, or not. I got an error message when I submitted it. So here are my comments again:

The wolves are a balance to our ecosystem. They bring in many, many tourists, as well. Please use the current count of wolves as the baseline of the population. Please find other ways of managing the wolves around cattle, e.g., dogs, etc. Please don't kill the wolves. Aspen trees are coming back in Yellowstone. Elk populations will not disappear. The natural balance will continue, if we allow the current population to exist. Please change your plan to reflect these comments. Thank you so much.

#### Erb, George

#### Wilson, WY

People are acting on their fear of the wolves. There are alternative ways to handle the wolf problems with out killing the wolves. One is by the use of dogs to protect cattle. Please keep the present population of wolves in Yellowstone and the surrounding area. They have brought in many tourists and are helping the aspens to grow back in the area. Please don't kill the wolves. The balance has been brought back and now it will be destabilized once more if this plan goes through.

#### Ladd, Beedee

#### Wilson, WY

15 breeding pairs means, I believe, to Game and Fish that all other pack members may be shot at will. This is an embarrassment to Wvoming, flies in the face of ALL research on wolf impact to habitat, and is a throwback to the days of "the only good Indian (read wolf) is a dead Indian (read wolf)". Do your homework, guys. Read the research, ingest the thinking of the 21st century, and come back with a plan that will do the GYE and Wyoming proud. Thank you. Beedee Ladd

#### Poole, Steve

I am outraged and embarrased at the ridiculous plan that the governor and the legislators have continued to push to protect a fraction of ranchers from fears based largely in ancient myth. Programs exist to reimburse the rancher for any loss of stock to wolves, state funds should suppliment these funds rather than any spending on lethal methods to remove the wolf. This plan is based on politics not science, the fact that you did not even have the guts to hold a comment session in Jackson, the community that is most affected by wolves, is further proof of the political manipulation of this process by the stockgrowers and their political cronies. The economic benefit of wildlife watching to our area and state dwarfs to fractional input that ranching may provide. The hypocritical stance shown toward advertising to wildlife watchers and elk management policy are a shameful act by you and our state government. To save an elk, shoot the cattle. I am a long time resident and a hunter who has a tremendous respect, based in science, for the predators, humans included, as the prime examples of intelligence, strength, and awareness in our ecosystems, the wild predators are critical to the natural systems correct balance. The planning decision depends on the use of the tools of perception, awareness, attitude, education, thought and action. None of these tools favor the current plan when correctly applied. The interest of the vested few are not integrating the compassionate relationship and respect due to this magnificent animal that is an essential part of a balanced ecosystem. Wise wolf management would make the animal a trophy species not a predator in all areas of the state. No killing at all on federal lands of the national forest or parks. Please forward these comments to the governor and legislators.

#### Reagan, leigh

#### Wilson, WY

I strongly disapprove with this plan. It's important to do our job to protect the wolves from harm and ensure their safety in the future.

Sincerely, Leigh Reagan

#### stevens, robert

wilson, WY

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#### Wilson, WY

Wilson, WY

I favor not killing wolves in Grand Teton national park until studies show a definite inbalance compared to other wildlife. I favor managing wolves based on maintaining the current population and not based on some arbitrary goal of shooting hundreds of wolves.

#### Unfried, Amy B.

#### Wilson, WY

I strongly oppose the proposed gray wolf management plan. A few brief reasons why:

"Fifteen breeding pairs in the state" of which "seven breeding pairs" may be outside the protected area of the National Parks is ridiculous. The problems start with the definitions-- a breeding pair isn't just an adult male and female observed together but an actual mated pair who provide leadership for their pack. A pack is not just two adults and two juveniles observed together as currently defined but a much more complex social structure, not at all the same thing. Defining a pack as four animals does not guarantee that there will be an alpha male and an alpha female: defining it as five or six animals would have a much higher probability of actually including leader animals.

There is also the issue that packs' territories frequently overlap the park boundaries; if a pack's den is inside the protected area but much of its hunting territory is outside the "safe" area, it will be subject to being killed under this plan. It is just not as simple as "15 breeding pairs, 7 outside the park" makes it sound.

Granted that the agricultural industry in Wyoming has historic and deep-seated antagonisms to wolves and other predators, but the tourism industry in Wyoming is benefitting greatly from their presence. When my family visits Yellowstone, as we do multiple times per year, we often allow tourists to use our spotting scope to get their first, exciting look at a wolf. These visitors come from all over the United States and all over the world to see Yellowstone, and the wildlife is one of the chief attractions--not just ungulates but, equally or even moreso, predators.

You might also wish to take into consideration the fact that if wolves are subject to hunting and the adults are killed, the remaining juveniles, without adult supervision and training in hunting elk or other appropriate prey, are much more likely to become problems with respect to predating on livestock. A management plan that simply dealt with those wolves that have demonstrated an inclination to predate on livestock, rather than creating open season on all wolves, would be much more successful in eliminating problems.

#### Miller, Jim

### wright, WY

Thank you for the info, I would like to comment on your report it is very professional. i have been waiting for this time to come and hopefully some day can be part of the management process as we all know our elk numbers are deminishing but also are very aware of the drought habitat effects we are currently go thru. thanks again keep up the good work. Jim Miller

#### Hinch, Steve

### Yellowstone, WY

Wyoming needs to look at Montana's plan and be more proactive in maintaining long term viable wolf populations outside Yellowstone national Park. Viable alternatives need to be made in dealing with predation on agricultural herds instead of slaughtering any wolf possible. Wyoming has a great opportunity to show the nation how to exist with predators and species that most of the country has eradicated.

### Hilborn, Doug

### Yellowstone National Park, WY

Keep the wolf number up and disease out of the elk herds since wolves do a much better job of taking out the sick and weak and hunters kill young cow elk while wolves kill older and sicker. Common sense really

### **Robert**, Patricia

### Paradise Valley, AZ

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Wyoming should manage wolves based on maining the current population and not based on an arbitrary goal of shooting hundreds of wolves. I am against the use of lethal methods to resolve and prevent conflicts unless it is a last resort. I do not want any wolves killed in Grand Teton National Park. Thank you

#### Rothstein, Dustin

I just received a propaganda email from the National Resources Defense Council Action Fund urging the recipients of the email to oppose your proposed Wolf Management plan. They did not recommend actually reading the plan or looking into the facts, just writting to oppose the plan. I just finished reading the entire plan, and feel you did a great job. I think the management plan is very well laid out and will ensure the wolf population, as well as the population of all other animals in Wyoming, are properly managed. Good work. And please don't let the negative responses from everyone who has been mislead by the NRDCAF affect what you're doing.

#### pennoyer, jordan

#### denair, CA

There are too many elk in Teton County. We need more hunting and more wolves. not less.

#### Tashjian, Randy

#### Glendale, CA

Camarillo, CA

I'd like to voice my opposition to the proposed delisting of endangered Wyoming wolves by the US Fish and Wildlife Service until Wyoming has a management plan that incorporates the following points:

1) Wolves should have Trophy Game status throughout the state, and be managed by the Wyoming Game and Fish Department.

2) The state should be divided into three or four management zones with wolves in the Greater Yellowstone Ecosystem receiving the greatest protection; those farther out would have less protection, and wolves in the remainder of the state would have the least protection. There should be mandatory and immediate reporting of any wolf deaths caused by humans.

3) If it is proven scientifically that wolves are having a detrimental effect on other wildlife, the Wyoming Game and Fish Department should be allowed to do selective wolf control until that wildlife population rebounds, then it should stop. Wyoming's wildlife has more to fear from loss of habitat due to energy development and suburban sprawl than it does from predators.

4) The state should make every effort to acquire wolf management money directly from the federal government, not as an allocation from the U.S. Fish and Wildlife Service.

Thank you for your consideration.

Sincerely, Randy Tashjian

#### pennoyer, susanne

#### Los Angeles, CA

Wyoming needs more, not fewer, wolves. The elk starve unless fed in feed lots. Elk in feed lots get diseases that spread to all the animals including cattle.

#### Bauer, Jody

#### Oxnard, CA

To All Concerned Parties,

I have read the draft plan for Gray Wolf Removal and do not agree with it. I'm also having a hard time understanding why this plan was ever drafted? It appears to be a move made primarily for hunters. I can't see any other reason for this.

Please rethink your plans and don't go forward with this.

Sincerely, Jody Bauer

#### Buenaobra, Edoardo

#### Palo Alto, CA

Please do not go forward with this Draft Wyoming Gray Wolf Management Plan. Wolves are an important part of their respective ecosystem's trophic cascade. The are beautiful animals and are only now reaching numbers that will take them off the endangered species list. If they are taken off and considered trophy game and as preadatory animals, we will probably end up relisting them as endangered. These amazing animals must be protected and must be granted their space to roam about, and live free from boundaries. Once again, they are beautiful animals and are vital to the trophic cascade. They should be protected and should not be considered trophy game. Please do NOT go forward with this Draft Wyoming Gray Wolf Management Plan.

Thank you kindly, Edoardo Buenaobra

#### Hinton, Michael

#### San Diego, CA

The draft soundly answers questions of management and priorities of conservation when required. It also provides good balance between the consumptive use of wolves (as trophy game animals) and the desires of those wanting to see wolves a part of the ecosystem.

I would urge the Commission to adopt the Wyoming Gray Wolf Management Plan.

#### Palmer, Beverly

#### Santa Barbara, CA

Fish and Game wants to kill 2/3 of the wolves. The excuse is the wolves are decimating the elk population. This is not true. It is an excuse. The ranchers/hunters want all the wolves killed. Defenders of Wildlife compensates ranchers for any losses from predators. Ranchers are also already allowed to kill wolves who they catch attacking livestock.

The balance in nature here is off from humans.

A very poor record of "Living with" ....

Its time to "Live With" .... Wolves have a right to live here. Humans need to learn to stop killing everything.... PLEASE!!!!!!!

#### Blume, Mark

#### Truckee, CA

You have completely disregarded the mandate of the American people to reestablish this species. Pull your heads out of your collective asses and support your ecosystem.

#### Jensen, Lindsey

#### Truckee, CA

I strongly oppose this plan that removes wolves from the protection of the endangered species act, and I think that it is unfair to restrict the population of wolves to such a low level of breeding pairs. Gray Wolves are still in need of protection and I believe the proposed plan is a completely inadequate amount of protection. A mere 15 breeding pairs when then wolves are still endangered is a digression in animal management and wilderness preservation.

#### Zelasko, Sandy

### Valley Center, CA

If you want our tourism dollars (we just spent \$2,500 on our visit last week) then let the wolves continue their role in the ecosystem without hunting pressures. My husband and I visit Wyoming regularly. We own property in the Star Valley and hope to one day make it our home. We are however considering selling and making Montana our choice depending on factors such as Wyomings wolf management policies.

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#### bednorz, karen

#### Ventura, CA

Unbelievable - the wording & questions posed "can be" mis-leading.

Plans to slaughter endangered species???

We need to care for all creation. This proposal is out of balance.

Thank you for reading & providing space for comments.

Kindly,

Mrs. Bednorz

#### **Busch**, Mike

Ventura, CA

ventura. CA

We have gone down the path of trophy hunting wolves in the past, we need to learn from our mistakes and keep these beautiful animals protected.

#### corez, sus

i urge you to reconsider the slaughter of the wolves who are STILL on the endangered species list.

#### Costello, Richard

Allow wildlife to thrive or deplete naturally, without setting forth guidelines and regulations.

#### davis, tim

is this some sick joke? does reducing an endangered species down to 30 animals seem even remotely sane? i don't think so. letting the endangered species live until they are not an endagered species is the only solution. i can't believe that i actually have to put that phrase into writing. i'll repeat it again because whom ever made this call in the bush adminstration is clearly mentally retarded.

all endangered species should be encouraged to recover until they are not on the endangered species list. period.

tim

#### Kempf, Korina

Ventura. CA

Why are we killing the wolves? These seems rediculous, and in favor of the livestock industry. How can you ensure that by controlling the population you are taking into account those that will abuse or misinturpret there rights in protecting their livestock? Will there be a fine for those that mis-interpret the law in gaming. Is there a budget set up for technology required inorder to ensure the safety of the breeding popultaions? I would rather see federal funding go towards something more productive. Dare I say Global Warming. Will home land security also be involved in hazing animals? This ia wasted resources. Home land security was recently involved in the hazing of Buffalo within Yellow Stone National park and the state of Montana. I would critically reconsider this program as it seems there are alot of loop holes. As a concerned citizen of wildlife populations and protecting our environments, I strongly oppose this bill. Korina Kempf

#### lucas, debbie

#### ventura, CA

Please protect the wolf population. They are a natural part of our eco-system and should not be slaughtered. Thank you.

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#### ventura, CA

Ventura, CA

#### medrano, jenny

Please do not take aggressive actions to exterminate naturally raoming wolves in their natural habitat. Nature's harmonious balance should not be disturbed for the greed of man and his urge to kill. Man does not need to manage nature, nature is far more intelligent than man when trying to regulate wild life (life of all kinds, for that matter). Hunters are not needing to be accomodated. Nature needs to be protected. I strongly oppose this action!

#### Paralitici, Stephanie

I am strongly opposed to the slaughter of the Gray Wolf. I think it is a waste of tax dollars and life to hunt and slaughter a species for abiding by its natural instincts and need for survival. This slaughter could take this species to the brink extinction. The Gray Wolf that has just begun to recover from being over hunted. Please reconsider the "need" to hunt and kill these amazing animals.

#### salfen, chris

#### ventura, CA

Ventura, CA

Let the wolves continue to grow in their population. As far as trophy hunting, this is like hunting your dog. Your not going to eat it.

#### Siodmka, Lynne

I opppose the slaughter of wolves. Please take whatever action necessary to protect them. The wolves provide balance in our ecosystem by keeping vermin and elk in proper balance.

thank you,

Lynne Siodmak

#### Unmacht. Eric

#### Ventura, CA

My goal in writing is not to change your mind. I know you have already made your decision, according to the previous page that said: "Although the Department encourages public input, there is limited ability for the Wyoming Game and Fish Commission (Commission) to make additional changes to the Draft Plan and expect the Plan to be accepted by the U.S. Fish and Wildlife Service (USFWS)."

My goal is to try to show you that killing is wrong by asking you to be aware of the severe suffering that your actions will cause you in the future. Even though your mind has justified this action, you know deep down that killing is wrong, especially for sport. Despite the fact that every enlightened person has said so - from Jesus and Abraham to Mohammad and Buddha - you know through your past experience. Each time you have killed something, you feel bad. Each time you have created or nourished someone or something, you have felt good. In this way, killing causes even more suffering to the killer than the killed. So after you take these actions, please be aware of their effects so that you will one day follow the right path to a happy and peaceful future.

Thank you for taking the time to listen. May you and the others find an end to your suffering and be happy

#### Villacorta, Violeta

#### Ventura, CA

I strongly oppose House Bill (HB) 0213 which would allow Wyoming's Grey Wolf Management Plan to murder hundreds of wolves. What neds to be done is BAN hunting, so that wildlife supports a natural ecosystem. I oppose this bill and ask that we refrain from using our tax dollars for such a gross plan.

#### George, Linda

#### Walnut Creek. CA

I realize this is not a simple issue, and that the reintroduction of wolves has been a challenging process.

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#### ventura, CA

Ventura, CA

Nevertheless I urge Wyoming Game and Fish yo not approve this plans to delist wolves and to change their designation to trophy animals at this juncture.

#### Herrera, Jonathan

It makes no sense to further endanger an animal species that it already under some type of protection. Has there been sufficient evidence to determine the wolves the necessary eliminate to restore elk numbers. For the sake of endagered animals and their habitats, please do not shrink the Gray Wolf population.

#### Paetzold, Andreas

I understand that the concerns of people trying to raise bovine livestock in desert and semi desert areas are immense concerns for those people. There are many factors that could reduce the profitability of ranching in Wyoming, wolf predation being one of them. People should have the right to protect their herds from predators that seek their livestock out, but not all predators. Oft is the case that wolves and other predators do not attack livestock. Setting a limit on the number of wolf packs that live in certain areas does not take into account that some wolf packs will never attack livestock. The ability of people to defend their property will still be there irregardless after delisting. Livestock predation is the only valid reason to try to limit the number of wolves. The impact of wolves on game animals is inconclusive, and may show wolves increase game numbers. Therefor, setting limits on the number of breeding pairs of wolves has no point.

#### Smith, Patricia

#### Wyoming needs to keep a greater number of wolves in its management plan. Also, any wolves that need to be removed should be removed using non-lethal methods. The Grand Teton wolf packs should be left intact. The state needs to realize that these wolves are a big economic draw, as tourists come from all over to see them. It would be sad indeed if we revert to the kind of thinking about wolves that was predominant in the last century and led to their extinction in the Yellowstone/Grand Teton area in the first place.

#### Bacigalupi, Tadini

In order for wolves to survive into the future, wolves must be protected so that they can actually survive as a species, seven breeding pairs is not enough to do this, nor is it enough to allow for wolves to migrate to other states like Colorado. Survival of the species necessitates the ability of wolves to occupy their former native habitat throughout the United States, and Wyoming's plan is in complete opposition to this and therefore fails as a recovery plan. Additionally, Wyoming's plan is, if not in law, in spirit the absolute opposite of what Congress envisioned with the Endangered Species Act.

#### Winn, Robert

# Craig, CO

I am proud of your state for sticking to your guns and enforcing the will of your citizens. It is a goodplan that should meet the requirements, yet still protect the intrest of you citizens. THe predatory status is a great idea and will help protect other areas of concern throughout your state and neighboring states. Specifically it will help create a buffer zone for the elk heards of NW Colorado. This is a good thing. I wish I lived in a state where the Department of Game and fish still stood up for the right to manage public resources in the best interest of the public and not the interest of special interest group.

#### Escamilla, John

#### Denver, CO

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

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### Boulder, CO

Boulder, CO

## Colorado Springs, CO

# Conifer, CO

3. Not to kill Grand Tetonâ?Ts wolves.

#### Meyer, neil

#### Denver, CO

I live in Colorado but my heart is always in Wyoming.

I spend a great deal of time fishing, hiking and vacationing in your state.

I've seen wolves in YNP as well as while backpacking in the Washakie Wilderness and I've seen recently killed elk.

While I appreciate your departments concerns for ungulate populations, I believe 7 breeding pairs outside the parks (which would mean about 50-100 wolves) is far to low a number to ensure a healthy populion as well as a viable predator/prev interaction.

I also believe-

Conflicts with livestock should be dealt with by non-lethal means if possible.

Packs with ranges partly in Parks (such as Grand Teton) should not be killed.

Shooting wolves from the air should be strictly forbidden.

Thank you and I hope you will address concerns expressed by citizens.

#### Scott. John

#### Denver. CO

Wolves have a place in the ecology. Please let them live in peace.

#### Steven, Kathleen

#### Denver, CO

Given the fact that wolves (as with all wildlife) do not confine themselves to man-made boundaries, the numbers of pairs for Wyoming seem much too low - particularly since you are including those within the park boundaries. Wyoming should manage wolves based on maintaining the current wolf population. I understand the need to minimize wolve/livestock conflicts, I would hope non-lethal methods (which have been used successfully in Montana) to resolve & prevent conflicts would be primary, with lethal methods used as a last resort. Furthermore, killing woles for conflict with other wildlife (such as elk) makes absolutely no sense (unless you are an elk hunter who doesn't really want to work very hard for his successful kill). Any decrease in elk numbers should be investigated by an independant source & should look for all causes (like oil & gas drilling) before the decrease is attributed to wolves & wolves are killed. Lastly, I do not believe the state of Wyoming should include the breeding pairs in either of the National Parks as part of their breeding pair numbers, nor should they be allowed to kill any wolves in the parks.

#### Gentling, Sally

#### Dillon, CO

I believe the plan is shortsighted, and inadequete, I feel that it lacks the consideration aof all the species in the ecosystem and is only attacking the so called problem of a higher wolf population, but not looking at the health of all plants and animals in the Greater Yellowstone area (Elk, Moose, Bison) and how a higher wolf population benefits those species. It seems like the plan will only push the wolf population back into endangered species levels, and we will have to start the process of re-introducing wolves back to wyoming. How can the Wyoming Division of wildlife ensure that hunters will not murder more Wolves than they have permits for? What future planning is in the works to help the health of the whole nothern rocky mountain eco system? Please take these things into account before moving forward with the slaughter of the majestic Grey Wolf.

#### Hoffman, Arlene

### Fort Collins, CO

I assume that, along with each of the 15 breeding pairs, there will be a pack of nonbreeding wolves. These wolves should be protected. Wolves that live primarily in our national parks should not be killed if they move across the borders of the park, which of course are not recognized by the wolves. Conflicts between humans and these very intelligent and loyal animals should be resolved without harming wolves or disturbing their pack relationships.

#### Tarantola, Pam

Ft. Collins, CO

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The Peace of Wild Things

When despair for the world grows in me and I wake in the night at the least sound in fear of what my life and my children's lives may be, I go and lie down where the wood drake rests in his beauty on the water, and the great heron feeds. I come into the peace of wild things who do not tax their lives with forethought of grief. I come into the presence of still water. And I feel above me the day-blind stars waiting with their light. For a time I rest in the grace of the world and am free. — Wendell Berry

This Wendell Berry poem relates my thoughts on all things wild, especially wolves. Wolves embody the essence of nature's perfection in every cell, every fiber, every unique hair and epitomize the "grace of the world" to which Berry refers. As the Earth's supposedly "superior" species, our human responsibility is to protect them NOT to destroy them, especially for mindless, needless sport. Who but dominance-crazed creatures would even conceive such a mis-guided plan. As humans, we have the chance to display---if even for a short second of nature's beautiful timepiece---the "grace of the world" by acting with reason, rationality, preservation and a semblance of the grace possessed by all "wild things". Look to Montana for a sane solution and model in dealing with this issue. DO THE RIGHT THING TO PRESERVE NOT DESTROY!!

Wyoming should:

1. Manage wolves based on maintaining the current NATURALLY-EVOLVING population and not based on an arbitrary goal of shooting hundreds of wolves for sport.

2. NOT kill Yellowstone's or Grand Teton's wolves.

3. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

#### Anthony, Robert

#### Grand Junction. CO

I believe the numbers you have set in your plan for wolf breeding pairs and packs is too low and risky.

#### jenkins, jon

Howard, CO

We need a more sensible plan for the protection of our wolves. In the meantime, don't kill any more of them. The world is watching.

#### Krecker, Jon

Lafayette, CO

Dear Sirs, I very strongly oppose the delisting of wolves from the Endangered Species Act. I strongly support maintain the current population & not based on an arbitrary goal of shooting hundreds of wolves. This is inhumane very narrow-minded & shortsighted. I strongly support you to use non-lethal methods to resolve & prevent conflicts & only use lethal methods as a last resort. I also very strongly urge you NOT to Kill any wolves in Grand Teton National Park. Humans need to do a much better job of sharing the planet with animals. Wilderness has value a great deal of value and wolves live in the wilderness whenever I am in the wilderness I know that I am in their home.

#### Kinyon, Susan

#### Longmont, CO

Manage wolves based upon current population maintenance, not based on an arbitrary goal of shooting

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hundreds of wolves. lethal methods as a last resort. Thank you.

Use non-lethal methods to resolve and prevent conflicts and only use Don't kill wolves in the Grand Teton area.

#### Newcomb, Sandra

Longmont, CO

Wyoming needs to come up with a wolf management plan that ensure the continued recovery of the wolf. It has taken years for the gray wolf's come back from almost extinction. In my opinion it is unthinkable that the US Fish and Wildlife Service would even consider the delisting of Wolves when Wyomings plan's main point is extermination. When you take into account that the wolves became added to the endangered species list 30 years because of similar thinking it makes one disgusted beyoud belief with our US goverment and state agencies. My family just recently purchased land in Wyoming and we hope to make our home there in the next few years. I'm hoping Wyoming can help me to appreciate and be glad that we purchased this land in Wyoming.

#### peirce, roger

lyons, CO

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not to kill Grand Teton's wolves.

#### Unruh, Jerry

#### Manitou Springs, CO

My wife and I have visited Yellowstone National Park in winter eight times in the past 20 years. We were thrilled when wolves were reintroduced and continued to be so as the wolf population expanded. It is with great regret that we now see how severely the state of Wyoming is trying to limit wolf populations. I think there is ample evidence to show that wolves are a keystone species in Yellowstone and that would be true for the rest of the West. I respectfully submit that 7 - 14 breeding pairs are insufficient for a viable species to exist in the long term. Most of the studies I have seen suggest that 50 breeding pairs of almost any species is the bare minimum required to maintain genetically healthy populations. It is not surprising that U.S. Fish and Wildlife Service would sign off on such a low number given the distortion of science by the Bush Administration.

I recognize that there have been studies to suggest, elk populations have been decreased by wolves. That is all to the good. Elk populations have been too high as shown by studies in Yellowstone National Park. Aspen are now starting to recover as elk populations are reduced and are kept moving by wolves. There was also a report in the journal "Science" that showed lower reproduction due to higher stress on elk. Again, this is helpful in bringing back healthy ecosystems. In addition, wasting disease should give us all pause about overpopulation of both elk and deer.

Please do not adopt the proposed program. Rather, allow wolves to expand to the number required for healthy ecosystems all over Wyoming. Incidentally, I am very much in favor of wolves being reintroduced into Colorado. The ranch, farm, and hunters lobby has held sway in Wyoming and all over the West far too long. Lest my comments be misjudged. I am respectful of good hunters and their understanding of the outdoors. I am not respectful of those to want to eliminate all predators except people.

#### Roberts, Bay

#### Nederland, CO

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of

shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. do Not kill Grand Teton wolves.

4. it is an honor to have wolves in the U.S. and we should protect them!

#### Ryan, Robert

#### Parker, CO

- I feel Wyoming's plan is too focused on killing wolves to get to some arbitrary number of breeding pairs as opposed to trying to protect the current number of wolves currently in the state.

- I would like to see more of a focus on non-lethal methods to resolve and prevent conflicts involving wolves and feel lethal methods should be used only as a last resort.

- I am against the killing of any Grand Teton wolves unless absolutely necessary.

#### Thomas, Michele

#### Steamboat Springs, CO

Please don't interfere so much with the ecosystem. History has shown how we must keep correcting past actions that were too drastic. Lethal measures to control wolf population should be the last resort.

#### Hulse, Carol

#### Strasburg, CO

There are many of us in this country and around the world that were elated when they bought the wolves to Yellowstone and watched for any news on their successes and failures on a daily basis. I will never forget when the beautiful, high profile male, #10, was killed and decapitated by the likes of Chad McKittrick and the profound effect that the wonderful #9 had on the Rose Creek and many other of the wolf packs in the Greater Yellowstone Ecosystem. I recall when #39 (trying to head back to Canada to perhaps find her mate) was shot by a ranch foreman who defended his actions by stating that "he thought she was a coyote". He would have had to have been blind not to be able to tell the difference. The wolves have already paid dearly for any indiscretion they may have even remotely displayed in the past 12 years so why do you continue to try to eradicate all of them once again? History will not repeat itself again if I have any control over it. It is time the special interests of livestock producers and outfitters be placed on the "back burner" for a change. Hasn't it been obvious the draw that the wolves have had by tourists to the State of Wyoming? Isn't this why the Wyoming Tourism Bureau now displays pictures of these majestic creatures on their advertisments and website? Perhaps right next to it they should show the true picture of how wolves are viewed by many Wyoming citizens and what your intentions are in regard to trying to kill each every one of them if you had the opportunity. I believe this might bring an abrupt halt to many of your tourism dollars & perhaps this is the course of action that needs to be taken as a wake up call to those of you who try to play "God" with our creator's wild creatures. Please reconsider & revise your plan.

#### Sharpe, Rebecca

Winter Park, CO

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not kill Grand Teton's wolves.

#### **Rylander**, Jason

### Washington, DC

Complete comments of Defenders of Wildlife will be submitted via Federal Express. A summary of those

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comments follows:

Defenders' comments on the draft plan reiterate concerns we have previously submitted to the State of Wyoming in comment periods held for earlier drafts of the state's wolf plan, as well as concerns related to more recent developments and stances taken by the state regarding wolf management. The overall thrust of the plan remains wolf eradication rather than wolf conservation. We remain opposed to the plan's focus on reducing Wyoming's wolf population to the bare minimum recovery levels established by the U.S. Fish and Wildlife Service and oppose the plan's intention to classify as predatory animals—especially as wolves would assume this status in nearly 90 percent of the state. We believe this status is a direct threat that would endanger not only the wolf population in Wyoming, but also the entire northern Rockies regional wolf population.

Wolf recovery in the northern Rockies, as the Wyoming plan itself notes, is of national significance and interest. Since the reintroduction of wolves in the region 12 years ago, collaborative efforts between federal and state agencies, non-governmental organizations, and individual ranchers to reduce or prevent wolf-livestock conflicts have made great strides in developing tolerance for sharing the landscape with wolves. It is incumbent upon the state of Wyoming to adopt the tolerance needed for wolves and humans to co-exist, as many of its ranchers have done, instead of broadly expanding the circumstances under which wolves can be killed. The Wyoming state wolf plan simply lacks the adequate regulatory mechanisms that must exist to ensure a viable wolf population into the future. Wyoming's plan would result in the immediate killing of large numbers of wolves by establishing a "no wolf" zone where the species would be completely unprotected by federal or state law across most of the state. The plan would result not only in the reduction of wolves to levels that could trigger emergency federal relisting, it would also stop wolves from being able to recolonize former wolf range in Wyoming outside of the small area proposed for trophy game status, or in adjacent states.

We urge Wyoming to revise its plan to provide appropriate protections for wolves, to encourage and ensure the species' long-term recovery in the region.

#### Kennedy, Kelli

I feel that it is important to manage wolves based on maintaining the current population, not by using a predefined number of breeding pairs as a goal. I also oppose killing any wolves in the Tetons. Finally, if conflicts do arise, the use of non-lethal methods should be used to resolve and prevent conflicts and only use lethal methods as a last resort.

#### Laughtland, Josh

Please manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves, and use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

#### Nissl, Jan

Boise, ID

I believe all the state plans need to be coordinated into a regional plan before the gray wolf is delisted. Just maintaining numbers is not enough. Is there enough biodiversity to support the populations in each state to make a regional guardianship work.

### Lynch, Bill

#### Chubbuck, ID

I am an avid sportsman who loves to fish and hunt in the Rocky Mountains. I plan on hunting deer and elk on a annual basis when I get out of school and I feel that the number of wolf breeding pairs is too low to maintain healthy populations of deer and elk. I hunt for both trophy and meat and I prefer quality over quanity in both areas. I am afraid that hunting as a source of revenue for game and fish departments and local business has a great influence on wildlife management plans that may negatively affect that revenue. Please consider the quality of strong healthy herds in deer and elk populations in regards to the

# Boise, ID

### Boise, ID

low number of wolf breeding pairs being proposed on the Draft for the Wyoming Gray Wolf Management Plan.

#### McMurray, Fred

I strongly feel that the Wyoming Gray Wolf Management Plan is a plan for eliminating Gray Wolves in Wyoming. Aiming at the minimum allowed number of breeding pairs is aiming for failure. I feel that it is evident that the the Wyoming Game and Fish don't want any wolves in Wyoming and they plan to get rid of them, or as close to it as allowed. I don't believe that Wyoming should be allowed to manage the Gray Wolves in Wyoming unless they come up with a plan to manage the wolves, not eliminate them.

#### Artley, Dick

#### Grangeville, ID

Coeur d'Alene, ID

I know Wyoming politics almost as well as I know the politics here in Idaho. Once the wolf is delisted in Idaho, they might have a maximum of 18 months under state "management" before they are all dead.

Governor Otter and the state Fish & Game Dept. repeatedly hammer it into the public that the "reduced big game numbers are the results of wolf kills."

I am retired from the US Forest Service. I know the truth. The reduction in large ungulates is due to habitat loss (primarily hiding cover) and the massive increase in roads.

The Wyoming situation is nearly identical to that here in Idaho.

#### McClain. Barbara

Pls work to find a balanced plan for wolf management

#### Brown, Barbara

I thinkusing lethal methods to control wolves should be a LAST resort. I believe the breeding pairs should not be limited within national parks. I believe current populations should be used as a basis for allowed numbers, rather than an arbitrary limit.

#### Kull, Arthur

Wolves are part of the natural eco-system of the US. The whole approach of wolf management seems to be based on the fear that wolves will decimate livestock and hunters' game. Although some kill will happen, why is it that only humans have the only right to own game for food and sport and not the natural eco-system? The Maasai manage their livestock herds among lions, cheetahs and leopards! Whay can't we?

I am for keeping the wolves at their current numbers., that they not be any hunting quotas, and that they not be hunted in the Grand Teton region.

#### Pedersen, John

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not to kill Grand Teton's wolves.

#### Pedersen, Teresa

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

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### Idaho Falls, ID

Idaho Falls, ID

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Nampa, ID

Nampa, ID

Idaho City, ID

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

#### 3. Not to kill Grand Teton's wolves.

#### Bosworth, Ken

1.) Wolves in the area of Grand Teton National Park and the Jedediah Smith Wilderness should be allowed to breed and hunt without arbitrary limits being set on their populations. These populations are part of the Greater Yellowstone ecosystem, and should be allowed to interact with the populations in YNP 2) Wyoming Game and Fish should use live, non-lethal, trapping and relocation methods to move "problem" wolves to remote Wilderness areas.

3) Shooting of wolves should, if allowed at all, be highly regulated and Wy. G&F should charge trophy hunting fees for such.

4) The 15 breeding pairs target population is ridiculously low as a "viable" population. This does not allow for the possibility of some epidemic wiping out the Wy. population entirely (e.g. parvo virus). If that did happen, we would be right back in the situation of having the wolves re-listed (which will happen under a Democratic administration).

#### Havens. Pauline

#### Pocatello, ID

Please, do not kill the wolves in the Teton NP. They should not be destroyed even if they happen to leave the boundaries of the part.

#### smith, jason

Thanks so much for your consideration. I realize that this is a tough issue, but I feel strongly that we need to keep the west wild with at least a reasonable amount of breeding pairs of wolves and I have little doubt that WY Game and Fish estimates are way too low.

#### Niesse, Brian

As a guide in 2006 along the south fork of the Shashone river in the Washanki Wilderness wolves were a problem for the elk population. Wolves were seen and heard often. There needs to be a plan in place to keep the population in check. I agree with the delisting of the wolf. I think it will help the elk, deer, and moose populations in this area. I think it will help make up lost revenue for outfitters if the can offer wolf tags. I think the grizzly bear needs to be delisted also. I have seen 1st hand the impact both animals have had on outfitters and hunters in this area and they are not good. I think the state will do a much better job in the management than the federal government.

#### **Darwall**, Stephen

I am concerned that the number of breeding pairs that Wyoming would be committed to protecting is too low. Even a concerted effort to protect 15 breeding pairs might end up successfully protecting fewer and risk moving back towards endangerment.

#### **Buchner**, Scott

Please consider the following:

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not to kill Grand Teton's wolves.

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#### Ann Arbor, MI

Belgrade, MT

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# Pocatello, ID

victor, ID

Nenphis, IN

Wolves do not understand state boundaries and your proposed plan would affect wolves throughout this region, including Montana where I live.

Please do not take a giant leap backwards by adopting this plan. Wolves are part of the reason living in this region is so special.

Thank you,

Scott Buchner

#### Amnotte, David

As a Montana resident I feel your plan does not allow wolves to maintain sustainable numbers Montana plan does a much better job mantaining wolf population. Your plan should follow our states ideas, not the livestock industry of Wyoming

#### ANDERSON, RICHARD

THE MONTANA GRAY WOLF MANAGEMENT PLAN IS MUCH MORE SENSIBLE AND I URGE WYOMING TO ADOPT A SIMILAR PLAN. DON'T LISTEN TO THE EXTREMIST FANATICAL ANTI WOLF CROWD!

#### **Richards**, Paul

Wolves should be encouraged on ALL public lands in Wyoming, not only National Park, but also all BLM and Forest Service lands. Public lands for public wildlife! Public wildlife for public lands!

If ranchers don't like wolves, they can get their cows off of our public lands.

On their own private lands, ranchers should be able to control wolves.

#### Beck, John

After growing up in Wyoming and living much of my adult life in Wyoming, I strongly oppose the Draft Wyoming Gray Wolf Management Plan because it seeks to kill almost all wolves. We have already killed all wolves in Wyoming once years ago and we cannot afford to do it again. We need a plan that is common sense, based on science and on the principle that we need a health wolf population to restore and maintain a balanced ecosystem. Any plan that is based on greed or negative bias against the wolf should not be adopted. I urge you to have a plan that protects a health wolf population. My phone # is 406 581-6415. Thanks for your consideration. John Beck

#### Dickman. Garrett

Delisting the species is not my main concern. If the wolf regained status as a trophy animal and the proceeds from high-priced tags were used for conservation, I would be more supportive. Instead, this seems to be a plan backed by local political pressure and bad science. Fifteen breeding pairs is a low number for an already inbred population, leaving little to no room for error. I suspect this plan is based on ranchers' monetary losses, but it doesn't seem to also look at the vast economic gains from tourism. It certainty does not look at current, accurate science. This plan allows the minority, uninformed fearmongers to get their way. Consistently, the American people, and the world have said that they would like to see healthy wolf populations. This plan does not include a healthy population, and it is not based on science. It is based on the emotions of a small minority of people who arguably know slightly to no more about wolf biology/ecology than those who do not support this delisting. This plan would be a tragic and mind-numbingly stupid loss for the world as the wolf population is not likely to be sustained at that level. Try Again.

#### Bozeman, MT

#### Bozeman, MT

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# **Bigfork**, MT

BILLINGS, MT

Boulder, MT

#### **Grinnell, Chris**

#### Bozeman, MT

Wyoming's plan for managing wolves, unlike Montana's, sounds more like an excuse to destroy as many wolves as is convenient. The wolf population in Wyoming is a success story, and I would love to see them delisted. But not under the conditions of this plan. This sounds like an invitation for disaster for wolves. It is the natural beauty, recreation opportunities, and the spectacular wildlife of our region that draws people and their money here. Let's work on a more sustainable approach to encourage our wildlife, then trimming down their numbers to placate a few. Conflicts will happen - that is a part of life - but we need to work on resolving conflicts - in this case, between wolves and people's possessions - peacefully, through non-lethal methods. And definitely don't kill wolves in Grand Teton (which this plan would allow)!

Thank you!

#### Jochem, Nancy

#### Bozeman, MT

Manage wolves based on maintaining the current population and not on an arbitrary goal of shooting hundreds of wolves.

Use non-lethal methods to resolve and prevent conflicts and only use lethal methods as a last resort. Do not kill any wolves in Grand Teton National Park

#### Kenworthy, Craig

#### Bozeman, MT

We believe that state management of wolves is the best long term way to conserve the species, but that state management needs to be based on sound science and traditional wildlife practices. As the group dedicated to protecting the Greater Yellowstone ecosystem, with staff working throughout western Wyoming, we want to see state management succeed, but we also believe that Wyoming's plan needs to reflect a better balance.

As an example, Montana's state plan seeks to conserve wolves while respecting the needs of ranchers to protect livestock. Montana will end up killing some wolves, but only when it needs to, not as a standalone goal. Montana's plan includes a range of tools that allow for a case by case approach. That model, which is based on avoiding and resolving conflicts, is a better approach than Wyoming's proposed plan. We ask the state to make these changes in order to create a balanced plan that works for the long term: 1. Modify the goals regarding number of breeding pairs. The current plan allows for reducing the number of wolves in a 'breeding pair' down to 4 animals. That could result in fewer than 30 animals outside Yellowstone National Park. Instead of setting artificial goals, we suggest the state manage the packs within the trophy game area based on conflict management and allow the number of wolves per pack to fluctuate naturally.

2. The state seems to be proposing that any pairs on the Wind River Reservation count in the goal of 7 pairs outside of Yellowstone. The tribes are a sovereign nation and prepared their own wolf management plan. Aside from the legal issues involved, we do not believe the state is not entitled to tell the tribes how to manage wolves by attempting to use wolves there as a means to reduce the number elsewhere.
3. We acknowledge that many people in Wyoming expressed strong opinions about the trophy game-predator line. At the same time, drawing a line based on political considerations is not good wildlife management. We urge the state to reconsider and follow Idaho's example, which allows a more liberal take in some areas, but still has the state wildlife agency managing the species throughout the state. This will also allow for movement of lone wolves through an area and help prevent long term problems with inbreeding.

4. Grand Teton National Park's wolf packs move in and out of the Park. In order to maintain their ecological role in the Park, the state cannot engage in a repeated pattern of shooting any wolves that colonize that area and then animals that recolonize it. We urge you to amend the plan to state that wolves from Grand Teton will only be killed if they are involved in ongoing conflicts with livestock.

5. The issue of managing big game herds is a complicated one. We are concerned that the state may engage in blaming wolves for any changes in game herds, even when other issues such as oil and gas drilling, subdivision and the ongoing drought are the true factors in a decline in a given herd. We urge the

state to avoid a "You can't shoot the drought" approach and to seek to address all impacts on game herds. If the state is going to remove wolves because it believes they are impacting a given herd(as everyone knows, we are way over state wide objectives on most game species), it should also plan and implement strategies to address the other impacts.

In summary, we ask that Wyoming look at how its neighboring states are going to manage wolves and create a more balanced plan. Such a plan can meet the goal of keeping the species from going back into endangered status, respect the needs of all stakeholders and allow Wyoming to manage the species like other wildlife are managed. As an organization, we are ready and willing to work with the state on those issues, but we believe that a better plan is the best way to get there.

Craig Kenworthy Conservation Director.

#### Krebsbach, Eugene

#### Bozeman, MT

should allow wolves to exisit in the wild unless they conflict with domestic herds regardless of a specific number of breeding pairs. need a population large enough for genetic diversity.

#### Murphey, James

I think that Wyoming should follow a plan similar to Montana's. I think that the goal should be to maintain current populations of wolves, with wolves being killed ONLY as a last resort, e.g., when specific animals have demonstrably attacked livestock. I think it is outrageous that Wyoming would kill wolves just because "there are enough already." Wolves are an important part of the ecosystem, and more wolves would help solve problems such as overpopulation of elk (which thus require supplemental winter feeding and/or killing of bison), which can lead to habitat destruction and disease. Wolves in Grand Teton National Park should not be targeted for killing at all (i.e., unless there are specific problems with specific wolves). The Northern Rockies ecosystem should be preserved in a somewhat natural state, which is a huge part of what makes the area in which we live so special. I do not believe that hunters' desires to have more elk to hunt should take precedence over the desires and priorities of the majority. Finally, I think that Wyoming's proposed plan makes Wyomingites look totally out of touch with today's reality. Thank you for your consideration of this.

#### **Richardson, John and Gail**

Your plan is not based upon maintaining a viable long-term population of recovered gray wolves, as is our plan here in MT. Your plan is not scientific; it is political. You would allow your current wolf population to be decimated by arbitrary shooting, only maintaining the barest minimum population. Allowing shooting of wolves outside Grand Teton N.P. when these are wolves that spend much of their time inside the park is totally unjustified. You obviously do not want a balanced plan. You are kowtowing to livestock interests at the expense of our native wildlife. What about non-lethal controls? Is all you care about killing wolves?? We are wildlife watchers and have enjoyed seeing wolves in MT and WY. They are part of our natural heritage. Go back to the drawing board.

#### Stevens, Nike

I urge you to allow wolves to be part of the ecosystem in the Greater Yellowstone area including National Forest and BLM lands.

#### Swearingen, Jennifer

Wyoming's plan should not target wolves that inhabit the Tetons and the immediately surrounding area. Wyoming's plan should aim to maintain the existing population, not to dramatically reduce it. Please adopt policies to reduce conflicts rather than focusing on lethal measures.

#### Horn, Maurice

#### Bozeman,, MT

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# Bozeman. MT

#### Bozeman, MT

# Bozeman, MT

Bozeman, MT

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Please keep wolves in Wyoming. Thanks mhornrentalres@mcn.net

#### Williams, Rod

#### Deer Lodge, MT

All I have for commits at this given time, and is the same for Montana. That many,many people have suffered due to the illegal introduction of the wolves into the surrounding ecosystem of our fellow states. We can how ever manage to co-exist with the pest's but it like many species needs to be properly managed so that it can properly fit in our world. So it is the best interest of the people that this hunt for the wolves proceed as planned without altercation. LET THE HUNT BEGIN!!

#### McKey, Sandra

#### **Dillon**, **MT**

Please do not arbitrarily limit the number of wolves in Wyoming, but instead manage wolves based on the current population. Additionally, resolve conflicts using non-lethal means if at all possible. We need to share this planet constructively.

#### Boyden, David

#### Emigrant, MT

The WY plan should manage current populations and not reduce them artiburarily. Lethal methods should be a last resort. Grand Teton wolves who stray outside the park (they don't read maps last time I checked) should not be killed.

A compensation plan for ranchers should be in effect. That is fair. However, wolves are a national resource and heritage that should not fall prey to a small number of rancher's desires. Compensate-don't destroy the wolves.

#### denny, gary

#### emigrant, MT

wolves kill the weakest and oldest elk and deer. hunters kill the biggest and most productive elk and deer. the majority of Americans want not less but more wolves. you cannot cater to the wishes of hunters only. your mandate is to enhance wildlife. killing 2/3 of the wolves would clearly show that your department functions for the sole benefit of hunters and ranchers. for many of us, wolves have as much right to live as humans. it is a sin against nature to slaughter innocent creatures for just being themselves. wolves are not evil, or killers for pleasure as humans.

this is really about respect. having respect for nature. when you talk about wildlife management it should mean managing for all living creatures and not just managing production animals for hunters.

#### Attardo, Pamela

#### Helena, MT

My opposition to Wyoming's plan is four-fold: I believe that de-listing is premature. I believe that the plan should be based on maintaining the current population, rather than reducing it to an arbitrary number. Conflict situations should be resolved or prevented using non-lethal methods, with lethal methods used only as a last resort. Wolves should be allowed to inhabit Grand Teton Park as well as Yellowstone - national parks are for wildlife, after all.

My question to you is, how many tourists come to Wyoming from all around the nation and world to look at Wyoming's beef cattle? Wyoming has a unique situation - the wolf population is an an asset rather than a liability. Wyoming has to make the wolf phenomenon work for it rather than against it. There are ways other than killing to manage wolf populations.

#### Vignere, Joel

#### Lakeside, MT

I encourage Wyoming to continue in this Dark Ages game management mentality for I believe that the wolf will NEVER be declassified until you folks get your heads out of you know where.

#### Brandau, Jim

#### Livingston, MT

Appears to me that the State of WY wants to exterminate all the wolves AGAIN! Our lands aren't just for

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livestock.

#### Chiaviello, Philip

#### Livingston, MT

Wyoming should come to grips with the best science available and impliment a plan that will ensure an intact ecosystem. Wolves are an important piece of the ecology and must be preserved in sufficient numbers to be viable. I believe there is sufficient science to support an expansion of the wolf population in Wyoming.

#### Earl, Jim

#### Livingston, MT

Please don't sacrifice the ranches within the Trophy hunting area! The trophy hunting area should include the entire state!

#### Kessler, Nancy

#### Livingston, MT

As a resident of the Greater Yellowstone Ecosystem, it is extremely important to me that wolves remain a part of our wildness, and be managed not just for survival, but to ensure they thrive. Wyoming's plan ensures the opposite. My neighbor to the south should take a good long look at the plans presented by my state. Montana, and our neighbor Idaho, and produce a working plan that complements its neighbors' plans.

In short, Wyoming's plan must:

1. Manage wolves based on maintaining the current population and not on an arbitrary goal based on allowing hunters to shoot hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts between humans, domestic animals and wildlife, and only to use lethal methods as a last resort.

3. Not promote, encourage or allow under ANY situation the killing of wolves based in or near Grand Teton National Park.

Thank you.

### Sullivan, Daniel

#### Livingston, MT

I believe that Wyoming is acting only as the errand boy, sent by the clerks in Washington, to deliver a political message. Namely, the current reactionary plan to manage the wolf out of existance in Wyoming. WG&F is subservient to those controlling a climate of contempt for any living creature that cannot be tamed. The only true threat from the wolf is that they might outlast their foes until the next election cycle. No, slaughter from helicopters is the name of the management game and as many of these animals as possible This is the sum and total of this barbaric plan. Shame on the State of Wyoming.

#### Gourley, Bruce

#### Manhattan, MT

Wolves bring millions of dollars into the state of Wyoming, as tourists from all over the world come to Wyoming and Yellowstone to view the animals. The dollar benefit wolves bring to Wyoming is far greater than money lost through livestock predation (not to mention that many more cattle are lost to other causes than are lost to wolf predation). The philosophy of the current Wyoming wolf "management" plan is to eradicate wolves to a rate at which their survival is marginal, with no concern as to their long term viability. By so doing, the state of Wyoming will lose revenue and bow to the pressure of a few ranchers who spend more time worrying about kills by wolves (0.11% of all cattle loses in 2005) than they do the greater number of deaths which come from coyotes (22 times as many kills as by wolves), domestic dogs (5 times as many kills as by wolves), loss by theft (5 times that of losses to wolves), and vultures (2 times as many kills as by wolves).

Responsible management of wolves by the state of Wyoming would include maintaining the current population, use of lethal methods as a last resort when attempts to resolves wolf conflicts are fruitless, and no killing of Grand Teton wolves.

In summary, the current wolf "management" plan will hurt Wyoming financially, is based on unfounded fears of wolf predation while much greater sources of livestock losses are ignored, and will place the future of wolves in Wyoming in jeopardy.

**Bruce Gourlev** Yellowstone Net www.yellowstone.net

#### montejano, vicki

#### Missoula, MT

Missoula, MT

Management of wolves should be based on current populations, not an arbitrary goal or number. Absent true predation on livestock non-lethal methods should be always be used.

Don't give-in to pressure from the cattle and sheep lobbies, wolves are an integral part of the natural ecosystem in Wyoming.

#### Nicolazzo, Blake

Thanks for taking public comment. I oppose this plan because Wyoming, Montana and Idaho are supposed to be wild states with wild animals. I am tired of politicians and lawmakers taking the side of cattle ranchers and hunters. I totally resoect good hunters- those who realize that it's a sport, NOT a lazy man's activity. But I have little respect for some cattle ranchers stuck in their old boy ways who hurt our environment not only by killing wild animals they consider a nuisance, but who also introduce extreme amounts of pollution into our water and air.

There should be challenge in our beautiful states, with the animals who belong here allowed to live. Managing wolf pairs and trying to get them to act like domesticated animals is an unfair expectation. We should have wild wolf pairs, and they should be allowed to kill what they eat- this is natural. Cattle ranchers and ALL business who want to operate on the animal's land should have to figure something else out. We, afterall, are human, and have a higher brain function than animals. Sincerely,

Blake Nicolazzo

#### Fraser, Donna

#### Sheridan, MT

Gray wolves should be managed in such a way that big game quotas are NOT driving management goals. Wolves were a natural part of the Greater Yellowstone Ecosystem before being exterminated by humans. Lethal population control should be considered as a last resort.

Thank you for your consideration.

#### Stamm, John

#### St. Regis, MT Wyoming should maintain the number of wolf breeding pairs at least as currently exists. Wyoming should look to the plan Montana has adopted for guidance for a plan that would insure a reasonable number of wolves and for a plan that could be acceptable.

#### Vasquez, Anita

Victor, MT

Wyoming should:

1. Manage wolves based on maintaining the current population and not based on an arbitrary goal of shooting hundreds of wolves.

2. Use non-lethal methods to resolve and prevent conflicts and only to use lethal methods as a last resort.

3. Not to kill Grand Teton's wolves

#### Yoder, Paul

Please do not remove wolves from the endangered list.

Please do not modify the definition of "unacceptable impacts".

Please do not allow private citizens in Wyoming or on Tribal lands with approved wolf management plans to take wolves that are in the act of attacking their stock animals or dogs.

#### Culbertson, Shelly

Wolves play a very important role in the natural balance of the ecosystem. They should not be killed; they should be allowed to sustain the numbers that they can naturally based on weather and prey conditions.

#### Hammond, Jing

I do not want my tax dollars to go to the slaughter of animals, wolves or otherwise.

#### Jardine. Kim

Please think of future generations. Why do you want to KILL everything for profit?

The Bison, Wolves, Bears, Coyotes. you kill because of the Cattle industry! I don't want my tax dollars to support this crime.

How can you feel good about this? Your not doing the right thing, you need to change jobs and go shovel your crap where it's legal. Maybe you can be a trash picker upper! Maybe then you can do something that fits your need to do something dirty.

#### White, Dana

#### Reno, NV

I am against the wolves being taken off the endangered species list and thus allowing the massacre of the breed once removed.

### WOOD, APRIL

Dear Sirs,

I strongly feel that killing anything that is on the endangered spices list is wrong, wrong, wrong. They are on that list for a reason and should not be massacred for any reason. I Native American and I have strong ties to the wolf, and we consider them family. They were here first and deserve better than to be slaughtered like this plan is proposing. I don't believe that you can just determine that 7 breeding pairs are enough ecspecially when the orignal call was for 15. I am a avid hunter and as a hunter I would NEVER blame nature for doing its job. Thats the call of the WILD. You can't control Nature. We've been trying for years, it never works. We are the ones to blame for this. Baiting things to kill them is against the law, and should be just that. When you chase something down by air where it has no chance at all is sick and unfair to say the least. Elk herds have been on the decline for years and years, not only from natural events but mainly from humans themselves, so why punish something that has such a small part in it when it should be us that gets punished. I don't believe that we would work so hard to bring them back just to kill them off again. I am ashamed and disappointed in our government for even considering something like this. April Wood

### Grosz, Denise

What is Wyomying thinking??? Removing means killing wolves. No way will US citizens put up with killing a native species. Wolves are a nuisance and kill elk, yes they have been doing exactly that since before any of us walked this earth. Now we want to consider wolves a trophy animal, how about calling the mountain lions that stalk runners in CA and UT trophy animals too. Native species should not be removed. My family lives in Cody Wy and they are more concerned with the ocassional grizzly bear that shows up in their back yard and chases a few people near



Sparks, NV

# Reno, NV

Reno, NV

reno. NV

Cuba, NM

fishing areas or out lying homes. NO KILLING WOLVES!!!!!

#### Weinmann, Marie

#### **Brooklyn**, NY

Thank you for this opportunity to comment. the wolf's come-back has been a huge success story -- and taking them off the endangered species list will be a serious set-back to the health of their numbers.

Please reconsider this plan -- and allow the wolves to live.

Sincerely,

Marie Weinmann

Yates, Linda

#### Scappoose, OR

This letter is to express my opinion to the Wyoming Game and Fish Department & state that I strongly oppose your recent draft Wyoming Gray Wolf Management Plan.

I am extremely disturbed that your proposal would allow Wyoming to begin the slaughter wolves as early as this winter. As a wolf supporter, I would like to see more protection for the animals, but I realize that we have to try to strike a balance that is fair for those on both sides of the issue.

Livestock owners & hunters also need to also be willing to compromise, & this doesn't appear to be the case here. It seems that wolf hysteria bred of ignorance runs rampant in Wyoming.

You only seem to have to very reluctantly accept wolves in a small part of your state compared to the entire states of Montana & Idaho, yet want more than twice as much funding to "control" the population. And you don't feel that hunters should have to fund any "control" yet they are the group who is going to be allowed to "control" the population by killing as many as they can in 34 of the state. Take away Yellowstone, a NATIONAL park that belongs to the entire citizenry of the nation. & shouldn't even be counted in my opinion, & that leaves almost no protected area at all, if you consider being a trophy animal protection.

Neither Montana & Idaho classify the wolf as a predator.

The draft talks about wolf depredation on livestock, but fails to mention that depredation of all kinds, wolves, bears, coyotes, cougars, & yes, even domestic dogs accounts for only 2% of livestock losses, so losses by wolves alone is less than 2%.

Your draft also fails to mention the spread of brucellosis through your elk feedlots.

Elk numbers are up, so much so that additional hunting tags are being issued. This certainly does not support the claims of decimated elk populations. I find it especially outrageous that wolves that are "preving on wildlife" could be killed for this. What is it you expect them to eat? This is after all, the way nature intended it to be.

I think it is an extremely poor plan, especially considering we are talking about an animal that is still endangered.

It certainly doesn't appear that sound science is being considered in this decision. It has the strong smell of political pandering to influential minority groups that pay for political favors.

Wolves are an important part of a balanced ecosystem. . The re-introduction, into Yellowstone has been an incredible success. Aspens & willows are again growing now that overgrazing by elk has stopped because the wolves keep them on the move. With the return of the aspens & willows, there has also been a return of beaver & songbirds that had been missing because their ecosystem was destroyed by the overgrazing.

Game is as plentiful as ever, with even longer hunting seasons in parts of the wolves' range in an attempt to further reduce herd sizes. Predation on livestock has remained at levels far below what was predicted before the re-introduction.

Tourism, rather than being harmed by the wolves' presence, is booming.

People come from around the world to see these magnificent animals in the wild.

Wolf watchers in Yellowstone bring in over twice as much money to the park communities than hunters do.

There have been no children eaten while waiting for school buses.

Nature has a balance that should be maintained & protected. When a key part of an ecosystem is removed, the whole system is out of balance.

Wolves were persecuted & exterminated for no legitimate reason & they deserve a place in their native environment. As Americans, we need to be big enough to allow the presence of wolves in their native environment.

I urge you not to decimate a wolf population that has only recently sprung back to life and is worldrenowned as a symbol of the American west. Please don't allow your state to represent the archaic ignorance & unfounded rabid hysteria that unfortunately is a very negative symbol of the American west. I ask you to reconsider your plan to allow the massive killing of wolves in the northern Rockies.

Thank you, Linda Yates

#### Locke Sr., John

Pittsburgh, PA

My vote is for the Wolves. After a life time of wishing I lived out in the west but had to settle for the trips out there as often as I could manage while working my job back here. I had thought Colo, Wyo, Mont, New Mex. & I guess Utah were my ideals. Maybe the both Dakotas also. If I were to read this plan to kill off the Wolves in Wyoming were to go thru, I wouldn't even drive thru the state when ever the next trip comes up to go west. I would boycott any thing having to do wih Wyoming. I feel evry strongly on this subject. John W. Locke Sr.

#### Woolever, William

#### Schnecksville, PA

As a property owner in Northwest Wyoming (Etna, WY), and a naturalist, biologist (college-educated), hunter, & fisherman, I do not oppose the delisting of the wolf as endagered, but feel that the wolf should remain on the "Threatened Species List" - though in reality the Federal Government has taken or will take this action anyway.

I do strongly oppose that the State of Wyoming or the Wyoming Game & Fish will create and establish " a hunting season " on this natural predator outside of the GYP & GTP ranges, Wyoming should not allow any hunting or trapping of the wolf, and should create a list in State Legislature for Threatened Species and place the wolf on it until more population data is available, as many States have their own endagered and threatened species list. The wolf was here before man and then re-introduced, I can not believe they eat that many elk, moose, deer, antelope, etc as the hunting guide community states - when the ungulate population is on the increase in some areas.

this is what happens to wildlife species when government makes bad decisions on economic pressure and selfish individual or groups speaking. It strikes me quite interesting that Canada, Minnesota, and Wisconsin, and Michigan have as many wolves as Wyoming, less in population of deer than all of Wyoming's ungulate species population, and there wolves don't face the same dilema as Wyoming. Landowners who suffer livestock damage should be allowed to kill wolves only under W G&F supervision or monitoring. Again no hunting season of the Wolves in WYOMING - should not be allowed, (includes my thoughts on Idaho or Montana also) - when we deplete this natural resource due to this action - I guess we can ship more wolves from Canada and start the whole process all over again ! No hunting or trapping of the Wyoming Wolves - save this beautiful predator which gives balance to nature instead of being stuffed in someone's house or a museum.

Thank you, **Bill Woolever** 

#### **Rinderknecht**, Timber

Howell, UT

I beleave that the wolf is done its damage to the farmers, ranchers, and hunters, they are destroying the elk and deer herds, anyone that hunts in the big mountain ranges can see the dwindling herds of elk and

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deer, outfitters are losing buisnes and wyoming will start to lose hunters to other states not only because of the dwindling herds but high threat of getting attacked by wolves. The ranchers are losing more animals to the wolf than ever before and who really supports this country and wyoming the rancher does, he works hard to feed his family with animals he raises and he helps the rest of the word feed there's also, answer one question? Have you or your kids or your grandkids eaten today, well if they have you can thank a rancher and a farmer! there's not much you can thank a wolf for except its pretty skinned hide an a wall.

#### Dinger, Marilyn

#### Kaysville, UT

Kaysville, UT

No arbitrary shooting or killing of wolves; at least maintain the current number of wolves in all of Wyoming including in the National Parks.

No lethal methods to control wolves. Instead, use humane methods.

Do NOT shoot, kill, or remove wolves in Grand Teton National Park.

Thank You

#### Smith, Gibbs and Catherine

Let natural selection determine the number of wolves, except if the numbers drop too low. The wolf is a vital part of a natural ecosystem.

If conflicts arise with livestock, take account of both sides of the problem and attempt to solve it in a nonlethal way.

Wolves deserve a chance to be wolves. Related wolves travel in packs and need that support to be viable. It really enrages us to think of Wyoming's nimrod wolf-haters gunning down any wolves and we feel your management plan is thoroughly bad. You know, we'll be rid of Bush in a bit more than a year. We fervently hope the U.S. Fish & Wildlife has enough gumption to refuse to approve your plan which is really a killing fields scenario. We hope the next administration will be more reasonable. We are disappointed at your Game & Fish people, but Utah's are the same, unfortunately. We are really disappointed in your governor, who should have better sense. Grrr.

#### swenson, tracy

#### nibley, UT

I have alot to say so I will be mailing my comments in.

#### Carroll, Lynn

Ogden, UT

The management plan places too much emphasis on limiting the number of wolves in the state to the minimum required. Wolves should be allowed to perform their natural roles without excessive human interference, so the plan should aim to minimize wolf-human conflict only. There should be restrictions on the "taking" of wolves in the eastern portion of the state, except in situations where wolves are "caught in the act" of attacking domestic animals or humans. In other situations, such as suspicion that wolves have been responsible for multiple livestock deaths, a permit should be required, which would be issued only after investigation had determined that wolves were probably responsible. In the "trophy" areas, the numbers of permits should be small, allowing a gradual increase in wolf numbers above the current population.

Thank you for the opportunity to comment. Lynn Carroll

#### Johnson, Ann

Salt Lake City, UT

How do the wolves know when they are in Wyoming and when they are protected by designations in

Teton and Yellowstone Parks. This seems to be a thinly disguised attempt to eliminate as many wolves as possible.

#### Gault, Marla

#### Sandy, UT

With no clear way or intention to monitor this extremely low number of "breeding pairs", you set a condition where over zealou wolf-haters can willingly kill any and all wolves they want to. The number 7 breeding pairs seems ludicrously low. The original wording at least used the term "pack". Without human interference, wolf packs monitor their size themselves based upon available resources - food, etc.

Give this widely loved animal at least a fighting chance in your state.

#### Johnston, John

#### Smithfield, UT

I am always amazed when wildlife management is associated with a Plan. Wildlife seems to efficiently manage itself in accordance with available food supplies and environmental circumstances without intervention and has done so for centurys. To make these decisions based on the economic needs of a few individuals, such as local cattlemen in this instance, is the reason why we had to spend millions of dollars recovering this population in the first place. Ultimately hunting will decline as a "passtime" and management of deer, elk and moose herds will be best accomplished with natural forces such as predation. To put put wolves under the management of a State Agency with only seven breeding pairs required is rediculous. A couple of idiots with a rifle could wipe out the wolf population before anything could be done about it.....then the State would say "Too bad, so sad" and move on with raising cattle for profit on Federal lands few of the few wolves that might kill a few calves in a year at the cost of an entire species of animal. This management plan needs to go back to a working group that has no ties to the cattle industry, or to groups that sponsor trophy hunting. Hopefully this can be stalled long enough for a new Federal Government to get in place and stop the insanity before we are facing another mulit-million dollar wolf population development program again in 20 years. I have been a life-long Republican who for the first time will vote for another party because of the polarization of my Party on issues like this. Wiping out a species so that a few prople can hang their heads on a wall, or so that a small group of people can make a few thousand extra dollars a year is not in the public interest.

#### Spotts, Richard

#### St. George, UT

This proposed plan is not ecologically sound or in the public interest. It puts too much emphasis on lethal control and keeping the wolf population at a token level, while putting too little emphasis on the ecological and tourism benefits of allowing for a more healthy wolf population level. Please read Aldo Leopold's famous book, Sand County Almanac, and learn to respect rather than despise wolves. Wolves are a keystone species, and they are an essential part of restoring the health of Wyoming's ecological systems and natural communities of species. Thank you for considering my comments.

#### baxter, garth

#### wellsville, UT

I think the draft is too generous toward wolves. Yellowstone and grant teton national parks are plenty large for wolf populations. Outside of the national parks, wolves should be treated as predators or hunted as trophies.I

#### Bean, Jack

#### West Point,, UT

I fully support the idea of compensation to livestock producers that have loss due to Wolf predation. I however, despise the idea of the hunter / killers that have the idea that all the wildlife is for the benefit and profit of this group. When do those of us who do not kill for the sake of the "Rack" have a say in how the Wolves are managed? Scientific data tells you that the Elk numbers are above that which was suggested by your biologists for Wyoming.

I don't suppose it has any effect on the narrow minded fools that came up with this Wolf management plan as to how the rest of us non game killers feel. I for one however will never spend another penny in your fair State again. I Love Wyoming to. But I hate your concept for Wolf management. It is for the

benefit of the hunter / Killer outfitters and in a small way the farmers and livestock producers. It is my sincere hope that thousands of people will join in and boycott your lovely State in the years ahead.

#### Saunders, Linda

Tenino, WA

October 10, 2007

Wolf Comments Wyoming Game and Fish Department 5400 Bishop Blvd Chevenne, WY 82006

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on Wyoming's Draft Gray Wolf Management Plan (Plan) dated September, 2007.

It is widely accepted, and Wolf Haven agrees, that the wolf population in the northern Rocky Mountains is ready to be taken off the list of threatened and endangered species. How de-listing is accomplished, however, continues to be an issue and is of major concern. We believe that the presence of a wolf management plan that guarantees a viable wolf population within the states of Montana, Idaho and Wyoming are absolutely necessary before federal de-listing occurs.

There are several issues in the Plan that are of major concern to us regarding the continued existence of a viable wolf population in the Rockies. The issues concern the Plan's proposed dual-status designation for wolves in Wyoming, and what the Plan describes as an adequate wild wolf population in the state.

Under Wyoming's draft Plan, the state commits only to maintaining 15 breeding pair of wolves statewide. and specifically, only 7 breeding pair outside of the national parks, through liberalized hunting and lethal kill provisions proposed in the Plan. Both Idaho and Montana are committing to maintain more than 15 breeding pairs, with no limit on the total numbers of wolves to be managed for, and wolves will be distributed throughout each state. Wyoming's Plan limits the distribution of wolves to the northwest portion of the state, and we believe that the minimal number and restricted distribution of wolves proposed in the Plan will not allow Wyoming to maintain its share of a viable wolf population in the Rockies.

In addition, the draft Plan does not provide any assurance that wolves will not be reduced below levels necessary to prevent re-listing under the Endangered Species Act (ESA), since the provisions for lethal take outside of the trophy game area are liberal and most likely impossible to monitor. The Plan, therefore, cannot meet U. S. Fish and Wildlife Service (USFWS) mandates the for recovery of listed species, which necessitate monitoring the population of species for a specified period of time after delisting, to assure that the species will not reach levels requiring re-listing under the ESA. The amount of lethal take that will be allowed under the Plan if the minimal number of wolves and extreme restricted distribution of wolves is managed for could dramatically affect wolf pack stability and consequently overall wolf viability in the Rockies.

The proposal in the Plan to have a dual status for wolves in Wyoming concerns us for two reasons. The Plan states that "Sufficient dispersal and exchange of wolves between the three sub-populations (in the Rockies) will be necessary to maintain genetic variation in the northern Rocky Mountain wolf population. In isolation, none of the three recovered sub-populations could maintain its genetic viability over the longterm." It goes on to say, "Isolation is unlikely if populations remain at or above recovery levels and regulatory mechanisms prevent chronically low wolf numbers or minimal dispersal." The USFWS states in its proposal to delist the Rocky Mountain DPS, that "in recognition of the importance of sufficient dispersal and exchange of wolves in maintaining genetic variability. Wyoming Game and Fish should not

remove lone wolves dispersing through areas outside of the trophy game area unless conflicts with human activities arise." However, as written, the Plan states that wolves in these areas may be subject to liberal public take regulations. The Plan states that public education efforts would emphasize that lone wolf sightings do not necessarily mean a pack is forming in the area. However, given the extremely well publicized anti-wolf attitudes of many Wyoming citizens, we find it truly hard to believe that anything, certainly not public education, would dissuade local citizens from killing wolves if it becomes legal to do so. Allowing dispersal of lone wolves, even if they were to make it through the proposed "predatory" section of Wyoming, does not allow for significant genetic flow within the Rockies for maintenance of a viable wolf population.

We are also concerned that the designation of predatory status of wolves in the majority of Wyoming will prevent any expansion of wolves outside of the Rockies into adjacent states. Various proposals have stated that the failure of wolves to re-establish adjacent areas to the northern Rockies is acceptable since the failure of outlying wolves is not likely to affect the success of the core Rockies wolf population. Looking at the larger picture however, if wolves are delisted as proposed in the Rockies, wolves will still remain endangered under the federal ESA in western Washington, and the majority of the western United States, and wolves should be recovered under the ESA in those areas as well. Wyoming's Plan could easily prevent such recovery by cutting off wolf dispersal opportunities to adjacent states, and allowing such a large amount of lethal take of wolves in the majority of the state.

From a national perspective, Wyoming's management of wolves is key to the maintenance of a viable wolf population in the Rockies, and without adequate protection so that genetic exchange and expansion occurs, wolf numbers could be reduced below levels necessary to prevent re-listing under the ESA. Considering the resources that have been spent over the past decade to recover the wolf in the Rockies, we are concerned that efforts could be in vain due to liberal lethal control measures allowed in most of Wyoming under its Plan.

Thank you for the opportunity to comment on the Draft Wyoming Wolf Management Plan.

For Wolf Haven International,

Linda Saunders Director of Conservation

#### Williams, Linda

#### **Oconto Falls, WI**

I don't oppose everything in your plan but there are a few things that I wanted to comment on. 1) I think that a trophy area is a nice idea but feel that the designated area is too small. Or, to say it differently, I think that the area of the state where wolves would be classified as "predators" is much too large.

2) I disagree with managing wolves that prey on wildlife, even if you're super-concentrating the wildlife by feeding them through the winter in certain areas, I think that you should not penalize the wolves for this, it only makes sense to go where the food is and if humans are unnaturally concentrating wildlife in an area I see no reason not to expect wolves to follow.

3) I think that 15 pairs of wolves may be a reasonable number to expect WY to support as their part of the wolf population but you've relagated them to a very small portion of the state and are unfairly taking advantage of the Yellowstone population to account for the majority of your 15-pair requirement. I would like to see additional pairs required outside the Yellowstone area.

Thank you for offering the opportunity to comment.

Linda Williams

Bélanger, Ken	Canmore, AL Canada
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As a frequent visitor and former resident of your state; I can't believe the transparent reasoning behind this plan. It is obvious that this is rancher & hunter driven w/no real science or concern for the protection of your state's strongest assets - its wildlife & natural spaces. Predator/prey relationships are key to a healthy ecosystem. We have only to look to Europe to see what this type of thinking created - virtual extinction of all large mammals. This is why so many millions of Euros come to visit North America; to experience what they no longer have. Eco-tourism is a very real, very sound long term income resource for Wyoming - much larger than the plan's proponents' short term gains. Protect what you have now, before it's too late. Otherwise you'll surely lose all your toursim to areas like where I live (Alberta) where we have large protected areas of National Parks for future generations to enjoy.

Thank you.

Kaminski, Timmothy PO Box 742 Bozeman, MT 59771 October 6, 2007 Bozeman, MT

Dear Wyoming Game and Fish Commissioners:

Following are comments on the Wyoming Draft Wolf Management Plan dated September 2007. The current Draft, as written, is not an acceptable Plan.

In my view, the State has an opportunity to reconcile traditional practices with new challenges of conserving and managing large carnivores while sustaining long-standing public use of resources that Wyoming, and in particular, the northwest region of the state, are fortunate to have. Necessary changes to the existing Draft will take courage, a long-term view, practicality and patience.

#### Perspective

Approaching two decades ago, I was the congressional staffer in Washington D.C. assigned the task of shepherding legislation for restoring gray wolves to Yellowstone. I worked with staff, members of the House and Senate Appropriations and Legislative Committees, and the staff of former Senator McClure (R-Idaho) during the period he negotiated restoring wolves with then Wyoming Senators Simpson and Wallop. I spent three years in this capacity, and among many tasks, was instructed to satisfy a diversity of concerns and conservation interests. I served in this role at the request of a western congressman and professional colleagues with whom I worked over a period of near 15 years, especially, the FWS appointed Wolf Recovery Team and the nation's foremost wolf experts. During this time, I was a stalwart supporter of state management for wolves, a perspective not shared or willingly entrusted by conservation groups. I remain a strong supporter of state wildlife agency conservation and management of gray wolves as 'trophy' game animals throughout the state.

I appreciate the complexity and in many regards, the difficulty of planning to conserve and manage gray wolves in an environment where wolves, domestic livestock and native ungulates are sympatric throughout the year. Based on my familiarity with the region and issues, I add that this complexity will be compounded significantly by Commission politics, continued reliance by select Game and Fish Department officials on feedgrounds that concentrate wintering elk, and national attention and controversy regarding public lands and resources that is sure to follow wolves that are repeatedly removed from state and federal lands in proximity.

In short, the challenge ahead involving cross-boundary issues and multiple jurisdictions will be far more difficult than managing within protected areas such as national parks, or government entities alone. Success in doing so, in the midst of myriad interests and politics, public land and resource management agency directives and administrative and management boundaries will likely require far more interaction, careful thought, and cooperation between the State, non-government and private entities than has ever been necessary in northwest Wyoming, especially where two of the nations' most historic and popular national parks also attract a disproportionate share of the nation's visitors and recreating public.

In contrast, the draft plan that is presented for comment appears to be about State 'management intent' and a 'measuring stick' for how the Commission will instruct the Department to evaluate wolves impact on wildlife more than a carefully prepared and detailed plan as to how the State of Wyoming intends to manage its share of the nations' Greater Yellowstone region wolf population into the future. As such, what is presented has more the appearance of a political statement than well-prepared and genuine opportunity for public comment and involvement. For example, it is disconcerting that the public involvement process and guidance to Game and Fish website imposes a bewildering but apparently purposeful limit to remarks in the email portal for comments, especially for those that, as in this case, were to include actual data in graphs and charts from Wyoming and the Greater Yellowstone region suggesting management options for reducing livestock conflicts the Draft Plan refers to as "issues of major concern" (p.19).

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Moreover, there is insufficient detail in the Draft Plan for 'how' the State intends to proceed to allow helpful suggestions for improvement. For example, what is an "appropriate" monitoring program? Or what is the intended scope of the Plan for "minimizing conflict" and "economic impact" with wolves?' Are proactive efforts intended, or should the public expect these efforts to be entirely reactive as inferred by "Manage human and/or livestock/bear/wolf conflicts using firearms, traps, snares, and controlled pharmaceuticals" in a recent job posting by the Game and Fish Department for 'Bear/Wolf Specialist' under "General Description of Work" and "Essential Function"?

I appreciate the opportunity to offer what I hope will be taken as constructive criticisms with suggestions for improvement as the State embarks on a considerable and important endeavor. To that end, for the remainder of my comments I have identified issues of concern (annotated with page numbers) and followed each with suggestions for improvement.

#### Section: Introduction

Concern 1: Page 1. It is worth noting that a primary driver for changing the recovery goal (FWS 2002) from '10 breeding pairs in each of three recovery areas for three successive years' (FWS 1987) to the FWS revised goal of 30 was in direct response to NW Montana's inability to meet its share of breeding pairs on a consistent basis. Changes in the number of breeding pairs (reductions) due to livestock conflicts and wolf control did affect the number of breeding pairs over and below '10', and thus were cause for the FWS concern about proceeding toward delisting. The redefinition changes to '30' and 'consecutive' allowed more progress via flexibility in the numeric recovery goal while retaining a distribution context for recovery, as NWMT packs were widely distributed due to habitat configurations relative to settlements (e.g. Flathead Valley, Mission Valley, etc. The concern is relevant to NW Wyoming.

In every year since 2000, at least 9 of 10 Wyoming packs outside national parks and refuge, packs (lowest for the period is 2006 when 20 of 26 or 77%) overlap active livestock allotments. Of these, at least 60% and as many as 90% of those packs depredate on livestock annually (cattle, predominantly calves); at least half of those (50%) are involved in repeat control actions. Of breeding pairs that overlap livestock for 2000-2006, at least half depredated on livestock and in every year but 2005, at least 50% of these were involved in control actions (Kaminski et al. 2007).

Suggestions for Improvement: Wyoming Game and Fish and its Commission would be wise to allow themselves more flexibility in meeting their conservation and management goals for maintaining wolf packs in northwest Wyoming. A suggestion is to 1) expand the proposed 'trophy' designated area east to Hwy 20/26 and 2) identify a range of packs to be maintained by the State outside YNP, GTNP-JDR and NER, e.g. 'no less than 7 and no more than 12'. This is especially true given that limited area exists in the proposed DAU east of the Absaroka Range and designated wilderness areas rarely used by wolves since 1998, and west of the DAU line. This geographic arrangement of the proposed management area, apparently recommended by the FWS (72 FR No. 26, 6119) effectively locks existing wolf packs intended to count toward the State minimum of 7 packs into areas 1) grazed by livestock that overlaps 2) private land, and 3) summer and winter ungulate range, effectively ensuring that wolves, livestock and native ungulates follow migratory patterns and overlap each other throughout the year (time and space) except for short periods when elk are yet to arrive on wintering areas, or during weaning/ shipping of domestic livestock in fall (Kaminski et al. 2004, 2005, 2006, 2007)(Figures and graphs available but not sent due to constraint in email comment portal).

Concern 2. Page 4/5. Figure 1. The Draft identified 23 packs by name during December 2006. This list is accompanied by a chart identifying wolf packs during summer 2006, and a map identifying resident wolf packs during 'early 2006'. However, there is no congruence in this information, making it difficult for a commenter to follow. For example, there are 10 packs, not 23, identified in Figure 1. Five packs were removed during summer/fall 2005 from the area in Figure 1 and these relate to a number of what are referred to as 'new packs' that are more likely remaining members of packs that were controlled and thought to be removed.

Suggestions for Improvement: It seems reasonable the public should have consistent and up to date information upon which to comment when asked to review Draft Plans, especially for those as likely to be contentious as for wolves. It is now nearing the close of 2007. Why not have a document that is accurate and consistent in wording and figures for public review so that confusion might be replaced with clarity?

#### Section: Legal Issues/Strategies

Concern 3. Similarity of State Plans, Page 5. A key aspect and difference between the Wyoming Draft and State Plans of Idaho and Montana is that Wyoming sees fit to delineate what is essentially wolf/no wolf zones in its management on lands that are public lands, not those administered by the State. The Draft accurately points out the Commission has no jurisdiction WRIR and NPS lands. This is also true of national forest lands that lie within state boundaries. Regarding native species, public land and resource law (National Forest Management Act; Sec. 219) gives emphasis that 'reproductive individuals shall be well-distributed throughout the planning area' (i.e. National Forest). Similar livestock conditions as those in Wyoming exist over much of northwest Montana, portions of the Greater Yellowstone Ecosystem and nearly all of Idaho that is regularly inhabited by wolves. About 7 of every 10 packs overlap active public land livestock allotments throughout the 3 state recovery area (Kaminski et al. 2005), yet Montana and Idaho Plans, as accepted by the FWS (which also lacks authority to constrain wolf distribution on national forest system lands) make no effort to curtail wolf distribution, a priori, in a manner that establishes a legal issue and conflict with the primary legal mandate for management of national forests.

Suggestions for Improvement: Lacking a change in the legal mandate for public lands administered by the FS under NFMA, State attempts to exclude portions of national forests that are grazed by livestock but otherwise suitable for wolves to inhabit, e.g. the Wyoming Range and southern tip of the Wind River Range, because both truncate portions of national forest lands, are sure to be legally challenged.

It is clear from the Draft that the primary concern for limiting wolf distribution and designations for trophy and predator status has solely to do with damage claims. Rather than a predator designation, the State might consider a separate classification such as used in Montana where wolves are managed as a species requiring 'special management'.

Using a chosen demarcation line, the State might place different management emphasis between these areas in terms of where it will consider wolves 'trophy' game and areas where it will remain involved in wolf management, such as feedgrounds outside of the designated trophy area where wolves occur, but not pay damages. This designation, as opposed to 'predator' could be quite broad for the 5 year monitoring period, and allow the State to collect population characteristics information it intends under Agriculture code in the absence of regulated take, or, it might allow the State to manage wolves similar to 'trophy' game without damage claims. This period of evaluation would give the Department and Commission time to think clearly about what conditions 'special management' might entail into the future, and opportunity to formally propose these prior to the close of the mandatory 5 year monitoring period.

These steps would 1) remove the arbitrary line and near certain legal challenge to constraint of wolf distribution on public lands where the Commission has no authority, 2) remove the 'predator' classification but replace it with emphasis signaling an evaluation period for determining what conservation and management steps or actions are likely to be necessary in the future, and 3) allow the State to remove the myriad assumptions it makes about its concerns in it's Draft and pose these instead as predictions the State intends to evaluate during the 5 year post delisting monitoring period. An example is the repeated citations the State makes throughout sections of the Draft regarding deleterious effects on prey populations and the leading, shaky logic it uses in arriving at these. To wit, it is premature and without scientific basis to infer that winter periods of wolf predation involving kill rates and prey species composition, sex and age can be applied throughout the year, as winter is a seasonal period that prey are especially vulnerable to predation (Mech and Peterson 2003, others). This comment is acknowledged in the Draft (page 27) but is sufficiently buried to be of little to no utility in qualifying leading statements regarding potential impacts of wolves on prey populations. The advent of GPS collars on marked animals is allowing some progress on the notoriously difficult matter of cause-specific mortality and predation

rates during non-winter periods, an area for the Department to investigate rigorously as is being attempted in YNP, Idaho and Montana.

Concern 4. Coordination of information with agencies and publics regarding multi-jurisdiction and crossboundary packs and lack of detail in the Draft as to how competing legislative authority and mandates will be managed. Pages 5, 28.

The highly transitional and migratory nature of native ungulates in the southern Yellowstone elk herd (Boyce 1989, Smith et al.), unnatural human feeding of elk during winter on both NER and state feedgrounds, and wide ranging movements make it unlikely that ecological requirements for wolves throughout the year can be met within any sole administrative unit or jurisdiction. This condition relates specifically to inadequacies in the size and shape of protected areas in meeting ecological requirements of large carnivores (Ginsburg and Woodroffe 1998) and the need for careful coordination among neighboring agencies with different mandates. This condition requires that coordination and careful integration of agency policies and mandates are understood with clear steps and contingencies for how and where shared responsibilities for conserving and managing large carnivores as wolves throughout the year will be addressed.

This detail is lacking from the Draft. Only sparing mention of agency coordination is made "success of any management program depends, at some level, upon successful coordination with other agencies and the public" (p.5). Elsewhere, the Draft underscores this importance and gives emphasis to this glaring omission by stating "Because wolf management procedures will be closely examined and arouse controversy, the Department seeks to build a balanced management approach that acknowledges the complexity of the political, social and environmental factors associated with wolves and their management" (p. 28).

The Draft plan gives no detail of its intention or commitment to address this concern regarding the sensitive issue of cross-boundary management of wolf packs and provides no indication of whether the legitimate interest and legal mandates Grand Teton NP, the JDR Parkway and National Elk Refuge (NER) including ecological integrity (Pyare and Berger, 2003), stability and persistence of packs that den or use substantial portions of the Park during portions of the year will be adhered to or met. There is no address of this need identified under legal issues, and there is no budgetary identification to this need but ample address of other costs for personnel, ATVs and horses, damage claims, etc.

This is surprising given comments on the importance of this aspect of wolf management in peer review of all three state plans, and the Commissions familiarity with this dynamic and the considerable involvement, coordination and interagency wrangling during more than a decade of IGBC and YES Subcommittee related to development of a Conservation Strategy and post de-listing management of grizzly bears.

The public trust in the State for managing wildlife deserve far better than a repeat of the embarrassing regional and statewide newsprint replete with headlines that detail agency wrangling and finger-pointing during the past year. The identified omission of interagency mandates for cross-boundary packs within the proposed DAU and WMUs registers a serious flaw and concern for interested publics to understand how the Draft and its intent for a balanced management approach that acknowledges the complexity of the political, social and environmental factors associated with wolves and their management as written to this point, will be implemented. In my experience involving agency coordination for conserving and managing grizzly bears, gray wolves, northern spotted owls, black-footed ferrets and a myriad of other wildlife under multiple jurisdictions over several decades, explicit procedures and agreements need to be worked out ahead of time so there is a clear procedure for dealing with the inevitable conflicts and challenges that arise between agencies with different mandates.

Suggestions for Improvement:

1. Clearly define in coordination with affected agencies what it means on p. 10 "...its management emphasis will be applied to maintaining seven breeding pairs that inhabit primarily areas outside the Parks."

2. Work with affected agencies to clarify how packs whose home ranges cross WMU boundaries will be assigned to a WMU.

Section: Wolf-Prey Interactions, Regulated Public Take and Wolf-Livestock conflict

Concern 5: Pages 15-21. The Draft plan identifies several key concerns including 1) the need for priority research on wolf prey interactions, 2) an approach for how wolf-livestock conflicts will be addressed, and 3) planning for regulated public take. Past address of these issues in the Northern Rockies has largely been independent of one another, resulting in a 'piecemeal' and counter productive approach. By addressing such issues and conflicts on a case-by case basis, opportunity to link and comprehensively address aspects of wolf management with regulated take, are lost. This is especially true in the Rocky Mountain west where wolves, native ungulates and domestic livestock are sympatric throughout the year.

Because of the high rate of wolf pack and home range overlap of active domestic livestock allotments outside of protected areas, we believe, contrary to Bangs (in press)( see Bjorge and Gunson 1983, Fritts et al. 1992, Bradley 2004) and as a consequence of our own analysis of the effects of social disruption and geographic spread of livestock depredations (Kaminski et al. in prep) that in the west, lethal removal is useful tool, but is not the most effective means of address of wolf livestock conflict (Kaminski et al 2006, 2007).

Our experience on western public land rangelands is that prey behavior exhibited in domestic livestock where they are sympatric with native ungulates, make cattle and especially calves and yearlings, disproportionately vulnerable to predation by wolves. Vulnerability of this nearly fixed or constantly abundant prey source is exacerbated by the manner in which they are grazed in remote backcountry areas of public lands. Calves and yearlings are predisposed to depredations by virtue of their behavior, coupled with traditional grazing practice (fixed location, widely dispersed, low vigilance). Thus, prey behavior coupled with traditional management practices contribute to vulnerability of livestock by nullifying any antipredator defense tendencies similar to those of native ungulates (grouping behavior). The predicted result is that the significant proportion of livestock depredations throughout the year are calves and yearlings, and that losses follow the time and sequence of grazing practice during the course of a year. This observation was also offered by Bailey (1907) more than a hundred years ago. Our data show this result.

Over the last several years my colleagues and I have been working on a management approach that carefully incorporates the evolutionary traits of social and long-lived carnivores, natural prey and domestic livestock at a regional scale to sustain ranching, reduce livestock conflicts and improve large carnivore and big game conservation in the Rocky Mountain west. Taken together, this systems approach demonstrates how science-based conservation planning can interface with wolf removal to facilitate a socially acceptable conservation and management strategy for sustaining the working ranch, large carnivores, and native ungulates throughout mountain and foothill regions of the Rocky Mountain West.

Suggestions for Improvement: I suggest as part of the Department and Commissions emphasis on research for guiding overall reduction of wolf-livestock conflict reduction and opportunity to integrate limited yet regulated take focused in areas of repeated livestock conflict, that the following suggestions and research focus be considered:

I recommend foraging theory as a framework to underscore the conservation importance of prey behavior where ungulates and domestic livestock are sympatric throughout the year, and need for managers to consider fully, the dynamic factors that may influence decisions such large carnivores as wolves make about prey choice across human-influenced (non-protected) landscapes. In this context, knowledge of predation risk factors and antipredator behavior mechanisms can be used to predict animals that are most vulnerable to predation (Blumstein 2000) and help generate methods for conserving both livestock and large carnivores by reducing losses of each (Kaminski et al. 2000).

A foraging theory framework provides an opportunity to bring understanding and insight to the issue of wolf-livestock interactions by building on the enormous work already produced in the study of predators

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and native ungulate prey. The result should be better focus, a comprehensive approach to fieldwork and analyses that link livestock and native prey relationships in areas where they are sympatric with wolves, and an increase the generality of results, especially in providing effective depredation avoidance mechanisms for protecting livestock without over-regulating human activities. In doing so, we strive to address the considerable conservation implications and needs to both people's livelihoods and persistent large carnivore populations in the mountain West.

Concern 6. The interpretation of the Jackson moose data presented on p. 23 is misleading and could even be construed as being purposely so. Only a portion of the available moose data is presented to arrive at what appears to be a predetermined conclusion. The entire data set which dates back to the mid 1980's shows that a decline began in the mid to late 1980's long before wolves were returned to the system.

Suggestions for Improvement. If data are to be used and interpreted in support of certain management actions the public should be allowed to see the whole picture and not simply a subset of the data used in a leading manner. The public deserves objective, rigorous and fair analyses, especially in cases that could have removal consequences for wolf packs.

Concern 7. The draft plan is surprisingly tight lipped about specifics for management of wolves due to impacts on ungulate populations. The WY House Bill, however, is more specific suggesting that WGF has latitude to remove wolves if the Department determines that wolf predation is having an impact on the recruitment rate of the affected wild ungulate herd. In addition if wolf-ungulate conflicts occurred at state-operated feedgrounds removals or other management actions could also take place. Feedground conflicts identified included situations in which wolves cause wild ungulates to move from feedgrounds; mixing of livestock and wild ungulates; wild ungulates that pose extraordinary safety hazards on state public roadways. Neither the management plan nor the House Bill suggest that population numbers relative to herd objectives will factor into the management process.

This is concerning for several reasons. First, that management action (i.e. removals) could be taken against wolves simply because their natural behavior (i.e. seeking out vulnerable prey where they would be expected to, that is, on winter ranges) is not convenient for managers and a human-induced condition widely regarded as problematic from a disease standpoint. The policy also seems questionable from both a social and biological standpoint; it is well-known that wolves depend upon large ungulates for their persistence. Available data regarding wolf predation on ungulates where they are concentrated on feedgrounds do not show a significant problem in terms of kill rate, and the Department acknowledges in this document that elk displacement, if at all, is temporary. Nonetheless, the draft assigns a lengthy list of economic losses to these types of conflicts.

Another aspect of this approach that is concerning has to do with the potential affects of removals on pack stability and the ability for cross-boundary pack to be maintained. There is reason to ask whether this type of conflict management will reduce the conflict or exacerbate it. In some cases, the disruption of pack social structure that can follow removals can aggravate conflicts in space and time. This type of conflict management approach seems to contradict the statement that "the Department seeks to build a balanced management approach that acknowledges the complexity of the political, social and environmental factors associated with wolves and their management."

Suggestions for improvement. Develop or commit to develop and implement a socially and biologically responsible policy regarding management/removal of wolves on feedgrounds.

I appreciate the opportunity to comment. Please consider my suggestions in the forthcoming revision to improve upon this important document for conserving needs to both people's livelihoods and persistent large carnivore populations in Wyoming and the Northern Rockies.

Sincerely,

Timmothy Kaminski Mountain Livestock Cooperative

#### Lewis Watts, Teresa

#### **Riverton**, WY

I greatly appreciate that your dept. provided public meetings and copies of the proposed plan, as well as the chance to speak my mind here. Ever since the Lander meeting, which I attended, I've carefully read, reviewed & made notes in the margins of the proposed plan. I feel the department has been very thoughtful.

I've never seen a grizzly or wolf in the wild, ever. For the record, I have no problem with hunting: I grew up going deer & squirrel hunting in Indiana. Our largest predators are coyotes and foxes; we know to keep our pets in sight, etc.

I'm surprised a bit at people who want everything tipped in their favor! I chose to live in Wyoming because I embrace everything about it; it's true, Wyoming gets in your soul. It's not practical or sensible to assume one can live in or near a WILDERNESS area and not have the WILD be an integral part of that. What's the view worth if there's no wildlife?

I'm glad the wolf may be delisted; what a success story! I studied Wyoming in-depth before moving here: Energy - whether oil, gas, coal, uranium, etc. is the king of economic impact in Wyoming. A close second compared to everything else is TOURISM. Wyoming is special & people come here to experience the WILD in WILDERNESS whether an avid hunter or photographer, a day hiker, or someone gazing from a tour bus window.

The problem I have is the implications of wolf population control. (Appendix 1, p 39 & elsewhere) If Wyoming Game & Fish truly believes in a ""FAIR CHASE ETHIC"", then how can WY STATUTE 23-13-103(a) be allowed? "". . . predatory animals and predacious birds may be taken without a license in any matter and at any time."" Reading literally and between the lines, this seems more like legalized EXTERMINATION, & as long as the Dept. maintains the 15 legally defined breeding pairs, etc., people - or ""their agents"" - can ""take"" a wolf.

There's planty of documented evidence that indicates some people will, beneath a cloak of legality and anonymity, take wolves and their pups by means that are cruel, inhumane & immoral. One could counter with ""well, wolves behaviors and feeding habits are ruthless & grisly . . . "" Yes, it can be described as such, but the wolf acts from God-given instinct. If someone finds a den of wolf pups alone & chooses to burn them alive, I ask you, is that CHOICE HUMANE, DECENT, OR MORAL? If one chooses to maim, torture, & destroy a wild animal because its LEGAL, what does that say about that person, that statute, the overall attitude by the Dept. of Game & Fish and the blind tolerance by the citizens of Wyoming? I find this potential loophole DEPLORABLE, do you?

I object to anyone, anywhere who exhibits conscience-free, sociopathic behavior in killing any animal, wild or domestic. We the people are the ultimate predators, and God gave us this Earth and dominion over everything on it.

Bringing the wolves back to ancestral habitat is one thing; legalizing the extermination of all but enough to avoid them being re-listed as "endangered" is quite another! I hope this doesn't happen, but I fear it will, which is why I had to write.

The 10-day reporting rule explained & discussed at the meeting is another point I question.: What possible incentive does a person have to comply with this? Especially, why does Wyoming statute 23-1-304, subsection D, state that ""information indentifying any person legally harvesting a wolf . . . is solely for the use of the dept . . . and is not a public record.""

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Why isn't it going to be a public record? It implies protection, secrecy, perhaps embarrassment? That's what comes to my mind, not just monitoring of the wolf population.

On page 28 of the proposed plan, under ""Management Actions"", the dept. states that ""most management actions taken to reduce impacts will involve removing individual wolves at an early stage before it is necessary to remove multiple individuals or entire packs if problems continue . . . In all cases, legitimate rationale will be needed before actions will be taken. All management actions will be documented, summarized, and made available to the public annually."" Great; I personally feel that's responsible management.

Since I'm in that ""Target Audience 3"" (pg. 29), I understand & comprehend that the dept's. management area is confined to the ""trophy game"" area as detailed in Appendix 2, (pg. 40) & elsewhere ""Boundary Descriptions for Wolf Management Units 1, 2, 3."" However, I can't help but wonder why that outside those areas, where the wolves are classified as ""predatory"", that no provision exists to include this harvesting information in the public record.

Also, in regard to to the ""Mangement Actions"" section, on page 31, Table 4, the budget proposed includes ""Wildlife Services Contract (aerial location, gunning, removal)"" with costs estimated at \$500,000, & ""Aerial Contracts"" estimated at \$342,000. It simply strikes me that this is geared much more toward extermination as opposed to monitoring populations: ""The Dept. is determined to keep economic losses from a recovered wolf population to a minimum."" (pg. 32)

And although your ""works cited"" bibliography is extensive, it has some gaping holes: There's not one reference citing anything about the lengthy (more than 5 decades thus far) study of Isle Royale, the national park island in Lake Superior, Michigan. Wolves have varied in population there from as high as 50 to as low as 18 so when I read info about the moose herds on page 22, I wonder why the Dept. hasn't studied data from Isle Royale. If "starvation was the primary source of adult female moose mortality in this study 1994-2001 accounting for 57% of all known mortality, "" (pg. 22) this situation is worth comparing to Isle Royale, where that kind of imbalance no longer exists. Drought, as noted on pg. 8 & elsewhere, is certainly a factor worthy of further study. CONTINUED"

I'm just fearful that the wolf's recovery makes it subject to pure demonization by anyone looking for a scapegoat. People in Fremont County, where I live, seem to be absolutely close-minded on the issue; they blame wolves for anything negative, regardless of evidence.

Here's some evidence that I found compelling: In an article titled. ""Livestock losses leave Ranchers worn down by wolves"", (5/16/04, found on BILLINGSGAZETTE.com) Mike Stark reveals that ""Each year, the Montana Dept. of Agriculture provides a list of causes of death for sheep and lambs.""

"According to [2003], 500 sheep were killed by wolves in Montana. Coyotes were the leading cause of death with 11,800 kills. OTHER FACTORS MORE DEADLY THAN WOLVES were weather 6300 deaths; disease 8,200; foxes, 1,000; eagles, 1,200; bears, 800.""

So the largest predator, the highly intelligent grizzly, devoured 300 more sheep than wolves. (And we all know how much bears love huckleberries!)

Mr. Stark also states that ""similar statistics are not available for cattle because funding is not available."" Let's develop funding for Wyoming.

Stark also reveals that ""since 1995, 301 cows have been confirmed kills by wolves in Idaho, Wyoming, & Montana . . . ""

As described on pg. 15, I personally find the ""regulated public take"" (i.e., hunting and trapping) abhorrent. Hunting game & fish for the comraderie, rite of passage, & for food & subsequent trophy mount I understand & have participated in - but to hunt & trap in any other regard I find morally reprehensible. People who thrill to kill something wild, I do wonder about their motives & what kind of people they are . . .

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it brings to mind the FACT that many of our society's prisoners first began their forays into destruction by maiming, torturing, & killing small mammals. Many sources document this, including college-level instructors within Depts. of Correction that provide educational opportunities to prisoners. (I've been one, in the past.)

What is redeeming, in any way, about TRAPPING? Pg. 16, Wyoming Statute 23-2-303(D): ""Upon delisting, trapping of gray wolves classified as trophy game animals will become legal . . . "" Hunt if you must, but trapping is inhumane & cruel . . . & what if something other than the intended animal is caught in a trap? Please don't allow it!

As to funding, why on pg. 20, is it stated that ""the Dept. will work diligently to ensure that revenue from license fees are not the only source of funding for a livestock compensation program.""? Why not?

On pg. 32, it is noted that "" . . . while there may be benefits to local communities from increased interest in viewing wolves, this does not generate income for wolf management by the Dept."" OK - BUT IT COULD! Similarly to how large cities fund new sports stadiums, why not tax tourism? I'd pay it, just like I have every time I ate at any restaurant in the ""doughnut cities"" surrounding Marion Co., (Indianapolis, Indiana), to build the Colts' ""Lucas Oil Stadium."" Remember, tourism is Wyoming's 2nd BIGGEST INDUSTRY . . .people from outside Wyoming will pay, too . . . In summary, there is a lot of GOOD built into the Depts' proposed wolf management plan - if the dept. acts upon its own document, as they purport they will do. On page 14, if & when the Dept. ""establish[es} public working groups consisting of volunteers . . . to assist with appropriate data collection"", I would gladly participate. As described on pg. 16, I would volunteer to assist with research efforts, too. I'd also volunteer to help with developing compensation programs. (Re, pg. 20) I'd be happy to submit a resume/vitae.

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Thank you, again, for providing this opportunity!