

p. 22: “Current research into the effects of predators on the Jackson moose population will continue, and combined with the current monitoring of the population by the Department, will help determine wolf predation effects.”

- How will the Department distinguish the effects of wolf predation from other factors affecting moose populations? More importantly, why is the Department interested solely in effects of wolf predation on moose? Why is it not interested in learning about the effects of wolves on moose *habitat*?
- Further comment: The Plan says nothing about whether reintroduced wolves differ in size or feeding habits from the wolves formerly native to this area. If this is or may be a factor in the levels of predation on moose, the Department should address it and the appropriate responses.

p. 23: “This situation necessitates continued monitoring to ensure the long-term health and viability of this herd.”

- “Monitoring” itself does nothing to “ensure long-term health” or “viability.”

p. 23: “These feedgrounds concentrate elk in lower elevation areas during the midwinter months with the intent [*inter alia*] of mitigating habitat loss”

- Why not let wolves *improve* existing habitat?

pp. 23-24: “To date, the estimated number of elk killed by wolves each winter in the Gros Ventre area and NER represents less than 1% of the total Jackson elk herd.”

- This rate hardly seems worrisome.

p. 27: “It is reasonable to assume that in the future, wolf predation may have a negative effect on some northwestern Wyoming elk, moose, mule deer, and bighorn sheep herds and, thus, hunter harvest.”

- Why is it “reasonable” to assume this? Especially given that this assumption follows the statement: “Very little is known about summer kill rates of wolves in the GYA or any ecosystem.”
- By “have a negative effect” the statement presumably means “reduce.” But reductions may or not be “negative” in a normative sense if/where current populations are at unsustainably high levels. Indeed, the paragraph goes on to state: “Many elk herds in northwestern Wyoming have been above herd objectives”
- Most importantly, the statement ignores ecology, including trophic cascades and the beneficial effects of large predators on landscapes.

p. 27: “Liberal issuance of antlerless hunting permits and extended seasons, combined with drought and predation, have reduced some of these [elk] herds to objective. In the future, severe environmental conditions may reduce some elk populations in the GYA to the point where wolf predation may have a strong influence on them.”

- It is not apparent what the Department means by “severe environmental conditions.” But again, this statement is not informed by current ecological understanding. Wolves and other large predators can have beneficial effects on landscapes, and these changes have the potential to buffer or ameliorate the effects of “severe environmental conditions,” such as those caused by global warming.

- This statement also ignores other aspects of wolf biology and behavior, e.g., what animals wolves preferentially feed on, the effect of diminished prey availability, etc.

p. 27: “However, since most of the packs that reside outside YNP and the NER are subject to take under the dual status classification, [wolf] impacts to big game are expected to be tolerable.”

- Use of “tolerable” leaves no doubt that this management plan is driven not by science but by politics.

p. 27: Last paragraph on this page

- Like the rest of the Plan, this paragraph says *nothing* about habitat quality or suitability. It seems to assume that wildlife management, of both wolves and ungulate populations, is simply a “numbers game.” This is outdated thinking, not only in light of recent trophic cascades research, but with respect to long-standing ecological understanding.

p. 28: “USFWS encouraged States and Tribes to define unacceptable wolf impacts to ungulate populations. Upon approval of this State wolf management plan by the USFWS, the Department will have the option to translocate or lethally take wolves from areas where ungulates are negatively impacted. Some wintering elk, deer, moose and bighorn sheep sub-populations on native winter range and elk on winter feedgrounds or near cattle feed lines could be susceptible to negative impacts from wolf predation and management action may be necessary under specific conditions.”

- Does the Department view this approach as a “definition”? Are “unacceptable wolf impacts” and “negative impacts” equivalent? Is “unacceptable conflict” (in the next paragraph on p. 28) just another category of “unacceptable/negative impact”? How about “excessive predation” in Appendix 1? It seems that *any* wolf predation on livestock or native ungulates may be deemed “negative” or “unacceptable” or “excessive” by the Department. That being so, the statement (on p. 28), “In all cases, legitimate rationale will be needed before actions will be taken,” is essentially meaningless, as what is considered “legitimate” will be entirely within the discretion of the Department and totally divorced from ecology.

pp. 28-29: “**PUBLIC INFORMATION & EDUCATION**”

- This section, like the rest of the plan, is devoid of any discussion of ecology. The closest the document comes are a few references to “wolf biology,” which in context seems limited to what wolves eat.
- The Department does a great disservice to Wyoming citizens by perpetuating outdated understandings of predator/prey/habitat ecology and fueling the discourse on wolf “conflicts” and “problems.”

p. 30: “Out of necessity, if for no other reason than to provide the State’s match for Federal funds, the Department will need to annually allocate some money from the Game and Fish Fund toward wolf management efforts.”

- This statement vividly reflects the Department (and the State’s) grudging acceptance of wolves and its failure to acknowledge the ecological advantages to restoring wolves to formerly occupied habitat.

pp. 31-32: "ECONOMIC IMPACTS"

- This section's account of the economic costs and benefits related to maintaining wolves in Wyoming is fatally flawed because it ignores entirely the positive effects (actual or potential) of wolves on terrestrial and aquatic habitats, and thus on related ecosystem services (provision of other wildlife habitat, species diversity, water quality and quantity, etc.). The bias is further demonstrated by (1) the tacit suggestion (p. 32, 1st two sentences in last paragraph) that wolves could be responsible somehow for the decrease in overall visitation to YNP "since wolf reintroduction," and (2) by the explicit statement (on p. 32) that the "Department is "determined to keep economic [that is, livestock] losses from a recovered wolf population to a minimum."

In conclusion, Wyoming's Revised Draft Wolf Management Plan shortchanges the Wyoming public now, in terms of information, and over the long term, in lost opportunities for habitat enhancement. The Plan puts the short-term interests of a very small segment of the population ahead of the interests of present and future generations of Wyoming citizens and the national public.

Thank you for your consideration of these comments.

Sincerely,

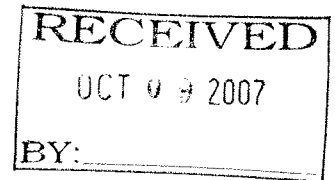


Debra L. Donahue

cc:
Ryan Lance, Esq.

Wyoming Fish and Game

To whom it may concern,



000032

Please reconsider removing the Gray Wolf from the endangered species list. Statistics have shown that the wolves are not the number one problem. If the concern is that the population is going to grow beyond what is manageable why not think of other solutions rather than an immediate extermination. Why not allow a certain number be hunted each year to thin the population slowly or relax the restrictions to ranchers who kill wolves on their own property while protecting their livestock.

Removing such a large number of predators immediately is going to adversely affect the environment and the remaining animals of all kinds. It's going to cause a domino affect. Prey numbers are going increase rapidly which will cause other problems to plant life and the rest of the animal food chain.

Will millions of dollars be spent each decade to control the wolf population? Conservationists have spent years of their lives watching the packs and documenting their activities and providing statistics. All that work seems to be for nothing if it isn't going to be considered.

Immediate extermination is wrong. There must be other solutions. Do not de-list the gray wolf!

A handwritten signature in cursive script that reads "Kathy Blake".

Kathy Blake

WOLF COMMENTS
WYOMING GAME AND FISH DEPT.
5400 BISHOP BLVD.
CHEYENNE, WY 82006

Oct. 6, 2007
Casper, WY

RECEIVED
OCT 09 2007
BY: _____

Dear Sir:

I strongly support the revised draft plan
for gray wolf management.

000033

The plan is a good compromise.

I would have preferred a larger area where
the wolf would have been classified as a
predator.

The main factor is to get control of
the wolf population which has become
excessive.

Thanks.

Sincerely

Howard L. Ewart

HOWARD L. EWART
980 STAFFORD
CASPER, WY 82609

RECEIVED

OCT 09 2007

BY: _____

October 8, 2007
418 E 25th St.
Cheyenne, WY 82001

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



000034

Dear Department,

I have been disappointed by Wyoming's Wolf Management Plan. Wolves are an integral part of a healthy ecosystem. They protect the land and vegetation from overuse by herbivores. I believe wolves would help to control wildlife disease by removing sick animals - even before we notice them - preventing them from disseminating various pathogens to other animals and the environment for lengthy periods of time. This might be especially true for chronic wasting disease. Wolves help disperse crowded animals in unhealthy situations.

Wyoming should try to maintain current wolf numbers. We should not condone the wholesale slaughter of wolves wherever they occur. It is wrong to blame wolves for declines in game numbers when other potent factors such as habitat loss, drought, and disease also affect numbers. Many areas have game in levels above the optimum levels. We should try to find a balance - one in which wolves must play their important part. Aerial gunning of wolves or any other animal should always be prohibited. It is indiscriminate and unsportsmanlike, to say nothing of the fuel, manpower and resources it wastes.

non-lethal methods to resolve and prevent conflicts should always be used first. Lethal methods are only appropriate when all else fails for solving serious problems.

Grand Teton Park should be a safe refuge for wolves as is Yellowstone Park. a protected travel corridor between them should be maintained.

We need to see how a healthy ecosystem with as complete a component of its plants and animals really works. We should respect God's Creation - It does not belong to us, we did not make it.

Thank you for the opportunity to comment.

Sincerely

Barbara E. Rugotzke

418 E 25th St

Cheyenne, WY 82001



WYOMING FARM BUREAU FEDERATION

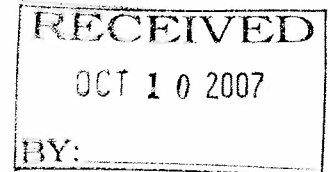
P.O. Box 1348

Laramie, Wyoming 82073 • (307) 745-4835

October 8, 2007

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

\$80000



To Whom It May Concern:

The Wyoming Farm Bureau Federation would like to provide the following comments on the Draft Wyoming Gray Wolf Management Plan. The Wyoming Farm Bureau Federation has been actively involved with the wolf introduction program since first proposed by the federal government. In addition our members utilize private and federal lands in the northwestern portion of the State directly affected by the wolf introduction program.

The Farm Bureau also participated in the first legislative process which produced Wyoming's first management plan. In addition we participated with other organizations in challenging the US Fish & Wildlife's rejection of the management plan. The most recent legislation which resulted in the current proposal contains very little input from the Farm Bureau. We feel this will result in a flawed plan. We also recognize that the Department cannot establish a program outside of the legislative mandate.

The draft document lists several references regarding livestock depredation (beginning on page 8), but we suggest that Bjorge and Gunnson's work in Alberta also be included (Evaluation of Wolf Control to Reduce Cattle Predation in Alberta). These researchers found that 41% of known predation losses were caused by wolves and that even with wolf control programs, livestock losses were significant. Another significant finding from this study was that of the 327 missing cattle the authors could only find 49. The draft document discusses that the Department will pay for losses caused by wolves in the trophy game status area, but does not discuss the details of this reimbursement. Bjorge and Gunnson point out the significant difference between missing livestock and confirmed losses. At a symposium on wolves sponsored by the Wyoming Farm Bureau Foundation, information presented by the Green River Cattlemen's Association indicates that for every loss confirmed, there are at least 6 unconfirmed losses. That information would be important for inclusion in this document as well.

The area which has been defined both in the legislation and in the draft plan significantly expands the amount of land which is included in the "trophy game" designated area. The land area proposed in the draft plan was established by the federal government with little or no input from the citizens in this State. This is unfortunate since the citizens will be the ones who must continue the management long after the Fish & Wildlife Service is gone. This should inspire the Wyoming Game & Fish to work to develop a plan responsive to the citizens of the State. The agency should consider proposing a reduced area over that contemplated in the draft plan so that private landowners can retain the maximum amount of flexibility possible.

In Wyoming call 1-800-442-8325

www.wvfb.org

The draft suggests this plan would establish a process which would result in the State taking over management of the wolf. The legislation which was recently passed by the legislative body and signed by the Governor set forth several criteria. One was acceptance by the State of the big increase in area considered as trophy game status for wolves. This appears to be confirmed in the plan. The second criteria was for an amended 10(j) rule which would give the State more flexibility to manage wolves in areas where there have been impacts to the wild game population. The proposed rule to accomplish this has been presented by the federal government, however, there have been many indications that these rules will be challenged in the judicial branch for legality. This process could well take several years if not a decade. The judicial branch could rule that the proposed 10(j) rule is not legal, which would then move the process back before the "change the rule" requirement of the legislation.

The other criteria would be for settlement of all legal actions surrounding the wolf recovery plan. This can be accomplished in at least 3 ways. The first would be for the federal government to reverse their opposition to Wyoming's first wolf management plan. The second would be for the State of Wyoming to withdraw their legal action against the federal government's refusal to agree to our previous wolf management plan. The third way would be for a legal decision in the case. We have not seen any willingness by the federal government to concede the field to Wyoming, nor have we heard of any ruling on this issue from the legal branch. The issue of Wyoming withdrawing their legal challenge seems to present the only way to fulfill this criterion prior to the February deadline. We would certainly hope this agency would not recommend Wyoming "roll over" in the legal challenge so the final hurdle can be overcome before the legislation self destructs.

The draft plan discusses population management, but gives the reader very little information on how wolves will be managed on the Wind River Indian Reservation. One of the major questions the Governor asked the Fish and Wildlife Service was how wolves will be considered and managed on the WRIR. This question is not answered very clearly in the draft management document. A copy of the WRIR wolf management plan should be included in the document. Also any MOU's or similar documents between the Department and the WRIR or Fish and Wildlife should be provided in the draft so the public can review the documents.

The draft discusses that wolves will be monitored statewide, but indicates that wolves outside the trophy game area will not be monitored as intensively as inside the trophy game area. WS 23-1-304 was amended to say that the Department, "Shall institute and maintain an active program of population monitoring statewide." The legislation did not differentiate between areas where wolves were classified as trophy and areas where they were classified as predators. The legislation also did not indicate that wolves should not be monitored on the WRIR by the Department. The draft plan appears to be establishing areas of the State with different monitoring criteria which conflicts with the amended language of the statutes.

The draft also discusses the possibility of utilizing different procedures for wolf population monitoring. Unfortunately language adopted in the 2007 session clearly spells out what criteria the Department must use in order to determine breeding pairs. The language was not permissive and cannot be read to allow for a different procedure.

The draft indicates that they will not be able to utilize helicopters in wilderness areas of Wyoming. The Wilderness Act states that “These areas are to be managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable...” The act also indicates that in the Gros Ventre Wilderness areas, the designation is subject to valid existing rights as well as access to exercise such rights. The State of Wyoming has maintained the right to manage wildlife within the boundary of the State and the legislative body has never relinquished that authority. Therefore, the Department can utilize helicopters for management specifically in the Gros Ventre Wilderness area. The act also specifies that “The purpose is to protect watersheds and wildlife habitat, preserve scenic and historic resources and promote scientific research...” Much of which needs to be accomplished by utilizing helicopters to manage wolves.

The draft states that in areas of the state where wolves are considered predators, anyone who takes a wolf will be required to notify the Department within 10 days of that action. Furthermore, the Department will require that the unfrozen skull and pelt be presented to a department employee. We cannot find anything in the statutes to authorize the Department to make this request. It is indicated that this is required to help the Department in management of wolves, but there is no indication what is needed or if the same information can be obtained in a different fashion. The draft also is silent on the penalties that will be levied should a citizen not comply with this requirement. No provision is made for any alternatives nor is there an adequate explanation for this requirement. It is doubtful that statutes even give the Department the authority to require citizens to comply.

The draft on page 17 indicates the Department is committed to create areas of safe passage for wildlife across highways, railroad lines, and through areas of intense human development. The exact meaning of this commitment is not clear. The draft is silent on what landowners will or may be required to do in order to allow the Department to fulfill this promise.

On page 18 of the draft, the discussion on wolf distribution reiterates the reason wolves were introduced in the area in the beginning. There is discussion regarding the “large tracts of public lands” but nothing is mentioned about the “large tracts of **private** land” which the draft puts into the trophy game area. The reduced flexibility of this designation will have impacts on landowners.

On page 18 of the draft, it indicates that the Department will not recommend any land use restrictions within Wyoming based solely on the presence of wolves. We fully and strongly support this action, but are concerned about the “solely” qualifier. The final should remove that qualifier.

On page 21 of the draft, one of the management options listed is relocation. When landowners in the western part of the State had wolves moving onto their lambing grounds, these landowners requested that the wolves be relocated. The Fish & Wildlife Service refused this request because relocation was an ineffective management technique. The final should not consider relocation given the F&W Services past experience with that management technique.

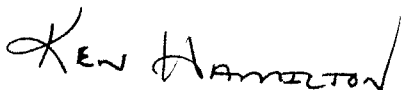
The draft also indicates that the Department "could" issue a permit to property owners in the case of livestock depredations. The amendments to 23-1-304 state that the Department **shall** issue take permits as long as there are adequate wolves to maintain 7 breeding pairs outside the national parks.

We feel there needs to be more discussion in the plan which fully analyzes potential costs to the State. The proposal does not provide much in the way of economic information which can be analyzed. We are aware of public testimony from the Director indicating somewhere in the neighborhood of \$2 million per year for adequate management, but the public should have "full disclosure" of what they are being asked to accept. The consequences of the State accepting another "unfunded mandate" should be carefully weighed before a final commitment is made by this agency to take over the management of wolves. The draft merely mentions that "supplemental funding will be sought" but there is no discussion on what happens when "supplemental funding" does not occur. Given the magnitude of the potential cost, some discussion on how the Department will manage with reduced or no supplemental funding should be included in this document.

The final statement on page 32 that the Department is determined to keep economic losses from a recovered wolf population to a minimum is very welcome.

Thank you for this opportunity to comment.

Sincerely,



Ken Hamilton
Executive Vice President

Cc Board
 NER
 WSGA
 WWGA
 Farmers Union
 WACD

Wyoming Department of Agriculture

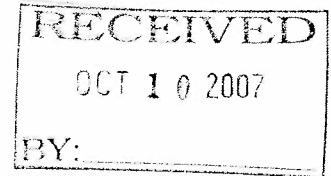
2219 Carey Avenue, Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593 ■ Website: wyagric.state.wy.us ■ Email: wda1@state.wy.us

The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor
John Etchepare, Director

October 5, 2007



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

000036

Dear Wyoming Game and Fish:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Wyoming Revised Wolf Management Plan dated September 2007.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We are encouraged to see progress towards a final and approved Wyoming Wolf Management Plan (Plan) and ultimately the delisting of the wolf in the Northern Rocky Mountains. We support Governor Freudenthal and the Wyoming Game and Fish Department (WGFD) in their efforts to amend the Plan, which meets both the needs of the United States Fish and Wildlife Service (Service) and the citizens of Wyoming. We offer the following comments in support of the Plan to delist the gray wolf and to move forward with state wolf management.

We understand and accept the final decision by Governor Freudenthal to extend the trophy game management boundary as proposed. We believe the boundary is more than adequate for maintaining a viable wolf population to the meet requirement of fifteen breeding pairs as defined. While it is discouraging to know a larger number of livestock producers will experience depredation in this designated area and they will have to prove their animals were killed by wolves in order to receive compensation, we continue to believe the positives of delisting and state management will outweigh the negatives.

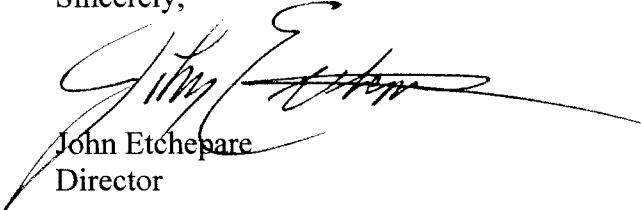
We strongly encourage the WGFD to continue their efforts to pursue outside funding for wolf management and compensation to producers for livestock losses due to wolves. The number of non-Wyoming citizens and organizations who supported wolf reintroduction should financially support the management of wolves and not rely solely on the WGFD, hunters, or livestock producers to foot the bill.

BOARD MEMBERS

Juan Reyes, District 1 ■ Jack Corson, District 2 ■ Jim Mickelson, District 3 ■ Jim Bennage, District 4 ■ Joe Thomas, District 5 ■ David J. Graham, District 6 ■ Gene Hardy, District 7
Patrick Zimmerer, Southeast ■ Dalin Winters, Northwest ■ Vacant, Southwest ■ Vacant, Northeast

The WDA thanks the WGFD for the opportunity to comment. We want to reiterate our support to delist the wolves and move to state management in Wyoming and the Northern Rocky Mountain Region. We encourage the state to continue to work with the Service in order to delist the wolves in a timely manner and according to the requirements set forth in House Bill 213.

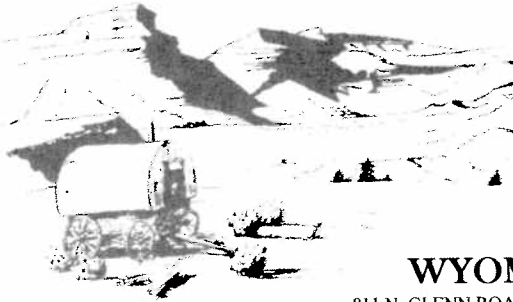
Sincerely,



John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
WDA Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board

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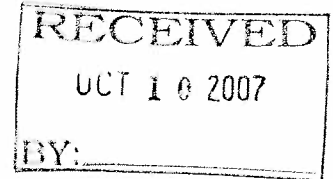
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Jon Child, *Cokeville, WY*

WYOMING WOOL GROWERS ASSOCIATION

811 N. GLENN ROAD • P.O. BOX 115 • CASPER, WYOMING 82602 • PHONE (307) 265-5250 • FAX (307) 234-9701
WWW.WYOWOOL.ORG • wyowool@wyowool.org

Wolf Comments

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

000037**To Whom It May Concern:**

The Wyoming Wool Growers Association offers the following comments on the draft Wyoming gray wolf management plan. The Wyoming Wool Growers Association has been one of the organizations at the forefront of opposition to introduction of non-native Canadian grey wolves into Wyoming by the federal government since they first proposed such. In addition our members own much of the private, and utilize a significant portion of the federal, lands in the northwestern portion of the State directly affected by the wolf introduction program.

The WWGA also participated in the first legislative process which produced Wyoming's first management plan. In addition we participated with other organizations in mounting a legal challenge to the US Fish & Wildlife's rejection of the management plan, (a legal action termed Wyoming Wool Growers et al).. The most recent legislation which resulted in the current proposal was adamantly opposed by the WWGA, with such opposition rejected by both the current Wyoming Governor and the 2007 Wyoming Legislature. Most of the issues we raised during the 2007 legislative process were largely ignored or downplayed. We believe this refusal to consider the objections and concerns we voiced will therefore result in a flawed plan to manage wolves for the benefit of Wyoming's livestock industry, our wildlife resources and our citizens. We also recognize that the Department cannot establish a program outside of statutes, but we encourage the Department to reject the example set by the 2007 Legislature and the current Wyoming Governor and take into account the comments and input from those most directly affected by this proposal.

The draft document lists several references regarding livestock depredation (beginning on page 8), but we suggest that Bjorge and Gunnson's work in Alberta also be included (Evaluation of Wolf Control to Reduce Cattle Predation in Alberta). These researchers found that 41% of known predation losses were caused by wolves and that even with wolf control programs, livestock losses were significant. Another

significant finding from this study was that of the 327 missing cattle the authors could only find 49. The draft document discusses that the Department will pay for losses caused by wolves in the trophy game status area, but does not discuss the details of this reimbursement. Bjorge and Gunnson point out the significant difference between missing livestock and confirmed losses. At a symposium on wolves sponsored by the Wyoming Farm Bureau Foundation, information presented by the Green River Cattlemen's Association indicates that for every loss confirmed, there are at least 6 unconfirmed losses. That information would be important for inclusion in this document as well.

The draft document states "While livestock losses to wolves are minimal industry-wide, losses to individual operators can be significant". We believe that this is an understatement of huge magnitude. While it is true that livestock losses to wolves are minimal "industry-wise (ie: on a national scale), we are confident that livestock losses, and particularly sheep losses, on a STATE-WIDE scale will be significant, no matter whose definition of "significance" is used. The Department should prepare itself for this, and not rely upon "public relation spin" from the federal government to base it's plan upon. In way of example, we are aware of one sheep operator who will now be within the "trophy game" area defined within the draft plan who experienced wolf depredation on his herd of sheep during the summer of 2007 on US Forest Service grazing allotments. Despite several attempts by the USDA/APHIS/Wildlife Services to remove depredating wolves from these herds, those efforts were largely unsuccessful. The only alternative left for this operator was to come off the forest allotments early (thereby causing an economic burden on the rancher directly related to wolves---an economic loss which, by the way, we will be looking to the WGFD, once it assumes ownership of these wolves, to fully compensate producers such as this for). Upon exit of the forest allotment, this one rancher was short 700 HEAD OF LAMBS, due almost certainly and entirely to wolves!!! We warn the Department and Commission that based upon the comments we find in the draft plan, it is WHOLLY unaware, and unprepared, for the economic effects of assuming ownership and control of these wolves from the federal government!!! In this particular instance, our member would present the Department with a demand for compensation of approximately \$140,000.00, and this organization expects, and stands ready to take whatever means are necessary to assure, that the Department fully pays these types of claims for compensation!!

While W.S. 23-3-115 states that a landowner or their agent will be allowed to legally take a wolf in the act of damaging private property, it has been our experience that in other trophy game species that the Department manages, utilizing this same sort of Legislative mandate, it appears that oftentimes the Department and its employees devise and put into place a scheme to make these types of provisions almost unworkable and in some cases, it appears that the Department intends to "set up" landowners and their agents who are trying to protect their property so that they place themselves into jeopardy of prosecution by the Department. This is inexcusable, and we place the Department on notice that we will be actively

monitoring the actions of the Department and it's personnel to assure that this type of scenario does not take place.

In way of example, we have been made aware of a situation which arose with one of our members this summer who was losing sheep to an unknown cause. The rancher utilizes Wildlife Services, and one of their trappers entered the rancher's property early one morning to try and determine what was killing the sheep. Almost immediately his dogs sounded an alarm, and upon investigating the trapper found a fresh sheep kill, and a mountain lion treed by his dogs in close proximity. Confident that he had determined the source of the rancher loss, and following protocol agreed to between the Department and Wildlife Services, the trapper attempted to contact the local Game Warden (who, by the way, has a reputation of animosity towards both ranchers and anyone aiding ranchers, such as this trapper) in order to notify him that he had found a depredating trophy game animal IN THE ACT of depredating, and that he was going to remove it. The Game Warden did not answer the trappers call, and after repeated attempts to contact the game Warden, with no success, the trapper left one last voice mail telling the Warden that he did not want to let this depredating animal go, and was going to dispatch it, which he did. Immediately following this, the Game Warden attempted to cite the trapper because he did not talk IN PERSON to the Warden.

This type of harassment, attitude, and behavior from Departmental personnel towards livestock owners and their agents who are simply trying to protect their private property is UNEXCUSABLE and will NOT be tolerated by this organization any longer, especially as it concerns trophy game status wolves. The Department is on record of supporting the introduction of wolves into Wyoming, has agreed with the Legislature to accept responsibility and ownership of them in the area defined within the draft plan, and will now have to live with the consequences of those actions. TO THAT END, WE REQUEST THAT THE DEPARTMENT MAKE IT CLEAR THAT ALL A LIVESTOCK OWNER, OR THEIR AGENT, HAS TO DO IS MAKE A GOOD FAITH ATTEMPT TO NOTIFY THE DEPARTMENT OF THEIR ACTIONS AS REGARDS THE TAKING OF WOLVES CAUGHT IN THE ACT OF KILLING, HARRASSING OR DAMAGING LIVESTOCK, and that no actual verbal or physical contact is required. There is no reason that a livestock producer or their agent should have to play an endless game of "cat and mouse" with Departmental personnel who, oftentimes, show tremendous disdain and disrespect to ranchers who are only trying to protect their animals.

The draft plan states, "The person reporting shall present the unfrozen pelt and skull to a Department employee during business hours for examination." We believe that it is unreasonable to require the person lawfully taking a wolf to have to then go to the extreme of having to find a Departmental person to "present" the animal too. The burden of examining the animal is upon the Department, so all the person who has taken the animal should have to do is make a good faith attempt to notify the Department and tell the Department where the "unfrozen pelt and skull" of the

animal is, and it should then be the Department responsibility to go to where the material is to examine it, NOT THE OTHER WAY AROUND!

The area which has been defined both in the legislation and in the draft plan significantly expands the amount of land which is included in the "trophy game" designated area. The land area in the draft plan was proposed by the federal government, guided through the Wyoming Legislature by the current Wyoming Governor, and foisted upon Wyoming by the 2007 Wyoming Legislature with little or no input from the citizens in this State. The result of these actions, which this organization considers to be disingenuous and dishonest, is that approximately 500,000 acres of private land have been condemned by the USFWS and the State of Wyoming as wolf habitat with absolutely no compensation offered to the private land owners whose lands have been confiscated through HB213 of the 2007 Legislative session. This is contrary to both the U.S. and Wyoming Constitutions, yet neither the current Wyoming Governor nor the 2007 Wyoming State legislature appeared to have any concern over this!! We encourage the Wyoming Game & Fish Department and Commission to NOT follow the example of the Governor and the Legislature and instead work diligently to develop a plan responsive to the citizens of the State and most particularly to the landowners who will be most directly affected by the presence of the State of Wyoming's wolves upon their private property. To this end, the agency should consider proposing a reduced area over that contemplated in the draft plan so that private landowners can retain the maximum amount of flexibility possible while at the same time minimizing the almost certain negative consequences of wolves on, or near, their property.

One of the other criteria set within the above mentioned HB213 that would precipitate the State of Wyoming assuming management and ownership of the USFWS wolves would be for settlement of all legal actions surrounding the wolf recovery plan. This can be accomplished in at least 3 ways. The first would be for the federal government to reverse their opposition to Wyoming's first wolf management plan. The second would be for the State of Wyoming to withdraw their legal action against the federal government's refusal to agree to our previous wolf management plan. The third way would be for a legal decision in the case. We have not seen any offers coming forth from the federal government to agree to the original Wyoming plan (and one must ask, why would they when the current Wyoming Governor and the 2007 Wyoming Legislature essentially hoisted a "flag of surrender" over the State Capitol to the USFWS with the passage of HB213!!). We have also not been informed of any ruling on this issue from the federal court. The issue of Wyoming withdrawing their legal challenge seems to present the only other way to fulfill this criterion prior to the February deadline. We hope that neither the Wyoming Game and Fish Department or Commission would recommend Wyoming "roll over" in the legal challenge (as other branches of Wyoming State Government appear intent upon doing) so the final hurdle can be overcome before the legislation self destructs.

The draft plan discusses population management, but gives the reader very little information on how wolves will be managed on the Wind River Indian Reservation. One of the major questions we have is how wolves will be considered and managed on the WRIR. This question is not answered in the draft management document. Given the fact that wolves will both occupy, as well as traverse, the WRIR, it is imperative that the Department have some sort of an agreement with the Tribes on how wolves will be managed, accounted for, and controlled once they enter and/or leave the WRIR. A copy of the WRIR wolf management plan (if one exists) should be included in the document. Also any MOU's or similar documents between the Department and the WRIR or Fish and Wildlife should be provided in the draft so the public can review the documents.

WS 23-1-304 was amended to say that the Department, "Shall institute and maintain an active program of population monitoring statewide." The legislation did not differentiate between areas where wolves were classified as trophy and areas where they were classified as predators. The legislation also did not indicate that wolves should not be monitored on the WRIR by the Department. The draft plan appears to be establishing areas of the State with different monitoring criteria which conflicts with the amended language of the statutes. This needs to be rectified by the Department.

The draft also discusses the possibility of utilizing different procedures for wolf population monitoring. Unfortunately language adopted in the 2007 session clearly spells out what criteria the Department must use in order to determine breeding pairs. The language was not permissive and cannot be read to allow for a different procedure.

The draft states that in areas of the state where wolves are considered predators, anyone who takes a wolf will be required to notify the Department within 10 days of that action. Furthermore, the Department will require that the unfrozen skull and pelt be presented to a department employee. We cannot find anything in the statutes to authorize the Department to make this request. It is indicated that this is required to help the Department in management of wolves, but there is no indication what is needed or if the same information can be obtained in a different fashion. The draft also is silent on the penalties that will be levied should a citizen not comply with this requirement. No provision is made for any alternatives nor is there an adequate explanation for this requirement. It is doubtful that statutes even give the Department the authority to require citizens to comply.

The draft on page 17 indicates the Department is committed to create areas of safe passage for wildlife across highways, railroad lines, and through areas of intense human development. The exact meaning of this commitment is not clear. The draft is silent on what private landowners will or may be required to do in order to allow the Department to fulfill this promise.

On page 18 of the draft, the discussion on wolf distribution reiterates the reason wolves were introduced in the area in the beginning. There is discussion regarding the "large tracts of public lands" but nothing is mentioned about the "large tracts of private land" which the draft puts into the trophy game area. The reduced flexibility of this designation will have impacts on landowners.

On page 18 of the draft, it indicates that the Department will not recommend any land use restrictions within Wyoming based solely on the presence of wolves. We fully and strongly support this action, but are concerned about the "solely" qualifier. The final should remove that qualifier.

On page 21 of the draft, one of the management options listed is relocation. When landowners in the western part of the State had wolves moving onto their lambing grounds, these landowners requested that the wolves be relocated. The Fish & Wildlife Service refused this request because relocation was an ineffective management technique. The final should not consider relocation given the F&W Services past experience with that management technique.

The draft also indicates that the Department "could" issue a permit to property owners in the case of livestock depredations. The amendments to 23-1-304 state that the Department shall issue take permits as long as there are adequate wolves to maintain 7 breeding pairs outside the national parks.

On pages 20-28, the Department, in carefully worded rhetoric, skirts around the issue of impacts of wolves to the Northern Yellowstone Elk Herd. We question why the Department does not fully disclose the total population numbers of the Northern Yellowstone Elk Herd pre-, and post-, wolf introduction? The public has a right to know fully the effects of the Clinton/Gore/Babbitt debacle that was foisted upon the citizens of Wyoming, and the Department SHOULD NOT be a party to helping to downplay or cover-up those disastrous effects!!

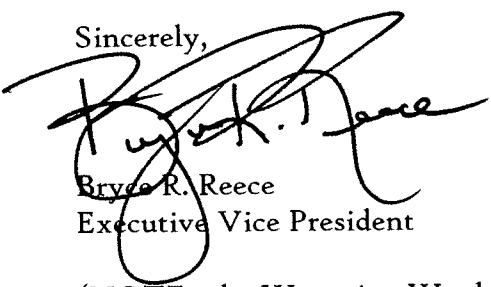
We feel there needs to be more discussion in the plan which fully analyzes potential costs to the State. The proposal does not provide much in the way of economic information which can be analyzed. We are aware of public testimony from the Director indicating somewhere in the neighborhood of \$2 million per year for adequate management, but the public should have "full disclosure" of what they are being asked to accept. The consequences of the State accepting another "unfunded mandate" should be carefully weighed before a final commitment is made by this agency to take over the management of wolves. The draft merely mentions that "supplemental funding will be sought" but there is no discussion on what happens when "supplemental funding" does not occur. Given the magnitude of the potential cost, some discussion on how the Department will manage with reduced or no supplemental funding should be included in this document.

The final statement on page 32 that the Department is determined to keep economic losses from a recovered wolf population to a minimum is very welcome.

Finally, the plan is completely silent on the issue of livestock guarding animals and the losses to such by wolves. This organization has estimated that an experienced, fully functional livestock guard dog is worth approximately \$5,000. Most sheep ranchers which utilize these animals have between 2-6 per herd of sheep. Ranchers have already seen entire units of livestock guarding animals wiped out in a single night by wolves, which is a tremendous economic burden on these family ranchers. The Department should expect, and be required, to compensate these ranchers for these types of losses when they occur, and we request that this be set out in the final plan.

Thank you for this opportunity to comment.

Sincerely,

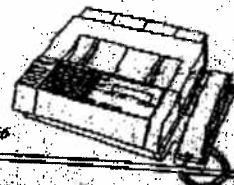


Bryce R. Reece
Executive Vice President

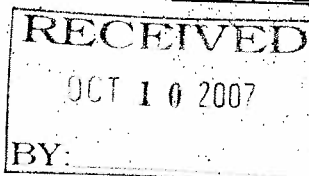
(NOTE: the Wyoming Wool Growers Association was provided a copy of the Wyoming Farm Bureau's comments on the proposed plan, which we found to be excellent and some of which we have incorporated into our comments, with our thanks to Ken Hamilton and the Wyoming Farm Bureau Federation).

SUBLETTE COUNTY, WYOMING
OFFICE OF COUNTY CLERK

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744 367-6376

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Telecopy Number: 307-777-4648

Comments:

BOARD OF COUNTY COMMISSIONERS

Sublette County, Wyoming

P.O. Box 250

PINEDALE, WY 82941

October 9, 2007

Wolf Comments

Wyoming Game and Fish Department

5400 Bishop Blvd.

Cheyenne, WY 82006

Sent Via Facsimile: 307-777-4648

**COMMENTS OF THE SUBLETTE COUNTY, WYOMING COMMISSIONERS ON
WYOMING'S REVISED WOLF MANAGEMENT PLAN**

Sublette County, Wyoming is located in Western Wyoming approximately seventy (70) miles south of Yellowstone and Grand Teton National Park. It is home to 6,654 citizens according to the 2004 census. The Sublette County Commissioners have a significant interest in ensuring that wolves are properly managed to limit impacts to livestock producers and wildlife populations.

We have reviewed Wyoming's Revised Wolf Management Plan proposed by the Wyoming Game & Fish Department ("WGF") to manage wolves once they are delisted by the United States Fish & Wildlife Service ("FWS") that was published by WGF on September 10, 2007. We were pleased to read that one of the WGF goals is to minimize wolf/human conflicts and that the plan is based on a dual classification system of wolves. Sublette County contains areas classified as both predatory and trophy-game in the expanded boundary demanded by the USFWS.

There is no question that the gray wolf (*Canis lupus*) should be delisted. The reintroduction of the gray wolf in the Northern Rocky Mountains has been wildly successful. The FWS recovery goals in the northern Rocky Mountains were 30 breeding pairs and 300 individual wolves distributed among Montana, Idaho and Wyoming. The 2006 inventory indicates that there are currently 86 breeding pairs and 1,300 individual wolves in this area. Unfortunately, Wyoming has conceded to the USFWS on original expectations regarding boundary issues, population numbers and the definition of breeding pair. If the USFWS proceeds with delisting, it makes sense to have the WGF manage wolves in Wyoming. However, such management responsibilities should only be assumed if the following conditions are met.

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Population Monitoring

The draft management plan contemplates extensive coordination with FWS to monitor wolf populations in Wyoming. To the extent the current methods underestimate wolf populations in Wyoming, we urge the WGF to be actively involved in assessing whether current monitoring methods accurately estimate such populations and to improve monitoring techniques. The use of helicopters within wilderness areas needs to be carefully reviewed, but should be used wherever possible. We believe the public can be effectively used by WGF in improving monitoring of wolf populations. We encourage the WGF to establish a specific plan to better assess existing wolf populations. It is only through accurate monitoring that WGF will be able to effectively manage the exploding wolf population in Wyoming.

Wolf Mortality

The draft management plan allows for unregulated take in those areas designated as predator, but requires reporting of such take. These requirements do not seem consistent with an unregulated take and should be minimized for landowners. In order to make these requirements the least onerous as possible, the WGF should establish a central contact to submit such information, similar to the way WGF handles Grizzly Bear issues. The landowner should not have to deal with government bureaucracy in reporting unregulated takes, but instead the process should be streamlined to cause the least amount of burden to landowners.

Under the draft management plan, Wyoming will be required to maintain at least seven breeding pairs outside the National Parks. We encourage WGF in preparation of regulations to implement W.S. 23-1-101(a), that permits for public take in the trophy game area be aggressive in limiting population growth beyond that which is required by the FWS.

Nuisance Wolf Management

We were pleased to see that the WGF wants to deal with wolf-livestock conflicts in a "prompt, appropriate manner". The draft management plan contemplates a cooperative relationship with USDA/WS. That cooperative relationship should not simply substitute WGF for the FWS. We encourage the WGF to establish management actions separate from historic management between FWS and USDA/WS, which sometimes were delayed or inadequate to deal with nuisance wolves. The WGF should not shy away from lethal control methods simply because the FWS has done so in the past. The landowner should be protected to the maximum extent.

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Current financial compensation to landowners through Defenders of Wildlife has been wholly inadequate. The WGF should not model its reimbursement plan after the Defenders of Wildlife process. In addition, the WGF must do a better job of confirming wolf kills than the FWS has done in the past. Research varies as to the appropriate ratio for confirmed kills versus actual kills. We urge the WGF to adopt a ratio of at least 8-1 and to provide such reimbursement in a timely manner. The WGF should also allow itself the discretion to increase such ratio based on data collection, which should be conducted in conjunction with livestock producers. The landowner should not carry the burden of the wolf reintroduction and must be adequately and fairly compensated for the costs associated with this program.

Wolf/Other Wildlife Interactions

WGF must do a better job than the FWS has in documenting the effects of wolf populations on wildlife. In our opinion, impacts to wildlife from wolf depredation have been underestimated in the past, especially related to Wyoming's moose population. Careful monitoring of the elk feeding grounds and protection from depredating wolves must be the primary focus of WGF management. In addition to depredation of the elk herds, wolf populations impact displacement of elk onto private property, causing commingling with livestock which can result in another set of issues for livestock producers.

Funding

The prospect of state management of wolves comes with a heavy price tag to the State of Wyoming. The federal government must be held accountable and required to contribute to this economic requirement and not simply pass the bill off to the State of Wyoming. We were pleased that the draft management plan includes documentation of the efforts to obtain federal funding for wolf management. We strongly encourage the WGF to aggressively pursue any form of federal appropriations to assist the State of Wyoming to pay these management costs.

The WGF must have the full financial support of the legislature to properly fund the management plan. Wyoming cannot allow the wolf population to be partially managed. If the State of Wyoming is unwilling to fully commit to a strong management plan, we believe that management should remain with the FWS.

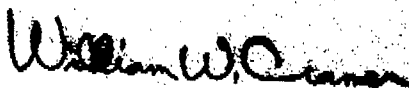
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Conclusion

The WGF cannot make any more concessions to the FWS on how wolves will be managed in Wyoming. The Revised Wolf Management Plan is a good start, but is not specific on many important issues, such as population monitoring, landowner protections, and funding. We urge the WGF to include as many specifics in the Final Plan as possible so as to provide a solid framework for future wolf management in Wyoming.

The Sublette County Commission appreciates this opportunity to comment on the Revised Wolf Management Plan. Thank you for your consideration.

Sincerely,



William W. Cramer
Chairman