

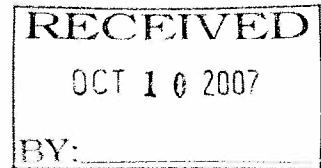


National Headquarters

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October 10, 2007

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



Re: Draft Wyoming Gray Wolf Management Plan

000039

ACTION: Public comment period.

Dear Wyoming Game and Fish Department:

Defenders of Wildlife ("Defenders") appreciates the opportunity to submit comments regarding the Draft Wyoming Gray Wolf Management Plan.

Defenders is a national non-profit conservation organization with more than 900,000 members and supporters nationwide. We are a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend, and have been involved in such efforts since the organization's establishment in 1947. Over the last three decades, Defenders has been an integral leader in the recovery of wolves in the Northern Rockies. Defenders created and administers The Bailey Wildlife Foundation Wolf Compensation Trust, which has reimbursed ranchers in the region for more than \$800,000 since the program was founded in 1987, and The Bailey Wildlife Foundation Carnivore Conservation Fund, which assists family ranchers and farmers with nonlethal, proactive methods that help reduce or prevent livestock losses to wolves. These methods include sharing the cost of range riders, livestock guarding dogs, predator deterrent fencing, and alternative grazing.

Our 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 ("FWS" or "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.

I. Background

In 2002, the State of Wyoming held a public comment period regarding its initial draft state wolf plan. Our comments, filed July 15, 2002, noted many concerns about the state plan and especially the classification of a wolf as a “predatory mammal” throughout all of the state. Wyoming then made some revisions to its plan, assigning a dual classification to the wolf as a “predatory mammal” in most of the state and as “trophy game” in the remainder of the state. Our comments, filed December 15, 2002, reiterated our continuing concern regarding the classification of wolves as a predatory mammal in significant parts of the state. We continue to believe this classification would threaten the continued existence of the gray wolf in Wyoming and across the northern Rockies region. Our concern was shared by the peer reviewers who, at the request of the Service, reviewed the state plan to determine its impact on wolf recovery in the region. Most of the 11 peer reviewers expressed serious concern regarding the potential for harm to the regional wolf population should Wyoming’s state plan be implemented.

In September 2004, the State of Wyoming filed a lawsuit challenging the Service’s refusal to approve its initial state wolf plan, as well as the agency’s alleged failure to “properly manage and control” wolves in Wyoming under the federal Endangered Species Act (“ESA”) and the National Environmental Policy Act. The court in that case granted motions filed on behalf of numerous conservation organizations, including Defenders of Wildlife, to intervene and defend the Service’s rejection of the Wyoming plan. After full briefing, the court dismissed Wyoming’s lawsuit for failing to challenge a final agency action or action “unlawfully withheld or unreasonably delayed” under the Administrative Procedure Act. *Wyoming v. U.S. Dep’t of the Interior*, 360 F. Supp. 2d 1214 (D. Wyo. 2005). The district court’s decision was affirmed by the U.S. Court of Appeals for the Tenth Circuit. *Wyoming v. U.S. Dep’t of the Interior*, 442 F.3d 1262 (10th Cir. 2006).

On July 13, 2005, the State of Wyoming submitted a petition to the Service to establish a Northern Rocky Mountain distinct population segment (“DPS”) for the gray wolf and to delist the Northern Rocky gray wolf under the ESA. On August 1, 2006, after conducting a status review pursuant to 16 U.S.C. § 1533(b)(3)(A), the Service issued a 12-month finding in response to Wyoming’s petition. Notice of 12-Month Petition Finding, 71 Fed. Reg. 43,410 (Aug. 1, 2006). The Service deferred designation of a Northern Rocky Mountain DPS to a future rulemaking process, *id.* at 43,416-17, and concluded that delisting was “not warranted” for the northern Rockies wolf population.

Defenders and many other conservation organizations argued in the context of this delisting proposal that the Wyoming plan was not an adequate regulatory mechanism to maintain a viable gray wolf population. *Id.* at 43,430. The Service agreed, concluding that unregulated killing of wolves under the Wyoming Plan could “reduce population levels to a point at which wolves in the [Northern Rockies] are, within the foreseeable future, likely to become in danger of extinction throughout a significant portion of the range.” *Id.* The Service determined that Wyoming’s proposal to classify the gray wolf as a “predatory animal” would leave wolves vulnerable to

unrestricted human-caused mortality, and would therefore “most likely prevent wolf packs from persisting ... even in otherwise suitable habitat.” *Id.* at 43,428. Based on concerns raised by Wyoming’s proposed dual classification of wolves as a trophy game species and as “predators,” the Service again rejected the Wyoming Wolf Management Plan.

In February 2007, Governor Freudenthal of Wyoming signed legislation (Wyoming House Bill 213) that proposes to revise Wyoming state statutes pertaining to wolf management. House Bill 213 becomes effective if three conditions are met:

- (1) Wyoming’s current lawsuit against the Service is settled;
- (2) by February 29, 2008, the Service publishes a final rule delisting the gray wolf in the northern Rockies; and
- (3) the ESA section 10(j) rule for managing the nonessential experimental population of gray wolves in the northern Rockies is modified to allow the state to manage wolves that are having an “unacceptable impact” on ungulates.

Substantively, House Bill 213 allows aerial gunning and harassment of wolves if they are having an unacceptable impact on big-game populations. The bill does not even attempt to encourage non-lethal solutions for wolf conflicts; it authorizes lethal take in all circumstances unless killing wolves could trigger relisting. The bill also allows landowners to obtain annual permits to remove wolves that are harassing private property. In the event the legislation goes into effect, the statute would be inadequate as a wolf regulatory mechanism as required under the Endangered Species Act as it fails to guarantee a healthy, long-term wolf population in this recovery area.

On September 10, 2007, Wyoming opened a 30-day public comment period regarding its new state management plan, which has been only slightly revised since it was last published for public comments in 2002. Wyoming has now conformed its definition of a breeding pair to the Service’s definition and agreed to alter slightly the boundaries governing where wolves would be managed as “predators” versus “trophy game,” but the plan still allows wolves to be shot on sight in nearly 90 percent of the state. Moreover, Wyoming still intends to reduce the state wolf population and maintain it at the bare minimum federal recovery goal of 100 wolves.

Wyoming has failed to address the concerns that Defenders and other groups have raised throughout these public comment periods concerning the dual status of wolves in Wyoming, especially the “predatory mammal” classification. Therefore, we continue to oppose Wyoming’s wolf plan until the plan and Wyoming state statutes are modified to meet federal ESA conservation standards and the public again has the opportunity to comment on their adequacy as a wolf management plan. Wyoming’s plan to classify wolves as predatory animals that can be shot on sight throughout nearly the entire state clearly aims to dismantle federal wolf recovery efforts the moment federal protections are ended and would undermine wolf survival in the region.

II. Inadequacies of the Wyoming Wolf Management Plan and State Statute

The ESA requires that the Secretary of the Interior determine by regulation whether a species is an endangered or threatened species as a result of any of five statutory factors: (1) the present or threatened destruction, modification, or curtailment of its habitat or range; (2) overutilization for commercial, recreational, scientific, or educational purposes; (3) disease or predation; (4) the inadequacy of existing regulatory mechanisms; or (5) other natural or manmade factors affecting its continued existence. 16 U.S.C. § 1533(a)(1). Consideration of these factors is required for both listing and delisting decisions. 50 CFR § 424.11. If any of these factors are present to support listing, a species cannot be delisted.

The new Wyoming plan and statute fail to provide an adequate regulatory mechanism, as required by the ESA, for the following reasons:

- 1) Immediately upon federal delisting, wolves across almost all of the state of Wyoming would be classified as “predators” and could be killed on sight. The Service has repeatedly determined this would pose a significant threat to wolf conservation because it risks allowing the wolf population to decline below the Service’s minimum recovery goals;¹
- 2) Under the new Wyoming statute House Bill 213, the proposed wolf range in Wyoming cannot be adjusted as needed, only “diminished,” which would prevent the state from countering declining trends in wolf population if added range is needed to ensure an adequate population is maintained;²
- 3) With its broad-scale “predatory mammal” classification, Wyoming’s plan would limit the availability of important dispersal habitat for wolves in adjacent national forests and wilderness areas and prevent wolves from recolonizing important portions of their range in neighboring states, thus establishing a barrier to wolf dispersal even within the DPS. This includes the exclusion of important wolf habitat and/or dispersal territory such as the southern halves of the Bridger Wilderness Area, the Bridger Teton National Forest and the southern segment of the Shoshone National Forest, all of the Bighorn National Forest including the Cloud Peak Wilderness Area and the Medicine Bow National Forest;³
- 4) The Wyoming plan is contingent on the federal funding of extremely

¹ 71 Fed. Reg. 43,410 (Aug. 1, 2006).

² 72 Fed. Reg. 36,939 (July 6, 2007); HB 0213, Enrolled Act 123 (“This described area may be diminished by rule of the game and fish commission if the game and fish commission determines the diminution does not impede the delisting of gray wolves and will facilitate Wyoming’s management of wolves.”).

³ 72 Fed. Reg. 6128 (Feb. 8, 2007); Wyoming Game & Fish Department, Draft Wyoming Gray Wolf Management Plan (September 2007).

expensive GPS tracking equipment to manage for the lowest number of wolves possible. Even if this technology became available in the early stages of wolf reintroduction in the region, wolf managers consider it largely cost-prohibitive as a general management device. GPS tracking requires extensive training and equipment, and managing at the minimum wolf population level would require intensive supervision to monitor the population closely and maintain preparations to relist the species on an emergency basis;⁴

- 5) The main focus of Wyoming's statute and plan is the protection and conservation of elk, not wolves, despite the fact that the state's 100,000 elk exceed its maximum population objectives. The statute and state wolf plan evince the state's clear hostility toward wolves and intention to kill wolves rather than allowing their recovery to continue;⁵
- 6) Wyoming's plan is contingent on federal funding, which has not been guaranteed.⁶

Furthermore, under the September 2007 plan, Wyoming commits only to maintain 15 breeding pairs statewide, including only seven breeding pairs outside the national parks and John D. Rockefeller Memorial Parkway. The Service's minimum population goals were never intended to be the maximum number of wolves allowed in the region, but rather represent the very minimum necessary to ensure the population is not eradicated once again. Managing strictly at the lowest number of wolves possible clearly indicates that wolves will not be managed as other native species like elk, deer, moose, and bear, whose populations are allowed to flourish in balance with available habitat.

A. "No Wolf Zones" and Predatory Animal Status

We strongly oppose the use of "no wolf" zones or unnatural limitations on wolf population size without scientific evidence demonstrating that these are necessary. The Wyoming wolf plan and statute both propose an enormous "no wolf" zone by designating wolves as "predators" in approximately 90 percent of the state. Wolves should instead be allowed to colonize naturally and without excessive control of their movements. They can be discouraged from unsuitable areas – like private ranches – when necessary and when problems arise that cannot be resolved through nonlethal means.

Currently, Wyoming state law classifies the wolf as a "predatory animal," Wy. Stat. sec.

⁴ *Id.* ("Population monitoring shall include the use of global positioning systems and radio collaring of gray wolves ... The commission is authorized to enter into memoranda of understanding with the United States Fish and Wildlife Service or other federal agencies...").

⁵ Neary, B. May 12, 2007. Agency predicts good hunting. Associated Press; Thuermer Jr., AM. May 16, 2007. Elk numbers soar as hunting seasons set. Jackson Hole News and Guide.

⁶ Wyoming Game & Fish Department, Draft Wyoming Gray Wolf Management Plan (May 2007).

23-1-101 (a) (viii), that can be killed “without a license in any manner and at any time” with few exceptions. Wy. Stat. sec. 23-3-103. The methods for killing wolves include aerial hunting, and state law authorizes entering private property, even when the landowner refuses, to destroy and eradicate wolves that are deemed by the state to be a “menace to livestock.” Wy. Stat. secs. 11-6-101, 11-6-105. No biological explanation justifies such measures, and the inability of such regulatory schemes to ensure a continuing viable wolf population in the state is glaringly apparent.

Predatory animal status is a throwback to the crude and brutal eradication methods of the past and could undo wolf recovery in the state. Given these many remaining issues, Wyoming’s plan cannot and will not contribute to the conservation and sustained viability of a state or regional wolf population.

Wyoming’s plan and statute designating the wolf as a “predatory” animal must be amended so as to provide sufficient protections, including imposition of substantial penalties to help deter violations. We believe these penalties must be weighted toward the maximum allowed under state law and vigorously enforced to ensure enough protection while the species continues to recover.

B. Wyoming’s Plan Manages for Ungulates Instead of Wolves

According to the State of Wyoming’s wolf management statute, the Wyoming Department of Game and Fish “shall manage the gray wolf population as necessary to ensure the long-term health and viability of any big game animal herd that is being threatened in this state.” The statute states:

At any time that there exists the number of breeding pairs of gray wolves specified in subsection (a) of this section, the department is authorized to take any action necessary to protect big and trophy game populations in this state from predation by gray wolves. The department shall give priority to areas where the wild ungulate herd is experiencing unacceptable impacts from wolf predation. For purposes of this section, a wild ungulate herd may be experiencing unacceptable impacts from wolf predation where the herd has declined below population objectives or is in danger of doing so and: (i) The wild ungulate herd in question is located within at least a portion of the home range of a documented wolf pack; (ii) The annual report of wolf population published by the United States fish and wildlife service provides, or the game and fish department has documented, that at least fifteen (15) breeding pairs exist in the designated trophy game area specified in W.S. 23-1-101 (a)(xii)(B)(I) and all national parks within the boundaries of Wyoming; and (iii) The department determines that wolf predation is having an impact on the recruitment rate of the affected wild ungulate herd and the governor certifies that determination as provided in subsection (f) of this section, if necessary to determine whether this section is effective. (e) For purposes of this section, wolf-wild ungulate conflicts occurring at state operated feedgrounds shall include any situations in which wolves: (i) Cause wild

ungulates to move from those feedgrounds; (ii) Cause a mixing of livestock and wild ungulates; or (iii) Cause wild ungulates to pose extraordinary safety hazards on state public roadways.

House Bill 0213, Enrolled Act 123 (emphasis added).

The Wyoming wolf management plan and statute are based on the false premise that wolves are having dire impacts on elk populations within the state. On April 25, 2007, the Wyoming Game and Fish Department (WGFD) held a videoconference meeting, facilitated by WGFD personnel, to consider the state's Mule Deer Initiative. WGFD staff indicated that elk numbers in Wyoming are quite high and that in some places elk are outcompeting mule deer on winter ranges. Emphasizing this point further, in a WGFD Commissioner's meeting held the same week, WGFD Assistant Wildlife Division Chief Bill Rudd urged the Commission to dramatically increase big game hunting licenses in the state to help reduce herds to achieve populations closer to objectives and provide relief to drought-damaged ranges.⁷

Despite claims by Wyoming elected officials and some sportsmen that elk populations are being ravaged by wolves, WGFD's own figures, reported at the Commission hearing, indicate that elk in the state are 54.3 percent above population objectives.⁸ As reported at the hearing, this is also the case for pronghorn (56.8 percent above objective), mule deer (17.9 percent above objective) and white-tail deer (20 percent above objective). The annual winter classification for Wyoming's largest elk herd – the Jackson Herd – was recently completed. The number of elk was similar to last year with 11,790 elk counted compared to 11,850 in 2006.⁹ The annual count on the National Elk Refuge totaled 7,279 elk. This is the eighth consecutive year wildlife managers have met the refuge population objective.¹⁰

In 2005 (the most recent year for which data are available), of the eight hunting units within occupied wolf territories, one was at the desired population objective while the other seven combined were above objective by 6,694 animals (17.8 percent). Elk cow:calf ratios fluctuate, but in 1995, before the reintroduction of wolves to the region, wildlife managers recorded a low of 19 calves per 100 cows, whereas in 2006 the ratio was at 25 calves per 100 cows.¹¹

Wyoming is showing far greater concern for abundant game species than they are for the gray wolf, despite years of efforts to reintroduce and expand wolf populations. Wyoming has long expressed a desire to see the gray wolf delisted within its border and within the region, but delisting only makes sense in an environment where the states are committed to continuing to conserve wolves. Wyoming's plan does not even come close to meeting the requirement that adequate regulatory mechanisms be in

⁷ See Brodie Farquhar, Game and Fish proposes additional hunting licenses to offset forage shortage, *Casper Star Tribune*, April 26, 2007.

⁸ *Id.*

⁹ Wyoming Game & Fish Dept., Annual Tally of Jackson Elk Herd, March 3, 2007, *available at* http://gf.state.wy.us/services/news/pressreleases/07/03/03/070303_5.asp.

¹⁰ *Id.*

¹¹ *Id.*

place prior to delisting.

C. The Service's Prior Objections Have Not Been Addressed

Defenders has not been alone in its recognition of the deficiencies that plague Wyoming's state wolf plan. The Service has also long recognized that Wyoming's plan and state law "are not sufficient to conserve Wyoming's portion of a recovered NRM wolf population at this time" and has gone so far as to state that "[i]f acceptable changes do not occur to the Wyoming regulatory framework, then the potential for excessive human-caused mortality as allowed under Wyoming state law would remain the lone threat to wolves in a significant portion of the range in Wyoming outside the National Parks." 72 Fed. Reg. 6106 (Feb. 8, 2007). The Service made clear that "attempting to manage a wolf population that is constantly maintained at minimum levels would likely result in the wolf population falling below recovery levels due to factors beyond WGFD's control." *Id.* at 6129. The Service also expressed "major concerns" about Wyoming's intent to maintain a large predator zone and a much more "limited area in which human caused mortality could be regulated" (USFWS 2007). Wyoming's plan "did not assure the USFWS that Wyoming's plan will conserve wolves at or above a recovered level in northwestern Wyoming." *Id.* at 205.


The State of Wyoming has not adequately explained how its recently revised plan and House Bill 213 resolve these very serious objections. As a review of the plan demonstrates, it maintains many of the very features that have concerned Defenders, and the Service for many years. Wyoming's plan and state law simply have not changed to any degree that would offer assurances that the state will act to promote the continued conservation and recovery of gray wolves. To the contrary, the state's plan would do the opposite.

CONCLUSION

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.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Wm. Robert Irvin", with a stylized, sweeping flourish at the end.

Wm. Robert Irvin
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Defenders of Wildlife
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Literature cited

Defenders of Wildlife et al. May 8, 2007. Proposed Rulemaking regarding Establishing and Delisting a Distinct Population Segment for Gray Wolves in the Northern Rocky Mountains.

Farquhar, Brodie. April 26 2007. Game and Fish proposes additional hunting licenses to offset forage shortage. Jackson Hole Star-Tribune.

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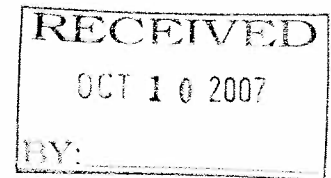
Wyoming Department of Game and Fish. Annual Tally of Jackson Elk Herd, March 3, 2007, available at http://gf.state.wy.us/services/news/pressreleases/07/03/03/070303_5.asp.

Addendums

Defenders of Wildlife et al. May 8, 2007. Proposed Rulemaking Regarding Establishing and Delisting a Distinct Population Segment for Gray Wolves in the Northern Rocky Mountains.



JACKSON HOLE CONSERVATION ALLIANCE



October 9, 2007

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

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To whom it may concern,

Please accept enclosed (two copies) comments regarding the Draft Wyoming Gray Wolf Management Plan as submitted by the Jackson Hole Conservation Alliance and the Biodiversity Conservation Alliance. These comments are also being submitted electronically through the Departments' web site.

Thank you,

Franz J. Camenzind, Ph.D.
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P.O. Box 2728
Jackson Wyoming 83001

Daune ShortWild Species Program Director
Biodiversity Conservation Alliance
P.O. Box 1512
Laramie, Wyoming 82073

The Jackson Hole Conservation Alliance is dedicated to responsible land stewardship in Jackson Hole, Wyoming, to ensure that human activities are in harmony with the area's irreplaceable wildlife, scenic and other natural resources.

October 9, 2007

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

To whom it may concern,

Please accept these comments on behalf of the 2,000-plus members of the Jackson Hole Conservation Alliance and the Biodiversity Conservation Alliance regarding the Draft Wyoming Gray Wolf Management Plan (Draft Plan). We view the current Wyoming wolf population as well on its way to becoming a major conservation success story. To ensure that this success isn't reduced to failure we urge the Wyoming Game and Fish Commission (Commission) to base Wyoming's Wolf Management Plan on the best available science. As presented, the Draft Plan appears to be dominated by political attitudes and not science. We recognize the legislative constraints the Commission is under in drafting this plan, however, we firmly believe that even with the existing legislation, this plan can be made more responsive to the best available science. We hope that the Commission will work to ensure that Wyoming has a viable, long-term sustainable wolf population.

GENERAL COMMENTS:

The overall tone of the Draft Plan is skewed to support an anti-wolf agenda. Phrases such as "...while minimizing wolf/human conflicts" lead the casual reader to assume that wolf/human conflicts do occur and so should be factored into the overall management of wolves. Human/wolf conflicts or injuries are extremely rare and wild wolf-caused human fatalities are non-existent in North America.

Page 3 of the Introduction states that "Wyoming residents were split in their views" and that 49% of Wyoming residents polled favored reintroduction of wolves to Yellowstone while 39% were opposed. These data are incorrect: Bath (Public Attitudes in Wyoming, Montana and Idaho Toward Wolf Restoration in Yellowstone National Park. 1991, p.93) reports 48.5% in favor but only 34.5% opposed. A 14 point difference appears to us to be more than a "split," which implies something akin to evenness. The same report (p.94) goes on to say "...that most Wyoming residents... support wolf restoration."

If indeed it is the desire of the Commission to use polling data in introducing the Draft Plan, then we urge that the results of the 2003 Wyoming Game and Fish Department's (Department) state-wide poll also be included (Wyoming Residents' Attitudes Toward and Opinions on Wolf Management in Wyoming, January 2003). Two conclusions from that poll stand out: First, "[A] majority (54%) of respondents overall strongly or moderately agreed that the 2001 level of wolf predation was acceptable." Only 33% strongly or moderately disagree that the 2001 level of predation was acceptable (p.16). Second: "[H]alf (50%) of respondents overall either strongly or moderately agreed that wolves are a benefit to Wyoming, while slightly more than a third (36%) of respondents overall disagreed that wolves are a benefit to Wyoming [.]" (p.5). Again, a 14 point difference hardly describes the comment that Wyoming's citizens are "split" on their feelings toward wolves. The apparent bias within this section of the Draft Plan risks adversely influencing the reader's conclusions.

The Draft Plan provides only a partial review of the existing polling results, incorrectly reports data and makes conclusive statements not justified by the data. The overall effect raises questions about the objectivity of the Draft Plan.

Regarding wolf population growth rates: The reader would be led to believe that Wyoming's wolf population will continue to grow without limits. The Yellowstone National Park (YNP) wolf population growth rate from 1995 to 2000 was between 40-50% per year. The growth rate slowed to 10-15% per year between 2001-2004 (Ten Years of Yellowstone Wolves 1995-2005. p. 18-20. In: Yellowstone Science. 2005. Vol. 13, No. 1). The 2006 YNP wolf population was estimated to be 136, a 15 percent increase from the previous year (Yellowstone Wolf Project. 2006. p.2). The 2006 Rocky Mountain Wolf Recovery Annual Report (p.179) states that the Yellowstone wolf population is expected to decline over the next several years. Providing data from only a few reports, and only one summary from the Greater Yellowstone Ecosystem (GYE) - a summary biased by the growth rates of the first years after reintroduction, which doesn't mention the most recent trends and predictions - leaves the reader with the erroneous impression that the early growth rates will continue far into the future.

The Draft Plan makes no distinction between the growth of the GYE wolf population and the expansion of the population. As presented, the Draft Plan would lead the casual reader to believe that even within core areas such as YNP, the wolf population will continue to increase and not be limited by environmental factors. There is mounting evidence that the YNP portion of the GYE wolf population is stabilizing and that the continued growth in the overall population is a result of expansion into new range, not more wolves occupying the same range.

The Draft Plan should focus on the expansion of the wolf population into new habitats: determining where wolves can reasonably be expected to survive with minimal conflicts with human interests and where the presence of wolves will likely lead to unacceptable conflicts with human interests. This discussion should be clearly prefaced with existing data making it clear that even within protected areas, wolf populations will not continue to grow unabated but instead will be limited by environmental factors. Clarifying this point should ward off bias and encourage an objective discussion and a reasoned outcome.

Regarding minimum wolf populations: The Draft Plan (p.4) states that "...Wyoming will commit to maintaining 15 breeding pairs and 150 wolves in the northwestern portion of the State including the National Parks and Parkway with 7 of these breeding pairs occupying areas outside the National Parks and Parkway." A recent and very thorough genetic analysis of YNP's wolves makes two significant predictions: First, it states that "[A]s expected for an isolated small population of constant size (170), our simulations predict a decrease in genetic heterozygosity and increase in inbreeding coefficient over the next 100 years...For a constant-size isolated population of similar demography and life history, it is predicted that a population size of approximately 600 individuals would be needed to prevent a decrease in heterozygosity and increase in inbreeding coefficients by less than 5% over 100 years." (vonHolt, B. et.al. The genealogy and genetic viability of reintroduced Yellowstone grey wolves. In: Molecular Ecology. 2007. p.14-16).

The results and predictions presented within this study are derived from analyses of 200 YNP wolves and assumes that the Park's wolf population will stabilize around 170 animals. One goal of the Northern Rockies Gray Wolf Recovery Plan is to establish connectivity between wolf populations in Idaho, Montana (and southern Canada) and northwestern Wyoming in order to facilitate a high degree of genetic heterozygosity. The vonHolt study also predicts that in order to avoid inbreeding and maintain heterozygosity, a minimum of 12 wolves would have to immigrate into the YNP population annually with 4 animals entering the breeding population even with a base population of 600 wolves (p.16). This study determined that between 1995-2004 "[I]mmigration of wolves to YNP from outside the recovery area was not observed or revealed from genetic studies of wolves within or outside the park[.]" (p.6). This would suggest that the current situation is not meeting the goals to maintain long-term heterozygosity and to prevent the problems of inbreeding.

Northwest Wyoming's wolves should be considered as one population including the Parks' wolves and those outside the Parks. But if the state's goal is to support only 7 breeding pairs of the required 15 breeding pairs and 150 wolves in total, the loss of

heterozygosity and an increase in the rate of inbreeding seems certain. Consequently, considering that the Parks can support no more than about 160-180 wolves, it is incumbent upon Wyoming to support many hundreds of wolves, perhaps as many as 400-450 to maintain a minimum population of 600. Only in this manner can we provide for the long-term viability of the GYE wolf population. Clearly, maintaining a minimum of 15 breeding pairs and 150 wolves is woefully inadequate and will fall far short of meeting this critical recovery goal and ignores the underlying purpose of the Endangered Species Act (ESA).

The ESA is implicit in its recognition of the importance of restoring species *and associated ecological processes*. Sanja and Berger (Beyond demography and delisting: ecological recovery for Yellowstone's grizzly bears and wolves. 2003. In: Bio. Cons. 113, p.63-73) make this argument as well as the need to include the degree to which wolves are integrated into their ecosystems as a measure of recovery. They recommend that "...ecological assays should extend as far across recovery zones as possible[.]" in order to determine the concordance between ecological and demographic criteria. The authors are inclined to conclude that wolves have not yet reached their ecological role throughout the recovery zone. We suggest that this may be occurring within portions of YNP where a number of recent scientific and popular articles have told of the increased vigor of various native plant communities in part as a result of elk becoming more mobile since wolves reoccupied the Park. The positive response of some plant communities seems to have influenced both the diversity and abundance of passerine birds and small mammals. Similar hard data and even anecdotal information is lacking for Wyoming outside YNP suggesting that in these areas, the wolves' full ecological role has not yet been reached.

The Draft Plan (p.6) states that "[T]he average size of the 23 packs in Wyoming outside of YNP in 2006 was 6.7 wolves (range 3-13) and 10.5 wolves (range 4-19) for the 13 packs inside YNP." The Rocky Mountain Wolf Recovery Annual Report for 2006 (p.177, 181) provides information that suggests that the average litter size for YNP wolves and those in Wyoming outside the Park were very similar (6 and 5.7 respectfully). Therefore, it appears that something other than litter size is functioning to control wolf numbers and hence pack size. The answer seems obvious when mortality data is checked. In YNP there were 10 known adult mortalities in 2006 (2 human-caused, 20%) while in Wyoming outside YNP there were 59 known mortalities (57 human-caused, 92%). It appears that human-caused mortality, primarily control actions, are the single most important factor in keeping average pack size smaller in Wyoming than in YNP.

Smith et al (Age Structure and Pack Composition of Yellowstone Wolves: Simple and Complex Packs. In Preparation) presents a comprehensive review of wolf pack age structure from heavily exploited populations in Canada and Alaska and compares this to the known age structure of YNP's unexploited and intensively monitored wolf packs. They state that "[O]lder wolves, especially large male wolves that are on average 20% larger than females, may be particularly susceptible to harvest especially snowmobile or aerial hunting because they are larger, slower and less capable of evading capture..." They go on to present evidence that males have a different role in the hunt than females and are more proficient at killing prey. They make a convincing case that although wolves have a high capacity to replace individuals, packs with primarily younger animals may face a higher risk of being killed by prey or in conflicts with other wolves. They conclude by saying that "...tasks within a wolf pack are mostly shared by older, experienced individuals so harvest may affect wolf behavior and should be considered when wolf control is proposed."

vonHoldt (op cit. p.19) reiterates this concern: "[H]owever, intense control actions in the region (*In Wyoming outside YNP*) may severely affect the continuity of pack systems and hinder genetic exchange. Moreover, if such actions result in the removal of breeding pairs, this may alter the stability of pack dynamics, leading to higher breeder turnover and more frequent occurrences of inbreeding as mating choices become limited to close relatives."

Although we have no access to data on age composition of Wyoming's wolf packs, the heavy exploitation they undergo on an annual basis and the comparatively small pack size (6.7 in Wyoming vs. 10.5 for YNP) suggests that the average age of Wyoming's pack members may be considerably lower than that of YNP's packs. If so, Wyoming's packs may have less experience in hunting wild ungulates and defending territories from other wolves than do their Park counterparts. This coupled with the overlap of their territories with the range of domestic cattle may lead to a greater probability of wolves preying on domestic stock, thus putting in motion a cycle of more control and a perpetuation of smaller and younger packs. Therefore, we urge the Commission to do everything within its power to reduce the depredation control action and avoid a public harvest season until the Wyoming segment of the wolf population has stabilized.

Fortunately, the Draft Plan commits to providing for a sustainable wolf population and nothing in HB 213, the Wyoming Legislation guiding Wyoming's Wolf Management Plan, prohibits the state from managing for more than 15 breeding pairs and 150 individuals. We strongly recommend that the Commission adjust its population goals upward to accurately reflect the findings and recommendations of the best available

science. Only by doing so can Wyoming's wolves once again become self-sustaining components of GYE ecosystems.

SPECIFIC COMMENTS:

Dual Classification: We firmly believe that the Wolf Trophy Game area should encompass the entire state of Wyoming (excluding Yellowstone and Grand Teton National parks, the National Elk Refuge and the Rockefeller Memorial Parkway). We acknowledge that the Commission is bound by Wyoming Statue that mandates dual classification, however we believe that the Commission could be an advocate for this change. In adopting a single status, harvest seasons could still be very liberal in much of the state, but regulated. Single status would have the additional advantage of allowing the Commission to set seasonal closures in the area between the GYE and Wyoming's border with Colorado and Utah. This could facilitate the re-colonization of wolves in these two states and better ensure the long-term survival of the species in the Northern Rockies.

Data Analysis Units: We firmly believe that the primary DAU that now incorporates a portion of the GYE should include the entire Wind River Range and the entire Wyoming Range. This DAU should also include the area between Wyoming Highway 22 and the Snake River, and between US Highway 191 and the Wyoming-Idaho state line. Again, we acknowledge that the Commission is bound to the current DAU by Wyoming Statue, but we encourage the Commission to be an advocate for this change.

We make this recommendation because we believe these areas provide excellent wolf habitat and because it would allow for a larger wolf population which would better enable continued genetic diversity and long-term survival of Wyoming's wolves. In addition, by including the entire Wind River Range in the primary DAU, the Commission would be facilitating the success of the Wind River Indian Reservation's (WRIR) Wolf Management Plan by providing a means for Wyoming to place protection on WRIR wolves that might have portions of their territories outside the Reservation boundary.

Along with the modified DAU, we recommend that the Commission establish three additional DAUs: the first to encompass the area between the GYE and the boundary between Colorado and Utah west of the continental divide (See: Comments, Data Analysis Units, this submission). The second DAU would include the area between the GYE and the eastern edge of the Big Horn Mountains. The last, or fourth DAU would include the remainder of the state.

Breeding Pairs: In light of our earlier comments regarding pack size, age structure and its implications for inbreeding and loss of heterozygosity, we urge the Commission to adopt a definition of pack size that respects the best available science, advances the goal of achieving long-term population viability and allows the wolf to assume its historic role in the environment. Only positive information obtained from Department and/or qualified, assigned personnel should be used to determine breeding pairs. Although useful to guide Department personnel in their research and assessment, individual sightings from the public should not be used to determine breeding pairs.

Wolf Mortality: All wolf mortalities should be reported to Department personnel within 72 hours regardless of whether it is a legal licensed take, depredation take, defense of private property take or accidental take. This is the required reporting period for mountain lions and it should be adopted for wolves. Allowing up to ten days to report human-caused wolf mortalities is too long and could allow for a significant over kill of wolves. All human-caused mortalities should be counted toward yearly harvest quotas.

Genetics and Connectivity: Our thoughts on this subject are included under the General Comments of this submission. Suffice it to say that the information presented within the Draft Plan is woefully outdated and lacking in best available science.

Habitat Management: We agree that there should be few if any land use restrictions based solely on the presence of wolves - with one probable exception, that seasonal denning area closures (approximately April 1 to July 1) may be necessary to prevent human disturbances and ensure denning success and breeding pair survival.

Nuisance Wolf Management: This heading and the accompanying text leads the casual reader to believe that wolves pose a threat to humans. This attitude is simply not supported by fact and serves only to keep this erroneous perception alive. The phrase and all its implications should be removed from the final wolf management plan.

Wolf-livestock Conflicts: We agree with the goal of entering into a Memorandum Of Understanding with the USDA/WS to assist with livestock depredation determination, response and control. We also support efforts to acquire compensation funding and assistance from private and federal sources and we urge the Commission to approach the Wyoming Legislature for appropriations from the general fund to augment such funds. We support the use of State General Funds because wolves do generate income to the region in the order of millions of dollars per year and much of that is taxed and goes into the general fund (See: Comments. Economic Impacts, this submission).

Other Wolf-Human Conflicts: We urge the Commission in its Final Wolf Management Plan to eliminate the phrase "Human-Wolf Conflicts" and replace it with "Other Wolf-Human Impacts." We strongly support the Commission in its efforts to include the wolf into its "don't feed the wildlife" campaign. Habituation of any large mammal to human food sources can only lead to problems that usually result in expensive control actions and too often end with the death of the habituated animal.

Management Actions: We offer a qualified agreement with the procedures outlined for management actions. We would like to see a distinction between individual's ability to take wolves that are damaging property or attacking livestock based upon whether it is occurring on private land or public land. Situations occurring on public land should undergo far more scrutiny than those occurring on private land.

Predator/Prey Interactions: Reading this section reminds me more of a political than biological presentation - it is so one-sided and biased that it nearly defies response. Completely lacking is any information on recent research coming from YNP research staff. A thorough response to this section on wolf/ungulate interactions is not necessary at this time. Suffice it to say that only in very rare cases do wolves exert such an impact on ungulate populations as to warrant significant wolf control. We know of no Wyoming elk population in existing wolf range that is "in trouble." We are aware of no peer-reviewed studies that support the claims or implied conclusions presented in the Draft Plan. None. Wolf management plans based upon insinuations and speculation are not "best available science" decisions.

The discussion on moose population trends in Jackson Hole is extremely biased. The moose population began its decline in the 1980s, long before 1997, the time the first wolves appeared in Jackson Hole. Recently completed studies indicated that factors other than predation account for more than 60 percent of female moose deaths. Predation by bears accounted for about 14 percent while only 2 percent of recorded moose deaths were attributed to wolf predation. Preliminary indications from an ongoing (Univ. Wyo-WG&F) moose study in Jackson Hole suggest that the moose decline may have halted and that the population may be increasing, in spite of 4 wolf packs occupying the moose range. The primary cause of the decline appears to be associated with poor habitat impacting both pregnancy rates and calf survival rates. To focus on predation as the cause of moose decline is highly biased, unprofessional and disingenuous. (Citations are available upon request.)

The discussion on wolf/elk interactions is so one-sided and misleading as to be embarrassing. The discussion about elk calf:cow ratios is misleading in that it picks only certain years to make points. For example, the report states "[T]he 2003 calf:cow

ratios for both the Gros Ventre feedgrounds and the NER decreased for the second consecutive year (Table 2)[.]” (p.24). It fails to mention that the same Table 2 indicates that the ratio increased in 2005 and 2006 on the NER and increased in 2006 in the Gros Ventre area. Statements such as: “[T]hus, the decline in calf:cow ratios in both areas indicates that while wolf predation likely played a role in the decrease of the Gros Ventre feedground ratios, factors such as other predators and the prolonged regional drought also were influential.” There is no data presented to support a direct cause and effect relationship between wolves and the alleged decline in the calf:cow ratio. Even with the tacit acknowledgement that drought and other predators may play a factor in this ratio, the reader is left with feeling that wolves remain the leading culprit. Again, there is no peer-reviewed analysis to support these insinuations.

The discussion of wolf interactions on elk winter feedgrounds fails in the most basic sense because it doesn’t acknowledge that Department-maintained winter feedgrounds are akin to providing an “attractive nuisance” for elk, and thus for wolves. With the attitude presented in the Draft Plan, wolf presence is taken as a potential or real problem that triggers actions to be taken against wolves. If wolves are to exist in Wyoming, and this point is not open to debate, wolves will be attracted to feedgrounds, that is where the elk are. The consequences of this kind of interaction should be anticipated, it is natural. What is unnatural is the annual, artificial concentration of hundreds of elk on very limited areas.

Management actions, if any need be taken, should first deal with eliminating the “attractive nuisance” of baiting and concentrating elk onto feedgrounds. If, for whatever reason, elk become a nuisance to private property, management actions should include protecting the property with elk-proof fencing. To focus management actions solely on wolves is a set-up to eliminate wolves.

The past history of immediately removing wolf-killed elk carcasses from the vicinity of feedgrounds must not reoccur. Removing carcasses deprives the wolves of feeding opportunities and forces them to kill again, probably much sooner than if they were allowed to completely consume the carcass. Similarly, examination or handling of elk carcasses by Department staff should not occur until after the carcass is mostly consumed so as to avoid the chance of carcass abandonment leading to extra predation.

The Draft Plan lists every conceivable inconvenience attributed to wolves coming to elk feedgrounds. It provides the number of feedground elk killed by wolves but makes no attempt to differentiate between additive and compensatory mortality. Page 24 of the Draft Plan states that “[W]hile there has been a significant wolf presence on the Gros Ventre feedgrounds in recent years...” and “Wolf presence was documented on

14 of the Department's 22 elk feedgrounds during the winter of 2001-2002 and on 12 feedgrounds in the winter of 2002-2003." But no information is provided to define what constitutes "significant wolf presence" or if the 14 and 12 feedgrounds visited was done so by single animals or packs, and what was the outcome of the "visits."

On page 25 it states that crowding (caused by wolves driving elk from one feedground to another) aggravates the risk of brucellosis transmission among elk. Yet there is no accompanying data - nor do we believe that any exists - that would make the case that wolf presence has in any way increased the brucellosis infection rate among elk. Making unsubstantiated claims, suggesting or making conclusions not supported with data and using inflammatory words is unprofessional, eliminates objectivity and disgraces the core principles of the scientific process.

Our greatest concern is the manner in which the alleged wolf/elk feedground conflicts will be resolved. The recovery goal identifies the State as having to maintain a minimum of 7 breeding pairs and the National Parks as maintaining 8 breeding pairs. Perhaps the 8 packs assigned to the Parks can be maintained within Yellowstone National Park. However, two Jackson-area packs have traditionally denned within the boundaries of Grand Teton National Park and another incorporates a portion of the Park within its territory. The fourth pack dens within the National Elk Refuge and includes portions of the Park, the Refuge and the surrounding Bridger-Teton National Forest in its territory. Currently at least 3 of these packs come in contact with one or more of the three Gros Ventre feedgrounds during any given winter. If control actions are taken against any of these packs because of their visiting the feedgrounds, it could directly impact Park and/or Refuge wolves. And if any or all of these packs were eliminated or reduced to such a level as to no longer be able to defend their territories, the one pack now least likely to visit the Gros Ventre area will likely move in that direction as it offers better wintering habitat. If this happens, it too could be controlled and even eliminated.

These scenarios need to be addressed with the consultation of resources managers from the three federal land management entities, and need to incorporate the best available science. Doing anything less is not responsible wildlife management and certainly not responsible management of a species about to be removed from ESA protection. Clearly, wolf control actions in the Gros Ventre Valley have the very real potential of reducing or eliminating packs now inhabiting at least parts of a National Park and a National Wildlife Refuge. These are unacceptable outcomes.

Big Game Management: Although Wyoming has a very laudable history of managing wildlife at or above herd objectives, it does so at a cost. For elk in particular, part of

that cost is the tradition of winter elk feedgrounds which are now the most important factor influencing the high prevalence of brucellosis in northwestern Wyoming's elk herds. It is estimated that the infected elk herds suffer a 6-8 percent drop in calf production due to abortions brought about by the impact of *Brucella abortus*, an organism not native to North America (As reported in: Smith, B. 2001 "Winter Feeding on Elk in Western North America." J. Wildl. Mng. 65(2):173-190.) We simply ask how a potential 6-8 percent increase in calf production would relate to the number of elk taken by a stable wolf population. We believe that the increase in calf production resulting from the eradication of brucellosis would be equal to or greater than the overall loss due to wolves. Since elk feedgrounds are the major factor contributing to the high brucellosis infection rate, and because the feedgrounds are a cause of concern to the Commission, perhaps the future of feedgrounds should also be included in the long-term management plan for wolves.

We are very disappointed with the tone of the discussion concerning big game management. It focuses entirely upon the single goal of producing as many individuals of a few desired species, such as elk, moose, mule deer and big horn sheep, and paints the wolf as being, or as about to become, the major obstacle to achieving this goal. The Draft Plan simplifies the natural interactions of habitat, climate, disease, big game and predators to the point where wolves appear to be the major impediment to successful wildlife management in northwestern Wyoming.

The Draft Plan goes to great lengths to report wolf kill rates on various big game species but makes no attempt to discuss the nature of the predation. What portion of the depredation was additive and what portion was compensatory? Were they old or young? Injured or diseased? What was the condition of the herds in question? Were they over objective or under? What impact did the depredation have on the herd size, age structure and overall longevity? To simply provide kill rates without providing additional details or a complete discussion of the various situations surrounding the big game species prejudices the reader's impression of wolf/prey interactions (See: Comments, Predator/Prey Interactions, this submission).

Public Information & Education: We agree with the Commission that a balanced Public Information and Education campaign will be crucial to successful management of wolves in Wyoming. However, the plan as outlined in the Draft Plan is completely lacking in presenting an accurate review of the best available science surrounding the role of wolves in the environment. A crucial part of a successful I & E program must include all the best available information and not focus, as the Draft Plan does, on just big game depredation rates. For example, a successful campaign must include the secondary and indirect consequences of having an established and stable wolf

population in northwestern Wyoming. It must also present conclusions based upon a complete analysis of all factors involved in the study results and it must provide an unbiased analysis of the implications.

Funding: We strongly support the Commission in their efforts to obtain other sources of funding as long as they remain free of requirements to initiate management programs not supported by sound ecosystems management policies and best available science. We suggest that the Commission begin this process by requesting financial support from the Wyoming Legislature to assist with the burden of managing species that are of benefit to the entire state such as the wolf and grizzly bear. We particularly believe it appropriate that state funds be used to compensate for verified wolf depredations upon private property.

We urge the Commission to work with Wyoming's Congressional Delegation to obtain appropriated federal funds to support the management of wolves (and grizzly bears) and to eventually assist in establishing a trust fund whose dividends are available to Wyoming, Montana and Idaho for the management of wolves and grizzly bears. As we have stated publicly, if the citizens of the United States consider the survival of these species to be important - and all the polls we are familiar with conclude such - then all the citizens of this country should share in the costs of maintaining these species. These costs cannot be born by this state alone and certainly not by the Wyoming Game and Fish Department alone.

A cost associated with Wyoming's successful game management programs is the direct dependency upon revenues derived from selling big game licenses. This direct connection understandably drives wildlife managers and the Commission to take every reasonable action to provide for as many big game animals as the habitat can support. The Commission must find a way to free itself from its nearly sole dependency upon license revenue. Only then can it begin to free its management programs from the need to provide a maximum number of big game animals in order to accommodate license sales sufficient to operate the Department. As we break this dependency, we can more objectively appreciate the value of having wolves in northwestern Wyoming.

Economic Impacts: The Draft Plan's discussion of economic impacts is so incomplete, one-sided and biased as to defy description. Regarding wildlife, the report only provides costs associated with loss of big game animals and subsequent loss of license sales revenue. It completely ignores revenues generated by the wolf viewing public and simply dismisses this factor by stating that "...overall visitation to Yellowstone National Park has decreased for unknown reasons since wolf reintroduction[.]" (p.31).

The Draft Plan also dismisses any revenue generated by wolf views as not generating "...income for wolf management by the Department[.]" (p.31-32). And yet the Draft Plan makes estimates of the financial loss to cattle producers, even though those costs are not now compensated for by the Department.

A recent economics analysis of the revenue generated directly by visitors going to YNP to view wolves concluded that in 2005 more than 35 million dollars were spent in gateway communities (As reported in: "UM economist: Wolves a big moneymaker," Mike Stark. Billings Gazette. 04-07-06.) A soon-to-be-released report (Yellowstone Science: In press) estimates that when the roll-over factor is calculated, the value of wolves to the surrounding communities approaches 85 million dollars annually. We recognize that these funds do not directly enter the Department's coffers, consequently, we reiterate our recommendation that the Commission request funds from the State General Fund and from the Federal Government for the management of Wyoming's wolves. (See: Comments, Funding, in this submission.)

Summary: We thank the Wyoming Game and Fish Commission for the opportunity to submit these comments regarding the Draft Gray Wolf Management Plan. We conclude with the following summary comments:

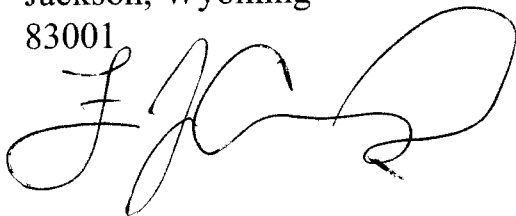
1. The Commission should work with the Wyoming State Legislature to do away with the dual classification for wolves and adopt a single Trophy Game Area encompassing all of Wyoming (excluding Yellowstone and Grand Teton National parks, the National Elk Refuge and the Rockefeller Memorial Parkway).
2. We strongly recommend that the Commission adjust its population goals upward to accurately reflect the findings and recommendations of the best available science.
3. The primary Data Analysis Unit should be expanded to include all of the Wind River Mountain Range, the entire Wyoming Range and the lands between Wyo. Highway 22 and the Snake River along US Highway 89, and the Idaho border and US Highway 191/89. Three additional DAUs should be described as outlined in the body of this submission.
4. Wyoming's wolves should be managed like other wildlife species, at carrying capacity and not as an arbitrary lower level barely sufficient to meet USFWS recovery goals.

5. Long-term management directives should be based on conclusions reached by analyzing best available science.
6. Every reasonable effort should be made to ensure that wolf travel corridors remain open for the free movement of wolves between the Greater Yellowstone Ecosystem population and those in Montana and Idaho, and for the eventual dispersal of wolves from Wyoming into Colorado and Utah.
7. Agency control efforts and hunter harvest levels should be limited so as to inflict minimal impact to wolf packs, their age structure and size.
8. All human wolf-caused mortalities should be reported the Department within 72 hours.
9. Supplemental funding for the long-term management of Wyoming's wolves should be sought from the State Legislature, the Federal Government and private sources, and a trust fund should be established whose proceeds could be used by Wyoming, Idaho and Montana for the management of both wolves and grizzly bears.
10. The Commission should establish and support a comprehensive Public Information and Education program that will provide the most current information on wolf biology and the wolf's role in the environment.

Respectfully submitted,

Franz J. Camenzind, Ph.D.
(signed)

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Duane Short
(signed)

Wild Species Program Director
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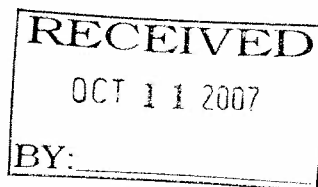
Wolf Comments

10/10/07

Wyoming Game and Fish Dept.

5400 Bishop Blvd.

Cheyenne, WY. 82006



000041

Dear Sirs,

In regards to inquiring about wolves, I wish to make a few comments, also referring to house bill. 0213.

I'm a Retired Rancher, and I've seen almost all of the problems involved with Ranching. There are many that involves nature, such as drought, lightning, hail, floods bad winters and so forth. We don't need the problems of a ~~man~~ ^{man} made dilemma, such as wolves running loose endangering our livestock.

I believe that a Rancher should have the right to protect his livestock, whether he lives next door to Yellowstone Park or out east in the grasslands, from this ~~man~~ ^{man} made problem.

I'm 50 years old, and know what I'm talking about.

Therefore, I think that it would be to everybodys
interest, to make it legal to kill when these beasts
often harm to ones property or livestock, Regardless of
location.

Thank you for Reading my thoughts on this so called
Controversial issue

Thank you

Lionel P. Patzer

Lionel P. Patzer

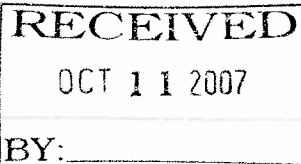
Box 704

Encampment, Wyo 82325

Phone

307-327-5723

Wyoming Game + Fish Dept.
5400 Bishop Blvd.
Cheyenne Wyo 82006



000042

Dear Sirs

I have read your Revised Wolf Management Plan and I feel you have caused in to the Feds. at the expense of the Citizens of the State of Wyoming.

There was a reason the wolf was wiped out years ago, but I guess those people that made that decision then were probably uneducated.

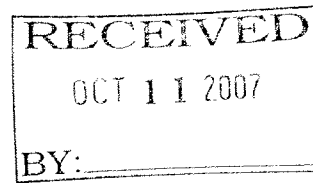
Again individual Property Rights have been trampled on by the Federal Fish + Wildlife, and by your dept. Two mistakes dont make a right.

Ed Bellare

P.O. Box 458

Encampment, Wyo. 82325

Wyoming Game & Fish Department
Cheyenne, WY 82005



000043
October 1, 2007

Please accept the following comments on the delisting plan for the gray wolf in the Northern Rockies. As outfitters who have seen wolves and lead wolf-watch tours throughout the recovery period since 1995, we consider wolf recovery to Greater Yellowstone ecosystem one of the great environmental success stories of the century. From the 1995/1996 reintroduction of wolves in Wyoming and Idaho, as well as natural recolonization in northwest Montana, there are now roughly 1,300 wolves. While we would like to see the gray wolf delisted, the state proposal under consideration will not ensure sustainable wolf populations into the future. In fact, we suspect that the proposed Wyoming wolf management plan would actually lead to indiscriminate wolf kills and potentially relisting of the species.

The US Fish & Wildlife Service (USFWS) asked Wyoming Game & Fish Department (WGFD) to meet the requirements of the Endangered Species Act (ESA) and to provide greater assurance that management controls are in place to maintain population levels above recovery goals. However, Wyoming has stated that it plans to increase the wolf kills and manage for the minimum number (15) wolf packs. Wyoming's definition of a pack is inadequate and not biologically based. Due to the state political position, Wyoming's dual status plan to kill as many wolves as possible is unacceptable. At the same time, a designation of wolves as "trophy game" statewide would be adequate as WGFD Trophy Game staff has openly stated. The vicious, rude, unruly attitude of many Wyoming residents present at the wolf delisting hearing in Cody, April 19 demonstrates, the unwillingness to comply with any laws to protect and recover wolves. This should prove that it is premature to delist wolves in Wyoming. The schedule for public meetings that included Cody, Pinedale and Casper, but not Jackson also proves the 100 percent anti-wolf bias of the WGFD Commission and leadership. Such strident opposition to objective input, also demonstrates that the decision is already made by WGFD to go with the existing plan. This is unfortunate.

Wolf delisting should not take place until Wyoming has a biologically sustainable management plan that does not rely on its neighboring states to make up the difference in wolf numbers. We support trophy game status for wolves throughout Wyoming. Wolves should not be delisted until the State's plan calls for managing them as a trophy game species statewide. Although wolf depredation on livestock has been particularly low this year, such a management plan could include a way to compensate livestock producers in a timely and effective manner while providing quick response times to deal with problem wolves. Revenues from the sale of wolf licenses could be used to support wolf management and wolves could still be killed if they attack livestock.

Wolves are widely known to be a keystone species. Since wolves were reintroduced to Yellowstone National Park and central Idaho in 1995, they have helped renew plant and animal systems' ecological balance. Willows, aspen, cottonwood, beavers, migratory songbirds and other riparian species now thrive. Research by Ripple and Beschta (2004) shows that wolves appear to be changing elk herd behavior and that these interactions could be increasing streamside willow production and survival, which in turn assists beavers and nesting by riparian birds. As a result, wolf predation now provides annual source of food for a wide variety of carnivores. In addition, coyotes and bears benefit from food sources wolves provide. If there are any places left in this country where fully functioning ecosystems flourish, it's in and around Wyoming's portion of our nation's oldest park - Yellowstone.

This is a classic example of the trophic cascade now seen in Yellowstone's Lamar Valley. Humans cannot simulate the effects of natural predators because predators interact with several prey species in a multitude of ways. Predators prevent prey populations from becoming overabundant and rarely drive prey to extinction while herbivores need to be regulated within upper and lower trophic bounds. This is the ecological predator/prey balance where nature is a fully functioning ecosystem.

Wolves have historically regulated ungulate populations naturally and are now doing so again. It is therefore unfortunate that Wyoming wants to amend Section 10(j) of the ESA to kill wolves killing big game. WGFD doesn't admit that wolves have helped elk populations already. By dispersing elk from the feedgrounds, the elk move around more freely which prevents the concentration of elk transmitting diseases to each other on the feedgrounds. In fact, wolves benefit the over-objective elk population by killing the sick and infirm members of the herds. Section 10(j) should remain as it is now in the ESA.

Unfortunately, the WGFD's inflammatory rhetoric has dominated the wolf delisting debate. We believe the following are factually accurate statements and should be considered before making a delisting decision:

1. Wolves are NOT decimating Wyoming's elk population. The state of Wyoming manages for a reduction in Wyoming's elk populations in all the herds in the Greater Yellowstone area. In fact, the recent Bison and Elk Environmental Impact Statement prepared by the USFWS calls for further reduction of elk on the National Elk Refuge. The Wyoming elk population is currently estimated at 91,555 elk - 8,910 more elk than the state's population objective. Source: Lauren M. Whaley, "State Elk 9,000 Beyond Objective," Jackson Hole Daily News, April 7, 2006
2. Wolves are NOT destroying Wyoming's tourism industry. According to Dr. John Duffield, wolf watching now contributes at least \$35 million annually for a multiplier effect of \$70 million a year to the Greater Yellowstone area's satellite communities. Total spending on Wyoming tourism, tourism revenues, and the number of people employed in the industry have all increased every year since 1997 (by 5.8 percent, 5.5 percent, and 1.5 percent each year respectively). Source: Wyoming Business Council, Wyoming Travel Industry 2005 Impact Report at 2, http://www.wyomingbusiness.org/pdf/tourism/Impact_2005_Final.pdf.
3. Wolves are NOT devastating Wyoming's livestock industry. In 2005, wolves killed a total of 54 cattle and 27 sheep in entire state of Wyoming. For this depredation, 41 wolves were killed. Source: U.S. Fish and Wildlife Service, Rocky Mountain Wolf Recovery 2005 Interagency Annual Report <http://www.fws.gov/mountain-prairie/species/mammals/wolf>
Only 2 percent of sheep mortality statewide is attributable to wolves. More sheep die from poisoning (5.5 percent), eagles (3.3 percent), lambing (13.9 percent), weather (17.8 percent), disease (8.2 percent), and other predators (45.1 percent). Source: USDA National Agricultural Statistics Service, <http://www.nass.usda.gov/wy>

We support wolves delisted from the Endangered Species List as trophy game status statewide with the current 10(j) language kept intact, unamended. Such management is the best way to manage for Wyoming wolves. As business people who have benefitted from wolf recovery to Yellowstone, we agree that we should celebrate wolf recovery rather than consider it a liability.

Sincerely,

Tory Taylor *Meredith Taylor*

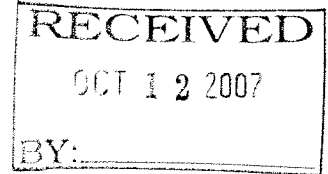
Tory & Meredith Taylor

Taylor Outfitters
6360 Hwy 26, Dubois, WY 82513

307.455.2161 metaylor@wyoming.com

Leo & Rosemary Benson
P.O. Box 350
793 Upper Hoback River County Road
Bondurant, Wy 82922
(307) 733-7159

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



October 10, 2007

RE: Wolf Comments

000044

We live on 80 acres in the Upper Hoback River Basin, on the east side of the Wyoming Range. Wolves have been spotted from the edge of our land. Last spring, grizzly tracks were found in the snow near our bridge. Mountain lion tracks are occasionally seen. We are Wyoming citizens and we find those realities to be acceptable, even desirable, despite your apparent generalized sense that Wyoming citizens want to be insulated from contact with indigenous wildlife.

As private landowners, we've been forced to invest thousands of dollars over the years on fencing to keep public-lands grazing cows off our land. Wolves would be far less expensive neighbors for us. The larger tourist economy benefits from wolf presence. Wild game health benefits from wolf presence. Wolves account for only a small fraction of domestic livestock fatalities, as WyG&F studies have shown.

Our area is summer range for elk, mule deer, and pronghorn. We have hunted and harvested those species. It is summer and winter range for moose. Migration routes go through here. Parturition areas are located here. Two state elk feedgrounds are located in our larger basin; more feedgrounds are to the north, west, east and south of us. We have a dog. We have kept horses and llamas. We don't have a problem with wolves as managed since reintroduction. Wolves may belong to the state, but not exclusively to the state legislators or Farm Bureau members.

When and where wolf numbers need to be restricted, let the USF&W Service do it. Federal management of wolves has been described as expensive. We pay taxes; those taxes have been put to far worse uses. Let a federal agency be responsible for a federal reintroduction that was done on federal (our public) land. Bison have already been designated as varmints when leaving the national parks or refuge as they have attempted repeatedly in the Upper Green River Basin. They should be allowed to exist (but not take over) on our other public lands. So should wolves.

Let wolf numbers be limited if adversely affecting game species on public land. Likewise, limit other factors adversely affecting game species on public land, as when public lands grazing degrades important plant species or mineral development and other land development appear to cause reductions in game herds. Important progress was made when several domestic sheep allotments were closed in the Upper Green River area and in the northern Wyoming Range. Wild sheep will benefit. Similarly, the closure of a cattle allotment in the Gros Ventre was an economical solution to the problem of cattle/wildlife conflicts. If you closed state elk feedgrounds that pose disease threats, you'd show smart planning for the future. Fair is fair.

We close quoting from a 10-03-07 letter-to-the-editor from Wilson resident Kim Johnson writer that was printed the **Jackson Hole News & Guide**: "Wilderness without its natural hierarchy is merely a preserve for deer, elk, moose, etc. Wolves, grizzlies, and mountain lions transform wilderness into wildness. True wildness comes to areas intact with every species of flora and fauna natural to those areas." You didn't hold a "wolf" meeting in Jackson Hole. That might have made your task more difficult.

Leo & Rosemary Benson

Leo & Rosemary Benson

RECEIVED

OCT 12 2007

BY:

P.O. Box 4443

Jackson 83001

Oct 8, 2007

000045

Here are our Wolf Comments
about the Wyoming plan.
I would like leadership
by our state to not kill
Grand Tetons wolves. We
~~agree~~
~~area~~ with neighboring
states who support
maintenance and containment
of wolves by methods
other than random shooting
by all.

This is not the wild
west and intelligent
biologists have great
alternatives to the present
proposal.

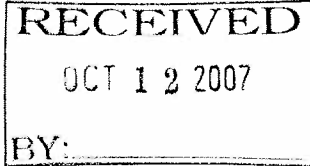
Jean & Richard Ferguson

Robert H. Hanson Sr
Arlene P. Hanson
Po Box 144
Wapiti, WY 82450

000046

October 9, 2007

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



Re: Draft Wyoming Gray Wolf Management Plan - September 2007

Please enter these comments for the record.

Foremost, we are very much opposed to the automatic inclusion of 500,000 plus acres of private property into the wolf recovery area. Under what authority has this incorporation of private land in northwestern Wyoming been designated for the wolf recovery area?

The government has taken prime livestock and quality crop producing land and tied the hands of producers who must continually be on the alert for predacious wolves. Producers must absorb untold unnecessary costs associated with this predation and stress on their livestock. The compensation is a pittance compared to actual losses.

The demarcation line should be redrawn to the forest service boundaries. Millions of acres of public land are more than enough to sustain wolves in northwestern Wyoming. The wolf population is after all experimental/non-essential and their numbers have far exceeded the initial goals set.

Funding for wolf management, now and in the future is not secured. The projected biennial costs are staggering and will be a huge challenge to be sure. A fine kettle of fish we've gotten ourselves into.

Page 19 - Nuisance Wolf Management/Wolf Livestock Conflicts
W.S. 23-3-115 - Damaging private property. What are the specifics of this list?

Page 20 - In order for compensation to ranchers to work, Game and Fish personnel need to respond promptly to wolf-killed livestock complaints. Their track record has been inadequate in the past.

Page 20,21 - Why waste time, effort and money on aversive conditioning/deterrence and relocation? We are opposed to such experimentation. We know from past management actions that only lethal control works on wolves.

cont'd.

October 9, 2007
Wolf Comments Cont'd.
Page 2

Page 20,21 - Sensitive Big Game Ranges - Take permits should be given out freely to property owners in the trophy game area. Harm to livestock and wildlife can be averted if a permit is in hand at the time of a potentially disastrous conflict. We believe Wildlife Services will need all the help they can get.

Page 27 - Big Game Management - Since wolves kill year round, your kill rates are inappropriately low. A single wolf will take one or two ungulates a week, not in a month. Add to this the many animals that are maimed (the 6 point bull elk in Meeteetse for example) and do not die immediately. Factor in stressed females who lose calves and ungulates displaced from their habitat that are killed by motor vehicles. Game and Fish personnel know the true statistics, which is why 90 wolves were annihilated in Wyoming over the past two years.

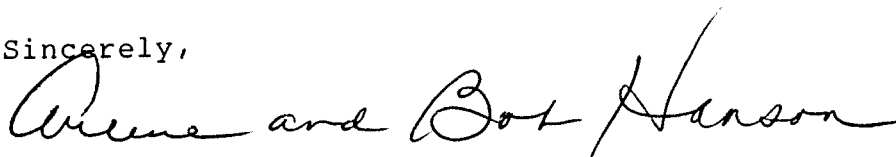
Page 28 - Management Actions - Game and Fish Departments move slowly to correct wolf mortality on wildlife and livestock. Wolf numbers will surpass the ability of Department personnel to expeditiously manage wolves. Money will run out. Farmers, ranchers and other property owners should be given permits and invited to help with the wolf management effort in the trophy game area. Remember, the Department's efforts should encompass all wildlife species.

Page 31 - Economic Impacts - Continued closures and strictures of the Forest Service and reduced access to Yellowstone National Park have contributed to the decline in visitorship and fear of wolves and grizzlies and a host of camping regulations makes for an "edgy" experience for the traveler. Is fear and non-use of our public lands the ultimate goal of our State and Federal agencies?

We must be circumspect in our decision to delist the wolf in Wyoming. The ramifications of this decision will have far-reaching impacts.

Thank you for your time in reviewing these comments.

Sincerely,

A handwritten signature in cursive script that reads "Arlene and Bob Hanson". The signature is written in dark ink and is positioned above the typed names.

Arlene and Bob Hanson
P.O. Box 144
Wapiti, Wyoming 82450
Tel: (307) 587-5796