



August 6, 2007

U.S. Fish and Wildlife Service
Western Gray Wolf Recovery Coordinator
585 Shepard Way
Helena, Montana 59601

RE: RIN number 1018-AV39

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on the U.S. Fish and Wildlife's (USFWS) proposed revision of the special regulation for the Central Idaho and Yellowstone Area Nonessential Experimental Populations of Gray Wolves in the Northern Rocky Mountains.

We filed a request for an extension of the proposal comment period on July 24, 2007, due to the proposed revision including changes in current wolf management involving many new and complex issues, including impacts of wolves upon ungulates, and increasing opportunities for private citizens to kill wolves for conflicts with domestic animals not previously allowed under the current regulations. In addition, the proposed revision will add the state of Wyoming, provided its state wolf plan receives USFWS approval, to the current states operating under the revised, more liberal management of wolves within the region. We believe that the 30-day period provided by the USFWS was inadequate to properly analyze a proposal of this complexity.

We also believe that the expert peer review comments that are being solicited simultaneously with public comments should be available to the public before the public comment period closes. This would assist the public in evaluating the science of the proposal and provide the public with the same information the USFWS will have from experts.

Wolves and Ungulates

The proposed revisions to the special regulations include a new definition of what is considered "unacceptable impacts" to ungulate populations from predation by wolves, before lethal control can be initiated. The proposed revision states that, "There are no populations of wild ungulates in Montana, Idaho, or Wyoming where wolves are the sole

predator. Wolf predation is unlikely to impact ungulate population trends substantially unless other contributing factors are in operation, such as habitat quality, and quantity, other predators, high harvest by hunters, weather and other factors.” It goes on to state that, “However, in combination with any of these factors, wolf predation can have a substantial impact to some wild ungulate herds with the potential of reducing them below State and Tribal herd management objectives.”

Given the February, 2006, State of Idaho proposal to reduce wolf numbers in the Clearwater area of northern Idaho based upon current and historic elk herd numbers, we are concerned that the new proposal will encourage the States and Tribes to focus their evaluation of ungulate herd health primarily on wolf predation, and not habitat quality and availability. Once the new definition is in place, and wolves need only be a “major cause “of wild ungulates not meeting state management objectives, lethal control will be an option. The current science on ungulate herds in Montana, Idaho, and Wyoming, indicates that ungulate herds are doing well overall, with some decreases in the number of ungulates in specific areas of each state. The new proposal discourages States and Tribes to use alternative measures to lethal wolf control, such as limiting hunter harvest or using non-lethal control methods, to increase ungulate numbers in these areas by making it easier to kill wolves than manage them using these alternative measures. Lethal control, in essence, becomes the preferred, and not the last resort to address reductions in ungulate numbers. Montana has stated that they will limit ungulate harvest by hunters in the two elk herds that are seeing declines rather than implement the proposed measure should it become final (Associated Press July 20, 2007). Montana only had 21 breeding pairs in at the end of 2006, which barely meets the minimum number of pairs required to be maintained before implementation of the proposed revised special regulation.

Wolf/Stock Animals and Dogs

The proposed revision includes the liberalization of who can kill wolves for a new suite of reasons. The expansion of the ability to kill wolves only by the USFWS and its agents, to livestock owners, was given with the first revision of the proposed special regulation in 2005. The proposed revision extends this ability to sportsmen and recreationists who have stock animals or dogs that are attacked, chased, harassed or molested by wolves. In our opinion, once again, under the proposed revision, the use of lethal control becomes the preferred and acceptable method used to resolve conflicts between wolves and people, instead of a last resort. Liberalization of lethal control on an endangered or threatened species prior to full recovery AND de-listing violates the intent of protection and conservation of listed species under the Endangered Species Act.

Wolf Pack Size/Population Numbers

Wolf Haven International acknowledges the amazing progress that has been made with the Rocky Mountain wolf population. The proposed revision includes establishment of a minimum population of 600 wolves (or 60 breeding pairs) before the liberalized lethal control on wolves can be initiated. Although this is a higher minimum population

number needed to meet recovery objectives than that currently in place, the proposed revision allows for a high number of wolves to be killed in the Rockies prior to being delisted. Again, we do not believe that this is appropriate action for a species listed as endangered or threatened under the Endangered Species Act.

For Wolf Haven International,

Linda Saunders
Director of Conservation