



August 6, 2007

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

RE: RIN number 1018–AU53

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on the revised U.S. Fish and Wildlife's (USFWS) proposal to designate the Northern Rocky Mountain Population of Gray Wolf as a Distinct Population Segment (NRM DPS) and to remove this DPS from the federal list of endangered and threatened wildlife. Wolf Haven International commented on the May 8, 2007, proposal, prior to the inclusion of the state of Wyoming's wolf management plan.

We filed a request for an extension of the newly re-opened comment period on July 19, 2007, due to the complexity of analyzing the effects upon wolves in the Rockies from adopting the state of Wyoming's wolf management plan actions, or the effect of the USFWS approving a wolf management plan submitted on behalf of the Wind River Reservation by the Shoshone and Arapahoe Fish and Game Department, which are both included in the current proposal. We believe that the 30-day period provided by the USFWS was inadequate to properly analyze a proposal of this complexity.

It is widely accepted, and Wolf Haven agrees, that the wolf population in the northern Rocky Mountains is ready to be taken off the list of threatened and endangered species. How de-listing is accomplished, however, continues to be an issue and is of major concern.

Wyoming

There are several issues that continue to be of major concern to us regarding the inclusion of the draft wolf management plan for the state of Wyoming in the proposal to designate a Rocky Mountains DPS and de-list the wolf population within that DPS. We are concerned that the USFWS is asking for comments on a draft wolf management plan for the state of Wyoming at this time, and are reluctant to comment on the plan until it is finalized. Until that time, issues presented in the new proposal such as dual-status for

wolves in Wyoming, what constitutes an adequate wild wolf population in the NRM DPS, and the emphasis upon game and not wolf management, are difficult to analyze.

Given this, the USFWS should not, however, reduce their standards in the name of making a deal with Wyoming. And they certainly should not allow Wyoming to kill wolves before they are de-listed over concerns about elk populations. Under Wyoming's draft plan, the state commits only to maintain 15 breeding pair statewide, including 7 breeding pair outside the national parks. The USFWS's minimum population goals were never intended to be the maximum number of wolves allowed in the region, but the very minimum necessary to ensure the population is not eradicated once again. The draft plan does not provide any assurance that wolves will not be reduced below levels necessary to prevent re-listing under the Endangered Species Act (ESA). In reality, Wyoming should not even be part of this public process until a decision is made on their plan.

The USFWS states in its proposal that "in recognition of the importance of sufficient dispersal and exchange of wolves in maintaining genetic variability, Wyoming Game and Fish would not remove lone wolves dispersing through areas outside of the trophy game area unless conflicts with human activities arise. However, wolves in these areas may be subject to liberal public take regulations. Public education efforts would emphasize that lone wolf sightings do not necessarily mean a pack is forming in the area." Given the extremely well publicized anti-wolf attitudes of many Wyoming citizens, we find it truly hard to believe that anything, certainly not public education, would dissuade local citizens from killing wolves if it becomes legal to do so. Allowing dispersal of lone wolves, even if they were to make it through the proposed "predatory" section of Wyoming, does not allow for significant genetic flow.

This and all other proposals released from the USFWS regarding the Northern Rockies population of wolves have always neglected to address facilitating expansion of wolves outside the proposed NRM DPS. Various proposals have stated that the failure of wolves to re-establish adjacent areas to the DPS is acceptable since the failure of outlying wolves is not likely to affect the success of the core Rockies wolf population. Looking at the larger picture however, if the boundaries are finalized as proposed, wolves will still remain endangered under the federal ESA in the majority of the western United States. Under the mandate of the ESA, the USFWS is required to attempt recovery of an endangered species where it is listed. The common excuse for the lack of concern over success of adjacent wolves is marginal habitat. Assessing habitat quality is somewhat subjective depending on the research methods and data used to assess the habitat. It seems apparent that the most efficient way for the USFWS to fulfill its mandate for wolves under the ESA is to encourage natural dispersal from existing populations. The final determination on habitat suitability will be settled if wolves re-colonize. They should be given a chance.

For Wolf Haven International,

Linda Saunders
Director of Conservation