



April 10, 2006

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

RE: RIN number 1018-AU53 Advanced Notice of Public Rulemaking concerning gray wolves in the northern Rocky Mountain region.

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on U.S. Fish and Wildlife's (USFWS) Advanced Notice of Public Rulemaking ("proposal") to designate a Northern Rocky Mountain (NRM) Distinct Population Segment (DPS) for gray wolves and to remove the NRM DPS from the list of Endangered and Threatened Wildlife.

Removing the Northern Rocky Mountain population from the list

The wolf population in Idaho, Montana and Wyoming has far exceeded numerical recovery goals as stipulated in the Rocky Mountain Wolf Recovery Plan. The speed with which the wolves have recovered in the Northern Rocky mountain states is a testament to the quality of the habitat, sound management, and what Endangered Species Act protection is capable of accomplishing. 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. How delisting is accomplished, however, continues to be an issue.

Establishing the boundaries of the DPS

The proposed NRM DPS appears to meet the requirements for establishing a DPS. At this time, however, Wolf Haven feels that it is inappropriate to include parts of states outside the core states of Idaho, Montana and Wyoming in the DPS.

One concern we have with incorporating portions of adjoining states into the NRM DPS is regulatory in nature: state management of wolves could potentially be a logistical nightmare. For example, the Oregon state management plan employs a zone management system that splits the state into an eastern and western zone. The boundary delineating Oregon's two state wolf management zones, however, is further west than the proposed federal DPS boundary, potentially dividing the state into three areas with different wolf management scenarios if the boundaries are finalized as proposed. Drawing a random line which conflicts with a state management plan that took years to develop could easily pave the way for complications that might not be justified by reasons given for including a portion of Oregon (or any other adjoining state) in the NRM DPS.

Wolf Haven is very concerned about the fate of any wolves that may establish themselves in eastern Washington if this rulemaking is finalized as proposed. While Utah and Oregon have state wolf management plans in place – the same cannot be said of Washington. Though wolves are considered endangered under Washington state administrative code (WAC), if wolves are federally delisted without a state management plan in place, there will be no federal management and no clear direction for the state agency. The USFWS has stated in the ANPRM that it will not require management plans from the border states (WA, OR and UT) as any losses in those states would not be likely to affect the core population within the primary states

(MT, ID and WY). Considering that both Montana and Idaho will be instituting a hunting season upon delisting and may significantly reduce their resident wolf populations (it can be assumed that Wyoming will come up with something similar), it is our belief that the fate of wolves in the bordering states should not be so casually disregarded. For example, if the state of Idaho truly reduces its wolf population by as much as two thirds, any packs that may establish themselves in the Kettle Range of northeastern Washington should not be discounted for their potential genetic and breeding pair contributions to the Northern Rockies wolf population.

In the proposal, the USFWS justifies its use of Montana and Wyoming's eastern borders as the boundary of the DPS "to provide clearly delineated, easily understood boundaries for law enforcement purposes; consistency with State wolf regulations and planning efforts; and for administrative convenience." With current state management (or lack thereof), it would stand to reason that this same logic should be applied to the western boundaries of the DPS as well.

If the USFWS insists on including portions of other states in their final DPS boundaries, then all states must be required to have acceptable wolf management plans. The state of Washington is fully intending to develop a state plan, but that will take time. As the core states were required to write plans AND have them approved by USFWS, Oregon, Utah, and eventually, Washington's state wolf management plans should also be reviewed for their ability to sustain any future resident wolf populations.

Excluding Wyoming from the DPS

Delisting Idaho and Montana while excluding Wyoming (outside of Yellowstone National Park) from the DPS is, in our opinion, unacceptable. The proposal itself notes that the option is "inconsistent with the available science discussed earlier in this preamble as it applies to the requirements for establishment of a DPS." The state of Wyoming has been determined not to change its management plan and with a state law in place that would preclude sound wolf management, an acceptable plan could be years away.

Down-listing the DPS to threatened

Down-listing the NRM DPS to "threatened" if Wyoming cannot come up with an acceptable plan may be a viable option. Aside from potentially allowing the state of Wyoming more state-level management, a status of "threatened" would largely resemble the regulations that are currently in place. Wolf Haven encourages the USFWS to explore the "threatened" option with the all of the DPS boundaries redefined at or within the core state lines (MT, WY and ID). Doing so may allow the USFWS and Wyoming time to work out their differences while allowing time for Washington to develop its state plan, and perhaps allow the wolves to disperse and settle within the bordering states. Idaho and Montana already have a significant amount of management flexibility under the new 10j rules and Wyoming could potentially gain more management control if the population were listed as threatened. With additional time, the USFWS could work with the Oregon Department of Fish and Wildlife (ODFW) in order to ensure that any future DPS boundaries would coordinate better with its state plan.

Conclusion

While the federal government and the core states are anxious to delist wolves, the fact remains that all states included in this proposed DPS, notably Wyoming and Washington, are not ready. If other states outside of the core states are to be included, the USFWS needs to require involved states to have acceptable wolf management plans that will allow for species survival while taking into consideration human/wolf interactions. Perhaps this recent proposal is evidence that the USFWS is learning from past mistakes... With a little patience; acceptable plans from the states; and a meeting of the minds between the USFWS and Oregon, something close to the proposed NRM DPS boundaries for delisting would appear to be both reasonable and attainable.

Wolf Haven International,
Tami Williams
Director of Conservation