

October 10, 2007

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

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on Wyoming's Draft Gray Wolf Management Plan (Plan) dated September, 2007.

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. We believe that the presence of a wolf management plan that guarantees a viable wolf population within the states of Montana, Idaho and Wyoming are absolutely necessary before federal de-listing occurs.

There are several issues in the Plan that are of major concern to us regarding the continued existence of a viable wolf population in the Rockies. The issues concern the Plan's proposed dual-status designation for wolves in Wyoming, and what the Plan describes as an adequate wild wolf population in the state.

Under Wyoming's draft Plan, the state commits only to maintaining 15 breeding pair of wolves statewide, and specifically, only 7 breeding pair outside of the national parks, through liberalized hunting and lethal kill provisions proposed in the Plan. Both Idaho and Montana are committing to maintain more than 15 breeding pairs, with no limit on the total numbers of wolves to be managed for, and wolves will be distributed throughout each state. Wyoming's Plan limits the distribution of wolves to the northwest portion of the state, and we believe that the minimal number and restricted distribution of wolves proposed in the Plan will not allow Wyoming to maintain its share of a viable wolf population in the Rockies.

In addition, 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), since the provisions for lethal take outside of the trophy game area are liberal and most likely impossible to monitor. The Plan, therefore, cannot meet U. S. Fish and Wildlife Service (USFWS) mandates for recovery of listed species, which necessitate monitoring the population of species for a specified period of time after delisting, to assure that the species will not reach levels requiring re-listing under the ESA. The amount of lethal take that will be allowed under the Plan if the minimal number of wolves and extreme restricted distribution of wolves is managed for could dramatically affect wolf pack stability and consequently overall wolf viability in the Rockies.

The proposal in the Plan to have a dual status for wolves in Wyoming concerns us for two reasons. The Plan states that "Sufficient dispersal and exchange of wolves between

the three sub-populations (in the Rockies) will be necessary to maintain genetic variation in the northern Rocky Mountain wolf population. In isolation, none of the three recovered sub-populations could maintain its genetic viability over the long-term.” It goes on to say, “Isolation is unlikely if populations remain at or above recovery levels and regulatory mechanisms prevent chronically low wolf numbers or minimal dispersal.” The USFWS states in its proposal to delist the Rocky Mountain DPS, that “in recognition of the importance of sufficient dispersal and exchange of wolves in maintaining genetic variability, Wyoming Game and Fish should not remove lone wolves dispersing through areas outside of the trophy game area unless conflicts with human activities arise.” However, as written, the Plan states that wolves in these areas may be subject to liberal public take regulations. The Plan states that public education efforts would emphasize that lone wolf sightings do not necessarily mean a pack is forming in the area. However, 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 within the Rockies for maintenance of a viable wolf population.

We are also concerned that the designation of predatory status of wolves in the majority of Wyoming will prevent any expansion of wolves outside of the Rockies into adjacent states. Various proposals have stated that the failure of wolves to re-establish adjacent areas to the northern Rockies 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 wolves are delisted as proposed in the Rockies, wolves will still remain endangered under the federal ESA in western Washington, and the majority of the western United States, and wolves should be recovered under the ESA in those areas as well. Wyoming’s Plan could easily prevent such recovery by cutting off wolf dispersal opportunities to adjacent states, and allowing such a large amount of lethal take of wolves in the majority of the state.

From a national perspective, Wyoming’s management of wolves is key to the maintenance of a viable wolf population in the Rockies, and without adequate protection so that genetic exchange and expansion occurs, wolf numbers could be reduced below levels necessary to prevent re-listing under the ESA. Considering the resources that have been spent over the past decade to recover the wolf in the Rockies, we are concerned that efforts could be in vain due to liberal lethal control measures allowed in most of Wyoming under its Plan.

Thank you for the opportunity to comment on the Draft Wyoming Wolf Management Plan.

For Wolf Haven International,

Linda Saunders
Director of Conservation

