

Wolf Plan Comments
Attn: Bea Pepper
Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, WY 82006

November 7, 2008

**RE: Public Comment on 2008 Draft Revision – Wyoming Gray Wolf
Management Plan**

Dear Wyoming Game and Fish Department,

The Wyoming Outdoor Council is grateful for the opportunity to provide comments on the 2008 Draft Revision of the Wyoming Gray Wolf Management Plan. We commend the Wyoming Game and Fish Commission (WGFC) and the Wyoming Game and Fish Department (WGFD) for addressing many of the issues with Wyoming's 2007 Wolf Management Plan that concerned conservationists and were highlighted by federal district court Judge Molloy in his decision to grant an injunction that forestalled wolf delisting. Although Wyoming's wolf management plan is vastly improved by the proposed revisions and clarifications, we believe that only substantive changes by the legislature (in particular granting wolves statewide trophy game status) will fully allay the concerns of scientists, conservationists, and the general public regarding state management of wolves in Wyoming. So long as Wyoming embraces a predator designation that allows wolves to be killed by anyone at anytime throughout 88% of the state, Wyoming's wolf management will be viewed with skepticism and the genetic connectivity of wolf subpopulations will remain at risk. Nevertheless, we understand that the WGFC can do little to implement meaningful changes to the classification of wolves in Wyoming given the statutory framework that governs wolf management in the State and appreciate the Commission's attempts to address those flawed elements of the 2007 plan that fall under its purview.

Maintaining a Recovered Wolf Population in Wyoming

We appreciate the inclusion in the 2008 Wolf Management Plan (hereafter 2008 Plan) of the U.S. Fish and Wildlife Service (USFWS)'s recovery criteria which called for at least 300+ individual wolves in a metapopulation with some genetic exchange between subpopulations (USFWS 1994, 68 F.R. 15817 [April 1, 2003]). Given Wyoming's current wolf population, it appears that some Wyomingites have experienced a high level of frustration with the failure of the USFWS's to successfully delist wolves because they were aware only of the USFWS's 1987 definition that a recovered population would comprise 100 wolves in each of three recovery areas (USFWS 1987). Elucidating the revised recovery goal in Wyoming's plan helps clarify this misperception and is an important step toward bridging the understanding gap between those who deem recovery incomplete because of a lack of demonstrated genetic connectivity and those who deem recovery as surpassed because more than 100 wolves inhabit the state.

We commend the WGFC's for clarifying its commitment to manage for at least 15 breeding pairs of wolves in the Wolf Trophy Game Management Area and its commitment to maintain at least seven breeding pairs outside the National Parks and Parkway. In his July 2008 decision to grant an injunction that ultimately returned wolves to the Endangered Species List, Judge Molloy echoed the concerns of conservationists by highlighting his belief that Wyoming's 2007 Wolf Management Plan (hereafter 2007 Plan) failed to clearly commit the State to managing for at least 15 breeding pairs of wolves within the state. Likewise, he stated his concern that Wyoming's commitment to maintaining only seven breeding pairs of wolves outside the National Park Units was insufficient to sustain Wyoming's wolf population because it did not guarantee 15 breeding pairs in the state if the National Park Units' population dropped below eight breeding pairs.

We recognize the importance of establishing the commitment to manage for at least 15 breeding pairs of wolves and appreciate the WGFC's doing so. Nevertheless, we urge the Commission and the WGFD to focus its management efforts, when given the opportunity to do so, not on managing for a pre-determined minimum number of wolves, but rather on managing wolves judiciously, using science-based principles that allow a sustainable wolf populations to persist at levels that maintain ecological function and ecosystem health in available wolf habitat, while minimizing livestock depredations.

We are concerned that the WGFC will commit to managing for more than seven breeding pairs outside the National Parks only once the number of breeding pairs within the National Parks falls below eight breeding pairs for two consecutive years. We believe the WGFC should be prepared to respond more quickly to fluctuating wolf population numbers to ensure that Wyoming's wolf population remains sustainable. Given how dramatically canine diseases such as parvovirus and distemper can affect wolf population numbers, the WGFC should be prepared to adapt its management goals outside the National Parks in the year immediately following a National Park population decline below eight breeding pairs.

Malleable Trophy Game Boundary

We do not support the still-malleable nature of the Wolf Trophy Game Management Area (WTGMA) boundary. The language in the 2008 Plan still authorizes the WGFC to reduce the WTGMA at its discretion, yet we see no reason for the WGFC to do so since this constrained area already impedes the genetic connectivity of wolf subpopulations. The malleable nature of the WTGMA was a major concern expressed by Judge Molloy in granting his July 2008 injunction against delisting. If the Commission feels that wolf numbers need to be reduced within portions of the WTGMA, it can do so by allowing a more liberal hunting season (after allowing public input on the proposed increase in license numbers and/or hunt season duration through oral and written comments), rather than by invoking the right to alter the WTGMA boundary. There should be no reason for the WGFC to reduce the WTGMA and the Commission's insistence that it be able to do so was highlighted by Judge Molloy and has continuously been evoked as a threat to wolf recovery by concerned conservationists.

Although we understand that the WTGMA boundary has been statutorily determined, we reiterate our belief that granting wolves statewide trophy game status is a prerequisite to the successful delisting of wolves in Wyoming. We believe that the Wyoming Game and Fish Department should manage wolves throughout the state, rather than being constrained to managing wolves in an artificially determined boundary that limits the movements of dispersing wolves and thereby inhibits genetic connectivity among Northern Rockies wolf subpopulations. After the initial attempt to delist wolves in 2008, criticism was unfairly directed at the WGFD and its ability to manage wolves was questioned every time a wolf was killed in the Predatory Animal Area (PAA) because most of the public did not understand that under the dual classification system the WGFD does not manage wolves in the PAA. Granting wolves statewide trophy game status would allow all ranchers in the state to receive compensation for livestock depredations and all hunters in the state to have equal opportunities to hunt wolves. We respectfully urge the WGFC to communicate the importance of revoking the dual-classification of wolves to the legislature in its upcoming legislative session as an essential step in expediting and facilitating the successful transition from federal to state wolf management.

Suitable Wolf Habitat

The WGFC maintains in its 2008 Plan that suitable wolf habitat in Wyoming is restricted to the northwestern corner of the state in an area largely contained in the WTGMA. Nevertheless, the USFWS has determined that the Wyoming Range, the Wind River Range, and the Big Horn Mountains constitute suitable wolf habitat (73 F.R. 63931, October 28, 2008). The suitable wolf habitat located south of Highway 22 may be particularly important to maintaining a dispersal corridor between the Wyoming and Idaho subpopulations. Currently this area is located in Wyoming's PAA. The inability of wolves to disperse into this area because of the strong likelihood that they will be shot as predators inhibits wolf movements and the concomitant gene flow that constitutes a key measure comprising a recovered Northern Rockies metapopulation.

Currently, Wyoming's PAA serves as an impermeable boundary limiting genetic connectivity of the Northern Rockies' three wolf subpopulations, a concern repeatedly highlighted by Judge Molloy in his adverse ruling on delisting wolves in 2008. In the event that Wyoming's legislature fails to concede to the wisdom of granting wolves statewide trophy game status in order to facilitate delisting, we reiterate the recommendation expressed in our January 2008 comments that the legislature at least consider extending the WTGMA boundary westward from Hoback Junction along the Snake River to Alpine and the Idaho boundary to increase the protection of wolves in Idaho's Palisades Wilderness Study Area and in the mountains south of Teton Pass. Currently, dispersing wolves have a difficult time moving into the saturated wolf habitat comprising Yellowstone National Park and cannot successfully disperse south because of Wyoming's predator area. Affording greater protection to wolves in the above mentioned area would facilitate dispersal movements between the Idaho and Wyoming wolf populations, thereby enhancing the likelihood that the genetic connectivity requirement of a recovered wolf population is met.

Legal Wolf Mortality

We appreciate the revised definitions included in the 2008 Plan and detailed in the Emergency Rule amendments to Chapter 21, Section 7(a) of the WGFC's wildlife regulations, which outlines wolf management in Wyoming. We particularly support the added definition for "doing damage to private property." The new definition, which mirrors the language of the 2005 Non-essential Experimental Population (NEP) special rule (10j rule), is more specific and less open to interpretation than the previously undefined "doing damage to private property." 70 F.R. 1290 (January 6, 2005). The inexactitude of that phrase and its openness to liberal interpretation was of particular concern to Judge Molloy and conservationists.

We similarly support the amended definition of a "chronic wolf predation area" since providing a two-month time frame within which two conflicts must occur better justifies the use of the term chronic. We also appreciate the greater specificity of what constitutes a chronic wolf predation "area." The new definition for "domesticated animals" provided under Chapter 21, Section 3(c) is more specific and therefore an improvement over the prior definition. Nonetheless, we remain concerned that hunting dogs are considered to be domesticated animals and depredations by wolves of hunting dogs that chase prey through their territory on public lands would warrant the lethal control of wolves based on this definition.

We support the more restrictive definition of "lethal take permit" that limits permittees to no more than two gray wolves on individual parcels of private land or grazing allotments as designated on the permit. Such a restriction will help limit unnecessary and wonton killing of wolves that may not be depredating or harassing livestock. We also support the addition of a specified time limitation on the permit.

We appreciate the affirmation that the WGFC will suspend the issuance of lethal take permits if the number of wolves in the WTGMA falls below 15 breeding pairs or 150 wolves, or below seven breeding pairs outside the National Parks and Parkway. However, we urge the WGFD to consider proactive measures to prevent livestock conflicts with willing owners and allotment permittees prior to reaching population thresholds that result in the possibility of relisting. In some instances, non-lethal methods or an integrated management approach using a combination of non-lethal management tools together with lethal control might be a more effective means of managing problem wolves (Gehring et al. 2006), particularly since lethal control does not always effectively reduce or prevent future livestock depredations by resident wolves or new wolves that move into the area (Gehring et al. 1999, Bradley 2004). Given the expense and often limited long-term success of lethal control, we encourage the WGFD to use non-lethal means of control whenever possible and work with ranchers and non-governmental organizations to explore and develop techniques that will allow livestock producers and wolves to coexist over the long-term.

Finally, we appreciate the reduced reporting time for legally harvested wolves in the WTGMA. Such a change will allow the WGFD to better monitor wolf population numbers and activities in the WTGA and allow the WGFD to respond more quickly with appropriate management to maintain sustainable wolf populations while addressing the needs of livestock producers and the general public.

Unregulated Public Take

We believe that gray wolves taken in the currently designated PAA should be reported in fewer than 10 days from the take. Receiving reports of wolf kills more quickly would enable the WGFD to manage wolves in the state more effectively. We recommend that individuals be required to report their kills within no more than five days of their take. Given the recent history of wolf recovery in the region, receiving timely information on wolf kills is more critical than receiving such information on coyotes or other predators that have not recently been federally listed as endangered.

We appreciate that individuals who kill wolves in the PAA will now be required to provide their name and address to the Wyoming Game and Fish Department (WGFD) in addition to the wolf's sex, the kill location, and kill date. This additional information will help facilitate the WGFD's monitoring of statewide wolf populations. Nevertheless, we reiterate our view that despite the important proposed changes to Wyoming's 2008 Plan, the designation of gray wolves as predatory animals is the key impediment to the delisting of wolves in the Northern Rockies. Wyoming's predatory animal classification was highlighted by Judge Molloy as a principal threat to wolf recovery in the region. Attempts to delist wolves while Wyoming maintains a predatory animal classification and zone will almost assuredly be met with continued litigation. We urge the WGFD, the WGFC, and the Governor to encourage the legislature to seriously consider proposed legislation that would grant wolves statewide trophy game status. We strongly support state management, but cannot envision it becoming a reality until Wyoming

classifies wolves throughout the state as trophy game animals in the same way that Montana and Idaho have elected to do.

Regulated Public Take

We appreciated the opportunity for public input and the management considerations adopted by the WGFD in instituting a public wolf hunt in June 2008. We support setting slightly more lenient license limits in areas that are experiencing severe wolf-livestock conflicts. However, we would advocate that in turn, the WGFD be prepared to enact a hunting buffer zone around National Parks or in dispersal corridors if such measures become necessary to ensure the genetic connectivity of the Northern Rockies subpopulations. We appreciate the language change that sets forth the trapping of trophy game animals as a possibility rather than as a pre-determined eventuality, but urge the WGFC to eliminate the potential for trapping wolves post-delisting.

We support the reduced time-frame for reporting criteria for wolves taken in the WTGMA. Receiving timely information on wolf kills will better enable the WGFD to evaluate whether hunting regulations are adequate for maintaining wolf population numbers above the desired objective.

As outlined in the Emergency Rule changes for the Chapter 21 regulations (Section 7(a)), we appreciate that the carcass of a gray wolf killed as a result of doing damage to private property now shall not be removed from the site of the kill and the kill site will remain undisturbed until it can be investigated by the WGFD. This will facilitate investigations into wolf depredations and wolf kills and enable the WGFD to better determine events surrounding a wolf kill so future livestock and wolf kills can be reduced. Given that the WGFD will investigate the circumstances surrounding a wolf killed in defense of property, we recommend that such kills be reported within 24 hours, since scavengers and other predators may compromise evidence at the kill site over a three-day period.

Genetics/Connectivity

We disagree that “no specific linkage corridors are needed because all suitable wolf habitat occurs as one contiguous block in NW Wyoming.” While it could be argued that suitable wolf habitat in northwestern Wyoming is contiguous if wolves were classified statewide as a trophy game animal, the WTGMA boundary, which serves as a barrier to wolf dispersal, bisects suitable habitat and dispersal corridors in Wyoming. Wolves that disperse south out of Yellowstone and across the WTGMA boundary encounter the PAA where they may be shot on sight. As a result the likelihood of south-dispersing wolves heading west into Idaho to successfully connect with Idaho wolves is remote. And such movements only will become less likely as wolf population numbers are lowered by both regulated and unregulated hunting.

Legislating statewide trophy game for wolves would mitigate barriers to wolf dispersal since hunting would be regulated in important dispersal areas south of the National Parks. If Wyoming persists in maintaining dual classification for wolves, however, achieving the genetic connectivity that is fundamental to maintaining a recovered wolf metapopulation will face severe challenges and the delisting of wolves will be difficult to achieve and vulnerable to legal challenges. Despite the WGFC's view that no specific linkage are needed, genetic connectivity among wolf subpopulations has yet to be demonstrated and requisite wolf dispersal and colonization are less likely to be achievable as long as Wyoming maintains its current PAA and continues to allow unregulated hunting in critical dispersal areas.

We commend the WGFC for its newly stated commitment to ensure genetic diversity and connectivity among wolf subpopulations. However, we believe that the easiest way to effectively incorporate migrants into the gray wolf population would be to facilitate the movement of naturally dispersing wolves by classifying wolves throughout the state as statewide trophy game. Again, we urge the WGFC to work with the legislature to achieve this goal. Additionally, we encourage the WGFC to work with agencies in Montana and Idaho to develop a regional framework for managing Rocky Mountain wolves. Ideally, we would like to see the establishment of a regional wolf management plan developed by regional wildlife managers and scientists with the participation of all stakeholders.

We urge the WGFC not to rely exclusively on maintaining genetic diversity through the relocation and/or translocation of wolves. Given the complex social structure of wolf populations and the difficulty of introducing wolves into saturated areas, the likelihood of increasing genetic diversity through artificial measures is by no means assured. The WGFC will more easily achieve genetic exchange among wolf populations by facilitating movements of dispersing wolves and by carefully regulating hunting rather than allowing wolves to be shot by anyone at any time in important dispersal corridors that lie within the PAA. For example, dispersing wolves in the Dog Creek area south of Jackson reside in suitable wolf habitat in a wilderness study area and may facilitate genetic connectivity between Idaho and Wyoming subpopulations, yet are vulnerable to being shot on sight because they are located in the current PAA.

Nuisance Wolf Management

We would like to see the WGFC elaborate on non-lethal methods that might be used to prevent and mitigate wolf-livestock conflicts as well as elaborate on working with livestock producers and non-governmental organizations to minimize wolf-livestock conflicts. A variety of non-lethal techniques have been developed and implemented successfully, allowing wolves and livestock to coexist (Stone et al. 2008). Using non-lethal methods or an integrated management

approach using a combination of non-lethal management tools together with lethal control often is a more effective means of managing problem wolves (Gehring et al. 2006) than using only lethal control that may not effectively reduce or prevent future livestock depredations (Gehring et al. 1999, Bradley 2004).

We also urge the WGFC to explore and implement aversive conditioning or deterrence methods to prevent wolf-livestock conflicts as a general proactive measure, rather than as a means of dealing with conflicts only when wolf population numbers preclude the use of lethal control measures. Use of such measures may help livestock producers coexist successfully in some cases, minimizing the need for livestock compensations and lethal control of wolves. The WGFC should explore preventative measures that may prove less costly than relying exclusively on ongoing lethal control measures.

Granting wolves statewide trophy game status would ensure that all livestock producers are helped with wolf-livestock conflicts and compensated for livestock losses. We urge the WGFC to encourage the legislature to consider statewide trophy game status for wolves as a means of equitably assisting and compensating livestock producers throughout the range of the gray wolf in Wyoming.

Big Game Management Actions

We appreciate the addition of a definition for “unacceptable impact on a wild ungulate population or herd.” The definition eliminates some of the subjectivity of the phrase, which would have been open to varying interpretations by different wildlife managers.

We believe that the determination of an “unacceptable impact” should be based on science and should follow the prescription outlined in the 2008 NEP Special Rule (10j rule) (78 FR 4736, January 28, 2008). Specifically we believe that prior to embarking on lethal control of wolves because of their “unacceptable impacts” to specific ungulate populations or herds, the State should commit to preparing a science-based document that:

(1) Describes the basis of ungulate population or herd management objectives, what data indicate that the ungulate population or herd is below management objectives, what data indicate that wolves are a major cause of the unacceptable impact to the ungulate population or herd, why wolf removal is a warranted solution to help restore the ungulate population or herd to State ... management objectives, the level and duration of wolf removal being proposed, and how ungulate population or herd response to wolf removal will be measured and control actions adjusted for effectiveness;

(2) Demonstrates that attempts were and are being made to address other identified major causes of ungulate herd or population declines or the State ... commits to implement possible remedies or conservation measures in addition to wolf removal; and

(3) Provides an opportunity for peer review and public comment on their proposal prior to [initiating lethal control efforts]. The State ... must:

- (i) Conduct the peer review process in conformance with the Office of Management and Budget's Final Information Quality Bulletin for Peer Review (70 FR 2664, January 14, 2005) and include in their proposal an explanation of how the bulletin's standards were considered and satisfied; and
- (ii) Obtain at least five independent peer reviews from individuals with relevant expertise other than staff employed by a State, Tribal, or Federal agency directly or indirectly involved with predator control or ungulate management in ... Wyoming."

We appreciate the WGFC's addition that gray wolves will not be lethally removed because of unacceptable impacts to wild ungulates or because of wolf-wild ungulate conflicts at feedgrounds if doing so will prevent the WGFD from achieving the wolf recovery objectives outlined in Section 4(a). Given the risk of relisting if wolf populations fall below the minimum established population goals for Wyoming, we believe it would be advisable for the WGFD to follow the recommendations established in the 2008 NEP rule and propose lethal removal of wolves because of unacceptable impact to wild ungulate populations or herds only when such a measure would "not contribute to reducing the wolf population in the State below 20 breeding pairs and 200 wolves, and will not impede wolf recovery" (78 FR 4736, January 28, 2008).

The 2008 Plan states that control measures will be undertaken "where wolf predation is a major cause of an ungulate herd not meeting one or more State management objectives" (p. 34). However, as the WGFC's Chapter 21 regulations currently stand, the rationale for initiating lethal control of wolves (namely that the population or herd is not meeting the State population management goals or recruitment levels established for the population or herd) does not require the WGFC to attribute documented ungulate declines to wolves before initiating lethal control. Ungulate control measures must be undertaken on a case-by-case basis only when wolf predation has been shown to be a major cause in ungulate population declines or low recruitment. The WGFC should recognize that drought, disease, and other issues may negate the need to decrease wolf populations as a means of reducing predation pressure on ungulates. Diseases such as chronic wasting disease, which now has been documented as far west as the Star Valley, may have a significant impact on a particular elk herd, weakening the elk and making them more vulnerable to predation. Yet rather than being responsible for a herd's decline in such a case, wolves actually may mitigate the declines by reducing the rate of disease transmission among animals. The WGFC needs to evaluate each population or herd's decline scientifically, evaluating and assessing the many possible reasons for the decline. The mere fact that wolves exist in a particular area that has a declining ungulate population is insufficient reason to lethally remove wolves.

The issue of lethal control as a result of "conflicts" between wolves and feedground elk is scarcely addressed in the 2008 Plan. However, the language in the Emergency Rule Chapter 21 regulations regarding this issue is still open to interpretation and could lead to the lethal removal of wolves based on the subjective evaluation of a feedground employee rather than on a scientific analysis. "Conflict" needs to be defined more specifically. The public deserves greater transparency regarding what constitutes a "conflict" in the eyes of the WGFC so that we

may adequately comment on whether or not aggressive management measures would be justified under particular circumstances.

Under W.S. §23-1-109 (e), the legislature currently defines wolf-wild ungulate conflicts occurring at state operated feedgrounds as 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.

Since these definitions are not further clarified in the Emergency Rule or the 2008 Plan, we must assume that these definitions would serve as a basis for initiating lethal control of wolves. We feel that these definitions of conflict are inadequate. For example, the proportion of feedground elk that would need to be “moved” by wolves to prompt lethal control of wolves is not defined. Based on such a definition, a wolf that harassed one feedground elk on one occasion could lead to the extermination of a pack of wolves whose territory encompassed the feedground. These issues merit further clarification.

In general, given the unnatural concentration of animals on feedgrounds and the increased risk of disease transmission, some depredations of feedground elk by wolves could be beneficial to the overall health of area herds, particularly as wolves appear to target animals in poor condition. Since wolves could help reduce the prevalence of wildlife diseases and the potential for disease transmission in our big game herds, conflicts at feedgrounds should be evaluated on a case-by-case basis and wolves should not be killed indiscriminately simply for moving or attacking elk at feedgrounds.

Funding

The Wyoming Outdoor Council deeply appreciates the efforts the WGFC, the WGFD, and the State of Wyoming have made to secure funding for wolf management in Wyoming. However, we are concerned that the proposed cost of the WGFD’s wolf management and monitoring plan far exceeds those of Idaho and Montana, which are managing for wolves as trophy game animals throughout their respective states. (The proposed cost of Wyoming’s wolf management plan in 2007 was \$2.27 million per year compared to \$837,325/year for Idaho and \$765,296/year for Montana; the projected cost of 2.48 million for the first two years that was outlined in Wyoming’s 2008 Plan still far exceeds anticipated costs in Montana and Idaho). Given that the cost of Wyoming’s proposed wolf program appears to be an issue of great concern to sportsmen in the state, we would appreciate more detailed information regarding the proposed costs and would like to see greater transparency in how resources to support Wyoming’s monitoring

efforts will be allocated. We also would appreciate greater transparency regarding why Wyoming's wolf management costs far exceed Montana and Idaho's projected costs.

Economic Impacts

Determining the economic impacts of wolves, particularly those associated with the lost hunting license sales and associated income that might result from lowered elk herd numbers is extremely difficult to quantify. We do not underestimate the seriousness of these potential costs. Nonetheless, it is important to consider potential factors that might mitigate these costs. For example, given the recent discovery of chronic wasting disease in northwestern Wyoming and the virtual certainty that its prevalence will increase in northwestern Wyoming's ungulate herds in the coming years, we anticipate future disease-induced ungulate population declines. Wolf predation could well serve as a compensatory rather than an additive form of mortality in diseased herds. Wolves are likely to target animals that have contracted CWD and may reduce disease transmission rates in the herds. The extent to which wolf predation lowering disease incidence offsets losses of healthy animals that might have been available to Wyoming's hunters will merit consideration and study in the coming years.

With regards to the cost of livestock losses, we support the WGFC and the WGFD's determination to keep economic losses from a wolf population to a minimum. That annual livestock losses decreased somewhat from 2006 to 2007 is encouraging and we certainly hope to see this trend continue. We believe that investing in developing and implementing non-lethal methods to supplement and enhance the efficacy of lethal control efforts may ultimately reduce livestock losses even further. The increased presence of humans that results from implementing measures to prevent livestock-wolf conflicts may result in more careful oversight of livestock herds and the reduction in other types of losses (e.g., those related to illness, weather exposure, accidents, other predators, etc.) which may offset losses that might be attributable to wolves. Investing up front in measures such as the use of range riders, guard dogs, portable fencing, fladry, and other non-lethal methods for preventing wolf-livestock conflicts may help minimize future costs of livestock depredation compensation and lethal wolf removals. Therefore, we urge the WGFD to be cognizant of the many successful efforts to manage potential wolf-livestock conflicts and to begin incorporating such measures into its wolf management program once delisting is successful.

Conclusion

Federal District Court Judge Molloy recently determined that Wyoming's regulatory mechanisms for managing gray wolves are inadequate. The USFWS similarly determined that Wyoming's regulatory mechanisms were inadequate before inexplicably reversing itself and

accepting Wyoming's 2007 Plan. However, most of Wyoming's wolf regulations are determined by statutory authority, giving the WGFC little ability to adapt its proposed management measures to enhance the genetic connectivity among Northern Rocky Mountain wolf subpopulations or to ensure that Wyoming sustains a viable, recovered wolf population. We commend the changes that the WGFC has proposed in its 2008 Plan. However, although we support many of these changes, the Wyoming Outdoor Council remains concerned that the fundamental flaw with Wyoming's wolf management plan, the dual classification status granted to wolves in Wyoming, still serves as an insurmountable obstacle to the successful delisting of wolves.

We support state management of wolves and are confident that Wyoming will manage its wolves effectively once it is given the opportunity. We therefore urge the Wyoming Game and Fish Commission, the Wyoming Game and Fish Department, and the Governor's office to encourage members of the State legislature to seriously consider adopting Representative Gingery's draft legislation granting wolves statewide trophy game status. By adopting such a plan, the legislature would give the WGFC and the WGFD the freedom to craft a science-based wolf management plan with a regional framework that acknowledges and addresses the needs of all stakeholders while maintaining a recovered population of wolves in Wyoming.

Sincerely,

Sophie Osborn
Wildlife Program Manager
Wyoming Outdoor Council

cc: Governor Dave Freudenthal
Wyoming Game and Fish Commission
Senator Burns
Representative Childers
Representative Gingery

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