

January 13, 2012

Public Comments Processing
Attn: FWS-R6-ES-2011-0039
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive
MS 2042-PDM
Arlington, VA 22203

Re: Docket No. FWS-R6-ES-2011-0039; 92220-1113-0000-C6

Dear Mr. Ashe,

The Jackson Hole Conservation Alliance has worked for more than 30 years to ensure that human activities are in harmony with the wildlife, scenic and natural resources in Jackson Hole. We represent some 2,000 members who live or recreate in western Wyoming, and who take special pride in the ability to do so in an intact ecosystem. We have participated for many years in efforts for the successful return of wolves into this ecosystem and thank you for this opportunity to comment on the Proposed Delisting Rule for Removal of the Gray Wolf in Wyoming From the Federal List of Endangered and Threatened Wildlife and Removal of the Wyoming Wolf Population's Status as an Experimental Population (Rule).

The Rule is predicated on a wolf management plan that will accomplish the goal of the U.S. Fish and Wildlife Service (USFWS) to successfully remove wolves from the Federal List of Endangered and Threatened Wildlife with assurances that the species will remain sustainable and occupy their role within the ecosystem. The Wyoming Gray Wolf Management Plan (WY Plan) does not provide that assurance. A wildlife management plan does more than regulate population numbers. A good management plan monitors population dynamics – dispersal, genetic connectivity, and reproductive and recruitment success – and provides guidance on incorporating the information into a tool that ensures healthy sustainable populations. However, the WY Plan is highly ineffective because of the inability of the Wyoming Game and Fish Department (WGFD) to utilize scientific strategies beyond the limited boundaries of the Wolf Trophy Game Management Area (WTGMA).

The Conservation Alliance strongly recommends that USFWS not move forward with delisting until the insufficiencies of this plan are corrected. The WGFD should not be inhibited in their management efforts and should be able to manage wolves with the best science available throughout an appropriate geographic range. The boundary of the WTGMA is an arbitrary line without scientific justification, and does not acknowledge the extent and need for lands beyond that line to successfully support populations or dispersal to other appropriate habitats. A more extensive WTGMA will benefit wolves and the ecosystem, as well as hunters, ranchers and WGFD. The Conservation Alliance believes that a statewide WTGMA should be established that will provide better scientific and resource management and promote greater social tolerance.

In addition, the “flex zone” presents problems. As another boundary that is arbitrarily determined and unrelated to any existing boundaries, known or unknown, it also will be difficult for hunters to identify. The fact that it shifts during the year will only add to the complexity. This area should remain as WTGMA the whole year. The zone is proposed to ensure genetic connectivity, but placing this area within the WTGMA only during hunting season will counteract the purpose of the area allowing for dispersal. It has been stated by WGFD in Jackson that dispersal will occur between Wyoming and Idaho. The need for essential genetic connectivity is acknowledged in the Department of Interior and Wyoming agreement. Genetic exchange is compromised by this zone and threatens the maintenance of high enough population numbers to ensure genetic exchange. Studies that show past gene exchange were done with larger population numbers in the sub-populations and might not be relevant with lower numbers. That makes this corridor even more critical and in need of greater monitoring with accompanying adaptive management.

The WY Plan repeatedly uses the numbers of 10 breeding pairs and 100 wolves agreed upon by the

governor's office and the Department of Interior. These numbers are the bare minimum necessary to prevent delisting. Management will have to be based upon some higher number in order to stay above that minimum. Unfortunately, the plan does not identify an objective for the population number. The numbers, 10 breeding pairs and 100 wolves, with repeated use, will become the defacto population objective and impossible to replace with a more realistic objective. An objective number should be determined that will prevent a wolf population decline and possible relisting. What factors, including population numbers, will trigger a status review or would initiate more conservation management is another missing component in the plan.

Hunting, livestock depredation management and other actions that decrease the population of wolves should be assessed in total to make sure that population numbers remain viable. There is little in the plan on the use of non-lethal management and not a lot of this kind of management has been done in Wyoming. There should be use of this complementary approach to management in the plan to offset the need for lethal takes, especially if wolf population numbers begin dropping unacceptably in an area. In particular, this method of management should be used at Wyoming feedgrounds if wolves are having an impact. Determining an impact to ungulate herds, on feedgrounds or on native range should not be a subjective decision. It should be carefully, scientifically assessed with specific parameters to show negative impacts.

The absence of Grand Teton National Park, John D. Rockefeller Parkway and the National Elk Refuge in discussing areas outside of WGFD management is extremely problematic. Those areas of federally managed lands should be included with Yellowstone National Park and the Wind River Reservation when describing management beyond the responsibility of WGFD.

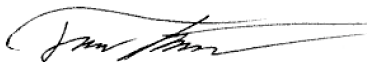
This draft plan does have some improvements not found in the old plan. The lethal take permit has been changed from one year to 45 days. This allows better monitoring of conflicts and actions taken. The new definition of a breeding pair is more in line with accepted science and is a better way to assess the population's decline or success.

It is difficult to assess a plan that has so many elements contingent upon Wyoming legislative approval. We believe the WGFD should have as much autonomy as possible to remove this volatile issue from politics and place it under the direction of science. Reaching the objectives of this plan will require more resources in manpower and funds than the agency presently is allocated. The Rule should not be approved until these inconsistencies are corrected.


Wyoming's management plan does not reflect the stated purpose to "establish a framework for wolf management in Wyoming that will provide for a recovered and sustainable population of wolves that is well connected genetically to other subpopulations in the NRM (Northern Rocky Mountain Distinct Population Segment), while minimizing wolf/human conflicts and ensuring the long-term health and viability of big game herds." The Rule to delist the gray wolf in Wyoming based upon this faulty attempt at management will not meet the goals of U.S. Fish and Wildlife Service and should be changed to correct the failings in the Wyoming Gray Wolf Management Plan. The Jackson Hole Conservation Alliance recommends that these changes be made before Gray wolf delisting in Wyoming proceeds.

Thank you for your consideration of these comments.

Sincerely,



Trevor Stevenson
Executive Director



Louise Lasley
Program Director