



IN REPLY REFER TO:

United States Department of the Interior

U.S. GEOLOGICAL SURVEY

ALASKA SCIENCE CENTER

1011 E. Tudor Road

Anchorage, Alaska 99503

24 July 2007

Ed Bangs, Wolf Recovery Coordinator
U.S. Fish and Wildlife Service
Ecological Services
Montana Field Office
585 Shepard Way
Helena, Montana 59601

Dear Ed,

As requested, here is my peer review of the proposed revision of the special regulation for the Central Idaho and Yellowstone Area nonessential experimental populations of gray wolves in the Northern Rocky Mountains (Federal Register [FR] 72(129):36942-36949, dated 7/6//2007).

The proposal rule changes are relatively minor but will provide useful flexibility to States, Tribes, and the general public to deal reasonably with conflicts with wolves. The rule appropriately describes that wolf predation can be a major, contributing factor to population declines of wild ungulates, but that it is often difficult to assign one factor, such as wolf predation, as the “primary” cause. This rule change will allow States and Tribes to include wolf control in a range of management actions to address cases where wild ungulate populations are not meeting management goals. The proposed rule maintains a thorough public and scientific review process to ensure that wolf control actions are well-justified and publicly supported.

The proposal accurately characterizes the status of wolves in the affected areas and the effects of human take on wolf populations. Given the resilience of wolves to human take and the rates of population increase currently observed in the region it doesn't seem that the added criteria that States do not reduce wolf populations through wolf control below 20 breeding pairs and 200 wolves is necessary or justified. The existing 15 breeding pair minimum management target for each State is adequate to provide a “substantial margin of safety” above the recovery objectives.

The additional allowances for protecting stock animals and dogs are a logical extension of the current regulations. As described in the proposed rule, these added opportunities for people to protect their property from wolves will likely result in little or no additional take of wolves and may actually improve public acceptance of wolves in the region.

Sincerely,

/s/ Layne G. Adams

Layne G. Adams
Research Wildlife Biologist