

July 9, 2007

Mr. Ed Bangs
U. S. Fish and Wildlife Service
Western Gray Wolf Recovery Coordinator
585 Shepard Way
Helena, Montana 59601

Dear Mr. Bangs:

I have reviewed the U.S. Fish and Wildlife Service's proposal to modify the current Regulations for Nonessential Exp Experimental Populations of the Western Distinct Population Segment of the Gray Wolf (70 FR 1286).

Overall, these changes help to bring credibility to wolf management by giving the States and Tribes tools to initiate sound management. As you know I have always been a solid supporter of returning wolves to their former habitats. However, I have always realized there will come a point when they will have to be managed and that means active control when necessary.

1. I believe the Service has done a good job of examining the potential impacts of predation on ungulates, livestock, and domestic animals. In some cases I believe the impacts could be more severe than what you describe but there appears to be plenty of needed flexibility in your approach.
2. With as many protected areas available to wolves the wolf control measures you propose will have little impact on the recovered wolf population.
3. Wolves can sustain heavy human-caused mortality and I believe your safety margins are quite adequate.
4. I found no oversights, omissions or inconsistencies in the proposed revision. If there were oversights then revisions can always be made.
5. Your conclusions are sound.
6. I think the literature you provided was adequate. You could have given many other examples of the impacts of predation from other areas but I do not believe that is necessary.

In summary I believe the revisions you propose are very adequate to achieve your management objects. Contact me if you have questions.

Sincerely,

Warren Ballard, Ph.D.
Professor & NRM Associate Chair
Bricker Chair in Wildlife Management