

Proposed Revision of Special Regulation for the Central Idaho and Yellowstone Area Nonessential Experimental Populations of Gray Wolves in the Northern Rocky Mountains. Federal Register 72:36942-36949. Friday, July 6, 2007.

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I find the Proposed Rule Change to be a well-reasoned attempt to increase the flexibility of the States to manage wolf populations in the interim before delisting. My overall assessment is that the scientific basis for the proposed change is sound and accurate. Detailed comments are discussed below.

Effects of wolf predation on ungulates (page 36944, middle column)

I think the acknowledgement that elk populations are influenced by multiple causes (in addition to wolf predation) is an important consideration. The document does a good job of outlining the various factors influencing elk populations and the pertinent literature sources. The recognition (at the end of this section) that wolves can cause reductions of ungulate populations below management objective under certain cases also seems appropriate. There seem to be a few elk populations that have declined with the reintroduction of wolves (North Fork Flathead, GNP; Banff National Park, and the Northern Range of Yellowstone National Park), most of which are documented in the scientific literature. Perhaps it would be useful to reference some of these cases explicitly.

I fully agree that we will rarely have information confirming wolves as a primary cause of any ungulate populations, especially with the complication of density dependence and additive and compensatory mortality. Thus, lowering the standard to wolves being one of the major causes seems reasonable.

Inclusion of “management goals” in addition to population goals (pg 36945, left column)

This Proposed Rule Change has broadened the wolf impacts to include any impact that prevents a State or Tribe from meeting its management objectives. This includes “cow/calf ratios, movements, use of key feeding areas, survival rates, behavior, nutrition, and other factors.” This proposed change provides a fairly wide latitude to the States and Tribes in determining “unacceptable impacts”, as it is tied to management objective that they set. This seems reasonable to me, in large part, because this is how States will likely manage wolves once they are delisted. However, whereas there is a considerable discussion of what is expected by the Service of State and Tribal proposals of wolf take (top left column, pg 36945), most of this discussion is focused around the documenting wolf impacts to ungulate populations. There is very little discussion of what the Service might expect as documentation that wolves are impacting some other State

or Tribal management objective, such as wolves keeping elk away from a key feeding area. Perhaps some additional language describing how such indirect impacts of wolves on ungulate management objectives is warranted.

The 20-pack safeguard

I believe that the stipulation that the Service not allow take of wolves that will cause the wolf population in any State to drop below 20 packs or 200 wolves is an appropriate and reasonable safeguard to prevent wolf numbers from slipping below the 15 pack per State regulation. The 20 pack safeguard seems reasonable given the propensity of the wolf population to recover or maintain numbers. It is stated that the wolf population growth rate would still be positive (i.e., numbers could be maintained) even if wolf mortality was essentially doubled due to wolf control actions. Without running the data through a population model, I do not think that this relationship between a doubling of wolf mortality and a positive population growth rate can be evaluated. Nevertheless, I agree that the wolf population can sustain a rather large amount of take, much more than what is occurring currently. The fact that the Service will maintain the 20-pack safeguard also provides for an adaptive management approach should the wolf population fail to recover from high levels of legal take.

Addressing Take to Protect Stock Animals and Dogs

The proposed change to allow take of wolves that are attacking stock animals and dogs seems reasonable. I only have a couple of comments

It was not clear to me what is meant by “legally present”. Does this mean that if one is trespassing on private land they cannot take a wolf that is attacking their domestic dog? Or if a rancher’s livestock move off of their designated grazing allotment, is it illegal for the rancher to take a wolf that is attacking such livestock? Perhaps some clarification would be useful here.

I fully agree with the statement that such wolf attacks on dogs or stock animals will be rare. Most wolves are fairly wary of humans and this behavior should prevent many such attacks when humans are near.