

"L. David Mech"

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Amelia/Ed,

Sorry I was unavailable to peer-review your proposed Wolf 10j rule revision. However, you might find today's critique of some use.

In general I believe that the proposal does "reasonably address conflicts between wolves and domestic animals or wild ungulate populations; would provide sufficient safeguards to prevent misuse of the modified rule; would provide an appropriate and transparent public process that ensures decisions are science-based; and would provide adequate guarantees that wolf recovery will not be compromised."

The only suggested change I have is to try to define what is meant by wolves being a "major cause" of a herd or population not meeting established State or Tribal population or herd management goals. Possible specifics in this definition would be strong evidence that wolves are killing a high proportion of all the calves/fawns perishing as well as killing, for example, > 70% of the calves/fawns born during each of several consecutive years, and/or wolves killing a high proportion of prime-aged females during each of several consecutive years, along with evidence that neither habitat nor weather has been extreme and that human offtake has not been excessive. If "major cause" is not specifically defined, that lack more likely would cause contention during review or challenge.

I do agree that local and/or temporary wolf control should not jeopardize wolf recovery in the West, given current wolf numbers and adequate taking regulations.

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