State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

James Doyle, Governor
Scott P. Hassett, Secretary
Scott A. Humrickhouse, Regional Director

www.dnr.state.wi.us/org/land/wildlife/reclands/sandhill

11 July, 2007

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

Re: Peer Review

I have read *Federal Register* Vol. 72, No. 129 (July 6, 2007), proposed rule change on gray wolf management in the *Experimental Population* (EP) zone of the Western Gray Wolf Distinct Population Segment (WDPS), and offer the following comments.

The U.S. Fish & Wildlife Service (FWS) has adequately characterized possible impacts on wild ungulates, livestock and dogs by wolves within the EP region of Montana, Wyoming and Idaho. These potential impacts are in keeping with management issues experienced by wildlife officials elsewhere on the continent where wolves occur.

The FWS has demonstrated that the EP portion of the WDPS has biologically exceeded the established recovery goal, and is therefore biologically recovered. Further, the FWS has adequately described the flexibility that exists for managing and taking EP wolves, both statutorily and historically within the WPDS since its creation.

The proposed change to the criteria of what is "Unacceptable impact" (from "primarily caused by wolf predation" [2005 Rule] to "wolves as one of the major causes…" [present proposal]) on wild ungulates clarifies this issue, in my opinion, and makes a State or Tribal argument easier to assess and defend. At the same time, the documentary expectations placed on State / Tribal agencies are sufficiently rigorous that wolf control action would only be approved if/when a petitioning Agency could scientifically demonstrate a need exists, and such actions would benefit ungulate goals while not adversely impacting wolf recovery.

The idea of not dipping below 20 breeding pairs, or 200 wolves/state seems logical, and I agree that it would provide a safety net for adequate wolf conservation under these provisions of take. I am not familiar with the data FWS feels exists that "…indicates that the current annual mortality rate of about 26 percent in the adult portion of the population could be nearly doubled and the wolf population could still maintain itself at current levels.", nor do I necessarily agree with or advise that such heavy take occur. Certainly if such heavy take were to occur on the *adult* segment, pains would have to be taken to ensure that the *yearling* and *pup* segments of the population were relatively unmolested. Such safeguards would be difficult to enforce. However,

the above-mentioned safeguards of maintaining 20 pairs and 200 wolves/state would preclude any concerns over the logic of the latter statement.

The history of legal take by private citizens, as provided in the rule change – while felt on the individual level – is not large enough to have an impact on a population level, as was also demonstrated in the data provided. I concur with FWS that future take under the proposed rule change would have minor impact on wolves.

Within this segment of the proposed rule change, I am curious what criteria exist that would aid an inspecting agent to justify a take when evidence of wolves is limited to "harassment" where physical evidence may be lacking – other than the obvious dead wolf. I realize, however, that a discussion of investigative tools are not within the scope of the proposed federal rule, but since "harassment" is mentioned, the onus is on FWS to have sound procedures in place to prevent nefarious actions by individuals desiring to commit illegal acts without a real potential that such acts would be brought to justice.

The documentation utilized in this rule is thorough and adequately addresses the issues covered in this proposed rule change. The only citation – one I believe is critical to FWS stance of what I feel might be an excessively high allowable adult mortality – is Smith 2005. This appears to be unpublished, and hence, not peer-reviewed. Never the less, as stated previously, the minimum established breeding pair and total population goals should provide sufficient to conservate the wolf population.

This Rule Change is a well-reasoned and sound approach to providing some latitude for agencies responsible for both wolf and ungulate management, and wolf and livestock management to respond to the issues of predatory impacts on wild and domestic prey. I believe it provides for outlets to address these issues while at the same time providing sufficient safeguards to ensure the conservation of gray wolves.

Sincerely,

Richard P. Thiel,
Coordinator, Sandhill Outdoor Skills Center
Wolf Monitoring Coordinator: West-Central Region