



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Scott Hassett, Secretary  
John Gozdzialski, Regional Director

August 6, 2007

Edward Bangs,  
U.S. Fish and Wildlife Service  
Western Wolf Recovery Coordinator  
585 Shepard Way  
Helena, MT 59601

Subject: Comments on proposed rule, RIN 1018-AV39

Dear Mr. Bangs:

As requested I have enclosed comments on proposed rule as a peer reviewer. I have worked as the coordinator of wolf recovery and management for the State of Wisconsin since June 1990. The enclosed comments represents my own opinions and do not reflect policies or endorsements by the Wisconsin Department of Natural Resources.

I have read and examined the proposal "50 CFR Part 17, RIN 1018-AV39, *Endangered and Threatened Wildlife and Plants; Proposal Revisions of Special Regulations for the Central Idaho and Yellowstone Area Essential Experimental Population of Gray Wolves in the Northern Rocky Mountains*, **Federal Register**, Vol. 72, No. 129, July 6, 2007, pp. 36942-36949. I have also examined and am familiar with most of the literature listed under a separate document as "References Cited".

My opinion on this proposal is as follows:

I believe the expansion of the definition of "unacceptable impact" to wild ungulate populations to provide for more flexibility for the states and tribes to conduct controls on the wolf population seems reasonable. An incremental approach to lethal controls as wolf population increase and exceeds recovery levels seems reasonable. Mech (1995) has discussed the need for more flexible system of lethal controls on recovered wolf populations.

It appears that wolves have surpassed recovery goals and demographically appear to be very healthy. As long as safe guards remain in place, such as peer and public reviews of assessments of "unacceptable impact" to ungulate populations, as well as commitments to maintaining wolf populations to at least twice the level of federal delisting criteria, and continuation of intense levels of population management, there is little risk of the wolf population of again becoming endangered. Haight et al. (2002) have conducted computer simulations of wolf populations at similar levels as exist in the Northern Rocky Mountains, and with several strategies of lethal controls. Even with the use of some population size management within limited portions of the wolf population range, there was little risk of major population declines or wolves again becoming endangered (Haight et al. 2002).

The taking of wolves by citizens for attacking dogs and stock animals appears reasonable, and similar to previously authority for people to shot wolves attacking livestock on private land or by special permit on

public land. The previous authority resulted in death of only 43 wolves in 12 years and represented only 8% of problem wolves that were lethal controlled in the region. Similar authority now exists in Wisconsin and had resulted in shooting of 2 wolves by private citizens ( one for a livestock attack and one for a dog attack), compared to 17 problem wolves taken by government trappers, or 11% of problem wolves taken in the state since March 12, 2007. Although the expanded authority may result in some increase in wolves taken by citizens, it will still continue to represent a relatively small mortality factor for wolves. In Wisconsin authority to shoot wolves in the act of attacking domestic animals is available for all landowners, but is not authorized for public lands. Public land grazing of livestock rarely occurs in Wisconsin, and hunting dogs attacked by wolves on public lands rarely are in situations where hunters would be able stop the attack by shooting the wolf. In general authority that empowers private citizens without jeopardizing the wolf population is likely to improve attitudes toward wolves and wildlife agencies in rural areas where such wolf attacks are likely to occur.

Comments on the specifics of the proposed rule:

p.36945, 3<sup>rd</sup> para., 1<sup>st</sup> sent., states (italics are mine) “While this change will likely result in more wolf *control* than is currently occurring, we propose to establish *controls* to ensure that wolf *control* for ungulate management purposes would not undermine recovery goals.” The second “control” perhaps should be “restrictions”; otherwise it gets a little confusing.

p. 36945, 5<sup>th</sup> para., 2<sup>nd</sup> sent., states “This data indicates that current annual mortality rate of 26 percent in the adult portion of the wolf population could nearly double and the wolf population could still be maintained at current levels”. I am not sure you can say that. The population also received very high pup production and survival which is likely to slow down as most areas of suitable habitat are saturated. Fuller (1995, p. 8) has indicated that annual mortality rates > 35 % for wolves > 6 months may lead to population declines. It might be appropriate to say that “adult mortality could probably increase to 35% (Fuller 1995) before declines in the population are likely to occur.”

p. 36946, 2<sup>nd</sup> para., 1<sup>st</sup> sent. , states “Since 1995, only 43 wolves (about 8 percent of the 538 wolves legally...”. The sentence needs to include the end of the time period, such as “Between 1995 and June 2007, only 43 wolves.....”

P. 1 of References cited, Garrott et al. needs to include “The Wildlife Society Bulletin”

You may also want to consider citing the literature below,

#### Literature Cited:

Fuller, T. K. 1995. Guidelines for gray wolf management in the Northern Great Lakes Region. International Wolf Center, Ely, Minnesota, Technical Publication #271, 19 pp.

Haight, R. G., L. E. Travis, K. Nimerfro, and L. D. Mech. 2002. Computer simulation of wolf-removal control for animal damage control. Wildlife Society Bulletin. 30: 844-852.

Mech, L.D. 1995. The challenges and opportunity of recovering wolf populations. Conservation Biology. 9:270-278.

Thanks for the opportunity to review and comments on this proposal. In summary, I believe the two modifications for expanded control on wolves impacting wild ungulates, and expansion of opportunities

for citizens controls are based on sound scientific reasoning and will not cause drastic declines or endangerment of these wolf populations.

Sincerely Yours

Adrian P. Wydeven,  
Mammalian Ecologist