

August 31, 2011

Wolf Plan Comments
Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, Wyoming 82006

The Jackson Hole Conservation Alliance has worked for more than 30 years to make sure that human activities are in harmony with the wildlife, scenic and natural resources in Jackson Hole. We represent some 2,000 members who live or recreate in western Wyoming and who take special pride in the ability to do so in an intact ecosystem. We have participated for many years in efforts for the successful return of wolves into this ecosystem and thank you for this opportunity to comment on the draft Wyoming Gray Wolf Management Plan.

A wildlife management plan does more than regulate population numbers. A good management plan monitors population dynamics – dispersal, genetic connectivity, reproductive and recruitment success – and provides guidance on incorporating the information into an adaptable plan. However, the Wyoming Gray Wolf Management Plan (WGWMP) is highly ineffective because of the inability of the Wyoming Game and Fish Department (WGFD) to utilize these scientific strategies beyond the limited boundaries of the Wolf Trophy Game Management Area (WTGMA). The Conservation Alliance strongly recommends that WGFD work to ensure that they are not inhibited in their management efforts and retain the ability to manage wolves with the best science available throughout an appropriate geographic range.

Also, tourism is a growing industry in Wyoming and an economic driver for some areas of the state. It has been clear during the extended controversy over wolf delisting that many people in the country are eager and willing to visit our state in order to see wolves. There has also been commentary reviling the killing of wolves. Considering this component in management decisions will help portray Wyoming as a Mecca for tourism and hunting.

In addition, the “flex zone” itself presents problems. A boundary that is arbitrarily determined and unrelated to any existing boundaries, known or unknown, will be difficult for hunters to identify. The fact that it shifts during the year will only add to the complexity. The area is proposed to ensure genetic connectivity, but placing this area within the WTGMA during hunting season will counteract the purpose of the area allowing for dispersal. It has been stated by WGFD in Jackson that dispersal will occur between Wyoming and Idaho, and the need for this essential genetic connectivity is acknowledged in the Department of Interior and Wyoming agreement. Studies that show past gene exchange were done with higher numbers in the sub-populations and might not be relevant with lower numbers. That makes this corridor even more critical and in need of greater monitoring with accompanying adaptive management.

A more extensive WTGMA will benefit hunters, ranchers and WGFD. The Wyoming Stock Growers Association supports changing the flex zone to a year-round trophy game area in order to have their lands within the management area and be able to receive compensation for their losses to predation. Hunters and WGFD would see greater revenues for hunts within this area and an expanded WTGMA would bring more gains to both.

The WGWMP repeatedly uses the numbers of 10 breeding pairs and 100 wolves agreed upon by the governor’s office and the Department of Interior. These numbers are the bare minimum necessary to prevent delisting. Management will have to be based upon some higher number in

order to stay above that minimum. Unfortunately, the plan does not identify an objective for the population number. The numbers, 10 breeding pairs and 100 wolves, with repeated use, will become the defacto population number objective and impossible to replace with a more realistic objective. An objective number should be determined before season setting meetings and guide those discussions and decisions. This should be a number that is presented as quickly as possible to the public with the scientific rationale for choosing that number. Another missing component in the plan is the identification of factors that would trigger a status review on how successful the plan is.

There is little in the plan on the use of non-lethal management and not a lot of this kind of management has been done in Wyoming. It would be good to see this complementary approach to management in the plan to offset the need for lethal takes, especially if wolf population numbers begin dropping unacceptably in an area.

This draft plan does have a couple of improvements not in the old plan. The lethal take permit has been changed from one year to 45 days. This allows better monitoring of conflicts and actions taken. The new definition of a breeding pair is more in line with accepted science and is a better way to assess the population's decline or success

It is difficult to assess a plan that has so many elements contingent upon Wyoming legislative approval. We urge the WGFD to strive for as much autonomy as possible to remove this volatile issue from politics and place it under the direction of science. Reaching the objectives of this plan will require more resources in manpower and funds than the agency presently is allocated and we would like to see the legislature improve and enhance the funding mechanisms for agency operations.

Managing wolves in Wyoming will be a challenge and an opportunity. The Jackson Hole Conservation Alliance believes that the challenges can be diminished and the opportunities enriched with extensive public participation under the leadership of Wyoming Game and Fish. There are many details unaddressed and issues still to be resolved. The Conservation Alliance offers our assistance to the Wyoming Game and Fish Department to involve the community of Jackson Hole in these critical discussions.

Thank you for your consideration of these comments.

Sincerely,

Trevor Stevenson
Executive Director

Louise Lasley
Public Lands Director