

# Certification Page Regular and Emergency Rules

Revised September 2016

Em	ergency Rules (After completing all of Sections 1 to	hrough 3, proceed to S	ection 5 below)	🔳 Regular Rule	S
1. General Information					
a Agency/Board Name					
Wyoming Game and	Fish Department	c. City			
b. Agency/Board Address 3030 Energy Lane				d. Zip Code	
e. Name of Agency Liaison		Casper	son Telephone Number	82604	
Mike Choma		307-473-3			
g. Agency Liaison Email Addr	ess		h. Adoption Date		
mike.choma@wyo.gov			July 19, 2017		
i. Program Game and Fish	Commission - Regulations				
The second se	mt For purposes of this Section 2, "new" only a	nolies to regular rule	s nonulasted in respon	se to a Wuoming legi	islative enactment not
	e or in part by prior rulemaking and does not inc				Interne characteric nut
	the above description and the definition of "new			ter respect	
a. Ale mese rules new as per	the above description and the definition of free	v in Chapter 1 of the	Rules on Rules?		
No. 🗌 Yes.	Please provide the Enrolled Act Numbers and Y	ears Enacted:			
3. Rule Type and Infor			and the second		The second s
	er, Title, and Proposed Action for Each Chapter	and an every service of the service of the			
	le Information form for more than 10 chapters and atta		)		
Chapter Number:	Chapter Name:		New	Amended	Repealed
47	Gray Wolf Hunt	ting Sea			
Chapter Number:	Chapter Name:		New New	Amended	Repealed
Chapter Number:	Chapter Name:		New	Amended	Repealed
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	107.24				
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Chapter Number:	Chapter Name		New New	Amended	Repealed
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Chapter Number:	Chapter Name		New New	Amended	Repealed
				ST - 39	
Chapter Number:	Chapter Name:				
				Amended	Repealed
Chapter Number:	Chapter Name		New	Amended	Repealed

3. State Government Notice of	3. State Government Notice of Intended Rulemaking			
	a. Date on which the Proposed Rule Packet (consisting of the Notice of Intent as per W.S. 16-3-103(a)			
Statement of Principal Reasons, strike and underscore format and a clean copy of each chapter of July 27, 2017				
rules were:				
approved as to form by the Reg				
<ul> <li>provided to the Legislative Ser</li> </ul>	vice Office and Attorney General:			
4. Public Notice of Intended Ru	<u>ilemaking</u>			
a Notice was mailed 45 days in advance to al	I persons who made a timely request for advance	e notice. No. 🔳 Yes. 🗌 N/A		
b. A public hearing was held on the proposed	rules No. 📕 Yes. Please complete	the boxes below.		
Date: May 4, 2017 May 17, 2017 May 17, 2017	DC pm Cody	Location: Game and Fish Office Bottom Federal Back		
May 22, 2017 6	00 pm. Green River 00 pm. Jackson 00 pm. Cody	Game and Fish Office Vergenan Beghonn Federal		
May 23, 2017 7- May 23, 2017 7:	00 pm Sundance 00 pm Shendan 00 pm Largumes	Crock Courty Courthouse Game and Fish Office		
May 25, 2017 6 May 23, 2017 6	00.pm. Casper 00.pm. Lander	Game and Fash Office Game and Fash Office Game and Fash Office		
	00 pm Jackson 90 pm. Pinedale	Game and Fah Office Game and Fah Office		
c. If applicable, describe the emergency whic	h requires promulgation of these rules without p	roviding notice or an opportunity for a public hearing		
5. Final Filing of Rules				
	riginal signatures and final rules were sent to the	hub 07 0017		
Attorney General's Office for the Govern		July 27, 2017		
b Date on which final rules were approved as to form by the Secretary of State and sent to the Legislative Service Office: July 27, 2017				
Legislative Service Office:	An della constitución	501y 27, 2017		
c. The Statement of Reasons is attached	to this certrication.			
6. Agency/Board Certification				
The undersigned certifies that the foregoi Signature of Authorized Individual	ng information is correct.			
Signature of Addionzed Individual	Kith Cub	m		
Printed Name of Signatory	Keith Culver			
Signatory Title	President			
Date of Signature July 19, 2017				
7. Governor's Certification				
I have reviewed these rules and determin	•			
	tutory authority delegated to the adopting a			
2. Appear to be within the scope	of the legislative purpose of the statutory at	uthority; and, if emergency rules,		
	ur in the finding that they are an emergency			
Therefore, I approve the same.				
Governor's Signature				
Date of Signature				

#### STATEMENT OF REASONS

#### CHAPTER 47

#### GRAY WOLF HUNTING SEASONS

W.S. § 23-1-302 directs and empowers the Commission to fix seasons and bag limits, open, shorten or close seasons for gray wolves designated as trophy game animals.

Section 3. An edit has been made indicating there shall be open seasons during 2017 for the hunting of gray wolves as set forth in this regulation.

Section 4. Mortality quotas have been modified to reflect the current population of gray wolves in Wyoming and future management through hunter harvest. The proposed hunt area mortality quotas have been developed to maintain a recovered gray wolf population.

Minor grammatical and formatting edits have been incorporated to provide additional clarity but do not change the intent of the rules and regulations.



# WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006 Phone: (307) 777-4600 Fax: (307) 777-4699 wgfd.wyo.gov GOVERNOR MATTHEW H. MEAD DIRECTOR

SCOTT TALBOTT

COMMISSIONERS KEITH CULVER – President MARK ANSELMI – Vice President GAY LYNN BYRD PATRICK CRANK PETER J. DUBE DAVID RAEL MIKE SCHMID

July 24, 2017

# MEMORANDUM

TO:	David Dewald, Senior Assistant Attorney General
FROM:	Mike Choma, Wildlife Law Enforcement Supervisor
COPY TO:	Brian Nesvik, Scott Edberg, Doug Brimeyer and Terri Weinhandl
SUBJECT:	Regulation Changes Made as a Result of Public Comment, Chapter 47, Gray Wolf Hunting Seasons

The Wyoming Game and Fish Department (Department) conducted 12 public meetings across the state to present this draft regulation proposal to the public. The draft proposal was also available for viewing and public comment through the Department website. As a result of these efforts, the Department received 186 individual written comments regarding this regulation.

Other than opposition to hunting wolves, the most widely mentioned recommendation was to establish a "no hunt" or "sacred" buffer zone surrounding the national parks. A 31 mi (50 km) buffer was the most common width cited by comments requesting a "no hunt" zone, although buffers of 50 or 100 miles were mentioned in several comments. A 31 mi buffer surrounding the national parks (Grand Teton and Yellowstone) would encompass the majority of the wolf trophy game management area (WTGMA) including all or most of gray wolf hunt areas 1, 2, 3, 6, 7, 8, 9, and 10, and significant portions of hunt areas 4, 5 and 12. Only hunt area 11 would lie almost entirely outside this buffer. A width of 50 miles would extend the buffer to encompass the entire WTGMA, including most of Hunt Area 11. A buffer of 100 miles would include significant portions of the area where wolves are classified as a predatory animal. Any of these buffer concepts, if implemented, would entirely negate the State's ability to manage wolves. Further restrictions on hunting wolves outside the WTGMA would also violate W.S. § 23-3-103(a).

Overall, 13% of comment submissions indicated support for hunting wolves, 64% opposed hunting wolves, and 23% offered management recommendations but did not express a position on hunting. Among comments submitted from Wyoming addresses, 40% support a hunting season on wolves and 39% oppose. Among comments submitted from addresses outside WY, 3% support and 74% oppose hunting wolves.

After consideration of all public comments received, the Commission made no changes to the draft regulation for gray wolf hunting seasons.

"Conserving Wildlife - Serving People"

1. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. 2. Predators are self-regulating and do not require hunting to manage their populations. 3. If hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway. 4. Wolves should not be listed as a predator anywhere in the state. Animals designated as predator are treated horrifically and can be killed in any manner. To allow a recovered endangered species to be treated this way is irresponsible and reckless. 5. The killing of 44 wolves only satisfies the hunter "opportunity" without reducing livestock conflicts. Human-caused mortalities and control action would be sufficient. 6. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. 7. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. 8. Wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone. Sincerely, Line Ringgaard

Final Comment	Dinggoord Ling	Uarning	6/16/2017 8:16:00
	Ringgaard, Line	Herning,	AM

Please reconsider shooting the wolves.....every animal has a right to live on this planet.....why are humans so intent on harming, destroying and putting animals close to extinction....what about humans, shouldn't some of them be culled.....some of them are animals, criminals, horrible people, but we keep them alive.....I wonder why sometimes.....why should wolves have to be at risk of being shot, hurt, maimed....all animals have feelings and yet we treat them like shit, like they don't matter...well THEY DO MATTER.....All species need to be protected before it's too late.....the sad thing is that shooters get a thrill from the kill.....go shoot your own foot then...or what about some hardened criminals who have also killed.....I love wolves in fact all animals on the planet and they all need protecting.....don't call me a do Gooder, I just have compassion for our animal kingdom.....please save the wolves.....

Final Comment	Voung Ally	Killarney,	5/5/2017 3:34:00
	Young, Ally	Killailley,	AM

Please do all you can to maintain the numbers of the wolf population. These magnificent animals are an integral part of the environment and wildlife attracts many tourists (Particularly of the non-hunting variety) and benefits the economy. Their importance to the balance of nature has been amply demonstrated in Yellowstone NP. No increases or extensions, to quotas/ timings/areas etc. They have every right to survive, just as we do. Thank you

Final Comment	Wells, Gayle	Leicester United Kingdom,	5/29/2017 12:10:00
	wens, Gayle	Leicester United Kingdom,	PM

I would like to see the Hunting of the Gray Wolf Stopped. These beautiful animals are important to the balance of the eco-system and all so the economy. They are all so a iconic animal to the USA. People go to the States to see these magnificent animals in their natural habitat. So please ensure these beautiful animals are protected for now and future generations.

Final Comment	Durrall Mandy	Nomuiah	5/5/2017 2:55:00
	Burrell, Mandy	Norwich,	AM

I am writing to express my concerns for Wyoming's future attractiveness for international tourists. The state's own agencies report that income derived from tourism amounts to millions of dollars annually and that tourism supports many thousands of jobs. People from across the world visit your state to view the beautiful Yellowstone and Grand Tetons National Parks and the majority also hope to see a wolf or grizzly in their natural habitat. Allowing high quotas for hunting of wolves in the twelve trophy game zones, and permitting wolves to be lured out of the parks and shot on sight, is bound to have a damaging effect on your state's tourist industry - wildlife enthusiasts will not want to see corpses and they will go elsewhere, to areas where the chance of seeing living animals is greater. In Montana the quota was reduced to two wolves in each of two zones adjacent to Yellowstone in order to protect their tourist income. I urge you to follow Montana's lead: lower the quotas and, once met, close them for the season. This will serve to protect your income from international tourism. I am in the UK and hope, one day, to visit some of America's magnificent National Parks and Wildlife Refuges - but only if the amazing wildlife is thriving and populations have not been tragically diminished by trophy hunting. Thank you for your attention. Susan Fairweather, Cornwall, UK

Final Comment	Fairweather, Susan	ST AUSTELL,	5/7/2017 1:14:00 AM

WHY is the USA persecuting Wolves, Bears, Wolverines & other magnificent Wildlife~!!?? Your Wolves are already endangered and so few are left :( Humans & Cattle are the invasive species, NOT the wildlife..... a handful of hunters should NOT be given priority to destroy your wildlife and upset the ecological balance. Farmers need to find non-lethal methods to protect livestock. Please Save and Protect your amazing Grey Wolves. The rest of the world is watching - we are angry you are letting redneck hunters & trappers destroy and exterminate wildlife - the wildlife does NOT need "managing" just leave them alone - Humans do NOT have the right to exterminate other species. One of the reasons tourists visit USA & Canada is to see your Magnificent Wildlife and National Parks. Please look after them :)

Final Comment	Cottle, Linda	Taumarunui, King Country,	5/3/2017 11:41:00
	Cottle, Linda	Taumarunun, King Country,	PM

The wolves have the right to live as much as we do. Yes they are predators but that is way God designed them. We need to kill them before there ain't none left. Fish and Game needs to acknowledge they are an important part of the environment and need to stop allowing them to be killed.

Final Comment	Phalan, Karl	Rogers, AR	6/15/2017 11:49:00 AM

I think predators need to be left alone, its already proven that when you disrupt wolves family pack by killing, the remaining members break apart and usually end up alone. Wolves alone, tend to go for easy and that would be your big fat cow or sheep. Why not give em a break for a yr or two and use non lethal methods and see how it is. The biggest threat and killer of livestock is NOT predators or wolves, it is health related per the USDA website. Going around and blasting them out of existence serves no purpose except give someone a kill thrill.

Final Comment	CHEATHAM,	laveen, AZ	5/3/2017 11:36:00
	kathleen		AM

I am highly opposed to allowing hunting of wolves for any reason in Wyoming. The recent success of reintroduced wolves in Yellowstone to restore ecosystems should be proof enough. Wolves create healthier populations of deer, elk and other prey animals. They are serving their naturally evolved purpose and should be allowed to live freely. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. Killing the leaders is not the answer and more often causes even greater problems when packs split up with younger wolves left without the guidance and training they need to hunt their natural prey. Predators are selfregulating and do not require hunting to manage their populations. Human-caused mortalities and control action would be sufficient. There are many deterrent methods which have worked for centuries. Wolves should not be listed as a predator anywhere in the state. Animals designated as predators can be killed in almost any manner. To allow this type of management of a recovered endangered species is irresponsible, reckless and archaic. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. Hunting n for trophies is just an ego trip for the hunters and serves no valid purpose. Killing wolves around national parks decreases viewing opportunity of a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. Even if wolves themselves are rarely seen, their positive effect in the rest of the animals and plants is valuable. As a native of Wyoming who still has deep ties and loves to visit this wonderful state, I truly hope you will do the right thing. We must learn from our past mistakes of messing with nature and do better now.

Final Comment	Shively, Tanya	Scottsdale, AZ	6/19/2017 9:53:00
	Shivery, Tanya	Scottsdale, 112	AM

Respectfully requesting a 50km Sacred Resource Protection Safety Zone and banning Predator Calls and Night time Predator Hunting.

Final Comment	klein, betsy	Sedona, AZ	5/22/2017 4:15:00 PM
	protect the wolf as a st a lot of tourist dollar	n important part of the ecosystem ars. Thank you!	. Allowing hunting
Final Comment	Myers, Angela	Agua Dulce, CA	5/22/2017 1:26:00 PM

Although we are based in California, we care about the environment and ecosystems of Wyoming and many of us travel there to hike and watch wildlife. We would like to suggest that there should be absolutely no legal gray wolf hunting season. The only time wolves should be subject to lethal control is if human or pet animal lives are in immediate danger (which is a very rare occurrence). Wolves are increasingly rare, and their highly social behavior means that killing them, especially 'trophy' individuals, disrupts their pack structure and can lead to further deaths as well as increased predation on livestock. As well, wolves keep natural ecosystems healthy by ensuring that ungulate numbers and behavior remain natural and that ungulates do not overgraze, overpopulate, become subject to disease, and wipe out habitat for other animals such as songbirds. If there must be a wolf hunting season, please keep it limited, enforce limits strictly, and maintain a 100-mile buffer zone around all National Parks, monuments, and wildlife refuges. Thank you for considering our comments.

Final Comment	Eroomon Vyri	Barstow, CA	6/19/2017 9:22:00
	Freeman, Kyri	Baistow, CA	AM
If hunting is allow	wed, there should be a	100 mile buffer zone	around National Parks and the
Rockefeller Men	orial Parkway. Loss o	f wolves in the areas v	where tourists come to view
them, will lead to	los of jobs in Wyomi	ng and loss of tourist r	revenues.

Final Comment	Comment Dow, MS Zoology, Camarillo, CA	6/19/2017 10:23:00	
	Rick	Camarino, CA	AM

Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the

public, what makes it different for Wyoming??

Final Comment	Dobson, Roger	Castaic, CA	5/2/2017 11:03:00
	Douson, Roger	Castale, CA	AM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Yesia, Mark	Eastvale, CA	5/4/2017 11:14:00
	I USIA, IVIAIK	Lastvale, CA	AM

We need buffer zones bordering Teton & Yellowstone National Parks where no wolf hunting is permitted: preferably 100 miles, since OUR wildlife travels. Quotas within a hunting unit should be reduced whenever a wolf is killed illegally; one illegal wolf should count as 10 removed from the quota. This sends the message that poaching will not be tolerated. Any wolf can be hunted or trapped any time of the year, with no license needed? Wyoming Fish and Game has proposed a quota of 44 wolves to be killed within the "Trophy" zone. No trapping is being proposed. No baiting is allowed, however, gut piles & parts of game left from hunters are not considered "bait"??? WHAT IS WRONG WITH YOU PEOPLE? "Predator calls, including puppy cries are allowed. You condone killing sentient beings who respond to distress calls? I have changed my mind: there should be NO wolf hunt, ever. Wolves improve the ecosystems where they live, and love their families more than you do. Only a deeply mentally ill person enjoys torturing and killing animals. I had a lovely time at these parks before you began hunting OUR wildlife (part of the Public Trust); seeing wolves at Lamar Valley was the highlight of our trip. Approximately 95% of federal, 88% of nonprofit, and 94% of total funding for wildlife conservation and management come from the non-hunting public. http://www.mountainlion.org/.../USA-O-NRWM-Smith-Molde-2014-W... I planned to bring a group of friends to Yellowstone and Teton this summer, but I am cancelling our trip. As long as you people take our money and manage OUR wildlife for the tiny mentally ill minority, we'll take our money elsewhere. Hawaii looks good. We'll come to Wyoming when you stop abusing our tax dollars and the Public Trust.

Final Comment Eagle, Reverend Jane	Graton, CA	5/29/2017 4:08:00 PM
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I have been in contact with men in wyoming that love killing wolves and they made fun of me because I live in the LA area. They were advertising for some sports outfit and showing their kills with their children. I realized in talking with them that there will never be a change in their attitude. They ridicule those that don't want wolves slaughtered and take great pride in showing the dead bodies. Their children are learning at their feet and will end up with the same baked in beliefs and behaviors. No amount of facts and science will ever change them. I had to block them as their comments to me got worse and I don't need to read that type of uneducated bs. It is time for things to change.

scott, lana	Irvine, CA	5/12/2017 12:49:00 PM
tial.		
Van ussel, Diane	Los angeles, CA	5/4/2017 6:53:00 AM
	tial.	tial.

Wolves should remain protected. If hunting is allowed there should be a strictly imposed protective zone. Apex predators should be protrcted, not hunted. All one has to do is look at Yellowstone National Park to understand how important wolves are to the environment. Let ranchers find a different solution.

Final Comment	Datta, Sangita	Los Angeles, CA	5/12/2017 8:53:00
	Datta, Saligita	Los Aligeles, CA	AM

Establish a safety zone around Yellowstone National Park. Protecting wolves just inside the park is not enough.

Final Comment	Datta, Sangita	Los Angeles, CA	5/12/2017 9:10:00
	Datta, Saligita	Los Aligeles, CA	AM

As an annual, regular visitor to this nation's park system, I treasure as sacred the all-toofew -- but transformative -- opportunities to see wildlife like wolves, coyotes, bears, elk, and hawks (of course more) in their natural habitat. Wolves are among nature's most amazing and highly self-socialized animals on the planet. Wolves need more protections, not less. We are their greatest threat. I do not trust humans intent on slaying wolves as trophies to abide by more lax laws. Do no harm.

Final Comment	Widder, Frank	Los Angolos CA	6/19/2017 3:57:00
	widder, Flaik	Los Angeles, CA	PM

I am a private citizen who visits Wyoming and Montana mainly to see the Grand Tetons and Yellowstone National Park. I am particularly interested in seeing the Wolves and Grizzlies of this area. My husband and I have been coming to these parks for at least 13 years in a row, sometimes twice a year. I keep up with what goes on with the care of our National Parks and also with the treatment of the wildlife. I am writing to you today in response to this survey. I understand that Wyoming has been involved in the Business

managing resources for the Public. Wyoming's main focus has only been to manage the Public's Resources in the best Interest of Cattle Ranchers who are a Special Interest Group. Isn't the public who use the national parks also a party of interest? We have recently read that Wyoming was recently caught using banned poisons in the national parks exposing the public and other wildlife dangerous substances that can cause great bodily harm. We would support a safety zone for our wildlife for their protection along the border of the national park. We are not being unreasonable in making such a request. We are tax payers and as such want to see that our Federal tax dollars are being used to manage the national parks and protect the wildlife that inhabit these parks. We are paying close attention to this issue. We've seen the damage done by cattle ranchers in Nevada by the Bundy group and also recently at Malheur Wildlife Refuge. This cannot continue. You have a public interested in protecting these great lands that should be in trust to the next generation. Please consider our request for a Resource Protection Safety Zone around Yellowstone National Park. We love visiting your state and spend considerable tourist dollars here. We want to move here one day soon, I'd like to believe that it would be a place we could call home. Thank you for allowing me to voice my opinion and concern, Sincerely, Mrs. Yolanda Ochoa & Stephen J. Hussey.

Final Comment	Ochoa, Yolanda	orange, CA	5/4/2017 9:11:00
	Ocnoa, Tolanda	orange, CA	PM

I am concerned that the states which still have gray wolf populations - including Wyoming - are seizing on the new Administration to gang up on wolves. Wild animals do not, in any practical way, "belong' to any state, regardless of what State law may declare; they belong to the Nation and the world. As a nation, and state by state, we give inordinate power and favor to ranchers, hunters, and developers. As individuals, however, 80% of American citizens want full protection for the wolf and for other apex predators. So I say. no wolf hunt! And only then will I visit Wyoming and spend my tourist dollars there. And since it has been proven that tourism is significantly depressed in the US (nobody wants to come here anymore to visit) you should heed my words; I'm definitely not alone.

Final Comment	Colleges Iulia	San Francisco CA	6/19/2017 10:23:00
	Gallegos, Julie	San Francisco, CA	AM

Please create a no-kill buffer zone of 50 kilometers (31 miles) around Yellowstone and Grand Teton National Parks! At the very least that the State of Wyoming can do is to establish this no-kill buffer zone so that wide-ranging National Park wolves won't be shot the moment they leave the sanctuary of Park Service jurisdiction. Do your State and your country, let alone the welfare and health of the natural eco-systems of gorgeous Wyoming the favour and protect the remaining wolf populations!

Final Comment	Valentine, Sarah	Saratoga CA	5/24/2017 3:32:00
	valentine, Sarah	Saratoga, CA	PM

We are coming for	or you! Murderers!!		
Final Comment	Gallardo, Angela	Stockton, CA	5/15/2017 11:37:00 PM
next year to speci not spend my mo	fically see the wolves.	The only way I can rong wrong by our wild	tional Park. I plan to go there etaliate against hunters is to llife. The wolves are essential
Final Comment	Yehling, Karin	Sylmar, CA	5/3/2017 8:36:00 PM
has not truly reco This will impact of specifically inten- this. 4. wolves are	vered / delisting was a our national parks in wa ded to provide. 3. genet	result of political pre ays that directly impa tic diversity among w leader is taken at the	everal fronts: 1. this species ssure, not sound science. 2. act the value they were volves is still too low to allow wrong time, an entire pack
Final Comment	BLUME, MARK	Truckee, CA	6/15/2017 4:06:00 PM
found them to be them!!!! it is gros yellowstone wolv	as responsive and more ssly immoral to kill a sp yes just demonstrates th	e loyal than most hun becies just for politica e policitally motivate	y german shepherds] and i hans i know. please preserve l agenda. the loss of the ed hate and depradations. e proven wolf damage to
Final Comment	biggins esq, nancy	ukiah, CA	5/29/2017 8:58:00 AM
1	of animals that you don RIGHT THING TO DC		the wolves, bears, big cats
Final Comment	Johnson , Lori	Centennial, CO	5/4/2017 3:22:00 PM

I guess with great white hunter like Dick Cheney among you, there must be a heavy duty to live up top the traditions of a Washington insider. Lots of experience killing hapless animals won't really get you a good job other than with people like the "Wild life Services" who really should all be under indictment. Do NOT let the cattle industry run your state. They already feedtheir cattle at the public's expense through the BLM so killing off the predators just in case they might interfere with the beef is just a little too much. Predators are necessary to a healthy environment and you really should get that lesson before you go kill them all.

Final Comment		$C_{2}$	5/31/2017 1:40:00
	Stark, Tom	Colo Spgs, CO	АМ

Humans don't often eat wolf meat, making hunting them purely for trophy purposes which is disgusting. Wolf populations in the US are just starting to make a comeback. Very little of their historical populations have any numbers of gray wolves. The conservation effort is just getting started. We have a responsibility to protect our planet, the species, and ecosystems which all benefit from strong, healthy wolf packs. We need wolves. Your organization should know this better than anyone. Please give their numbers a chance to build before even considering human extermination as an acceptable practice. Please do not allow wolf hunting seasons. Thank you for your time.

Final Comment	Turlay Allicon	Divide, CO	5/10/2017 11:08:00
	Turley, Allison	Divide, CO	AM

The State of Wyoming may have been given management of gray wolves in the state, however, listing them as vermin for 24/7 slaughter and then establishing a hunt on the YNP Park Borders is just slight of aiming for extermination. Wyoming really has no business managing wolf populations or resources for the Public interest. Wyoming's management is clearly directed and on behalf of the Cattle Ranchers and Livestock industry which wants nothing more than to exterminate predators off of the landscapes and have no interests in wild or native species or lands. As a result tourism is already dropping; tour groups are rerouting around the state of Wyoming as the reasons behind Boycott Wyoming are becoming more widespread. RMEF has even publicized that the state's Elk populations were healthier when there were larger populations of wolves. There are at best 400 wolves in the entire state; of which a good majority will be slaughtered by ranchers and farmers, and those who just hate the species. The wolves of YNP who are observed, studied, viewed and enjoyed by researchers, scientists, wildlife watchers from across the country and around the globe are targeted by the trigger happy trophy hunters who want nothing more than to take a park wolf. I strongly believe as a tourist, wildlife watcher, and a wildlife biologist that "management" of the wolf species in Wyoming needs to be reconsidered and constructed for the benefit of the species, and multi use tourism, rather than as a game farm and catering to special interest ranchers and hunters who want nothing more than to kill the entire species off of the state's landscape, and then what? .... Thank you for your time.

Final Comment	Chriss, Robin	Evergreen, CO	5/2/2017 12:41:00
	CIII155, KOUIII	Evergreen, CO	PM

I support the non hunting of wolves in Wyoming. The total number of wolves is not factually known. How can over 100 wolves be killed in Wyoming in 2016 while being on the Endangered Species Act. They were suppose to be protected. The number of wolves has to be down. Wyoming Game and Fish get information on the wolf population from ranchers with out it being fact. Wyoming wolves will be slaughtered and its economy will drop. I support stopping the killing

Final Comment	Golba, Carolyn	Evergroop CO	5/3/2017 10:06:00
	Golda, Calofyli	Evergreen, CO	PM

I insist you create safety zones for wolves around our national parks. The egregious victimization of wolves, once again, for the vapid and pointless 'sport' of trophy hunting is a disgrace to these majestic creatures which serve as an ecological keystone species and don't deserve to be demonized and constantly hunted to the point of near-extinction. WE THE PEOPLE of this nation, not a select few hunters, are AGAINST trophy hunting of wolves and this misguided policy. Please, create a safe zone for the wolves around our National Parks! Thank you.

Final Comment	Conner, Lisa	Lone Tree, CO	5/10/2017 1:26:00 AM
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I travel often to Yellowstone specifically to watch the wolves. I am horrified that you would even consider reopening wolf hunting. At least you need to establish a no hunting zone around the park to protect our park wolves. Note that non consumptive uses of wildlife are on the rise while hunting is going the way of the dodo bird. I hope that Wyoming can look to the future and not allow this horrible activity.

Final Comment	Doucet, Lisha	Wellington, CO	6/3/2017 11:38:00
	Doucet, Lisila	weinington, CO	AM

I am writing to express my outrage regarding proposals by State game agencies of Wyoming, Montana, and Idaho to allow trophy killing of 76 or more Yellowstone-area wolves during upcoming hunting seasons. The 2017-18 wolf hunts will completely surround Yellowstone and Grand Teton National Parks, and most of the killing will occur on national forest land. Our national park wolves will again be among the victims as they commonly roam across park boundaries to find food and family members during fall and winter. These government agencies need to respect my values and those of millions of other people wanting to see, enjoy, and protect Yellowstone's wolves. Please establish a safety zone for our wolves around our national state parks!

Final Comment	Haut, Lisa	Dridgenert CT	5/20/2017 12:52:00
	Haut, Lisa	Bridgeport, CT	PM

Thank you for not allowing trapping within the "trophy" zone. Wolves are incredibly important to the ecosystems of Wyoming, and add value to the Montana economy as our

national parks bring people outdoors to hear the cry of the wolf and catch a glimpse of these magnificent creatures in the wild. In order to adequately protect wolves, I urge you to create buffer zones bordering Yellowstone and Tetons National Parks. Also, please require quotas withing a hunting unit be reduced whenever a wolf is killed illegally. Poaching must not be tolerated. Please protect these wild creatures for future generations. Thank you.

Final Comment	Steege, Deanna	Washington, DC	5/30/2017 9:26:00 AM
NO HUNTING V	VOLVES!!!!!		
Final Comment	Defeo, Laura	Hobe Sound, FL	6/5/2017 2:29:00 AM

Hi, first I would like to thank you for this opportunity to give my comments. I have always believed that an extended boundary only makes sense. When the Wolves were reintroduced to YNP, they weren't given instructions to remain only within park boundaries. All of our wild animals know no boundaries. They go where food is available. The Wolf packs travel great distances to feed the pack what's required for their survival. It truly is my hope that the 30-31 mile boundaries are put into effect around not Yellowstone NP and Grand Tetons NP. Again, thank you so much for this consider.

Final Comment	Webb, Denise	Homesteed FI	6/11/2017 12:43:00
	webb, Demse	Homestead, FL	PM

As a citizen I am appalled that your state would allow the killing of wolves. This is a horrible practice, we should be protecting our wildlife instead of slaughtering them for trophies. I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Doll, Wendy	Lake Mary Seminole	5/4/2017 5:42:00
	Don, wendy	County, FL	AM

Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any

state to claim that wolves need to be managed is beyond absurd when there are less than 1700 Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

	-		
Final Comment	Shabbott, Mary	Punta gorda, FL	5/3/2017 10:35:00 PM
I oppose all hunti protections in ord	0	s are increasingly being kil	led. They need
Final Comment	Shabbott, Mary	Punta gorda, FL	5/31/2017 8:00:00 PM
Wolves who may shot by hunters th Wolf depredation	be used to the benign be second they cross an	areas are bordering nationa presence of humans and v n invisible boundary and or rrant a hunting season. We ock death losses.	ehicles in the park can be ut of protected areas.
Final Comment	Shabbott, Mary	Punta gords, FL	6/15/2017 5:19:00 PM
states and they we leave nature to take	ill disappear if hunted, ke of its own. There w	rotected. There are only 17 , trapped, etc. Please protect ill still be plenty of elk, de aving wolf hunting season.	et this special species and er, etc for hunting.
Final Comment	Norris, Sandy	Cedartpwn, GA	5/2/2017 12:10:00 PM
	umily are firmly agains	Cedartpwn, GA st any type of trophy huntir Wyoming would even hav	PM ng! I attended College in

I visit yellowstone national park annually. Spend money there. I expressly come to see the wolves. This is toi bad about the hunting of the wolves an grizzlies. If this continues i will not be back..to me if you losebeven one person's money..the state is losing money too..plz reconsider this hunting an kulling of our famous wolves

Final Comment	Sanders, Theresa	Flintstone, GA	5/3/2017 11:31:00
	Sanders, Theresa	Finitstone, GA	PM

Leave the wolves alone. Your st makes enough revenue off of tourists to line your pockets..leave the trophy hunting out of Wyoming. Stop the killing..protect them

Final Comment	Sanders, Theresa	Flintstone, GA	5/12/2017 11:27:00 AM
endangered speci	es list. Wolves won't h	opened up and they sho arm you unless they feel be something wrong with	like they are in danger. If
Final Comment	Ritch, Laura	Cedar rapids, IA	5/3/2017 8:02:00 PM
the purpose of ma ranchers and Wo systemMyself n	aking a few people hap If hating crowd that the ne and my family Visit .If the state goes ahead	pyThe State needs to n Wolf is a important par Yellowstone every Sum	t of the whole
Final Comment	Haugen, Randy	Decorah, IA	5/2/2017 11:42:00 AM

Wyoming gets Alot of tourist money, likely more than hunters and trappers. I would advise you to keep that in mind because if you have a open season no rules on Wolves you can kiss all of that money goodbye.

Final Comment	Hougon Dondy	Decorph IA	5/4/2017 10:23:00
	Haugen, Randy	Decorah, IA	AM

These proposed regulations will promote disruption of wolf family groups and likely result in further pressure on populations due to increased rancher resentment. Wyoming wildlife experts surely know that disruption of family groups causes more domestic animal predation. Why not go with the science and reduce conflict with ranchers? Aren't Wyoming Fish & Game Department personnel experts? Shouldn't they know this stuff? There should be a wide buffer around all national parks that prohibit "take" of wolves, bears, mountain lions, and all other species. Failure to protect these animals in boundary lands tarnishes Wyoming's reputation. One cannot underestimate the contempt most of us feel towards Wyoming hunters lying in wait just outside the park boundary or even luring carnivores out with gut piles and the corpses of bison, elk, and whatever other hapless creature steps across the invisible park boundary. These regulations allow "take" of young and of lactating females. What kind of person would engage in that? What kind of personnel would devise regulations that allow that? It is morally unacceptable and repugnant. The special allowances in hunt area 12 are especially heinous. A 7-1/2 month season that requires no license? This is indefensible. It is dangerous for wolves and for people

recreating in area 12. This cannot proceed. Lastly, I am dismayed that you promote "take" of an animal that is not eaten. Vibrant intact ecosystems require all species, and nature has no need for human "management." There is simply no excuse, and you are appeasing wolf killers at the expense of all the rest of us who actually value ecosystems that function and thrive.

Final Comment	Williams Damala	Doise ID	6/16/2017 10:19:00
	Williams, Pamela	boise, iD	AM

\*I am writing to express my concern as a tourist and through a tourist eyes. It is reported by some of your own agencies that tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. And I understand that hunting is a rich tradition to many of your residents, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wolf or grizzly in their natural habitat, inside the parks and I am afraid that if you allow hunting with high quotas in the twelve trophy game zones where wolves especially will be lured out of the park to be shot on site. Montana seen their wolf hunting season both ways, through the eyes of a tourist who come to Yellowstone and stay and spend money in the towns adjacent to the park, so they lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit .All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quotas and once met ---close them for the season because if you don't tourist from this country and the international countries will surely hear about how many wolves from the parks will be killed and act accordingly and that is not spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves which reside in the National Parks. Thank You, Theresa McLaughlin -from Idaho

Final Comment	McLaughlin,	Buhl, ID	5/4/2017 5:08:00
	Theresa		PM

Predator calls and night time hunting should be banned. Totally not a fair chase hunt. We need a buffer zone around Yellowstone and Tetons National Parks. I go to Yellowstone just to see the predators, you can see an elk or deer any where. The only place to really see these predators are in the parks, because they are killed massively every where else, so the predators that are left are always hiding from humans. Don't let these animals become extinct, between massive hunts and the amount of them that get poached, there numbers have diminished greatly.

Final Comment	McLaughlin,	Buhl, ID	5/31/2017 4:59:00
	Theresa	Duill, ID	AM

I travel to Wyoming because of the magnificent wildlife in Yellowstone and Grand Tetons National Parks and the wild areas around the parks. I urge you to create a buffer zone around the parks to protect those wolves who wander out from time to time. The killing of

an alpha female upsets the life of a pack and is inexcusable in this day. We reintroduced these animals and we must help protect them and not disrupt their lives. They are so important to the ecosystems of the area.

Final Comment	Christensen, Ann	Ketchum, ID	5/22/2017 5:18:00 PM
our human race b	-		DO GRAVE DANGER to the two sets to the two sets the two sets the two sets and the two sets the t
Final Comment	Nydegger, Nanci	Meridian, ID	5/4/2017 12:47:00 AM
predators there is		or power to STOP rod	ear future. Without these ents from infecting wild

Final Comment	Nydegger, Nanci	Meridian, ID	5/8/2017 3:53:00
	Nydegger, Maller	Meridian, ID	PM

I live in Jackson Hole 3 months a year. We have many family gatherings and corporate meetings as well as trips to YNP during that time. If Wyoming does not start treating their wildlife better we and other families that come up with us will not be able to return to Wyoming. Wolf depredation statistics do not warrant a hunting season. Weather, starvation, disease, poor husbandry etc contribute to the vast majority of livestock death losses. Wyoming total cattle/calves Jan 1, 2014 = 1,270,000 Wyoming losses, death, cattle/calves 2014 = 30,000 (2.36% of total) Wyoming verified wolf depredations 2014 = 49 (0.16% of losses) Wyoming total sheep/lambs Jan 1, 2014 = 355,000 Wyoming losses, death, sheep/lambs 2014 = 9,000 (2.54% of total) Wyoming verified wolf depredations 2014 = 6 (0.067% of losses) 2) Many of the Trophy Game Management Areas are bordering National Parks and Forests, including Yellowstone, Grand Teton, Shoshone, Targhee etc. This means that wolves, who may be more accustomed to the benign presence of humans and vehicles in the Park, can be shot by hunters the moment they cross that invisible boundary and out of protected areas, 3) Evidence shows that disruption of the wolf family unit can actually lead to an increase in livestock depredation, especially if one or both of the "Alpha" pair are killed. Loss of the Alpha female in particular can also have consequences on the survival of any pups, and, as the Alpha male will not mate with any of his offspring, the break up of the pack is almost certain. 4) It is known that some hunters appear to deliberately target Park wolves, especially those wearing radio collars. Any loss of these wolves not only impacts the remainder of their pack, but also the scientific study of the Park biologists. The wearing of an electronic radio tracking device should NOT place an additional target on the individual wolf. 5) While the decrease in quota numbers for three of the Management Areas (1,2,&3) is welcome, the increased quota in four Management Areas (4,8,11,&12) is unnecessary. 6) Wildlife tourism is a massive source of income for the Wyoming economy. Wolves are among the top animals listed whenever

tourists are asked what animal they would most like to see. The previous wolf hunts of 2012 and 2013 had a huge negative effect on that income. Read this article for a first hand insight into this effect on local businesses and economies: http://bit.ly/2pe7KUA

Final Comment	Sutz, Eileen	Chicago, IL	6/19/2017 6:01:00 PM

PLEASE STOP MURDERING OUR WILDLIFE! My husband and I canceled our dream vacation of 2016 to Alaska, because Alaska is murdering their wildlife. Not only will Alaska lose money because of decreased tourism, they will also end up with an ecosystem that is unhealthy, resulting in the death of even more wildlife. As a lifelong citizen of the United States, I demand that the MURDERING and abuse of our wildlife be stopped immediately. In addition, I request that The Indian Trust and The Public Trust to work protecting our sacred wildlife. In addition, I demand that a minimum of 50km Sacred Resource Protection Safety Zone around ALL National Parks, to give OUR wildlife a "safe zone" should they accidentally Rome outside of the border of our parks. In God We Trust, Jayne Looper

Final Comment	Looper, Jayne	Godfrey, IL	5/11/2017 10:24:00
	Looper, sugne		AM

Wolves are a sacred species to your Indian trustee, to the Public trustees, and to the environment as well. Hunting wolf packs fracture and destabilize their families, making them more likely to attack livestock as they do not know how to hunt properly, and may act erratically than wolves left in peace. Nature manages itself with the wolf, but man cannot repeat that process through completely random killings, becoming counterintuitive to the wellbeing of the land, as well as to cattle that are nearby. Wolves are in small numbers there, and as such, being family animals, suffer significantly when many wolves are killed. They are not the same as herd animals, or solitary animals; they are similar to that of people. Nonetheless, they are a "resource" of the Federal government and the public', and it is far too easy to cross outside of Yellowstone as borders have no meaning to them. Wolves have benefited Yellowstone massively, and should they be killed outside Yellowstone, there will be less wolves in the area, and Yellowstone as a whole will suffer, in fauna and flora, and geographic. Wolves are not enemies, they need not be persecuted. They are not the real harm to cattle; the harm is in consequence of breaking their families apart, caused by humans. There can be a coexistence, and it can benefit the state of Wyoming more than the people may think, despite prejudices and fear. Let not selfish interests or fear run how the wild is cared for, nor personal interests for self gain be abused; let education be, and nature exist as it should be. There can be compromises, but this is not the way. Please rethink this, and take into account of the whole land and life, as well as the people. Wolves are essential in an environment, doing more work than humans could achieve, and their care is to be managed by all trustees, the federal, public, and Native Americans, not just on the state.

Avila Takeru Hoffman Estates II.	Final Comment	Avila, Takeru	Hoffman Estates, IL	5/4/2017 7:10:0 PN
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I am writing on behalf of the wolf. I am asking for a buffer zone of no hunting be set up around Yellowstone National Park and that collared wolves not be allowed to be shot. Much harm comes when the packs that live for a he most part in YNP are allowed to be hunted. For several reasons: packs that lose there elders are more apt to prey on livestock, monies spent on research thru collaring is wasted, packs from YNP may not be as scared of man and need a protection area outside of the park. I may not live in Wyoming, but I have spent thousands and thousands of dollars there over the last decade going to YNP, and bring revenue into your state. Wolves on the landscape have made the environment better and improved the tropic cascade. A compromise needs to be met. Thank you

Final Comment	Lucasey, Patty	Loami, IL	5/4/2017 5:57:00 PM
national park wo	lves will again be amond food and family men	ting of our wolves for "fun ong the victims as they con mbers during fall and wint	nmonly roam across park
Final Comment	Keim, Lisa	Oak Lawn, IL	5/18/2017 4:02:00 PM
are TOURISTS	We have a trip planned	s and photographers. Most to Wyoming this summer	2
dollars camping, DEAD ONES	travening, cating and i	loping to see whenle, esp	ecially WOLVES. NOT

Please stop Wyoming wolf hunts until an accurate count Of Wolves and science can be used

Final Comment	Burris, Connie	Springfield II	5/2/2017 3:19:00
	Buills, Comme	Springfield, IL	PM

Here is the Comment We Just Submitted, use it, edit it Use Protect The Wolves<sup>TM</sup> as your Organization if you Choose. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have

not been allowed for the public, what makes it different for Wyoming??

Final Comment	Burris , Connie	Springfield, IL	5/2/2017 3:29:00 PM
			1 111

I am emailing to express my concern as a tourist and through a tourist eyes. It is reported by some of your own agencies that tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. And I understand that hunting is a rich tradition to many of your residents, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wolf or grizzly in their natural habitat, inside the parks and I am afraid that if you allow hunting with high quotas in the twelve trophy game zones where wolves especially will be lured out of the park to be shot on site. Montana seen their wolf hunting season both ways, through the eyes of a tourist who come to Yellowstone and stay and spend money in the towns adjacent to the park, so they lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit --- and it worked, me and My husband will be staying in silver gate. All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quotas and once met ---close them for the season because if you don't tourist from this country and the international countries will surely hear about how many wolves from the parks will be killed and act accordingly and that is not spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves which reside in the National Parks. Thank you Connie Burris, Illinois

Final Comment	Burris, Connie	Springfield, IL	5/3/2017 8:25:00 PM
			L INI

5/8/2017 I am writing to express long my concerns as a tourist and through a tourist eyes. It is reported by some of your own agencies that tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. And I understand that hunting is a rich tradition to many of your residents, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wolf or grizzly in their natural habitat, inside the parks and I am afraid that if you allow hunting with high quotas in the twelve trophy game zones where wolves especially will be lured out of the park to be shot on site. Montana seen their wolf hunting season both ways through the eyes of a tourist who come to Yellowstone and stays and spends money in the towns adjacent to the park, so they lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit --- and it worked, my husband and I will be staying in silver gate for a week. All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quotas and once met close them for the season because if you don't tourist from this country and the international countries will surely hear about how many wolves from the parks will be killed and act accordingly and that is not

spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves which reside in the Park. Thank you Connie Burris/ Illinois

Final Comment	Burris, Connie	Springfield, IL	5/8/2017 8:04:00 PM
your Dispicable to park boundario for these wolves No longer visit y	Outrageous proposal to es!!! Park wolves will a around the National Pa	Huntington and trap Y again be victims! There urk. If this goes through y of my money in your	others are OUTRAGED of Yellowstone Wolves right up MUST be A Safety Zone I will BOYCOTT and will State! PROTECT PARK
Final Comment	Burris , Connie	Springfield , IL	5/10/2017 7:11:00 PM
-		ection Zone / manage on the contract of the co	our federal resources in the Connie Burris
Final Comment	Burris , Connie	Springfield , IL	5/12/2017 8:40:00 AM
Hole for an exter provide that are I is the wolf, bear these creatures for by wolves. But, w	nded period of time. I we No Where else in this re and other animals that for any reason. Yes, I re	vas astounded by the re narvelous nation of our these parks provide. I d ad the paper and the ran	opportunity to visit Jackson source the National Parks s. Part of the unique aspect to not support poisoning of nchers cattle being attacked ane and civil manner. Thank
Final Comment	Myers, Vickie	Attica, IN	5/4/2017 11:08:00 AM

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not been allowed for the public, what makes it different for Wyoming??

Final Comment	Austin, Gary	Evansville, IN	5/4/2017 5:49:00 PM

I do not believe in trophy hunting. It should be outlawed. We are messing with an ecosystem that is complete. Managing this eco-system is God's right.

Final Comment	Voma Ioni	Muncia IN	5/10/2017 7:41:00
	Karns, Jeri	Muncie, IN	AM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Davis, Edwin	Summer Shade, KY	5/4/2017 10:52:00
	Davis, Edwill	Summer Shaue, KI	AM

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Final Comment	Durant, Susan	Summer Shade, KY	5/4/2017 10:57:00 AM
50km Sacred Res	ource Protection Safe	ety Zone	
Final Comment	Davis, Edwin	Summer Shade, KY	6/5/2017 4:19:00 AM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Durant, Susan	Summer Shade, KY	6/10/2017 5:52:00 AM
Stop killing wolves	s! The ecosystem nee	ds them!	
Final Comment	D, Carol	Boston, MA	6/15/2017 6:31:00 PM

Wolf hunting is a grizzly morbid unnecessary wanton waste activity that most independent researchers acknowledge probable creates more problems than not. I find it horrifying to think of these intelligent sentient pack and family oriented animals being teated like numbers where many families will be broken apart because some trophy hunter wants to kill a wolf. We can do better than this. The Yellowstone wolves have no fear and are sitting ducks as are the Wyoming wolves coming off protection. What a sin to protect something and then as soon as tit looses protection set about reaching the population. You neglect to mention in your proposal that wolves are generally self limiting in their populations. If dispersal is not possible they manage their own numbers. The MN wolf population remained at 3000 for many years without humans needing to trophy hunt. Its too bad the western states have such a bloodthirsty heartless approach to "managing" wolves. I'm sickened thinking of the slaughter awaiting these animals.

Final Comment	Kane, Louise	Eastham, MA	5/5/2017 2:30:00
	Kalle, Louise	Eastnam, MA	PM

Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!!

You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Guerra, Julie	Northampton, MA	5/3/2017 7:51:00 PM
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"We made great progress with the reintroduction in the 90s but this is a real regression; and it's a scary time for all wildlife, especially wolves. I was interviewing a woman last week from Defenders of Wildlife, and she was distraught. She said that in Wyoming, which has just lifted protections for wolves, a man called her to brag that he had gotten on his snowmobile, chased a wild wolf for 30 miles, until the wolf collapsed from exhaustion, and then he shot her." - http://news.nationalgeographic.com/2017/06/wolf-nation-brenda-peterson-wolves/ That hell you republicans so earnestly believe in, there's a special place there reserved for you and people like this. Fuck you and your "wildlife management."

Final Comment	Haughey, Marie	Parkville, MD	6/12/2017 5:52:00 AM

Kindly : re-consider the significance of Wolves and their unique contribution to US All and find ways to co-exist. Thank You ever so ...

Final Comment	Bullock, Norvie	Northeast Harbor, ME	6/19/2017 12:35:00
	Dunock, Norvie	Northeast Harbor, ME	PM

Gray wolves are an important American icon and a part of our history. They represent the wilderness and all it's beauty and glory. Wyoming is unique in that people travel from all over the county to see wolves in their natural habitat. Tourism elevates the economy and provides jobs. Wyoming should protect wolves as they have been a natural resource since they're reintroduction. People will not want to visit Wyoming if the wolf population decreases. To some folks wolves are just another animal and okay to hunt. To others who provide economic dollars to Wyoming, wolves are the reason they travel to the state. When hunting is allowed, wolf populations decrease and packs become discombobulated. This has been found to increase incidents with livestock because there is no longer continuity or a natural organization of the pack. Yellowstone is a huge draw for tourism. There must be a buffer zone around the park in which wolves cannot be killed. It is not humane to orca fair hunt when wolves acclimated to people step foot over an invisible border and can be shot dead. Wolves were once on the verge of extinction. They were reintroduced to that park and the state of Wyoming is entrusted with their fate. Protect these creatures of the wilderness who were here long before the European settlers. It is the right and moral action to take. Wyoming is shooting themselves in the foot if actions are not taken to allow wolves to survive and thrive. When tourists stop coming Wyoming will only have itself to blame.

Final CommentHenckel, KarolClinton Township , MI6/19/2017 10:3	AM
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Please make sure your quotas are high enough so we can continue to hunt elk in your beautiful state. I have hunted in your state since 1986 when wolves were not even mentioned and now it is always a topic of discussion. A few wolves are probably okay but I wouldn't care if it was VERY FEW. Elk are much more important to the economy out there than wolves and we would love to be able to keep hunting Elk in your state. Thanks for all you do and keep up the good work!

Final Comment	Winkel, Philip	Drummond Island, MI	5/5/2017 10:26:00 AM
people in the US	and a major percentag	eds the value of a dead one the ge would pay to witness their h your income instead of blindl	ife far exceeding the

ask there is vast money to be made through tours and wildlife quit living in the 1800

Final Comment	Mier, RR	Muskegon , MI	5/29/2017 8:43:00 AM
Request putting	a 50km Sacred Res	ource Protection Safety Zone	
Final Comment	Mier, RR	Muskegon , MI	6/4/2017 9:49:00 PM

So I guess I don't get it. I just don't understand why it is okay for anyone to hunt the wolf population in your state? Yellowstone was an eye opener I think to all of us when they brought wolves back into the park, the environment flourished, the natural balance was restored in ways we had no idea it needed to be. But I am betting this isn't about all of that is it? You are proposing to let people hunt wolves because of the money that lines your pocket from big business ranchers and other that have livestock that wolves have taken down. This is my take on it, the wolf did not move into our territory, your ranchers and others moved into theirs and made the decision that the business they wanted to start was in livestock, did you get that they (the ranchers) moved into WOLF COUNTRY and made the CHOICE to raise livestock in what should be considered a less than ideal environment for doing so. I would hope that all these people took into consideration the pros and cons of the location of their business and DECIDED TO TAKE THE CHANCE OF RAISING LIVESTOCK IN WOLF COUNTRY. Period, that is it, they moved into a part of this country that is home to wolf packs and now they are crying WOLF. Please... every time a cow or sheep or anything else is lost they claim it on their insurance and get paid for their loss. I suppose my little rant will not sway a vote or even be heard, I just hate that money is how decisions are made, not what is best for wildlife and the rest of us. What a sad place the US has become, God bless you

Final Comment	Otis, Vickie	Quincy, MI	6/19/2017 9:19:00 AM
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The National Wolfwatcher Coalition is an all-volunteer, nonprofit organization dedicated to promoting positive attitudes about wolves through education. Nationwide, we have over 800,000 followers, representing not only Wyoming residents but thousands of others who contribute to the state's tourism economy, specifically travelling to Wyoming in the hope of catching a glimpse of a wild wolf. The National Wolfwatcher Coalition does not support the quota of 44 wolves within the Wolf Trophy Game Management Area (TGMA). While some will consider this quota "conservative", we believe it is unreasonable for the following reasons: • Wolves can be hunted and trapped any time as a predatory animal in most of the state. • Within the TGMA any wolf in the act of damaging livestock can be killed by the owner or any other person charged by the owner with the care of the livestock or dog. • Aerial gunning of wolves inside the TGMA is allowed to control livestock depredations, to achieve ungulate management objectives if wolves are determined to be a significant cause for not meeting those objectives, or to address human safety issues. • Past experience has shown that the quota was exceeded outside the Park boundaries (2012 exceeded by 1 wolf in WHA 8 - Fish Creek wolf hunt area outside Tetons & 2013 exceeded by 1 in WHA 2 - Sunlight wolf hunt area outside YNP) • Yellowstone Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves and in a recent Park survey, the number one animal visitors hope to see is the wolf. When a Park wolf is killed legally or illegally, it creates world-wide outrage and reflects poorly on the state. At a minimum, there should be large buffer zones, closed to wolf hunting, around our National Parks. • We further recommend that the quota be reduced for every wolf killed illegally within that hunting unit. For example, if the quota is two, but two wolves were killed illegally any time during that year, the quota is zero for that unit for that year. If another wolf is later killed, it is applied to the following year quota. This would send a strong message that poaching will not be tolerated. • Our National Parks provide an economic benefit to local gateway communities (defined as 60-mile radius around each park boundary). In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons it was \$779 million). Wyoming already has extremely liberal wolf management regulations. There is no scientific reason to hunt wolves within the TGMA. The North American Wildlife Conservation Model states that wildlife is held in the public trust to be managed for all and does not support the casual killing of wildlife. Hatred is not a valid reason. Washington State University researchers have found that it is counterproductive to kill wolves to keep them from preying on livestock. Research also suggests that hunting wolves does not increase tolerance or reduce poaching. In one study, it was found that poaching increased, suggesting that liberalizing wolf culling may have sent a negative message about the value of wolves or that poaching prohibitions would not be enforced. Another study showed that hunters of wolves showed little inclination to conserve wolves. We believe Wyoming Fish & Game should do more to educate the public, including hunters, about the positive aspects of wolves. For example, there is strong evidence that wolf predation could markedly decrease prevalence of CWD. Wolves facilitate the recovery of browse-sensitive understory herbs and forest regeneration. Longterm trophic linkages have been identified in the Northern Range of Yellowstone National Park between wolves, elk, and deciduous tree species — aspen and cottonwood. Just because we can kill wolves; doesn't mean we should. We now have fewer wolves in Yellowstone National Park than we did 15 years ago. Politically based management does little to protect the ecological benefits of wolves and does not increase tolerance. In

summary, we ask for buffer zones adjacent to the National Parks, where there is no wolf hunting and greatly reduce the quotas elsewhere within the TGMA. Any wolf killed illegally should be deducted from the quota for that unit, thus sending the message that Wyoming truly cares about wildlife. Thank you for the opportunity to comment.

Final Comment	Warman Nanay	Duluth MN	5/25/2017 11:05:00
	Warren, Nancy	Duluth, MN	AM

Re: Proposed Wyoming Hunting Regulations for Gray Wolves Designated as Trophy Game Animals (SWAP Chapter 47, Section 4). The new Wyoming wolf-taking regulations--both in and outside of the Wolf Trophy Game Management Area and Seasonal Wolf Trophy Game Management Area--will have a negative effect on the status of the state of Wyoming as a steward of wild places and wildlife. It will have dampening effect on tourism. The national and worldwide population that identifies outside of the ranching industry, fur trade, and trophy-hunting industry is a large and growing voting group and economic force. Although it's natural for those who identify inside of these industries to hold onto their points of view regarding the conservation (or extermination) of natural predator/prey systems, the times are changing, and there's a need for the state of Wyoming to change with them. Although it's possible to ignore this need, it still remains, and its costs will continue to accrue to the people of Wyoming, the U.S., and the world. Sincerely, Scott Slocum

Final Comment	Slocum, Scott	White Bear Lake, MN	5/22/2017 9:27:00 AM
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Please protect the gray wolves living in your state. They may live in Wyoming, but they belong to the entire USA! Many tourists travel to your state, and to Yellowstone National Park in particular, with the hope of seeing a gray wolf in the wild. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. However, if hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway. Gray wolves are very much like humans in that they live in family oriented packs. If a pack is subjected to hunting, the pack becomes destabilized, which can lead to increases in livestock depredation. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. In addition, wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone.

Final Comment	Frank, Deb	Dittmer, MO	6/16/2017 9:18:00
	Frank, Deb	Dittiller, MO	AM

We do not support the wolf hunt. We believe that these top predators are essential to the ecosystems that they inhabit. And much more useful for non lethal tourists than brutal and often unethical hunters. Wolves belong on the Endangered Species list not offered for abuse by hunters.

Final Comment	Brunner, Linda and	Stockton, MO	5/29/2017 3:25:00
	Neil	Stockton, MO	PM

I would like to comment on the 2017 wolf hunting seasons, quotas and boundaries that are proposed for adjacent lands around Yellowstone National Park. I currently live in Bozeman, Montana and I have been to Yellowstone National Park and Grand Teton National Park many times before I moved to this special place. But of all the times I have visited these park lands, my wife and I have only seen one wolf once. It was a special moment as it was our only moment. I would love to have more experiences like that in the future. I strongly feel that the onslaught of government agencies trying to curtail the movement and population of wolves will be detrimental to the species and to chances of the public to share that same experience. Simply put, we need buffer zones bordering our Parks where no wolf hunting is permitted. I strongly urge Wyoming Game and Fish to establish a buffer zone bordering Yellowstone National Park and Grand Teton National Park. I have urged Montana Fish & Game to establish a buffer zone bordering Yellowstone and Glacier National Parks as well. I recommend that guotas be established and reduced within a hunting unit whenever a wolf is illegally killed. This will send the message that poaching will not be tolerated. Wolves also have an economic impact on local communities. From what I understand Yellowstone National Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves. I know that thousands of people come to the park just to experience and see wolves. It is also widely known that our National Parks provide an economic benefit to local gateway communities. In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons \$779 million & Glacier \$270 million). Without buffer zones around the park, there will be and have been attempts to kill wolves up to the park boundary. Yet, wolves can be hunted up to the Park boundary and lured out of the Parks with predator calls. This must not be allowed to happen. There needs to be wolf management science applied to these wildlands and to the population of this iconic species. Thank you for listening to my comments.

Final Comment	Nagel, Clinton	Bozeman, MT	5/29/2017 10:25:00
	Mager, Chinton	Dozeman, WH	PM

I am against Wolf Trophy Hunts for the following reasons; 1. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. 2. Predators are self-regulating and do not require hunting to manage their populations. 3. If hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway. 4. Wolves should not be listed as a predator anywhere in the state. Animals designated as predator are treated horrifically and can be killed in any manner. To allow a recovered endangered species to be treated this way is irresponsible and reckless. 5. The killing of 44 wolves only satisfies the hunter "opportunity" without reducing livestock

conflicts. Human-caused mortalities and control action would be sufficient. 6. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. 7. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. 8. Wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone. Please feel free to contact me if you have any questions Jackie Mathews

Final Comment	Mathews, Jackie	Cameron, MT	6/19/2017 3:43:00
	Mathews, Jackie		PM

Dear Wyoming Fish & Game, We thank you for the opportunity to comment on your proposed wolf hunt for 2017. Based in Gardiner, Montana, Bear Creek Council is an allvolunteer, grassroots advocacy organization. We organize around issues that affect our quality of life on the doorstep of Yellowstone Park. We have seen firsthand how wolves are essential to our local economy, but also to Wyoming and Montana's larger tourism industry. Wildlife watching tourism is now one of the top economic drivers in the Yellowstone region. Also, wolf studies in the park provide some of the world's most valued research on predator-prey relationships and wolf biology. For these reasons, we believe the wolf packs of northern Yellowstone are very unique, require special protection, and so we urge the state to be very conservative with setting wolf harvest near the border of the park. Bear Creek Council believes that native wildlife, like wolves, are intrinsically valuable and worth preserving not just for their value to people or for "use." Wolves provide both ecological benefit to their environment, and spiritual benefit to some people of Wyoming and neighboring areas, such as where we live in Gardiner. We do respect the rights of people to hunt wolves (there is more than adequate opportunities for that throughout Wyoming), or to protect their animals from wolves. We prefer that there is no harvest along the eastern border of Yellowstone Park. Specifically, we are concerned about harvest in Clark's Fork (Area 1), Sunlight (Area 2), and Absaroka (Area 3) where wolves that generally reside in northern Yellowstone will occasionally wander. We would like to see the quotas in each of these districts reduced to the greatest extent possible, again, to protect the special packs of northern Yellowstone. In December of 2012, a number of wolves were taken in the Wyoming hunt that were leadership members of the Lamar Canyon pack, which normally reside in the Lamar Valley, a world-renowned destination for wildlife. The incident drew widespread local and international criticism and calls for boycotting the tourism industry in Wyoming. At the same time, the loss of these key individuals caused a series of events that led to further wolf deaths and ultimately to poor wolf sightings in the park. The final result was a significant down-turn in the area's wildlife watching industry. Since 2012, the cessation of hunting in Wyoming (by federal law), and the reduction of quotas in adjacent areas of Montana (through advocacy efforts), have allowed the industry to build back to prosperity. We would hate to see a repeat of this incident; therefore, we urge the state to reduce quotas in these areas where harvest of just one individual wolf could impact our economy. Please consider our request and our positions as stakeholders in the management of wildlife that affects many people in many

ways throughout the region. Respectfully submitted, Nathan Varley, PhD President, Bear Creek Council Box 440 Gardiner MT 59030

Final Comment	Varley, Nathan	Gardiner, MT	6/18/2017 5:34:00 PM
ecological crimir government coul	ality. Only a deeply ig d even consider such a	gnorant, wholly uneth horrific effort towar	Ficent species, and an act of hical, and totally sold-out rd extermination of a species so to America. Paul Edwards
Final Comment	edwards, paul	helena, MT	5/7/2017 11:02:00 AM

I would ask that Wyoming consider a buffer zone on the lands surrounding Yellowstone Park. Targeting and killing Park wolves is, if nothing else, very bad visitor policy. I know that in Montana, visitors to the Park are outraged when they hear a wolf they have viewed in the Park has been killed by a hunter. More importantly, killing Park wolves disrupts the studies being done on these valuable animals. Wyoming now has what it has wanted for a long time. Wolf hunting and outright wolf killing. Give those who love the wolves and enjoy watching and studying them this one thing. Thank you.

Final Comment	Shepherd,	Sheridan, MT	5/5/2017 8:21:00
	Katherine	Sheridan, WT	AM

I do not support a wolf trophy hunting season in Wyoming. Many of Yellowstones wolves leave the park and enter Wyoming. 95+% of those wolves never get in any kind of trouble with livestock. Why kill innocent wolves that do no wrong. This will only cause problems for ranchers when wolf packs are destroyed for no reason. The loss of livestock will be Wyoming's fault and not the wolves. There is no exact count of wolves in Wyoming. Ranchers lie on the numbers of wolves they report. The only good thing is it will lead to wolves being relisted to the ESA and Wyoming will lose all control. Wolves are a major tourist attraction for Wyoming's economy. Why destroy that. Wyoming is already having economic issues. In fact it's population is dropping. People are leaving. I would think you would want to draw people to the state and not drive them away. I can tell you there will be many hunters who will kill every wolf they see and Wyoming will end up paying for this big mistake. I support no trophy hunting of wolves in Wyoming!!

Final Comment	Golba Carolyn	West Yellowstone, MT	6/18/2017
	Golba, Carolyn	west Tenowstone, MT	10:45:00 PM

I am strongly against this, we are just now making a come back for our wolf population, we also are still learning from them, how they change eco systems, change rivers, and are amazing wonderful creatures they are not vermin at all. Stop ranchers from swaying you people to exterminate our wolfs. Thank You Mrs. Kirouac

Final Comment	Kirouac, Tracy	Otto, NC	5/4/2017 12:16:00 PM
THIS IS SO WR MINE???WE HA	ONG ON SO MNY LE AVE FAMILYS! SOCI	EVELS WE! HAVE T AL LIVES? WE MTH	PROTECTED ANIMALS? HERE VOICE! She HER E FOR LIFE! WE CHANGE SENTIAL !!!thank you the
WOLF???????			5
Final Comment	Kirouac, Tracy	Otto, NC	5/20/2017 8:08:00

I'm writing in regards to the wolves being hunted in your beautiful state. I'm just concerned that wolves will be hunted so frequently that we may end up killing them all off. When I do my traveling I like to witness the wilderness if possible. I'm just concerned they may be killed off. Please don't ever let that happen to this beautiful animal. It would be a sad matter to discover. Thank you for your time. Sincerely, Jenny Zimney

Final Comment	Zimney, Jenny	Jamestown, ND	5/7/2017 1:24:00 AM
Love Wyoming a	& hunting Wyoming . 1	the wolf populations need	to be controlled

Final Comment	sittra hah	Butte, NE	5/19/2017 11:39:00
	sittre, bob	Dulle, NE	AM

I have spent much time dedicated to fighting for wolves and am totally adverse to them being hunted into extinction. They are greatly persecuted and propagandered by wolf haters and hunters alike and those whom are ignorant of their true nature and those whom use superstition to scare monger and turn people against them . This all has to end less they become extinct , in which case there will be a serious breakdown in the echo system pertaining to all life. It will be a major disaster, to us all as we are all linked like it or not in the circle of life. Then there is tourism to Yellowstone National Park. It creates \$638.6 Million in Economic Benefits. If the wolves become less visible, that could diminish the steady flow of tourism dollars, given that wolf watching in Yellowstone alone is estimated to generate \$35 million a year for the regional economy. Killing wolves as they cross that invisible line from Yellowstone will cause the state of Wyoming to cut its own throat. People from all over the world LOVE wolves and spend their money in Yellowstone and the surrounding areas. If you all want the wolves dead...then your economy dies with them.

Final Comment	Bear, Valerie	Meadow Grove, NE	5/3/2017 11:04:00
	Deal, Valene	Meadow Glove, NE	PM

PM

Tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. I understand that hunting is a rich tradition to many of your residents, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wild wolf or grizzly in their natural habitat, inside the parks. If you allow hunting with high quotas in the twelve trophy game zones where wolves especially, will be lured out of the park to be shot on site, you will be cutting your own throat. Montana saw their wolf hunting season both ways... through the eyes of a tourist who came to Yellowstone to stay and spend money in the towns adjacent to the park... so Montana lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit --- and it worked! All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quotas and once met ---close them for the season because if you don't tourist from this country and the international countries, who will surely hear about how many wolves from the parks will be killed and act accordingly... which is not spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves which reside in the National Parks.

Final Comment	Bear, Valerie	Meadow Grove, NE	5/10/2017 6:21:00
	Deal, Valene	Meadow Glove, INE	AM

I have spent much time dedicated to fighting for wolves and am totally adverse to them being hunted into extinction. They are greatly persecuted and propagandered by wolf haters and hunters alike and those whom are ignorant of their true nature and those whom use superstition to scare monger and turn people against them . This all has to end less they become extinct , in which case there will be a serious breakdown in the echo system pertaining to all life. It will be a major disaster, to us all as we are all linked like it or not in the circle of life. Then there is tourism to Yellowstone National Park. It creates \$638.6 Million in Economic Benefits. If the wolves become less visible, that could diminish the steady flow of tourism dollars, given that wolf watching in Yellowstone alone is estimated to generate \$35 million a year for the regional economy. Killing wolves as they cross that invisible line from Yellowstone will cause the state of Wyoming to cut its own throat. People from all over the world LOVE wolves and spend their money in Yellowstone and the surrounding areas. If you all want the wolves dead...then your economy dies with them.

Final Comment	Bear, Valerie	Meadow Grove, NE	5/12/2017 12:38:00 PM
I vacation in Wyo	oming purposely to se	ee nature, especially wolves.	Stop killing them!!

Final Comment	Nebel, Bob	Omaha, NE	5/29/2017 10:28:00
	INEUEI, DOU		AM

I visit yellowstone and WY yearly to enjoy the amazing beauty of the wild land, including the wild wonderful creatures that inhabit the Yellowstone area. Wolves (and Grizzly) should have a safe boundary outside of the park. These migratory animals do not know "safe zones" and should not be shot at will. Please think about eliminating the hunting for a large area outside of the park boundaries. Now that WY has carte-blanch to do as it will with the wolves, and I know many are just itching to kill them, WY also has a responsibility to protect them so that all may enjoy them, Thank you!

Final Comment Meade, Maggie	Derry, NH	5/22/2017 2:47:00 PM
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Please do not call wolf's predators. Like every other creature big or small they all have their role to play in our world. There are so many points I could argue but would you listen? Every year we fight for lives of our animals mostly we lose - meaning they die. Hung on someone's wall or standing tall so they can brag about what a great hunter they are. Aren't you getting tired of it? There are so many evil people in our world that influence others by using the terms it's our rights. Yeah, yeah, yeah... but until our Lord judges you you had better be careful. How about we take this up again next year? Give them a reprieve. No harm, no foul. Thank you for your time, Cathy A. Kocienda

Final Comment	Kocienda, Cathy	Hackensack, NJ	6/19/2017 1:43:00
	Rociellua, Cally	Hackellsack, INJ	PM

These hunting quite simply put are barbaric. We are a civilized people. Just because people love to kill doesnt mean we have the right too . As a comission you should be able to understand there are measures in place to keep wolves from contact with livestock and ranchers. If hubting does go forward there should be very specific rules in place such as no pup calls . no baiting , no den infringement, no luring. The pack needs alphas to survive. I personally value the beauty of nature and do not believe in killing for sport. As I could almost guess, each of the commissioners owns a dog. Think about where that dog came from. Please dont force another species to go extinct. You've seen the benefits in Yellowstone. You have the ability to make the same progress for the environment. Its your children too and their children thank you

Final Comment	Palmer, Mike	Howell, NJ	6/16/2017 10:05:00
			AM

Wolves are vital to our ecosystem. Elimination of wolves throws the balance of nature off, allowing animals to thrive that should not. It causes over grazing of forest areas and meadows which in turn restricts the bird population and pollination of flowers. Killing wolves is unnecessary given the fact that they are apex predators and are nearing extinction.

Final Comment	Crespin, Niccie	Corrales, NM	5/3/2017 9:43:00
			PM

Wyoming should be exalting its wildlife, not holding open season on it. The science is solidly against killing wolves. Do the right thing and turn down this proposal.

Final Comment	Stradley, Lloyd	Reno, NV	6/15/2017 2:45:00
	Stradicy, Lloyd		PM

To whom it may concern, I would like to share some points on why I believe it is not in our best interest to hunt the Gray Wolf in Wyoming. 1. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. 2. Predators are self-regulating and do not require hunting to manage their populations. 3. If hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway. 4. Wolves should not be listed as a predator anywhere in the state. Animals designated as predator are treated horrifically and can be killed in any manner. To allow a recovered endangered species to be treated this way is irresponsible and reckless. 5. The killing of 44 wolves only satisfies the hunter "opportunity" without reducing livestock conflicts. Human-caused mortalities and control action would be sufficient. 6. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. 7. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. 8. Wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone. Thank you for your consideration and time. -William O'Brien

Final Comment	O'Brien, William	Reno, NV	6/16/2017 10:26:00
			AM

I would appreciate knowing why animals collared with electronic tracking devices are allowed to be killed. Is this equipment paid for by taxpayers? It seems that whatever information is collected has very little value to your agency because it is perfectly legal to shoot a collared animal as long as the hunter complies with the request that the collar/equipment be returned to WGFD. Why is this not prohibited with wolves and other species? Photos I've seen of collared wolves are very evident. It would seem that anyone who can't see a collar should not be pulling a trigger or releasing an arrow. Thank you for reading and please respond to our concerns at your earliest convenience.

Final Comment	Clark, Gail	Fredonia, NY	6/19/2017 8:38:00
			PM

Many of the Trophy Game Management Areas are bordering National Parks and Forests, including Yellowstone, Grand Teton, Shoshone, Targhee etc. This means that wolves, who may be more accustomed to the benign presence of humans and vehicles in the Park, can be shot by hunters the moment they cross that invisible boundary and out of protected areas. We have already experienced great loss with an Alpha wolf shot. People come to this

area to view wolves not to find dead bodies while hiking. Bears and Wolves bring a great value to Wyoming tourism Why would you shoot yourself in the foot by killing them?

Final Comment	deech, carol	hawthorne, NY	6/15/2017 9:52:00 AM
management pla is not a good ide has already prov bordering YNP	n of Grey WOLVESI a to manage WOLVES ed to be untrust worthy	or any other wildlife for as wildlife manager's. Pl otected I don't want any o	nmentState management that matter!! As Wyoming us with Wyoming
Final Comment	Butler, Carol	New York, NY	5/4/2017 1:11:00 PM
		, for any reason murder o erve their lives without h	
Final Comment	Rising, Christine	New York, NY	6/9/2017 6:54:00

Within Wyoming's "Predator" zone (which is most of the state) any wolf can be hunted or trapped any time of the year. No license is needed. Wyoming Fish and Game has proposed a quota of 44 wolves to be killed within the "Trophy" zone. No trapping is being proposed. No baiting is allowed, however, gut piles & parts of game left from hunters are not considered "bait". Predator calls are allowed. We need buffer zones bordering our Parks where no wolf hunting is permitted. Please establish a buffer zone bordering Yellowstone and the Tetons National Parks. I thank you for not allowing trapping within the "trophy" zone. I request that quotas within a hunting unit be reduced whenever a wolf is killed illegally. This sends the message that poaching will not be tolerated. Yellowstone Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves. Our National Parks provide an economic benefit to local gateway communities (defined as 60-mile radius around each park boundary). In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons \$779 million & Glacier \$270 million). Yet, wolves can be hunted up to the Park boundary and lured out of the Parks with predator calls. I ask you to take my comment into account and vote in favor of wolves. Thank you.

Final Comment	Cusiban Andrea	Sahanaatada, NV	5/29/2017 10:26:00
	Sreiber, Andrea	Schenectady, NY	AM

We are dealing with an animal that has a social network not unlike ours. I realize this is a hunting state but we are not natural predators. Hunting is not the same as natural selection and raw nature. You are taking out brothers and sisters, mothers and fathers, aunts and uncles. This has been proven. Allowing the massacre of wolf families because you all feel they need controlled, managed and that they are vermin is no different than what Hitler did

AM

to the Jews or what Christians suffered during the Roman games. You are instilling your beliefs and prejudice on another being all while using a brutal albeit simple way rather than looking for a complex way to coexist with a complex animal. I implore you to reconsider. Be better than this,

Final Comment Costello-Lettau, Michele	Lake Milton, OH	6/19/2017 10:16:00 AM
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I am writing to express my concern as a tourist and through a tourist eyes. It is reported by some of your own agencies that tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. And I understand that hunting is a rich tradition to many of your residence, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wolf or grizzly in their natural habitat, inside the parks and I am afraid that if you allow hunting with high quota's in the twelve trophy game zones where wolves especially will be lured out of the park to be shot on site. Montana seen their wolf hunting season both ways, through the eyes of a tourist who come to Yellowstone and stay and spend money in the towns adjacent to the park, so they lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit --- and it worked, my wife and I will be staying in silver gate for a week this month. All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quota's and once met ---close them for the season because if you don't tourist from this country and the international counties will surely here about how many wolves from the parks will be killed and act accordingly and that is not spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves whoi reside in the National Parks. Thank You, Richard Amerine from Ohio.

Final Comment	amoning nichard		5/3/2017 3:04:00
	amerine, richard	norwalk, OH	PM

We need buffer zones bordering our Parks where no wolf hunting is permitted. Urge Montana Fish & Game to establish a buffer zone bordering Glacier & Yellowstone National Parks. Urge Wyoming Fish & Game to establish a buffer zone bordering Yellowstone and the Tetons National Parks. Thank Wyoming for not allowing trapping within the "trophy" zone. Also request that quotas within a hunting unit be reduced whenever a wolf is killed illegally. This sends the message that poaching will not be tolerated. Yellowstone Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves. Our National Parks provide an economic benefit to local gateway communities (defined as 60-mile radius around each park boundary). In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons \$779 million & Glacier \$270 million). Yet, wolves can be hunted up to the Park boundary and lured out of the Parks with predator calls. STOP the killing of wolves! Stop the war on Our wildlife! Wolves our vital for ecosystem balance. Your attention to this most urgent matter would be

much appreciated by all present & future generations of all species. Thank you Lydia Garvey Public Health Nurse

Final Comment	Common India	Clinton OK	5/29/2017 3:30:00
	Garvey, Lydia	Clinton, OK	PM

I am writing to express my concern as a tourist and through a tourist eyes. It is reported by some of your own agencies that tourism to your state rewards the state of Wyoming's coffer's with millions and millions of dollars each year, and 10's of thousands of jobs in your state are related to the tourism industry. And I understand that hunting is a rich tradition to many of your residents, but tourist flock to your state each and every year to view beautiful Yellowstone and the Grand Tetons National Parks and a lot of people come in hopes of seeing a wolf or grizzly in their natural habitat, inside the parks and I am afraid that if you allow hunting with high quotas in the twelve trophy game zones where wolves especially will be lured out of the park to be shot on site. Montana seen their wolf hunting season both ways, through the eyes of a tourist who come to Yellowstone and stay and spend money in the towns adjacent to the park, so they lowered their season quota to two wolves in each of the two zones right outside of the park so their tourism would not take a big hit --- and it worked, my wife and I will be staying in silver gate for a week this month. All I am asking is that you strongly consider doing what Montana has done in the zones right next to the parks and lower the quotas and once met ---close them for the season because if you don't tourist from this country and the international countries will surely hear about how many wolves from the parks will be killed and act accordingly and that is not spending their hard earned money in the state of Wyoming. Please consider the rest of the country and the world who marvel at the beauty of your state and the wolves which reside in the National Parks.

Final Comment	dymant avaan	Maafand On	5/4/2017 6:02:00
	dyment, susan	Meaford, On	PM

Wyoming's wolf management plan once again puts wolves wandering out of Yellowstone in the line of fire. We need stronger wolf protections in Wyoming! Indigenous rights groups have filed a formal petition to the State of Wyoming to create a no-kill buffer zone of 50 kilometers (31 miles) around Yellowstone and Grand Teton National Parks. The very least that the State of Wyoming can do is to establish this no-kill buffer zone so that wideranging National Park wolves won't be shot the moment they leave the sanctuary of Park Service jurisdiction. The state wolf management plan sets aside a relatively small area, mostly designated as wilderness, as a Trophy Game area where wolves can be hunted with a permit during a designated season. Outside this area, wolves are classified as a Predatory Animal, where they can be shot in unlimited number, at any time of year, without any kind of hunting license or permit.

Final Comment		Dand OD	5/26/2017 2:25:00
	RICHARDS, JAY	benu, OK	PM

Being as I am a devoted dog lover, I also love wolves and would like to see more of them, rather than less. It pains me to realize that almost all of the state of Wyoming is a "predator" zone where people can kill as many wolves, as often as they can, and without needing a license or permit. To me, this is outrageous!!! Wolves are wonderful, intelligent animals and do provide a cleaning out of sick and old Elk and other large animals. This thinning helps the environment. I hope you will consider my comments when writing any new proposals.

Final Comment	Davis, Pam	Mitchell, OR	5/29/2017 3:18:00 PM
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I am opposed to hunting wolves at any time for any reason. I have spent the last two years of my retirement testifying to that effect repeatedly at hearings of the Fish & Wildlife departments in both Washington and Oregon, as well as attending Wolf Advisory Group Meetings in Washington as a member of the public. Even if wolves were not an endangered species, which they are, and even if they did not play a vital role in maintaining wild lands in healthy ecological condition by controlling ungulate overpopulation, which they do, they generate income for the states in which they are still able to live. Tourists want to believe they may sight and even photograph a free and wild predator. It is in every way a mistake to further persecute these animals. Please be wise. Please follow the science that tells us we, and the land, need predators.

Final Comment	Pearsall, Carol	Neotsu, OR	5/3/2017 8:20:00
	I caisaii, Caioi	Neolsu, OK	PM

I DON'T EVEN KNOW WHERE TO START. I CAN'T BELIEVE HOW YOU PEOPLE CATER TO HUNTERS AND RANCHERS LIKE THEY ARE THE ONLY ONES THAT CALL THE SHOTS! YOU PEOPLE IN MONTANA ARE DESPICABLE AND EVIL FOR LETTING THESE HATEFUL REDNECKS THAT WANT TO ERADICATE EVERY WOLF AND YOU ARE LETTING THEM DO IT BECAUSE THEY HAVE DEEP POCKETS AND LOUD WHINEY MOUTHS. I HOPE YOUR PROUD OF YOURSELF FOR WHAT YOU HAVE DONE AND WHAT IT WILL CAUSE DOWN THE ROAD! THERE ARE A HELL OF A LOT OF PEOPLE DOWN RIGHT ANGRY OVER THIS MURDEROUS EVENT AND YOUR GOING TO HAVE TO DEAL WITH THE BACKLASH AND HOPE THAT SOME SHIT STORM DONT COME YOUR WAY FOR WHAT YOU HAVE DONE! I WILL NEVER COME TO YOUR STATE AND I AM TELLING OTHERS TO FOLLOW SUIT. THOSE WOLVES ARE NOTHING LIKE THESE LOUD MOUTHS RANCHERS ARE. BUT YOU WOULDN'T KNOW THAT OR MAYBE YOU DON'T CARE ABOUT IT JUST THE MONEY.

Final Comment	Thaisen, Debra	Portland, OR	5/2/2017 6:16:00 PM
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Well, you decimated -- actually eliminated - the species long ago, and now that one of the keystone predators has been, against all odds, re-introduced, you want to indiscriminately kill it off again to preserve the big-\$\$ interests of elk hunting, gas and ranching. Let's see if

you can temper your environmental hypocrisy this time and actually preserve the environment and natural order. I and my family and friends have been visiting WY MT ID every year for the last 12 years -- and we come and spend our \$\$ in your state to see and appreciate the wildlife. Do what's right for a change -- not what's right for your smallminded pocket of big \$\$ who care nothing about WY's beauty, nature and environment.

Final Comment	Chizmar, RE	Dhiladalphia DA	5/22/2017 7:31:00
	Chilzinai, KE	Philadelphia, PA	PM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Ford Dahin	Crear SC	5/4/2017 4:39:00
	Ford, Robin	Greer, SC	PM

I am against human interference with the Gray Wolf and designating it as a 'trophy game animal" and am against designating an open season for gray wolves. The Gray Wolf was removed from protection from the ESA because Wyoming believes there is evidence of hybridization of Gray Wolves with Coyotes. This is controversial but what isn't controversial is that the Gray Wolf was hunted into near extinction and if hybridization was to occur it would be because human interference caused the gray wolf to breed with a subspecies due to the stress of de-stablization of its pack. Let our predators do their job without interference of humans .

Final Comment	compiched david	landmum CC	6/19/2017 2:46:00
	carmichael, david	landrum, SC	PM

Dear Sirs and or Madams: I understand avid hunters and their organizations are heavily influencing decision making when it comes to Our wildlife. I say Our wildlife because it belongs to us all. The importance of predators and their roles in Our environment has been proven by science. Everyday it seems we are hearing of a new endangered species being added to a rapidly growing list. EPA Is being gutted like a deer. ESA is endangered itself. While I do reside in another state, I am a taxpayer. My dollars fund the beautiful National Parks that just happen to be in your state. National Parks that receive over 7,000,000 visitors every year. Tourists dollars that support your state. Please consider what's best for

our environment and the millions of visitors that come, over the select few that choose to destroy these pristine places. Places where we can visit and find peace and solitude. Thank you.

Final Comment	Troup, Elizabeth	Springfield, TN	5/4/2017 5:13:00 PM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming?? https://wgfd.wyo.gov/WGFD\_WebSurvey/

Final Comment	Phiops, Lynn	Austin, TX	5/4/2017 6:01:00
	i mops, Lynn	Ausuii, 1A	AM

Who do you think you are??? God put these animals here for a reason! Please read the Bible and learn God's plan for his wildlife. We are to be the stewards of his animals. You are allowing greed to cloud your conscience. "Any man who abuses an animal or the land, is an evil man, and will be dealt with...". I urged you please, educate yourself on the lives and importance of these animals. They have just as much right to be here as any man does, maybe even more...Not to mention the money I myself, and others I know, to come to your state to watch the wildlife.

Final Comment	Bethune, Donna	Houston, TX	5/10/2017 8:11:00 AM

Please do not hunt wolves. They play an important role in the food chain.

Final Comment	Stoddard, Isaac	Houston, TX	5/28/2017 11:07:00
	Stoudard, Isaac	Houston, 1A	PM

As a bi-annual visitor to Yellowstone National Park I spend a lot of money in the State of Wyoming on my trips to the park, where my primary goal is to view the wolves of Yellowstone. I respectfully ask that the quota's surrounding the park be zero or as low as possible. Many people enjoy viewing the wolves in the park and it is scentifically proven when hunting increases around the park areas visitors see fewer wolves. For the enjoyment

of all who come to see your beautiful State, please reduce the quotas in the trophy game area especially around the National Parks. Thank you for your consideration.

Final Comment	Drican Austin	Montgomory TV	5/29/2017 8:46:00
	Brisco, Austin	Montgomery, TX	AM

I support a Sacred Resource Protection Safety Zone around Yellowstone National Park. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Public Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Smith, Cathy	Rockwall, TX	5/4/2017 1:00:00 PM

Please save the wolves and implant a border around Yellowstone park. Wolves are an interigal part of the ecosystem and our heritage.visitors to Yellowstone want to see wolves which drives money into the areas around the park.

Final Comment	Smith, Cathy	Rockwall, TX	6/1/2017 6:50:00
	Sinni, Caury	Kockwall, 17	AM

We want our wildlife protected. Predators such as wolves and mountain lions are vital to our eco system and deserve our protection. Statistics support protecting wolves. We can't wipe out a species for the benefit of cattle or any other industry and we do not want our wildlife sacrificed for the benefit of a few. Weather, starvation, disease, poor husbandry etc contribute to the vast majority of livestock death losses. Wyoming total cattle/calves Jan 1, 2014 = 1,270,000 Wyoming losses, death, cattle/calves 2014 = 30,000 (2.36% of total) Wyoming verified wolf depredations 2014 = 49 (0.16% of losses) Wyoming total sheep/lambs Jan 1, 2014 = 355,000 Wyoming losses, death, sheep/lambs 2014 = 9,000(2.54% of total) Wyoming verified wolf depredations 2014 = 6 (0.067% of losses) 2) Many of the Trophy Game Management Areas are bordering National Parks and Forests, including Yellowstone, Grand Teton, Shoshone, Targhee etc. This means that wolves, who may be more accustomed to the benign presence of humans and vehicles in the Park, can be shot by hunters the moment they cross that invisible boundary and out of protected areas. 3) Evidence shows that disruption of the wolf family unit can actually lead to an increase in livestock depredation, especially if one or both of the "Alpha" pair are killed. Loss of the Alpha female in particular can also have consequences on the survival of any pups, and, as the Alpha male will not mate with any of his offspring, the break up of the pack is almost certain. 4) It is known that some hunters appear to deliberately target Park

wolves, especially those wearing radio collars. Any loss of these wolves not only impacts the remainder of their pack, but also the scientific study of the Park biologists. The wearing of an electronic radio tracking device should NOT place an additional target on the individual wolf. 5) While the decrease in quota numbers for three of the Management Areas (1,2,&3) is welcome, the increased quota in four Management Areas (4,8,11,&12) is unnecessary. 6) Wildlife tourism is a massive source of income for the Wyoming economy. Wolves are among the top animals listed whenever tourists are asked what animal they would most like to see. The previous wolf hunts of 2012 and 2013 had a huge negative effect on that income. Read this article for a first hand insight into this effect on local businesses and economies: http://bit.ly/2pe7KUA

Final Comment	Kasper, Tanya	Wimberley, TX	5/25/2017 2:31:00
	Kasper, Tanya	willocity, 1X	PM

Wolves need to protected. They are trapped, poisoned and killed without discrimination for their fur, in the name of cattle, for trophies, through killing contests and for sport. These animals are a critical part of the eco system and deserve our respect as such if not just being plain old compassionate. I for one do not want our wildlife killed in the name of cattle. It is not like the ranchers are raising pets after all. Cattle are raised for profit pure and simple and ranchers can put in fencing and other protections at their expense. Not us and our wildlife. A few things to remember: 1. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. 2. Predators are self-regulating and do not require hunting to manage their populations. 3. If hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway, 4. Wolves should not be listed as a predator anywhere in the state. Animals designated as predator are treated horrifically and can be killed in any manner. To allow a recovered endangered species to be treated this way is irresponsible and reckless. 5. The killing of 44 wolves only satisfies the hunter "opportunity" without reducing livestock conflicts. Human-caused mortalities and control action would be sufficient. 6. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. 7. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. 8. Wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone.

Final Comment	Kaspor Gary	Wimberley, TX	6/19/2017 10:38:00
	Kasper, Gary	winderiey, 1A	AM

It is nice to see that Wyoming will once again be able to manage wolves as well as other game animals. Predators have a large impact on prey species and with wolf numbers increasing certain areas have seen considerable impact on moose, elk, and deer herds. All wildlife is enjoyable and with proper management it is financially beneficial to the state and the people. Hunting is an important part of the ecosystem and good management allows all animals to thrive. Too many wolves depreciates the value of other wildlife and it

is tough to maintain quality when you can't manage a predator that is reducing prey populations.

Final Comment	Wayment, Lane	Croydon, UT	6/13/2017 10:05:00 AM
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I am writing to strongly oppose wolf hunting policies that are proposed for Wyoming. I spend much of each year and a fair amount of money climbing, hiking, camping and touring the western half of the state of Wyoming from the Wind Rivers to the Absarokas to YNP, GTNP and the ranges to the south. The chance to view wolves is one of the chief reason I come to Wyoming so often. I am sure I am not in a minority in this--many tourism dollars are spent to view Wyoming's predator population, far more than your state will receive from hunting wolves. A live wolf will draw people for years, a dead wolf will get you merely the price of the tag. I realize wolves and other predators have an impact on cattle, sheep, etc. I disagree strongly, however, that the best way to manage those impacts is with a hunt. There are many non-lethal options and even culling a problem wolf from time to time is still far better than a general hunt or classifying wolves as "vermin" outside of the hunt area. Please take into consideration the millions of tourism dollars that will be lost if Wyoming reduces its predator population to so few that it becomes difficult to photograph, watch, and study them. And at the least, please institute a 50-100 mile no hunting zone around the two National Parks and the Parkway. Thank you for considering my input. I love the state of Wyoming and consider it and its predator wildlife among the crown jewels of our nation. Respectfully, Chris Myers

Final Comment	Myers, Chris	Pleasant Grove , UT	6/19/2017 4:20:00 PM
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There's a major problem with killing wolves. It's terrible for our environment and it's wrong not to share the earth with them. If we need to spay or neuter them to keep numbers down, maybe that's the answe, but hunting and obliterating them for your own satisfaction is wrong. Wrong!!!

Final Comment	Nicoll, Kate	Salt Lake, UT	6/19/2017 10:27:00
	MCOII, Kate	Salt Lake, UI	AM

Please do all that you can to preserve wolf life and predatory life! The Environment needs them and the state will go through a habit shift without predators! Without them, deer will not have a natural predator and will cause more trouble than what it is worth. Here in Virginia, the deer population has gotten out of control where deer come up to humans or wander around in town streets and have no problem eating up plants or even crops that people plant because nothing can keep them from moving away or scaring them to move from one place to another. And if when left unchecked, the land will be designated as the plants can't keep up with the deer constantly grazing and destroying the land! The same will happen to Wisconsin if you take action against the wolves and other predators. Also, without the wolves, deer can catch diseases that will spread onto other animals and maybe

be given to humans if they are not disposed of first; which wolves and other predators do! Killing them mean a higher chance of catching a pack of deer that is sick and maybe have the disease spread. So considerate that before deciding to kill of the wolves in the area

Final Comment	Lusis, Aina	Vienna, VA	6/18/2017 10:49:00 AM
ignorant manner into extincting w (which barely to Earth is. We Cru	as to allow for all Nativities simultaneously fly uches how much there	ure's predators, beside ying in the face of scie still is to know) about estruction and leave h	uch a woefully, willfully es other wildlife, to be hunted ence and everything we know t how interconnected all life on ittle Hope for Humanities cological Slope.
Final Comment	Williams, Natalie	Auburn, WA	5/13/2017 5:28:00 PM
Wolves do NOT managing for rar	need to be managed. The need to be managed.	They manage themselv	ves. You need to stop
Final Comment	Hirsch, Melinda	Bellevue, WA	5/2/2017 5:49:00 PM
your state, please Allowing wolf h wander or be lur necessary to the hear (or see) that	e protect the wolves in unting in these zones e ed outside its borders. ecosystem of the parks	the zones surrounding endangers wolves livir Trophy hunting of the s is unnecessary and tr	, and the funds it brings to g your National Parks. ng within the parks that may ese majestic animals that are so ragic. Tourists do not want to at are key to the rich fabric of
Final Comment	Okita, Lynn	DuPont, WA	5/3/2017 10:27:00 PM
-	nding and belief that a tional Park. The wolve		
Final Comment			5/10/2017 10·53·00

Final Comment	Diakov Malany	Evona WA	5/10/2017 10:53:00
	Dickey, Melony	Evans, WA	AM

I would like to know if anyone has does the math on how many Tourism dollars are brought to Wyoming because of Yellowstone and the nations love of wildlife? People don't want to go to Yellowstone if they know there is no chance to see a bear or wolf in the wild. You kill off the wolves and you will see a backlash like never before. They are not in recovery and excuse me but handing over wildlife interest's to the states has always been a disaster for the animals that were federally protected. Politicians in states owe their elections to special interest groups, such as ranchers and trophy hunters. We know this.

States rights is a dog whistle to do whatever you want with no accountability. Leave the hunting to the wolves and get cows out of our Forests and parks. You may not feel the pain now, but if you eliminate these apex predators you will regret it in more ways than you can imagine.

Final Comment	Alexander, Doreen	Marysville, WA	5/4/2017 11:57:00 AM
Wolves are essentia hunting. Thank you	•	at supports our lives. I	am opposed to any wolf
Final Comment	Weidner, Patrice	Port Angeles, WA	6/10/2017 8:01:00 PM

I support a buffer zone around National Parks & the keeping wolves as an endangered species. We all know that wolves are essential to keep herds of Elk & deer healthy. As we saw in the documentary "How Wolves Change Rivers" we know they are essential to keep the ecosystem healthy too. The 6th Mass Extinction caused by humans will see 67% of all species die by 2040. It is irresponsible of Wyoming to slaughter wolves to the brink of extinction. The future of the world is in your hands. Do the right thing & care for the wolves in Yellowstone & add a Buffer Zone. Yellowstone is a UNESCO World Heritage Park. People come to see the animals mostly. It is not just a thermal Theme Park. I will not visit again until wolves are Protected.

Final Comment	Long Diana	Spottle WA	5/10/2017 5:40:00
	Lang, Diane	Seattle, WA	PM

I am a wildlife photographer who has visited Yellowstone several times & never seen wolves or Grizzly Bears. People who visit Yellowstone expect to see wildlife. Yellowstone is turning into a thermal theme park. I am going to the Great Bear Rainforest & spending my thousands of dollars to photograph bears. Wildlife tourism is rapidly growing because wildlife are endangered. It would be fa smarter to protect wildlife for future generations to enjoy & not hunt them to extinction. Two thirds of wildlife will be extinct by 2040. It is shortsighted & irresponsible to try to eradicate wolves., It is also essential to have a buffer zone around Yellowstone to give the wolves further protection from wandering. The state of Botswana in Africa has banned all guns & turned the country into a wildlife viewing park & this business is booming. Set an example for the rest of the world & combine a UNESCO Park with a wildlife viewing park. It will be the only one in the US & people for generations will flock there. Almost like a big zoo but it will be the only place where wildlife can thrive. This is the way of the future. Please do something amazing for future generations & protect wildlife for future generations.

Final Comment	Long Diano	Seattle, WA	5/11/2017 5:34:00
	Lang, Diane	Seattle, WA	AM

Dear Sir I do support the introduction of a Protection Zone around Yellowstone Park. I also think it is necessary to ban wolf calls & any hunting within this buffer zone. Wildlife around the world are disappearing fast. Yellowstone should be a Sanctuary where wildlife are protected & roam as they did hundreds of years ago. Yellowstone is famous around the world for its scenery but people also expect to see wildlife. Yellowstone needs to be a shining example for the rest of the US in wildlife protection., Check out how Kenya in Africa is protecting its elephants. Using High Technology, drones & an army of rangers they haven't had any elephant poaching for 5 years. No Wolves, Grizzlies & Bison don't have ivory but they are the Iconic species of America. Kenya now has a thriving tourist industry. Please do more to protect the wildlife of Yellowstone. Sincerely Yours Diane Lang

Final Comment	Long Diono	Souttle WA	5/22/2017 6:54:00
	Lang, Diane	Seattle, WA	AM

To Whom iT May Concern, I am writing as a taxpaying citizen of the US, a lifelong resident of a Western state and someone who is concerned that our native wildlife be preserved not only for sportsmen, but for all citizens. Even President Theodore Roosevelt who a a hunter himself, saw the need to preserve species for the enjoyment and education of all citizens. I urge you to consider this in making all decisions about wildlife regulation. It too often seems that hunters with outsized influence are causing decions to be taken by government, which is supposed to represent us all. Wolves are a species which need careful study and also, rangers and farmers need to be tasked to take careful steps to prevent predation. Balance is key. It is inefficient and careless to allow wanton killing of any species especially an apex predator. All things are connected. I urge you to protect the grey wolf Unethical means of baiting and unlimited hunting of grey wolves is irresponsible and unsporting. It calls to mind the indiscriminate slaughter of the buffalo in the 1800s. I urge you to incorporate the voices of Natives who are indigenous to Wyoming, and of scientists and naturalist, as well as citizens who may wish to visit your state and spend money to see wildlife. Please represent us all, including the wolves native to Wyoming, fairly. We are all connected. Let us respect that. Thank you.

Final Comment	Webber, Storme	Souttle WA	6/4/2017 1:14:00
	webber, Storme	Seattle, WA	PM

I am writing to urge the Wyoming Fish & Game to establish a buffer zone bordering Yellowstone and the Tetons National Parks to protect wolves. I am also requesting that quotas within a hunting be reduced whenever a wolf is killed illegally. This would send a strong message that any poaching will not be tolerated and has consequences. I would like to thank Wyoming for not allowing trapping within the "trophy" zone. It is important to note that Yellowstone Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves. Tourists come here to hoping to see wolves. This is an obvious economic benefit to local gateway communities (defined as 60-mile radius around each park boundary). In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons \$779 million & Glacier \$270 million). Yet, wolves can be hunted up to the Park boundary and lured out of the Parks with predator calls. This doesn't make sense

economically for these communities to encourage the killing of wolves. Thank you for your consideration in this matter. It is very important to keeping our wild places "wild".

Final Comment	Shofrondry Doulo	Sadra Waallay WA	6/12/2017 10:10:00
	Shafransky, Paula	Sedro Woolley, WA	PM

I visit Yellowstone / Grand Tetons 4-5 times a year primarily to see wolves and bears. I spend a lot of money in Wyoming during these trips. If these changes go through - I will no longer do so. I support a Sacred Resource Protection Safety Zone around Yellowstone National Park and the Grand Tetons. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 wolves Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming??

Final Comment	Wolfe, Virginia	Vashon, WA	5/5/2017 10:44:00
	wone, virginia	v asiloli, vv A	AM

As a regular GYE visitor, I am urging you to protect wolves, especially the wolves in the national parks. If you don't realize it, millions of dollars (in excess of \$35 million) is brought into your local economy by people like me who want to see live wolves in the wild. Wolves are an essential part of a healthy ecosystem and only account for a small percentage of cattle depredations. I wish to see wolves in the wilderness, not some welfare rancher's cattle. Wyoming's hostile attitude towards wolves will result in many people boycotting the state. Why would you want to literally shoot yourself in the foot by killing off an iconic American animal species, resulting in the loss of millions of dollars, jobs, and healthier ecosystems just to cater to some moneyed special interests. I thought the state was smarter than this, but I fear I am wrong, and the outdated, 19th-century mentality of apex predator eradication appears to be alive and thriving in Wyoming and its government. Count me in as one of the people who will not spend one more dime in Wyoming, after spending thousands of dollars each year in Wyoming watching wolves. Remember, extinction is forever.

Final Comment	Phillips, Beth	West Allis, WI	6/18/2017 6:21:00 PM
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Hunting wolves is wrong. What you are doing is encouraging immoral activities such as by not having a buffer zone around the areas that borders the protected areas for wolves. Hunters will simply lure them out by any means possible. The killing of "White Lady" is the direct result of your politicians votes that do not represent the majority. Laws are made

to keep immoral people from crossing the line. Moral people do not need laws Your laws are inadequate. All laws are ineffective if you lack the means of enforcing them.

Final Comment	Leavens, Darius	Winneconne, WI	5/13/2017 6:45:00
	Leavens, Danus		AM

Thank you in advance for taking my comments on Gray Wolf management. I am a lifetime resident of Wyoming and have always supported the Game and Fish efforts to manage wildlife. Gray wolves have entered Lincoln County, slaughtering mature elk, moose calves and mule deer. I personally observed an elk slaughter near our HOA. The wolves did not eat the elk. It was a thrill kill. I would like to suggest that in light of the brutal winter and mule deer fawn population decline, that agressive wolf management techniques be implemented. 1.) The population needs to be cut down to the minimum. 2.) A constant monitoring needs to occur to regulate wolves explosive growth potential. 3.) Elk feeding grounds need to be protected against wolf pack slaughter. 4.) Farms and housing developments in Lincoln County need to be protected from wolf intrusion, cattle, sheep and other animal kills. 5. Residents need to be able to kill a problematic wolf/wolfs on their property. 6. G&F need to be more sympathetic and response to wolf incidents in our county. Currently they are not. Many Thanks, Byron Baker (916)-365-6180

Final Comment	Baker, Byron	Alpine, WY	5/6/2017 10:26:00 AM
			AM

I would like to see changes in the predator zones to make all wolf hunting with helicopters, airplanes and running down wolves on snowmachines illegal. These practices are not only non sporting but also are very harmful to wintering wildlife.

Final Comment	Putnam, Nordell	Auburn, WY	5/4/2017 10:22:00
	Putiani, Norden	Aubuill, w I	AM

If man continues to kill the wolf for "sport", he will never find health or happiness, as he will also continue to kill his fellow humans. Killing animals at will to "control population" and remove something one views as a nuisance, is no more acceptable than humans seeking an abortion for the same reasons. We must assume you support both actions.

Johnson, Steven	Casper, WY	5/22/2017 1:16:00 PM
		1 1/1
	Johnson, Steven	Johnson, Steven Casper, WY

I am ashamed of my State for allowing this to happen! I knew that you would eventually start killing the wolves. I am sure that is the only reason you allowed them back. They are just another animal to kill! More out of state money for your coffers.

Final Comment	BOWDEN, JOYCE	CASPER, WY	5/23/2017 2:27:00 PM
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The quotas are too high and the buffer zone around the park needs to be larger. Pups are too young to be hunted. Finally, trapping is too cruel to allow - please eliminate all trapping permanently. Trapped animals suffer intensely for days.

Final Comment	Materi, Sandra	Casper, WY	5/29/2017 10:23:00 AM
	ng wolf hunting on th	onal Elk Refuge last fall e National Elk Refuge la	they had expressed an nds. Have you contacted
Final Comment	Durd John	Cooper WV	5/30/2017 2:11:00

Final Comment	Burd, John	Casper, WY	5/30/2017 2:11:00
	,	<u>r</u> , , , , , , , , , , , , , , , , , , ,	PM

Thank you for accepting my comments. I would like the department to expand season hunt dates to allow all hunters the opportunity at taking a wolf. Wolf season should be open to coincide with other hunting seasons in the trophy area. A september hunter deserves the same opportunity that an october hunter will receive. Please change all future seasons to coincide with other big game seasons. I understand the reason we are going to have a very conservative quota but I do not agree with it. In the future I would like to see a much more liberal quota set. Our western wyoming elk herds have suffered enough lets control the wolf populations. Respectfully submitted Sy Gilliland

Final Comment	Gilliland, Sy	Cospor WV	6/10/2017 7:30:00
	Gillianu, Sy	Casper, WY	AM

You must be realistic in your "trophy hunt" outside of Yellowstone. Read the article that was just in the New York Times about Yellowstone and the wolves within it. How they have grown used to people and so when they do go out of the Park (which everyone knows they are apt to do), they are sitting targets for your "hunters"! One of your WY "hunters" already killed one very famous wolf back in 2012-06 and destroyed a family and angered people not only in the US, but Internationally as well. If you do not protect the wolves of Yellowstone, you are not only endangering a treasure of the park and the millions of people that come to see them, but you are endangering your pocketbooks as tourism will decline and take with it their dollars if wolf viewership in the park deteriorates any further than it already has! DO NOT be stupid like the state of Alaska and kill every wolf that walks outside of Denali. Viewership of wolves in Denali is down 70%! Now, when its a desperate situation for the state and park, they are scrambling to add buffer zones. Be proactive and put buffer zones in place NOW while you have the opportunity! You have put a plan in place which basically says you want every wolf killed outside of your "trophy" zone. Do the right thing now by protecting the 100 or so wolves that still call Yellowstone home!

Final Comment	Markus, VIcki	Contonnial WW	5/2/2017 3:08:00
	Markus, vicki	Centennial, WY	PM

I realize as a Fish & Game department that you are more concerned with having enough ungulates for your hunters. It is obvious with your "wolf management plan" that you DO NOT want wolves anywhere in the state except for the NW corner and preferably you'd like to build a fence and keep them in Yellowstone! Even the lay person can see through your management plan. So, as a lay person who seems to understand ecosystems better than a fish and game department and how predators help not hurt ecosystems, I am asking you to add a buffer zone in your "Trophy Zone" to protect the wolves in Yellowstone. For me, its because I have witnessed first hand in Yellowstone how an intact ecosystem works and how beautiful it is to see it all work. For you and the state of WY, you need to be careful and not end up like the state of Alaska who didn't care about the wolves in Denali until viewership went down 70% and tourists started complaining and not putting dollars into their economy! Now, they are scrambling to add buffer zones in the hopes that the wolves will come back to Denali! DO NOT make the same mistake as Alaska has! And DO NOT think that it won't happen to you because believe me, it will! I know from Social Media that there already are massive amounts of people who are upset with your management plan who plan to boycott WY! They will go to Yellowstone, but they will enter through Montana, not WY, You have a chance right now to make it right and protect the wolves in Yellowstone! Do the right thing! You've already got what you wanted, a slaughter in 80% of the state! Don't be idiots and risk millions of dollars lost in the state because of another bad plan!

Final Comment Childs, Victori	a Centennial, WY	5/2/2017 6:07:00 PM
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It is obvious from your management plan that as state, you hate wolves and intend to keep your population numbers barely above the threshold for having the wolf relisted under the ESA! It's a real shame that you are letting less than 1% of your economy (ag & hunting) dictate your wolf management policy! You should pay more attention to your tourism dollars being approx 25% of your economy who want to see wolves! Since you want to kill every wolf outside of Yellowstone, please, please save the wolves in Yellowstone! Set up a 30 mile buffer zone outside of Yellowstone! That is not much to ask for is it? The very least you can do is to protect your tourist industry, as well as the research wolves in Yellowstone! Protect the Wolves of Yellowstone!!!! Please!!!!!

Final Comment	Helmuth, Vicki	Centennial, WY	5/7/2017 8:38:00
	neilliuul, vicki	Centenniai, w I	PM

I am outraged of your idea of so called management of our wildlife, our wolves. Wyoming hates wolves and is using this as an excuse to kill them. Consider environment and tourism not ranchers and hunters! It is obvious you don't have the best interest of our natural resources at heart just the desire to carry out inhumane, ignorant practices. Can you hive one good reason for allowing this killing? I am ashamed of living in this state!

Final Comment	Lucero, Daniela	Chavanna WV	5/4/2017 1:42:00
	Luceio, Dameia	Cheyenne, WY	PM

Thanks for taking time to read my comments. I believe hunting seasons should be allowed for wolves but I have concerns for two reasons! 1. I believe there should be a buffer outside the National Parks before hunting is allowed. The wolves that come from the Parks are used to humans and I believe are much easier to hunt and can destroy packs that stray over the boundary as happen in the last year of hunting allowed by Wyoming. The Lamar Pack lost three wolves including the Alpha female which the heart of any pack. A zone of 3 miles should work. 2. I also believe that the proposed length of the season is too long! I believe three months is long enough. Thanks again, Clay A. Rouse

Final Comment	Bougo Clay	Chavanna WV	5/19/2017 3:59:00
	Rouse, Clay	Cheyenne, WY	PM

I am speaking out against wolf hunting in Wyoming. All animals are connected to each other and deserve to live. Find ways to coexist peacefully. These animals are simply trying to live out their lives.

Final Comment	Lucaro Donialo	Chavanna WV	5/24/2017 4:00:00
	Lucero, Daniela	Cheyenne, WY	PM

I would like to see the Predator shoot-on-sight status reduced to a smaller geographical area. I would also like to see restrictions in place that prevent hunters from killing wolves that have not been involved in a livestock-killing situation. In other words, no hunting just for the sake of tracking down wolves to kill without good reason. Also, prohibit the killing of wolves in their dens, mothers with pups and adolescent wolves.

Final Comment	Tibert Wells,	Cody, WY	5/18/2017 11:46:00
	Lauren		AM

I live in zone 2. Zones 1 & 2 are on the eastern edge of Yellowstone. Not only are they a dispersal route for wolves from and to the park, but provide genetic exchange. Millions, literally, of people come to Yellowstone to see wolves, and the best viewing place is Lamar Valley. After the first wolf hunt in 2012, an outcry occurred when the alpha female was shot legally. But what happened afterwards is that her entire pack disbanded and it has taken years for the valley to have a recovered wolf population that tourists can view. Tourism provides a lot of dollars to the Cody area, as well as other areas around the Park. I propose two possibilities for my area zone 1 and/or 2: 1. Make some areas 'science' zones that are close to the Park. This could be done even by subdividing the Sunlight area so that only the higher, less road accessible areas are for hunting instead of the easy road access basin. This would provide a buffer zone around the Park. OR 2. Just like you do with deer or elk, WG&F can juggle the hunt in each area. Wolves from the Park follow the elk, and the elk begin to descend after the snows around late Nov/Dec. That alpha female shot in 2012, along with her mate, were shot late Dec following Park elk. I propose that you have a season in zones 1&2 that are October only, or Oct-Nov.15. I know these proposals you've seen before but have decided not to heed. I would hope that you take into account that people come world wide to view wolves; that the wolves in Sunlight/Crandall area are not

troublesome and are self-regulating packs; and so other than just opportunity there is no reason to even have a hunt here. Don't forget, there is a 365 day hunt in 85% of the state. Let wolves be unbothered here in the wildest zone. My personal experience is that after the first hunt in 2012, wolves could no longer be viewed in the valley. Those same wolves go back and forth into the Lamar.

Final Comment	Patten, Leslie	Cody, WY	5/23/2017 2:57:00
	I atten, Lesne	Couy, w I	PM

We are in support of science based conservation and the North American Model for Wildlife Management. By following these methods there is no indication why we should not have wolf hunting seasons in Wyoming. Yellowstone Country Bear Hunters Association is in full support of a Wyoming Wolf Hunt.

Final Comment	Kondelis, Joe		5/26/2017 8:12:00
	Kondens, Joe	cody, WY	AM

I'm so glad to see wolves back one a management plan. The only suggestions I have are to open the season earlier so people can hunt them during nearlynany other season. Also if any area does not reach the quota the season be extended until the quotas are filled. Lastly I would like to see all quotas increased but I feel like these numbers are good for now as a trial run. Thanks for your time.

Final Comment	Kallay Tay	Cody WV	5/26/2017 1:59:00
	Kelley, Tev	Cody, WY	PM

A non native species of wolf was transplanted in Wyoming which is larger than any native species of wolf that was here originally. They have multiplied to the point that there are FAR too many and our big game herds have suffered greatly, especially the elk and moose herds. The numbers of wolves have had to be culled greatly already by the Feds because they're are so many. A hunting season will not change anything, there will always be plenty of wolves. No species should have there numbers brought to the edge of eradication by another non native planted species. A hunting season is long past due and there is not one good arguement for not having one now. Get on with a season and let's get to controlling there decimation.

Final Comment	Livingston Isson	Coder WV	5/26/2017 4:52:00
	Livingston, Jason	Cody, WY	PM

The State of Wyoming's proposal to allow trophy hunting of gray wolves in certain areas, and allow on-site killing of the species in all other areas at any time is not good management for the species, and does not reflect the best science on the subject. Wyoming Fish & Game has a duty and a responsibility to manage all wildlife in the state responsibly, and using the best science available. Because this website does not allow attachments, below are links to scientific studies and information that Wyoming has failed to consider in its drafting of the proposed regulations.

http://www.fws.gov/home/wolfrecovery/pdf/Final\_Review\_of\_Proposed\_rule\_regarding\_wol ves2014.pdf http://www.wolfandwildlifestudies.com/downloads/huntingwolvesinmontana.pdf http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0113505 http://rspb.royalsocietypublishing.org/content/283/1830/20152939 The contents of the studies referred to above are hereby incorporated by reference, in their entirety, and the Commission must consider the best available science before it approves any rules allowing gray wolves to be hunted in Wyoming. The science does not support trophy hunting, or the predatory designation allowing shooting on site, of the gray wolf. Accordingly, the Commission must not approve the draft of Chapter 47.

Final Comment	Calmes, Ariel	Evenston WV	6/16/2017 10:33:00
	Callines, Allel	Evanston, WY	AM

Wyoming Game and Fish Commissioners, Thank you for sharing information with the public regarding the upcoming wolf hunt in Wyoming, and offering an opportunity to comment on management of this public resource. I have the following comments regarding the upcoming wolf hunting seasons. Wyomingites pride ourselves as independent, hard working folks tied to the land. We should be the ones to manage the wildlife within our borders but it must be done appropriately. Hunting, Ranching, and Tourism are all major drivers of the local economy and all aspects should be supported. I make my living as a Professional Naturalist within Grand Teton and Yellowstone National Parks. I am concerned about the loss in economic revenue from decreased wolf sightings which will occur should wolves be taken adjacent Grand Teton National Park. Hunt Unit 6 (Pacific Creek), 8 (Fish Creek) and 9 (Crystal) all abut the National Park, with wolves frequently traveling in and out of the park. Removing up to 7 wolves from Unit 8 in particular will undoubtedly impair wolf viewing opportunities inside the Park Boundaries, and could impede valuable scientific research on wolf behavior being conducted by the NPS by removing animals with collars. Currently wolf watching related tourism generates an estimated \$35.5 million in annual revenues to surrounding communities to Yellowstone. I support a buffer zone around both parks, where trophy hunting or predator management is eliminated to compensate for this potential impact. In asking for a buffer zone I recognize that management of wolves statewide is in the best interest of the species and our relationship with them as hunting maintains the natural fear of wolves to people, which will reduce future conflicts. The buffer zone would serve as a good compromise for wolves which use both the park and adjacent public lands. Under the North American Conservation Model, wildlife are held in the public trust, meaning all citizens of the United States, hunter and non hunter alike collectively own our wildlife. Today only around 5% of the population of the US identifies as hunters yet public perception of hunting remains positive. In order to maintain our tradition of hunting we must also maintain this relationship, meaning that hunting must continue to take place with integrity. A dual listing of trophy game in 15% of the state and predator status in the remainder sends the wrong message. Wolves should be managed as trophy game statewide. In managing wolves as trophy game, WYG&F will also generate additional revenues from license fees, aiding in budget issues currently plaguing the state. Chronic wasting disease is rapidly approaching the Jackson Hole Elk herd, and may have severe consequences. As opportunistic predators which prey on vulnerable animals, wolves may have an important role to play in the

control and management of CWD in the future. I would like to see more research on this hypothesis and how it may alter future management actions. Last fall, I harvested my first bull elk in the Gros Ventre Mountains east of Grand Teton National Park. After observing a herd of cows for twenty minutes, while listening to the bugle of a nearby bull, a second bull came into view. With one bullet the bull was down and I began the process of harvesting the animal. On the pack out, I looked down to see mountain lion tracks, a few minutes later we found wolf tracks. And my partner had seen bear tracks earlier in the day. The Greater Yellowstone Ecosystem is special because it supports the full complement of mammals; predator and prey, as it did when the first European-American explorers entered the area over 200 years ago. Let's protect Wyoming's wildlife, and keep its management in the our hands by doing it right. Thank you for your consideration. Regards, Josh Metten

Final Comment	Metten, Josh	Lashaan WV	6/5/2017 8:33:00
	Wietten, Josh	Jackson, WY	PM

To Whom it May Concern: I testified in the 1993 Federal Hearing in behalf of the wolf reintroduction. I have learned a great deal since that day and with the exception of a few incidences where wolves have become habituated to cattle and/or sheep, I believe that we are completely out of line "managing" them through such hunting practices. I grabbed these points as they are succinct and speak to my concerns for wolves without my reiterating or tweaking them. Plain and simple, too, we are headed down a pretty scary road with disease in our elk population. To be indiscriminately upsetting wolf pack structure without regard for their interconnection to each other is essentially making the wolf pack significantly less balanced in their behavior as the necessary predator that they are. Too, here is a great deal of ignorant hatred targeting this creature and I do believe it has crossed the line and has greatly influenced the "scientific" and political arena. I prefer not to have my wild animals treated so poorly... Here are the following points.. 1. Wolves have complex social structures and hunting only serves to destabilize the pack social dynamics which can lead to increases in livestock depredation. 2. Predators are self-regulating and do not require hunting to manage their populations. 3. If hunting is going to be allowed, there should be at least a 100 mile buffer zone around the National Parks and John D. Rockefeller, Jr. Memorial Parkway. 4. Wolves should not be listed as a predator anywhere in the state. Animals designated as predator are treated horrifically and can be killed in any manner. To allow a recovered endangered species to be treated this way is irresponsible and reckless. 5. The killing of 44 wolves only satisfies the hunter "opportunity" without reducing livestock conflicts. Human-caused mortalities and control action would be sufficient. 6. Wolves are NOT trophies. They are an integral keystone species that are an essential component of a properly functioning ecosystem. 7. Killing wolves around national parks decreases the chances of seeing a wolf which will lead to decreased tourism revenue for communities dependent on tourist dollars. 8. Wolf populations are not sufficiently recovered for genetic diversity to allow for hunting and uncontrolled killing in the predator zone. I ask you, Wyoming Game and Fish to do what is best for the balance off our ecosystem. We all need

a healthier connection to wild creatures based on supporting them intelligently and with great regard and care. We are "all connected" and let's never forget that. Respectfully, Laurie S. Brown

Final Comment	Brown, Laurie	Jackson, WY	6/15/2017 10:26:00 AM
wolf hunting pla predator hunting believe all gray v am strongly oppo- management; it of factors, and it all should be an exa safety zone aroun not "fair chase" to of the park. Killi of park wolves, v Furthermore, kill which will lead t I have many frier wolves and bears an avid deer and desires of the rar economic impact tourism and sigh	ns. I hope you will con in general, IF wolf hu wolf hunting throughou osed to the predator-free does not take in to acco ows for them to be tak mple for other western nd the National Parks a to shoot an animal that ng wolves right adjace which can in-turn affect ling wolves around nat to decreased tourism re- nds and family that wo s for their livelihood. I elk hunter, but it is un aching and hunting con- t these new hunting reg	nsider my comments: I nting is going to happ ut the state should be r ee zone. That is not go ount their social struct ten in horrific ways n states. 2. There should and John D. Rockefell is unaccustomed to he ent to the park influence of the ecology of these tional parks decreases evenue for communities ork in that industry, that honor and respect the fair if the agency cates	ure and other ecological poisoning, etc. Wyoming ld be at least a 50 mile buffer ler, Jr. Memorial Parkway. It is unting and is used to the safety ces the ecology and structure special protected areas. the chances of seeing a wolf es dependent on tourist dollars. at rely on regularly seeing e ranching way of life, and I am rs to the economic needs and gnores or downplays the on other industries, such as
Final Comment			6/15/2017 12:12:00

Final Comment	Kusler, Anna	Jackson, WY	6/15/2017 12:12:00 PM
This is a test sub	mission		
Final Comment	Hayden, Roger	Jackson, WY	6/15/2017 4:20:00 PM
See enclosed Wo WOLF.17.docx	ord document, thank you	ı-/Users/franzcamenzind	l/Desktop/WYO-
Final Comment	Camenzind, Franz	Jackson, WY	6/19/2017 12:41:00 PM

The proposed number of wolves to be killed is misleading because wolves are pack animals. When one member is killed, especially an alpha or experienced wolf, it will affect the ability of the whole pack to survive. With wolves treated as predators in 80% of the state, they will be eradicated there. Only in the parks & the hunting zones is there any

chance for them to survive. The wolves of Yellowstone & Grand Teton are a national resource & attraction. As soon as the wolves cross a park boundary they will be killed. But they don't know the difference. Hunters will lie in wait right at the boundaries to get them. The regulations should provide for the creation of ample buffer zones of 50 to 100 miles around the parks so at least the park wolves will not be decimated. Otherwise one of the main attractions of the parks, and contributor to their remaining a complete, historic American ecosystem, will be lost.

Final Comment Weston,	, Julia Jackson, WY	6/19/2017 2:13:00 PM
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I oppose a hunting season on wolves at this time. The wolves are killed by USFWS and WGFD now as they leave the refuge in the winter. The wolves are welcome on the NER and applauded for killing the elk. The Jackson Elk Herd is now reduced below the 11,000 total promised in the 2007 ROD. There are not enough elk and other prey on the landscape for the wolves to follow the prey as they leave the refuge. They inevitably end up on nearby ranches. This tool to reduce the elk herd to numbers in violation of the BEMP is decimating the elk herd and resulting in the decimation of the wolf packs wintering on the NER and in GTNP. Until this illegal action of WGFD and USFWS is stopped and the elk herd population and elk herd segments assessed and put to the public, destroying the wolves in the mix with additional take in hunts is opposed at this time. When you decide to follow the law in wildlife management you can revisit killing wolves for sport. Not now I oppose your plan to hunt wolves and in particular near the NER and GTNP.

Final Comment	Bainbridge, Deidre jackson, WY	6/19/2017 2:17:00	
	Danionuge, Delute	Jackson, w I	PM

First, thank you for the opportunity to comment on chapter 47 regulations. Hunting wolves was part of the bargain in wolf reintroduction. However, I would encourage the department and commission to consider instituting a buffer around the parks. My family is supported by tourism dollars in a very real and very substantive way. My husband is a guide for a local tour company, and wolf watching on trips is a huge driver of bookings. When wolves were last delisted, the numbers may have been maintained but their behavior changed. When wolves learn that humans are hunting them, they become much more secretive and difficult to spot on a tour. The wolves in the park transcend the park boundaries and are thus affected by hunting. A buffer around the park with permits for takes in the case of clear, demonstrable conflicts would help ensure that all locals livelihoods can thrive with state wolf management. Thank you.

Final Comment	Conotto Votu	Jaalmaan WW	6/19/2017 2:24:00
	Canetta, Katy	Jackson, WY	PM

I oppose any so-called sport hunting of wolves. Hunting is defensible, and I grew up as a hunter, in order to put meat away for the winter and other times -- but wolves are not hunted for their meat! If it is necessary as a matter of prudent management of wolves, to kill some of them, that killing should be done by Game and Fish employees in the most

humane way possible, and not by "sportsmen" hunters. In any case great care should be taken not to improvidently disrupt the social nature of the packs.

Final Comment	Hailagan Mamy	Lashaan WW	6/19/2017 3:31:00
	Heileson, Marv	Jackson, WY	PM

June 19, 2017 Wyoming Game and Fish Department Casper Regional Office ATTN: Wildlife Division, Regulations 3030 Energy Lane Casper, WY 82604 Director Talbott, Please accept these comments on behalf of the Greater Yellowstone Coalition (GYC) for the proposed 2014 wolf hunting season. GYC has over 90,000 members and supporters, both in Wyoming and nationally, that have a continued interest in the management of wolves in Wyoming. GYC has not opposed sound management of wolves or science-based wolf hunts. However, we continue to firmly oppose the dual-classification of wolves in Wyoming as being counter to the North American Model of Wildlife Management. We have and will continue to seek statewide trophy game status for wolves in Wyoming. The focus of our comments for the 2017 hunting season is adaptations to the states quotas and wolf hunt area boundaries that would benefit ecotourism locally in the Jackson community. Please consider the following comments on the proposed 2017 seasons. Modification of hunt areas and quotas The wolves of Yellowstone National Park (YNP) and Grand Teton National Park (GTNP) are involved in fewer livestock conflicts, have assisted the National Park Service in meeting their management objectives, have created world-renowned wolf watching opportunities, are involved in decade's long scientific research, and are resilient packs that have consistently contributed to the state's count of breeding pairs. It was reported at least anecdotally at the season setting meetings that the number of confirmed breeding pairs within the National Parks may have dropped in 2016. This puts even more merit into a cautious approach along Park boundaries. We continue to suggest that WGFD consider additional wolf subunit areas with lowered quotas to protect park resources, maintain wolf pack structure, and increase opportunity for wildlife viewing. We recognize that any "buffer" based on a set distance would be arbitrary. However, wolf hunting units drawn with the knowledge of basic pack territories and where they overlap the Park boundary into National Forest lands could create hunting units that limit the impacts on packs that spend most of their time within Park boundaries and out of conflicts. In 2014 we proposed an example of a new wolf hunt area on lands east of GTNP and the National Elk Refuge, but with a significantly reduced quota (0) to protect the wolf packs whose territories overlap the boundary of the park. A hunt area in this general geography could be used to protect packs that have a national significance because they spend the bulk of the year in protected areas with a significant wildlife watching constituency that benefits the local ecotourism economy. We have seen this approach work in Montana and Fish Wildlife and Parks in 2017 has proposed continuing this season structure for the next two years. We continue to believe there is room for improvement in Wyoming's hunt units and quota allocation that can meet desired objectives of many constituents. Without having the 2016 annual report and pack distribution at this time, it's difficult to make this science-based recommendation, but we'll look for future opportunities to modify hunt areas. Wolves in GTNP and YNP are a management asset to the state of Wyoming. These wolves are closely monitored by the National Park Service. Because of the low margin for error in Wyoming's population and the need to maintain a stable number of breeding pairs, minimizing hunting

in these areas will benefit Wyoming's management so conflicts can be addressed where they're more prevalent. A fair-chase wolf hunt that conserves populations should focus hunting pressure on areas with chronic conflicts and preserve intact core populations. Continued Closure of JDR Parkway We continue to support closure of wolf hunting in the John D. Rockefeller Jr. Memorial Parkway (JDR Parkway) in wolf hunt area 6. We ask that the wolf hunt area boundary be redrawn to exclude hunting for wolves in the JDR Parkway to avoid confusion in the regulation. Currently, it's only listed as a footnote and redrawing this map and boundary in the proposed hunting regulation would make this delineation more explicit. Conservative Season Structure We support the otherwise conservative elements of Wyoming's proposed season. Wyoming's relatively small Trophy Game Management Area requires this continued conservative season structure. With the relatively low wolf population in Wyoming compared to surrounding states and requirements for maintaining breeding pairs, WGFD simply does not have the margin for error for expanding wolf harvest through trapping, extended seasons, or increased bag limits. The current bag limit of one wolf and season dates of October 1st - December 31st by WGFD are the most conservative hunting structure of the three northern Rockies states. The Department should reject calls to expand the length of the season into September as it would only result in hunt areas closing quickly with young wolves killed easily at rendezvous sites. Non-Lethal Tools and funding GYC is committed to working with the WGFD on non-lethal deterrents and have provided some tools locally in the form of LED light deterrents and have offered purchase of turbo-fladry that may have seasonal applicability around calving pastures. GYC is a willing partner in seeking out funding for these programs. Additionally, we continue to seek better solutions for wildlife management funding, incorporating non-consumptive users who don't otherwise contribute funding through the traditional North American Model of hunting/fishing license sales. Conclusions On behalf of the Greater Yellowstone Coalition, I appreciate the opportunity to submit these comments on the 2017 proposed wolf hunting season. We will continue to advocate for improvements to state statutes that create flaws in the foundation of Wyoming's plan and are outside the consideration of this public comment period. As the group dedicated to protecting the Greater Yellowstone Ecosystem, with staff working throughout western Wyoming, we want to see state management succeed, but we also believe that Wyoming's plan needs to reflect a better balance. Thank you for your consideration of these comments. Respectfully, Chris Colligan Wildlife Program Coordinator Greater Yellowstone Coalition P.O. Box 4857 Jackson, WY 83001 (307) 734-0633 (307) 699-1408 (cell) ccolligan@greateryellowstone.org

Final Comment	Colligon Chris	Jackson WV	6/19/2017 4:56:00
	Colligan, Chris	Jackson, WY	PM

I would like to see archery season for wolf in the rare case had a chance at a wolf with bow
during archery elk season. This would be something that would be a true trophy and almost
impossible chance. It is something that would hardly affect the quota and could be taken
off the season quota with out affecting the season much

Final Comment	Maynard, Kevin	Londor WV	5/5/2017 1:57:00
	Maynaiu, Kevin	Lander, w I	PM

I believe the management of grey wolves should stay in the hands/protection of the Federal Government. I've seen no real plan for the animals in Wyoming. I believe this opens the door to slaughter of wolves -- trophy animals, shoot on sight, poison cubs in dens, and the ever barbaric trapping. The last I saw of this "plan" there was a clause saying it cannot come under judicial review. This is against the 1st Amendment, our right to redress the government. Please do not take protection away from grey wolves. Thank you.

Final Comment	Werner, Sandra	Laramie, WY	6/15/2017 7:05:00
	werner, Sanura		AM

Part 1 Wyimin Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper, WY 82604 Re: Wyoming Game and Fish Commission, Chapter 47 Gray Wolf Hunting Season 2017 Submitted electronically at: https://wgfd.wyo.gov/WGFD WebSurvey/CommentOnly.aspx Dear Wyoming Game and Fish Department, Thank you for the opportunity to comment on the Wyoming Game and Fish Department's (WGFD) proposal for the 2017 gray wolf hunting season, Wyoming Game and Fish Commission regulations, Chapter 47. Defenders of Wildlife (Defenders) is a national non-profit conservation organization with more than 1.2 million members and supporters nationwide, of which 1,300 are residents of Wyoming. Over the last three decades, Defenders has played an important role in the recovery of wolves in the Northern Rockies. Defenders led a Wolf Compensation Trust from 1987 through 2011, reimbursing more than \$1.4 million to ranchers in the region for livestock losses due to wolves. Today, Defenders assists ranchers across the West with nonlethal tools to minimize livestock losses to wolves. We operate these projects in partnership with county, state, tribal and federal agencies. Overall Population Goal Wolves are an important component of Wyoming's natural heritage and should be managed toward achieving healthy and abundant populations. Defenders is opposed to WGFD's focus on reducing the wolf population to the lowest number that the agency feels it can reach and remain above the bare minimum recovery levels established by the U.S. Fish and Wildlife Service (Service). Wolves should be managed to maintain healthy and abundant populations across large landscapes so that they may perform their important ecological role. WGFD should manage wolves throughout Wyoming and not just within the trophy game area of the state. We disagree with the dual-listing classification —especially since wolves are classified as predators in nearly 84 percent of the state. Excessive wolf mortality within the predator zone could become a direct threat to range expansion and future recolonization of wolf populations elsewhere. It is our understanding that the WGFD intends to reduce the wolf population to 160 wolves, largely to address livestock conflicts (Spina, May 24, 2017). However, the science has increasingly shown that lethal removal of wolves can disrupt pack structure, is ineffective in the long term at reducing livestock conflicts, can prove more costly than nonlethal prevention measures, and fails to increase tolerance for the species (Wielgus and Peebles, 2014; McNay, 2002; Harper, et. al. 2008; Hogberg, et. al. 2013; McManus, et. al. 2014). Defenders acknowledges the importance of social tolerance for a species, evident in our earlier wolf compensation program and our ongoing conflict prevention work (Stone, et. al. 2017). We also recognize that losses to individual producers can be significant; however, this should not be the main driver for WGFD's management decisions on wolves.

Defenders along with numerous conservation partners did not agree with the dual-listing legislation passed by the Wyoming Legislature. We remain eager to see this law revised to allow WGFD to manage wolves, and manage them for healthy and abundant populations throughout the state. Predator Zone Defenders remains opposed to the State of Wyoming's designation of nearly 84 percent of the state as a predator zone for wolves where they may be hunted or trapped at any time of the year, without a license or tag. Wyoming's plan limits the availability of important dispersal habitat for wolves in adjacent national forests and wilderness areas and prevents wolves from recolonizing significant portions of their former suitable range in neighboring states such as Colorado and Utah. Currently, data is collected on wolf mortality in the predator zone yet this data is not considered when setting seasonal quotas for hunting within the trophy zone. This information should be considered. Defenders will work with our partners to urge the Wyoming Department of Agriculture to work with the state Legislature to introduce new legislation to allow WGFD to manage wolves across the state. Proposed Hunt Area Quotas Around National Parks This wolf hunting proposal fails to recognize the ecological, economic, intrinsic and scientific value of Wyoming's wolves. Wyoming is home to wolf packs whose territories straddle Yellowstone and Grand Teton national parks and the John D. Rockefeller, Jr. National Parkway. Thousands of visitors each year visit the parks in hopes that they may see a wolf. In fact, 44 percent of Yellowstone visitors cite wolves as the species they want to observe the most (Duffield, et. al., 2006). In 2016, national park visitors to Wyoming spent approximately \$945.3 million in local gateway regions, and supported 13.4 thousand jobs and \$1.2 billion in economic output to the Wyoming economy (Cullinane, et. al. 2017). A recent study showed that sightings of wolves in Denali and Yellowstone national parks were significantly reduced by harvest that occurred adjacent to the national parks (Borg, 2016). For these reasons, we believe packs whose territories extend outside the national parks' borders should be recognized for their benefits to the integrity of the parks' ecosystems, their contribution and importance to science and their economic benefit to local communities. We request the Department set quotas of 0 in Wolf Hunt Areas (WHA) that include packs that straddle national park boundaries. Another option would be to redraw the WHAs recognizing locations where current and future packs are likely to straddle park boundaries, and assign quotas of 0 to these new WHAs or "subunits." This idea is not without precedent; in recognition of the social value of the parks' wolves, Montana Fish, Wildlife and Parks created wolf management units 110, 313 and 316 adjacent to both Glacier and Yellowstone National Parks and set low quotas within these subunits, recognizing their use by wolf packs that straddle national park boundaries. John D. Rockefeller Parkway We support the Department's decision to continue to keep the John D. Rockefeller Jr. Memorial Parkway closed to wolf hunting. This decision contributes to the ecological integrity of this important corridor between Grand Teton and Yellowstone National Parks. Conclusion Wolf recovery in the Northern Rockies is of both local and national significance and interest. Since the reintroduction of wolves in the region more than 20 years ago, collaborative efforts between federal and state agencies, nongovernmental organizations, and individual ranchers to reduce or prevent wolf-livestock conflicts have made great strides in developing tolerance for sharing the landscape with wolves. It is incumbent upon the state of Wyoming to adopt and promote the tolerance

needed for wolves and humans to coexist. Thank you again for the opportunity to comment on this plan. Sincerely, Chamois L. Andersen Senior Representative

Final Comment	Andersen, Chamois Laramie, WY	6/19/2017 5:00:00 PM
up north. I fear we will happen to us much deeper resp	ground on the predator areas. Wolves have deve e will not be able to control the exploding popu in southern Wyoming. Hunters are the ones tha ect and connection to our wildlife. We deserve sitting in downtown Denver	lation and the same thing t pay the bills and have a

Final Comment	Waldren Jaconh	Dowling WV	5/26/2017 1:16:00
	Waldron, Joseph	Rawlins, WY	PM

I strongly oppose the hunting of wolves. The wolves are an apex predator that are essential to the ecosystem and the well-being of many other animals including our Birds. Anyone who researches and looks at the scientific facts will know that this is accurate information and to hunt the Wolves is not necessary for survival. It is a thrill for Trophy Hunters and is absolutely deplorable. Wolf packs are also loving family units and to decimate him for the thrill again is just horrific and if they are left alone to thrive they benefit the environment as well as the ecosystem.

Final Comment	Vietlen Louise	Dimenton WW	6/19/2017 1:23:00
	Kistler, Louise	Riverton, WY	PM

I and my hunting friends are very excited to be able to hunt gray wolves in Wyoming. We hunt the Hoback area, and have seen wolves during the past four years while hunting deer and elk. We have also found the carnage these animals have brought to our Hoback wildlife, including documented slaughters on our elk feed grounds. Thank you Wyoming officials for having a plan that meets Federal requirements and that also protects our precious big game species. Can't wait for approval to start hunting area 12!!

Final Comment	Radakovich, Brad	Dook Springe WV	5/4/2017 4:12:00
	Kauakovicii, Diau	Rock Springs, WY	PM

Trophy hunting is an embarrassment to any man with a gun. I ask that Wyoming Game and Fish end the killing of wolves in Wyoming. Any affect that wolves have on cattle is minuscule; the current population of wolves is just a tiny fraction of what it once was. Killing for trophies is a moral disgrace. Please put an end to all wolf killing in WY.

Final Comment	kemmerer, L.A.	Sheridan, WY	6/19/2017 11:37:00
	Kellinterer, L.A.	Sheriuali, w I	AM

I support the Wyoming Game and Fish Department's proposal for wolf management. Wolves pose a danger to many other wildlife and game animals in Wyoming, costing taxpayers and reducing herds.

Final Comment	Holst, Paul	Sundance, WY	5/22/2017 7:34:00 AM
This is a test. My	v actual comments wer	e not accepted.	
Final Comment	Hayden, Roger	Wilson, WY	6/18/2017 3:41:00 PM

PART 1 OF COMMENTS Wyoming Game and Fish Department 5400 Bishop Blvd Cheyenne, WY 82006 RE: Chapter 47 Gray Wolf Hunting Seasons To Whom It May Concern: Thank you for the opportunity to comment on the Wyoming Game and Fish Department's proposed Chapter 47 Gray Wolf Hunting Seasons. Wyoming Wildlife Advocates is a 501 (c) (3) corporation with thousands of supporters regionally and nationally. They are strongly opposed to trophy hunting of wolves or other carnivores. Our mission is to promote rational science-based wildlife management that fosters ecosystem health and dynamic equilibrium between species. The Sierra Club is a national non-profit conservation organization founded in 1892 with more than 3,000 members and supporters in Wyoming and 3 million members and supporters nationwide. Its mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. Western Watersheds Project, a non-profit 501c3 membership organization dedicated to protecting and conserving the public lands and natural resources of watersheds in the American West. WWP has over 1200 members, including members who live in Wyoming. WWP is active in seeking to protect and improve the riparian areas, water quality, fisheries, wildlife, and other natural resources and ecological values of western watersheds. To do so, WWP actively participates in state and federal agency decision-making concerning public lands management and resources throughout the West. Self-regulating population The proposal to hunt 44 wolves, and thereby remove approximately 20 percent of the estimated population of 210 in the trophy hunt area is not based on science. Ken Mills of the Wyoming Game and Fish Department was quoted in the Jackson Hole News and Guide saying the habitat in guestion was "saturated." Therefore, the population has stabilized and should not be hunted. Reducing this population serves no ecological or biological purpose. Analyzing 14 years of data, Smith et al (2012), noted that, "At the population level, litter size and survival decreased with increasing wolf population size and canine distemper outbreaks." Smith et al found that the leading cause of wolf deaths was by other wolves. In other words, wolves kill each other when competing for resources and space. They don't continue to expand unchecked. Cariappa et al (2011) analyzed data collected at 32 sites across North America and found that wolf populations regulated themselves by density-dependence more than by availability of prey species. They found that wolf populations self regulated by killing each other and were limited less by prey availability by a 3:1 margin. Hunting is ineffective The WGFD is proposing to

reduce the wolf population in the trophy hunt area by approximately 20 percent, with the expectation that doing so will result in a reduction of as much as 85 percent of conflicts with livestock. This is based on the belief that reducing numbers to 2009-2013 levels, the last time the state had control, will result in the lower conflict levels from that time. This approach does not account for changes in population dynamics between then and 2017. It assumes nothing has changed, and that simply reducing the population will achieve the intended result. Regardless, studies have found that reducing wolf populations to reduce conflicts is ineffective. Wielgus and Peebles (2014) studied the effects of wolf mortality on reducing livestock depredations in Idaho, Montana and Wyoming from 1987–2012. They found that for each wolf killed in a given year, chances of predation the following year increased by 4 percent. They also wrote in their study that depredation would begin to decrease only if a wolf population was reduced by 25 percent. With such an annual reduction, however, the population would quickly disappear, the authors noted. The WGFD proposal to reduce the trophy hunt area population is not based on sound science.

Final Comment	Havdan Dagan	Wilson WW	6/18/2017 3:47:00
	Hayden, Roger	Wilson, WY	PM

PART 2 OF COMMENTS Mortalities Why would the WGFD omit from its definition of mortality "gray wolves taken by the Department, gray wolves taken under the authority of W.S. § 23-3-115 (c), gray wolves taken under Lethal Take Permits and known natural and accidental gray wolf deaths." as stated in Section 2 (a) of the proposed regulations? A dead wolf is a dead wolf, and each death reduces the population. Last year, with no hunting in the mix 77 wolves died from a variety of causes. That's 23 percent of the population and pushing Wyoming's managed population perilously close to being unsustainable. This definition of mortality appears to be a deliberate attempt to obscure or hide actual mortality and provide population estimates that are inaccurate and dishonest. The WGFD should count all known wolf deaths and causes if that can be determined. Pack Dynamics Randomly killing wolves through hunting would not benefit the population you're proposing to manage. Removing key family members disrupts pack dynamics and is not a responsible way to manage these animals. Further, Wielgus and Peebles suggest that randomly killing pack members disrupts pack discipline, and usually leads to younger wolves breeding and creating new packs. These new packs then need to compete for territory, and often turn to livestock to survive. Plenty of evidence exists to support this. Cassidy et al (2015) concluded: "With the recent findings that density-dependent intraspecific aggression regulates the survival of northern Yellowstone wolves (Cubaynes et al. 2014), our study demonstrates a socially mediated mechanism by which this vital rate is influenced in this population. Our findings also have management implications for social carnivores where human exploitation may alter group composition through the removal of specific individuals. Such anthropogenic influence could indirectly affect competitive abilities of groups, altering natural social dynamics with fitness and population-level consequences." Conflict prevention The state of Wyoming should require ranchers, through statute or regulation, to use of reasonable, non-lethal measures to prevent livestock depredation. These measures have proven to be more effective than lethal measures (Hadidian, 2007; Pratt-Bergstrom, 2016; Fascione, Delach & Smith, 2004; Treves et al, 2016). It would behoove the state to require these measures, rather than pay damage claims

to ranchers who refuse to implement the most basic measures. Loss through disease, weather or depredation is the cost of doing business in this region. Like any other business, agriculture should accept those risks and protect against them. We believe "social tolerance" for large predators on the landscape should be determined not just by ranchers and hunters, but by all citizens of Wyoming. Wolf watching Wildlife watching is growing in popularity in this region, and it is a major contributor to the economy. A recent report (Thomas & Koontz, 2016) found that visitors to Grand Teton National Park alone spent \$597 million in surrounding communities. Visitors to Yellowstone spent another \$680 million, according to a report by the US Department of Interior (2016 NPS Visitor Spending Effects). In numerous surveys, most of these visitors reported that they want to see wildlife, especially our iconic large predators. A recent study (Borg et al, 2016) has found that wolf sightings in Yellowstone and Denali national parks decreased 45% when hunting was allowed at the borders. We therefore request that no hunting be allowed in the trophy hunt areas surround the parks. We need to protect park wolves as valuable park resources but also as a valuable and integral part of our economy and community. Flex zone We further request that no hunting be allowed in the so-called "flex zone," located south of Jackson and along the Idaho state boundary. This area is important for connecting the Wyoming and Idaho wolf populations to foster genetic interchange. Allowing it to be a free-fire predator zone for half the year is not necessary and is counter to its purpose of connecting the two populations. Chronic Wasting Disease As the always fatal Chronic Wasting Disease marches closer to Western Wyoming, with it's iconic elk herds and densely concentrated winter feed grounds, an increasing number of scientists are encouraging an abundance of wolves and other predators on the landscape throughout the region. Wolves in particular have a unique ability to detect disease in an animal like a deer or elk long before humans notice. Predators like wolves are one of the least expensive and most sensible tools we have to mitigate the spread of CWD throughout Wyoming and beyond. "We suggest that as CWD distribution and wolf range overlap in the future, wolf predation may suppress disease emergence or limit prevalence," said Tom Hobbs in a column in the Jackson Hole News and Guide April 2, 2014. Hobbs found through his study of the Rocky Mountain National Park elk herd that wolves can slow or limit the spread of disease by spreading the herds out, and by the removal of carcasses as sources of infection. (Hobbs 2006, Wild et al 2011). His study also found that wolves can limit the lifespan of elk, and therefore limit the amount of time an infected animal has to spread disease. Hobbs concludes that predation by wolves could have potent effects on disease prevalence. We believe it would be foolish to reduce the population of wolves when they provide important ecosystem services in the ecosystem by keeping herds as healthy as possible. The Wyoming Game and Fish Department should incorporate an interdisciplinary team of wildlife health scientists, ecologists, and wildlife managers to manage Wyoming's wildlife in a healthier and more sustainable manner for the future. Conclusion In conclusion, there is no biological or ecological rational for reducing the population by 20 percent. In 2016, wolf mortalities reached 23 percent of the population of wolves outside the national parks without any permitted hunting. This level is pushing the sustainability of this population, and adding hunting to the mix most certainly would push mortalities higher and put this population at risk. We urge the WGFD to abandon plans to allow hunting in the trophy zone. The latest science indicates reducing wolf populations has little effect on reducing conflicts. In fact, it has the opposite effect. Please focus your efforts on conflict prevention

through better livestock management. We appreciate the information provided by Norm Bishop that we included in these comments. Sincerely, Roger Hayden Managing Director Wyoming Wildlife Advocates PO Box 1772 Wilson, WY 83014 307-739-2000 roger@wyomingwildlifeadvocates.org www.wyomingwildlifeadvocates.org And on behalf of: Lloyd Dorsey Conservation Director Sierra Club Wyoming Chapter Box 12047 Jackson, WY 83002 307-690-1967 lloyd.dorsey@sierraclub.org www.sierraclub.org/wyoming Jonathan Ratner, Director Western Watersheds Project – Wyoming Office PO Box 1160 Pinedale, WY 82941 Wyoming@WesternWatersheds.org

Final Comment	Havdan Dagan	Wilcon WV	6/18/2017 3:53:00
	Hayden, Roger	Wilson, WY	PM

PART 3 OF OUR COMMENTS References Smith, Douglas, Daniel Stahler, Erin Stahler, Matthew Metz, Richard McIntyre, Joshua Irving, Rebecca Raymond, Colby Anton, Ryan Kindermann, and Nate Bowersock. 2011. Yellowstone Wolf Project Annual Report. National Park Service Yellowstone Center for Resources Yellowstone National Park, Wyoming YCR-2012-01. Cariappa, C. A., John K. Oakleaf, Warren B. Ballard, and Stewart W. Breck. 2011. A Reappraisal of the Evidence for Regulation of Wolf Populations. The Journal of Wildlife Management 75(3):726–730; DOI: 10.1002/jwmg.74 Wielgus, Robert B., and Kaylie A. Peebles. 2014. Effects of Wolf Mortality on Livestock Depredations DOI: 10.1371/journal.pone.0113505. Cassidy, Kira A., Daniel R. McNulty , Daniel R. Stahler, Douglas W. Smith, and L. David Mech. Group composition effects on aggressive interpack interactions of gray wolves in Yellowstone National Park. Behav Ecol (2015) 26 (5): 1352-1360. DOI: https://doi.org/10.1093/beheco/arv081 Cubaynes S. MacNulty DR, Stahler DR, Quimby KA, Smith DW, Coulson T. 2014. Density-dependent intraspecific aggression regulates survival in northern Yellowstone wolves (Canis lupus). J Anim Ecol . 83:1344–1356. Cubaynes S. MacNulty DR, Stahler DR, Ouimby KA, Smith DW, Coulson T. 2014. Density-dependent intraspecific aggression regulates survival in northern Yellowstone wolves (Canis lupus). J Anim Ecol. 83:1344-1356. Hobbs, N. Thompson. 2006. A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park. Fascione, N., Delach, A. & Smith, M.E. (2004). People and predators. Washington, D.C.: Island Press Hadidian, J. (2007). Wild neighbors: The humane approach to living with wildlife. Washington, D.C.: The Humane Society Press. Pratt-Bergstrom, B. (2016). When mountain lions are neighbors: People and wildlife working it out in California. Berkeley, CA: Heyday Books. Thomas C.C. & Koontz, L. (2017). National park visitor spending effects: Economic contributions to local communities, states, and the nation. (Natural Resource Report NPS/NRSS/EQD/NRR—2017/1421). Washington, D.C.: U.S. Department of the Interior. http://Go.nps.gov/vse

Final Comment	Haudan Dagan	Wilson WV	6/18/2017 3:57:00
	Hayden, Roger	Wilson, WY	PM

It is evident from past years that Wyoming only manages the Publics Resources in the best interests of cattle ranchers. Wyoming is such a beautiful & scenic state. People visit to see

the scenery & the wildlife. Visitors to Yellowstone want to see wildlife & that includes wolves & Grizzly Bears. Visitors bring in many millions of dollars to the state. We also know that Elk populations are healthier when there are wolves to cull sick animals from the herd. With so few wolves left in the wilderness it is essential that they are protected. Humans are causing the 6th Mass Extinction that the earth has seen. Please think of future generations & protect this iconic species. The fate of wildlife is in your hands. We don't want to see our beautiful wilderness trampled by cows. Sincerely Yours. Diane Lang

Final Comment	Lang, Diane	Seattle, WA	5/3/2017 7:19:00
			AM

Ian A wolf viewer of several years I Yellowstone, I and many others are OUTRAGED of your Dispicable Outrageous proposal to Huntington and trap Yellowstone Wolves right up to park boundaries!!! Park wolves will again be victims! There MUST be A Safety Zone for these wolves around the National Park. If this goes through I will BOYCOTT and will No longer visit your park, nor spend any of my money in your State! PROTECT PARK WOLVES with A SAFETY ZONE Ms Connie Burris

Final Comment	Burris, Connie	Springfield, IL	5/10/2017 7:06:00 PM

think it is time for Mankind to Stop playing with the Ecological Balance of Nature ! It is also INHUMANE to re introduce & then offer up as Trophys !!

Final Comment	Tasahanaan Linda	Garland , ME	5/10/2017 5:47:00
	Taschereau, Linda		AM

Please, please end the hunt of wolves. They are genuinely the entire reason my family and I (and all of my friends along with their fanilies) choose to visit your state on a near annual basis. They are an absolutely mesmerizing creature with a MASSIVE following, and allowing them to be hunted is not only causing horrible PR for your state, but I've spoken to many that are refusing to ever return due to the sheer proposal of killing wolves. We have scientific evidence that removing them does little to no good for elk (and so on) populations. If you feel it necessary to have them removed, PLEASE do it the right way by sending them to a conservatory or somewhere that they'll have a chance to survive, because that's what they deserve. They aren't hurting us and should never be treated as "game"- they have just as many emotions as humans, are more loyal than almost any human I've ever met, and are only trying to survive without hurting or threatening a single human. This is 2017- have we not come further than killing intelligent beings for pleasure?

Final Comment	Motalan Achlia	Kongog City, MO	5/5/2017 8:09:00
	Metzler, Ashlie	Kansas City, MO	PM

I choose to live in Wyoming--specifically, Jackson Hole--because it is one of the most beautiful places on earth. It abounds with life and I welcome every bit of it into my yard, into my life and consciousness and soul. Every predator has the right to live here and every predator has its own job to do. People come to Teton County from all over the world--and they want to SEE WOLVES. Living, breathing, family-oriented wolves are valued because they are alive and share our space. Why do citizens of Wyoming keep trying to murder every wolf they see? I am sick of hearing about the importance and necessity for killing wolves! When will Game and Fish understand that wolves (and bears) are more valuable ALIVE? Gather money from tourists, not just hunters! Please stop murdering wolves in any part of this beautiful state, but especially stop the proposed slaughter in Teton County!

Final Comment	Hohenfold Levice	Lashaan WV	5/7/2017 4:33:00
	Haberfeld, Louise	Jackson, w I	PM

I am really disgusted how you can consider other living creatures as "trophies" you have no respect for life and for creatures as wolves capable of feelings surely much more than people who enjoy killing just for pleasure this is sick and sad and evil I will boycott your state and invite everyone to do the same until this barbaric cruelty eil end and do not lie with unscientific reasons because I already know the excuses to justify such a crime!!!!

Final Comment	Illuan, Jin	<b>D</b> :	5/15/2017 1:28:00
	illuall, JIII	Firenze,	PM

1) Wolf depredation statistics do not warrant a hunting season. Weather, starvation, disease, poor husbandry etc contribute to the vast majority of livestock death losses. Wyoming total cattle/calves Jan 1, 2014 = 1,270,000 Wyoming losses, death, cattle/calves 2014 = 30,000 (2.36% of total) Wyoming verified wolf depredations 2014 = 49 (0.16% of losses) Wyoming total sheep/lambs Jan 1, 2014 = 355,000 Wyoming losses, death, sheep/lambs 2014 = 9,000(2.54% of total) Wyoming verified wolf depredations 2014 = 6 (0.067% of losses) 2) Many of the Trophy Game Management Areas are bordering National Parks and Forests, including Yellowstone, Grand Teton, Shoshone, Targhee etc. This means that wolves, who may be more accustomed to the benign presence of humans and vehicles in the Park, can be shot by hunters the moment they cross that invisible boundary and out of protected areas. 3) Evidence shows that disruption of the wolf family unit can actually lead to an increase in livestock depredation, especially if one or both of the "Alpha" pair are killed. Loss of the Alpha female in particular can also have consequences on the survival of any pups, and, as the Alpha male will not mate with any of his offspring, the break up of the pack is almost certain. 4) It is known that some hunters appear to deliberately target Park wolves, especially those wearing radio collars. Any loss of these wolves not only impacts the remainder of their pack, but also the scientific study of the Park biologists. The wearing of an electronic radio tracking device should NOT place an additional target on the individual wolf. 5) While the decrease in quota numbers for three of the Management Areas (1,2,&3) is welcome, the increased quota in four Management Areas (4,8,11,&12) is unnecessary. 6) Wildlife tourism is a massive source of income for the Wyoming economy. Wolves are among the top animals

listed whenever tourists are asked what animal they would most like to see. The previous wolf hunts of 2012 and 2013 had a huge negative effect on that income. Read this article for a first hand insight into this effect on local businesses and economies: http://bit.ly/2pe7KUA It is heartbreaking that people must fight to ensure endangered animals are not slaughtered by the hands of hunters.

Final Comment	Shabbatt Mary	Dunta gorda El	5/22/2017 11:08:00
	Shabbott, Mary	Punta gorda, FL	AM

Re: Section 4. Hunting Regulations for Gray Wolves Designated as Trophy Game Animals. The new wolf-taking regulations--both in and outside of the Wolf Trophy Game Management Area and Seasonal Wolf Trophy Game Management Area--will have a negative effect on the status of the state of Wyoming as a steward of wild places and wildlife. It will have dampening effect on tourism. The national and worldwide population that identifies outside of the ranching industry, fur trade, and trophy-hunting industry is a large and growing voting group and economic force. Although it's natural for those who identify inside of these industries to hold onto their points of view regarding the conservation (or extermination) of natural predator/prey systems, the times are changing, and there's a need for the state of Wyoming to change with them. Although it's possible to ignore this need, it still remains, and its costs will continue to accrue to the people of Wyoming, the U.S., and the world. Sincerely, Scott Slocum

Final Comment Slocum, So	cott White Bear Lake, M	IN 5/22/2017 9:09:00 AM
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Wyoming is still Living in the 1800s. Wyoming has one of The most beautiful landscapes in America, Once teeming with all the wildlife in nature. Now it is full of Cattle, who are NOT PART OF THE LANDSCAPE! Like it or not, Cattle are the invasive creatures here. They trample wolf territory, putting wolf pups in danger, but you all think WOLVES are the vermin. That makes NO sense whatsoever! Cattle ranching and Hunting are determining the "Eco" life of a region, which is a joke, Irresponsible and Despicable! Wolves are the top tier of Nature's ecosystem In North America. They shouldn't Be Hunted! This is a Species That should Always remain as endangered, because Delisting them, ignorantly means to you...SHOOT AND KILL ON SIGHT until they are EXTINCT AGAIN! HUNTERS AND CATTLE weren't part of the landscape 50,000 Years ago... WOLVES were. Either of you Who approves Trapping and Hunting of Wolves In Any Form, Is simply saying you cater To Special Business Interests, and therefore you No longer have the Concerns of the State Of Wyoming in mind. JUST ONCE...figure how much TOURISM INCOME your state brings in, because, believe it or not, THOUSANDS of people from ALL OVER THE WORLD love wolves and come to YNP and the TETONS to see them in the wild. If you don't PROTECT the wolves from being slaughtered into extinction, those tourists and their money will also cease to exist in your state! Make a 30 mile buffer zone for Yellowstone National Park and keep the hunting away from the invisible line between YNP and your trophy hunting. So

what are you going to do? PROTECT THE WOLVES or "cut your nose off to spite your face?"

Final Comment	Bear, Valerie	MEADOW GROVE, NE	5/21/2017 9:37:00 PM
Wyoming or anyw the wild ecosyster depredation of Wy There was a scient the wild. In light of	where else in the countr n on which we all depe yoming's wolves advers tific reason that federal of rapid climate change	g. A viable wolf population, why, is vital to the safe and econor and. Trophy-hunting "benefits" sely affects everyone who lives tax dollars were spent to reintr which impacts on the wild econ and other predator killing.	mic maintenance of a few hunters. The or visits that state. roduce wolves into
Final Comment	KILEY, ANNE	PULTENEY, NY	5/23/2017 4:05:00

i oppose hunting wolvs in teh trophy zone. too many animals are killed by hunters. they have exceeded all quotas and such killing needs reduction. there is too much poaching going on. shut down the blogs that tell wildlife murderers how to kill illegally. we need buffer zones by the parks for a few miles to prevent animals being killed because they wander a little bit out of the parks safety. its a shame that these regulations are promoted by a council filled only with hunter/wildlife murderers and farmers. and that people who believe in humane co existence for people and animals have no voice. thjey are blackballed in having any voice. is that america or democracy or is that like udi amins world? somethign is drastically wrong with this kind of skewed unbalanced voice on wildlife lives.

Final Comment	1.1: :		5/31/2017 1:38:00
	publieee, jean	flemington, NJ	PM

It would be he right thing to do for the wolves, and Wyoming. It has been documented that keeping your top predators helps the rest of the ecosystem stay in balance. This helps remove sickly animals in a natural survival mechanism. Please remember, that most visitors to the area want to see wolves.

Final Comment	Calbert Sussemab	Lag Vagaa NV	6/1/2017 8:58:00
	Gelbart, Susannah	Las vegas, NV	АМ

Wolf hunting must be STOPPED, cause, this is a senseless attitude toward our Wolves ... Why not to start "human hunting - chasing all the hunters" in America & around the world ??? ... That's our Wolves would hope for ... Sincerely, Renato

Final Comment	Giullino, Renato	Manhattan, NY	5/28/2017 11:20:00
			PM

PM

Please stop the wolf hunt. Our wolves are essential to the ecosystem that supports our lives. Thank you.

Final Comment	Weidner, Patrice	Port Angeles, WA	5/29/2017 7:25:00 PM			
I think there needs to be a season on the wolves in order to be able to control their numbers and help control our big game numbers. There has been too many people suffer from these animals including the Game and Fish department. I personally think you should make people buy a wolf tag/stamp through out the state just simply for the reason to help bring in funding to the department. I am glad for the success for the reintroduction to be able to give us sportsmen a chance to hunt an apex predator like this. Would also like to see the same thing for grizzly bears.						
Final Comment	Bergeson, Johnny	Laramie, WY	5/26/2017 2:04:00 PM			
First of all I want to thank the Wyoming Game and Fish Department for continuing to work with USFWS and other parties to ensure that the wolves within the state boundary of						

Wyoming are being managed using valid scientific data. The WYGF has done an excellent job of collecting data on the existing populations of wolves living in Wyoming. The highly qualified staff employed by the WYGF are very capable of managing our population of wolves now and into the future. The wolves within the State of Wyoming SHOULD be managed by the WYGF department and NOT USFWS. I fully support the Wyoming Game and Fish Commission's Gray wolf Hunting Seasons which are currently under review. Thank you!

Final Comment

Raper, Kathy

Pinedale, WY

6/7/2017 10:32:00 AM

Here is the Comment We Just Submitted, use it, edit it Use Protect The Wolves<sup>™</sup> as your Organization if you Choose. Wyoming has been caught selling banned poisons already in the Past, Wyoming has no Business managing any resources for the Public. Wyoming only manages the Publics Resources in the best Interest of Cattle Ranchers a Special Interest Group. RMEF even told us our Elk populations were healthier when there were over 2 million Wolves. For any state to claim that wolves need to be managed is beyond absurd when there are less than 1700 Left in Montana, Wyoming, Idaho, Oregon, Washington and California. Wyoming is in Direct Violation of the Trusts if they continue to Manage our resources only for Cattle Ranchers! The Public does not think that you deserve to manage

## WGFD Web Survey Chapter 47, Gray Wolf Hunting Seasons

Any Resources period!! You skated by on the last charges against you.... that would have not been allowed for the public, what makes it different for Wyoming?

Final Comment	Austin , Gary	Evansville, IN	5/4/2017 5:53:00 PM
within the Troph OUTSIDE the c at ANY time. A is just too much predatory anima does not manag wolves that occu Game and Fish to look after the	hy Game Management lesignated Trophy Gan nd now the wolves ins a. "Wolves outside the als as defined in state la e for population viabil ur in these areas are m Department In regards ir animals, or spend tim	is again proposing gray we Areas. It is important to re- ne Management Area can a ide the TGM area are being Trophy Game Managemen aw and therefore can be ha ity outside the Trophy Gam ore likely to be involved in to potential conflict with 1 ne, money, and energy on swer. Sincerely, Gary Kasp	emember that wolves already be shot on sight g targeted as well? This it Area are considered rvested. The department me Management Area as a conflicts." ~ Wyoming ivestock, ranchers need non-lethal deterrents,
Final Comment	Kasper, Gary	Wimberley, TX	6/15/2017 10:23:00 AM
beautiful state. T	These animals are not t	not be listed as a predator rophies. Wyoming is being urism! Hunting of wolves	y viewed as a back-
Final Comment	Bosworth, Marla	Jackson, WY	6/19/2017 10:13:00 AM

10:13:00 AM

Xerra - WorkGenine - Pilo

I am revolted that 50 trophy hunting John of gray wolves. John You MUST provide 35 a buffer safe zonepu you are allowing 433 a butter surrounding parks wyoming Game and surrounding parks wyoming Game and because critters, Fish Dept do NOT understand Wildlife Divison houndary limits. Do Wildlife Divison The bound - Attn: Regulations The bound - Attn: Regulations ned in + 3030 Energy Lane boundary limits, Do 1 náve dries outlined in Casper wy Lamb (detail), 2013. Kathafine Bernwell. End and Lamb (detail), 2013. Katheline Barnwell. From Antimal Box 1:00 Postcards by 10 Artists. SO huntless Published by Princeton Architectural Brits. Dis Katharine Barnwell. Whene they are?! [DIOTS] .





## Chapter 47, Gray Wolf Hunting Seasons

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## All written comments must be received at the below address no later than 5:00 p.m., June 19, 2017.

Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604	MAY 19 2017
0	WYOMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING
Comments:	
As a representative of Bowhunters of W appreciate the Giff dept. considerine adding	yoming I would
	to the apple
pre Scason for Elkadeer. This offerder	1 -1 0 0
bowhunters to hunt take a gray wolf whi	le hunting elk or
deer in during the sept. We are asking	for this to share
the quota and not in cleasing the quota.	
8 0	
	(Please use reverse for additional comments.)

Steva Martin

5/17/17 Date



## Chapter 47, Gray Wolf Hunting Seasons

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Wyoming Game and Fish Department Wildlife Division **ATTN: Regulations** 3030 Energy Lane Casper WY 82604 OMING CAME & FISH WILDLI & DIVISION Comments: CASPE WYOMING Hickeful present ctive 100 ec. ecre araci 00 to aul. 10 quesel 61 Aminale (Please use reverse for additional comments.) Dotsaha-th 22/1 Date

5/2017

I'm Roger Hayden, executive director of Wyoming Wildlife Advocates.

Thank you for the opportunity to comment on the Wyoming game and fish proposed wolf hunting regulations.

Our mission is to promote science-based wildlife management that fosters ecosystem health and a natural balance among species.

According the game and fish department, the trophy game area in question is "saturated." To us, that means the population has self-regulated and stabilized.

Therefore, there is no biological or ecological reason to kill 44 of the estimated 210 wolves in this zone. In other words, killing roughly 20 percent of the population in this area would serve no obvious need nor provide clear benefits.

In fact, doing so certainly would not benefit the population you're proposing to manage. Removing key family members from packs is disruptive and not a responsible way to manage wildlife.

With the approach of Chronic Wasting Disease, the role wolves and other large carnivores will play in removing diseased animals and keeping prey populations healthy is that much more important. Maintaining them on the landscape is wise management.

Aside from the scientific problems with this plan, it also would have negative consequences for our vital regional tourism industry.

Wildlife watching generates approximately \$1 billion a year for this region. Wolf watching generates an estimated \$35 million. We should acknowledge that before making decisions that ultimately delivers no obvious ecological benefits, but could cause harm in numerous ways.





#### Chapter 47, Gray Wolf Hunting Seasons

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Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604

Comments: agree with the Wyoming Game + Fish Department's Wolf management regulation changes. (Please use reverse for additional comments.)



|23|2017









#### Chapter 47, Gray Wolf Hunting Seasons

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Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604

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Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604

Comments:			
I support Wyoming	Game + Fish	departments	Sezaard
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## Chapter 47, Gray Wolf Hunting Seasons

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All written comments must be received at the below address no later than 5:00 p.m. Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604 AY 25 2017 OMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING Comments: UOH Cean m wol 125 9 *L*1 I å\_ W ano Wolu ne 4 a rsol Wo luea đ leo 0 fede 2.77 ance 1.4 75 70 Ôu, Cows 130 bu 1 ZOM 11**1**WS Z ma 70) (Please use reverse for additional comments.) wolves Goldman May 27 2017 ndu **Printed Name** 5/2017



## **Chapter 47, Gray Wolf Hunting Seasons**

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All written comments must be received at the below address no later than 5:00 game June 19 Wyoming Game and Fish Department Wildlife Division 2017 25 **ATTN: Regulations** 3030 Energy Lane Casper WY 82604 OMING GAME & F WILDLIFE DIVISIO: CASPER, WYOMING Comments: WI M 316 Dan (Please use reverse for additional comments.) INA GAYLER  $\overline{O}$ 5/2017

Jaramel



Wyoming Game and Fish Department Chapter 47, Gray Wolf Hunting Seasons

PO Box 161281 Duluth, MN 55816 www.wolfwatcher.org

The National Wolfwatcher Coalition is an all-volunteer, nonprofit organization dedicated to promoting positive attitudes about wolves through education. Nationwide, we have over 800,000 followers, representing not only Wyoming residents but thousands of others who contribute to the state's tourism economy, specifically travelling to Wyoming in the hope of catching a glimpse of a wild wolf.

The National Wolfwatcher Coalition does not support the quota of 44 wolves within the Wolf Trophy Game Management Area (TGMA). While some will consider this quota "conservative", we believe it is unreasonable for the following reasons:

- Wolves can be hunted and trapped any time as a predatory animal in most of the state.
- Within the TGMA any wolf in the act of damaging livestock can be killed by the owner or any other person charged by the owner with the care of the livestock or dog.
- Aerial gunning of wolves inside the TGMA is allowed to control livestock depradations, to achieve ungulate management objectives if wolves are determined to be a significant cause for not meeting those objectives, or to address human safety issues.
- Past experience has shown that the quota was exceeded outside the Park boundaries (2012 exceeded by 1 wolf in WHA 8 - Fish Creek wolf hunt area outside Tetons & 2013 exceeded by 1 in WHA 2 - Sunlight wolf hunt area outside YNP)
- Yellowstone Park interpreters annually talk to anywhere from 30,000 to 50,000 people a year about wolves and in a recent Park survey, the number one animal visitors hope to see is the wolf. When a Park wolf is killed legally or illegally, it creates world-wide outrage and reflects poorly on the state. At a minimum, there should be large buffer zones, closed to wolf hunting, around our National Parks.
- Our National Parks provide an economic benefit to local gateway communities (defined as 60-mile radius around each park boundary). In 2016, the economic output for Yellowstone National Park was \$680 million (Tetons it was \$779 million).

Jaranel

Wyoming already has extremely liberal wolf management regulations. There is no scientific reason to hunt wolves within the TGMA.

The North American Wildlife Conservation Model states that wildlife is held in the public trust to be managed for all and does not support the casual killing of wildlife. Hatred is not a valid reason.

Washington State University researchers have found that it is counter-productive to kill wolves to keep them from preying on livestock.

Research also suggests that hunting wolves does not increase tolerance or reduce poaching. In one study, it was found that poaching increased, suggesting that liberalizing wolf culling may have sent a negative message about the value of wolves or that poaching prohibitions would not be enforced.

Another study showed that hunters of wolves showed little inclination to conserve wolves.

We believe Wyoming Fish & Game should do more to educate the public, including hunters, about the positive aspects of wolves. For example, there is strong evidence that wolf predation could markedly decrease prevalence of CWD. Wolves facilitate the recovery of browse-sensitive understory herbs and forest regeneration. Long-term trophic linkages have been identified in the Northern Range of Yellowstone National Park between wolves, elk, and deciduous tree species — aspen and cottonwood.

Just because we can kill wolves; doesn't mean we should. We now have fewer wolves in Yellowstone National Park than we did 15 years ago.

Politically based management does little to protect the ecological benefits of wolves and does not increase tolerance.

In summary, we ask for buffer zones adjacent to the National Parks, where there is no wolf hunting and greatly reduce the quotas elsewhere within the TGMA.

Thank you for the opportunity to comment.

These 05/24/2017 Kriszta Gavler

Colorado/Wyoming Representative



## **Chapter 47, Gray Wolf Hunting Seasons**

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All written comments must be received at the below address no later than 5:00 page Fine 1972017: Wyoming Game and Fish Department Wildlife Division IAY 25 **20**17 **ATTN: Regulations** 3030 Energy Lane Casper WY 82604 YOMING CAME ? H CASFER, WYOMIN Comments: 4120-214 AA (Please use revene for additional comments.) 1) porkis Printed Name Date 5/2017

larand.

To Wyoming Game and Fish Commissioners May 24, 2017 Petition for Regulation Change Attachment A

Protect The Wolves™ Pack is a Native American group that speaks for approximately 57,000 members, is seeking 501c4 status in that the group speaks for our sacred resources. All living things are considered Sacred to the majority of indigenous people that respect their elders' teachings.

Indigenous people hold that wildlife are sacred:

Animais, in many of today's indigenous cultures, are imbued with powerful spiritual significance.

In the The Seven Sacred Teachings of White Buffalo Calf Woman, also known as the Seven Grandfather Teachings, these teachings are shared, valued and practiced by many indigenous peoples.

These Teachings are universal, "the traditional concepts of respect and sharing that form the foundation of the Indigenous way of life are built around the seven natural laws, or sacred teachings.

Each teaching honors one of the basic virtues intrinsic to a full and healthy life. Each law is embodied by an animal to underscore the point that all actions and decisions made by man are manifest on a physical plain. While the animal world taught man how to live close to the earth, and the connection that has been established between the animal world and that of the indigenous has instilled a respect for all life in those who follow the traditional Indigenous way."

Love - Eagle Respect - Buffalo Courage - Bear Honesty - Bigfoot Wisdom - Beaver Humility - Wolf Truth - Turtle

Indigenous people lived in <u>Yellowstone</u> more than 10,000 years ago, Shoulderblade said. A total of 28 tribes have ancestral connections to Yellowstone National Park, which still is considered sacred land.

There are currently more than 1,600 tribal cultural sites that exist within park boundaries. These sites are part of our heritage no different than the Wildlife that we hold Sacred

"When authorized under National Historic Preservation Act, the Archeological Resources Protection Act or other provisions of law, the Service will protect sacred resources (Wildlife being one of our Sacred Resources Please refer to Yellowstone National Park Management Policy <u>https://www.nps.gov/history/tribes/documents/npsmanagementpolicy.pdf</u>) to the extent practicable and in a manner consistent with the goals of American Indian tribes or other traditionally associated groups.

https://cdn.fbsbx.com/v/159.2708-21/18537619\_1225335764242...oh=91ccc3b6c8z3cd/b518452b382z97961&cc=592880A2&dl=1

Jaranel

The Indigenous People do not discount items held sacred by other cultures, yet it continues to be an issue when the Indigenous speak of what they hold sacred.

The Wyoming Game and Fish Commissioners are trustees of not only Indian trust resources but also the public's resources, and are attempting to manage resources like wolves, grizzlies, bison that are considered federal resources as well. These species fall under the protection of not only the Indian trust, but the public trust as well as evidenced below under CITES.

Prior to setting any wolf hunting season surrounding Yellowstone National Park,

Protect The Wolves™ Pack requests that you consider our petition for regulation change that includes a 50 km Sacred Resource Protection Safety Zone around Yellowstone and Grand Teton National Parks. Alaska has already brought forward Protections surrounding Denali National Park.

Yellowstone and Grand Teton National Parks not only hold countless sacred sites, but also many different sacred species in the beliefs of the indigenous people. These animals that have resided within the Parks have become humanized (wildlife without the fear to flee in human presence) over time, in effect means that they do not stand a chance should they exit federally protected lands.

Wildlife are not able to see boundaries, and as such not only deserve protection under the laws of the United Nations, but also those mandated upon the Trustees that fall under the Indian trust, public trust, as well as nature's trust, a within these areas surrounding all of our National Parks.

Nature's Trust By Wood, Mary Christina develops a framework, Nature's Trust, to characterize government's ecological obligation in the modern ecological age. Nature's Trust draws forth an ancient and enduring legal principle known as the public trust doctrine. With roots extending back to early Roman law, the doctrine rests on a civic and judicial understanding that some natural resources remain so vital to public welfare and human survival that they should not fall exclusively to private property ownership and control. Under the public trust doctrine, natural resources such as waters, wildlife, and presumably air, remain common property belonging to the people as a whole. Such assets take the form of a perpetual trust for future generations. The public's lasting ownership interest in this trust vests in both present and future generations as legal beneficiaries. Public trust law demands that government act as a trustee in controlling and managing crucial natural assets. Held to strict fiduciary obligations, government must promote the interests of the citizen beneficiaries and ensure the sustained resource abundance necessary for society's endurance. The U.S. Supreme Court declared in Geer v. Connecticut: "[ I] t is the duty of the legislature to enact such laws as will best preserve the subject of the trust, and secure its beneficial use in the future to the people of the state." This duty arises as a limitation on government, an expectation that still smoulders in the popular sovereignty held by the people. As a foundational property law principle, the trust doctrine imparts the original legal mechanism to ensure that government safeguards natural resources necessary for public welfare and survival. Long predating any statutory law, the reasoning of the public trust puts it on par with the highest liberties of citizens living in a free society.

This public property right ranks so fundamental to citizens that some scholars describe it as a natural right or human right. As Professor Joseph Sax auggested more than four decades ago in a landmark article, the public trust responsibility underpins democracy itself, demarcating a society of "citizens rather than of serfs."

Wood, Mary Christina (2013-10-31). Nature's Trust (pp. 14-15). Cambridge University Press. Kindle Edition.

Should you refuse to set this petition for requested regulation change to the next available meeting, along with the delay in setting any wolf hunting seasons, you will be in direct violation of not only the above-mentioned trusts, but in direct Violation of the Mandates placed upon you under said Trusts. It is imperative that our nation's Trustees begin to manage the public's resources in the best interest of all included, the Indian trust, as well as "the public" trust, as well as Natures Trust

There is already sufficient case law that has proven our indigenous resources under the Indian trust do not have to solely exist within reservation boundaries. With regard to our sacred resources, objects, or sites it should not matter where our sacred resources, such as wildlife, exist under the auspices of the National Environmental Protection Act as well as our Indigenous Religious Freedom Restoration Act.

Please see Definition of Indian Country.

#### **Definition of Indian Country**

Indian country is defined at 18 U.S.C. § 1151 as:

- all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation;
- b. all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state; and
- c. All Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same.

Consistent with the statutory definition of Indian country, as well as federal case law interpreting this statutory language, lands held by the federal government in trust for Indian tribes that exist outside of formal reservations are informal reservations and, thus, are Indian country. Indian Country with Treaties specifically use the language of "usual and customary places" which then extends Indian country off of known Reservations.

The Yellowstone National Park fails into this Category because it contains 1600 plus Sites Sacred to the Indigenous as well as Sacred Wildlife of which Wolves, Grizzlies, Bison to name a few are held Sacred by the majority of Tribes.

The Trusts, all-inclusive prohibit Trustees from managing Resources that are at the request and demand of Special Interest Groups like Cattle

Ranchers or Trophy Hunters, to manage the Trusts resources in a manner only geared towards these Special Interest Groups. Further these Trusts mandate that there shall be no special interest Groups involved in the suggestion of or included in the management of said public resources.

Dependent Indian communities are a category of Indian country that are not Indian reservations or individual Indian allotments and that satisfy two basic criteria. First, the U.S. Government for the use of Indians as Indian land must have set them aside. Second, they must be under federal superintendence – that is, the federal government must exercise a degree of control or oversight of these lands for Indian purposes. Which now brings the Indian Trust, Public Trust, as well as National Historic Preservation Act, the Archeological Resources Protection Act or other provisions of law, the Service will protect sacred resources (Wildlife being one of our Sacred Resources Please refer to Yellowstone National Park Management Policy to bear upon Wyoming's attempt to manage resources that fail into the above categories.

The Gray Wolf Management Plan must include protection of the Grey Wolf in the National Elk Refuge, (NER) (SRPSZ) because Congress enacted the National Elk Refuge (NER) in 1912 to protect the Jackson Elk Herd from what had been massive starvation in the winter months. The refuge was enacted to provide winter refuge, forage and feed for the elk to curb starvation and depredation by the elk on local cattle ranches. The National Elk Refuge has been managed in concert with the WGFD for a reduction in the total population of the Jackson Elk Herd, and in particular the total number of elk wintering on the (NER) since 2007. In result The National Elk Refuge, (NER) has published the benefit the wolf packs had been on the NER each winter in terms of further reducing the wintering elk population. These wolves in addition to hunting, preying, and culling the elk herd, are viewed, observed, appreciated and photographed by winter visitors to the (NER) and to the Jackson Hole Vicinity. In the spring as the elk migrate from the refuge with the reduction in elk population not all the wolves follow the elk, some wolves have preved upon the cattle on the local cattle ranches, the ranches the (NER) was enacted to protect from elk depredation. The USFWS has been employed to kill the wolves that the USFWS applauded on the (NER) as predators on adjoining lands. Now this predator control shall revert to the regulations of the WGFD. This management must be regulated in the public trust with the requisite public input and this includes all the public, as this is the National Elk Refuge and not limited to the State of Wyoming. The (SRPSZ) in the (NER) surround is required.

We can not allow Cattle Ranchers to use Wolves as a scapegoat, simply due to the fact that A Cattle Rancher in Oregon where Police say a 69year-old man has been arrested in northeast Oregon for elk poaching after an investigation into 25 elk carcasses on and around his property. And was arrested on 12 counts of unlawful take of elk in a closed season and 12 counts of waste of elk. This on Rancher is not the only Rancher that does terrible acts such as this. He just happens to be one that got caught.

## The Wolf, not only being Sacred to the Indigenous, are also considered a species protected for international trade. Please see the inclusion as

#### referenced in CITE

Canis lupus is a Listed Species under Checklist of CITES Species

CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora, 27 U.S.T. 108) - Establishes a system of import/export regulations to prevent the over-exploitation of plants and animals listed in three appendices to the Convention. Different levels of trade regulations are provided depending on the status of the listed species and the contribution trade makes to decline of the species. Procedures are provided for periodic amendments to the appendices.

CITES was signed by 80 nations in Washington, D.C., on March 3, 1973. United States ratification occurred on September 13, 1973, with documents submitted to the depository government (Switzerland) on January 14, 1974. CITES entered into force on July 1, 1975.

Implementing legislation for the United States was provided by enactment of P.L. 93-205, the Endangered Species Act of 1973. Executive Order 11911, signed April 13, 1976, designated Management and Scientific Authorities to grant or deny requests for import or export permits.

Public Law 96-159, signed December 28, 1979 (93 Stat. 1255) designates the Secretary of Interior, acting through the Fish and Wildlife Service, as both the Management and Scientific Authority for implementation of CITES. It also created an International Convention Advisory Commission, which was later abolished by P.L. 97-304, October 13, 1982.

Public Law 97-304 also requires the Secretary of State to report to Congress when a reservation is not taken to the inclusion of a species in the appendices when the United States votes against it. In addition, these amendments require certain scientific authority findings to be based upon the best available biological information, but no State is required to make population estimates for such determinations.

As of November 28, 1999, 146 countries were party to the Convention, and they had held ten biennial meetings of the Conference of the Parties. The U.S. Fish and Wildlife Service hosted the Ninth Conference in Fort Lauderdale, Florida, in 1994. For more information on CITES, go to the U.S. Fish and Wildlife Service International Affairs CITES website at

http://checklist.cites.org/#/en/search/output\_layout=alphabetical&level\_of\_li sting=0&show\_synonyms=1&show\_euthor=1&show\_english=1&show\_soa nish=1&show\_french=1&scientific\_name=Canidae&page=1&per\_page=20

The Grey Wolf Management Plan shall include adequate regulatory mechanisms to ensure the preservation of the grey wolf species in the (SRPSZ). This requirement includes and is not limited to regulations, which clearly define each element of the crime of illegal take of a Gray Wolf. This shall include clear definition of the penalty for said illegal take which shall be a clear deterrent to a violation of this law. It is mandatory that the deterrent include a loss of hunting license/privilege for an appropriate period of time and restitution in the amount to be determined from public input and from the science of wolf management to date. The laws shall be clear and irrefutable if you kill a wolf illegally you will lose your ticket to hunt and you will pay. You may go to jail depending upon the gravity of your offense. The mandatory jail term offense shall be clearly defined in Summary, we ask that you do what is right, and set aside any setting of wolf seasons until this petition for Regulation change can be 100 percent fully evaluated. Wolves, Grizzlies, as well as Bison are considered a Sacred Animal to name but a few, as such should be guaranteed the same protections that the Government places upon the Freedom of Religion. Especially when these Sacred Species exit the boundaries of Yellowstone National Park where many Indigenous Sacred places and wildlife currently are protected, then exit Parks without knowing that they remain protected.

#### WGFD Tracking Number: 05242017

To request a change to regulations under the authority of the Wyoming Fish and Game

Commission (Commission), you are required to submit this completed form to the

Laramie Wyoming Meeting May 24th. By Protect The Wolves<sup>TM</sup> Pack Volunteer Staff

Member Vicki Markus who resides within Wyoming.

#### SECTION I:

#### 1. Person or organization requesting the change Organization: Protect The Wolves™ Pack a Native American Group

Name of primary contact person: Roger Dobson, Director of Media. Patricia Herman, President Address: 27946 Henry Mayo, Castaic CA 91384 Telephone number: <u>406-219-8690</u> Email address: <u>roger@protectthewolves.com</u>

2. Rulemaking Authority - Patition to the Wyoming Game and Fish Commission ("The Commission") pursuant to the Wyoming Administrative Procedures Act, W.S. 16-3-106, to amend hunting regulations and hunting areas pertaining to wolves pursuant to the Wyoming Gray Wolf Management Plan.

3. Overview – To amend the Wyoming Gray Wolf Management Plan to establish a RESOURCE PROTECTION SAFETY ZONE (SRPSZ) of 50km, or approximately 31 miles around All National Parks and the National Wildlife Refuges located in Wyoming Including Yellowstone and Grand Teton National Parks and the National Eik Refuge, (NER). Further, we are requesting a delay in the hunting season

to allow this matter proper consideration as well as the input from all interested publics in the United States of America. This is due to the fact that Yellowstone and Grand Teton are in fact National Parks, which were established "for the benefit and enjoyment of the people" in The United States. Congress enacted the National Elk Refuge (NER) in 1912 to protect the Jackson Elk Herd from what had been massive starvation in the winter months. The refuge was enacted to provide winter refuge, forage and feed for the elk to curb starvation and depredation by the elk on local cattle ranches. The National Elk Refuge has been managed in concert with the WGFD for a reduction in the total population of the Jackson Elk Herd, and in particular the total number of elk wintering on the (NER) since 2007. In result The National Elk Refuge, (NER) has published the benefit the wolf packs had been on the NER each winter in terms of further reducing the wintering elk population. These wolves in addition to hunting, preying, and culling the elk herd, are viewed, observed, appreciated and photographed by winter visitors to the (NER) and to the Jackson Hole Vicinity. In the spring as the elk migrate from the refuge with the reduction in elk population not all the wolves follow the elk, some wolves have preyed upon the cattle on the local cattle ranches, the ranches the (NER) was enacted to protect from elk depredation. The USFWS has been employed to kill the wolves that the USFWS applauded on the (NER) as predators on adjoining lands. Now this predator control shall revert to the regulations of the WGFD. This management must be regulated in the public trust with the requisite public input and this includes all the public, as this is the National Elk Refuge and not limited to the State of Wyoming. The (SRPSZ) in the (NER) surround is required.

4. Rationale – To save taxpayers the cost of collaring wildlife an expense that MFWP finds necessary to install new collars each year, in addition to prevent the human-caused mortality of humanized wildlife, legal or otherwise (wildlife that have become accustomed to human presence, such as in Yellowstone, wherein they are unaware of human threat due to hunting or otherwise) that venture outside of Yellowstone National Park. They are not only state or federal resources; they are sacred tribal resources, as well as public resources. As Such, need their Federal Protections within the SRPSZ.

#### **SECTION II:**

5. Date of Petition: Will be hand served in Laramie May 24th by our Wyoming volunteer staff member Vicki Markus

#### 6. Catagory of Proposed Change

Hunting/Trophy areas surrounding all designated National Parks including Yellowstone and Grand Teton N.P and the National Elk Refuge with wildlife that have been humanized. Wildlife that are used to being near Humans as the resources of all the people of the United States, Tribes included, due to these being sacred resources.

#### 7. The proposal to Amend Wyoming Game and Fish Commission Chapter

21.

Amend Chapter 21 Section (3): Add section to item (j) that includes establishing

A SACRED RESOURCE PROTECTION SAFETY ZONE of 50km surrounding All National Parks within Wyoming including Yellowstone and Grand Teton National Parks, and the (NER), and that wolves within this zone must be protected from any and all human-caused mortality to the greatest extent possible.

Add new line item chapter 21 Section (III): National Park Resources adding

the following: Wolves in the greater Yellowstone acosystem are resources of the public of the United States of America, and as such will not be managed by Wyoming Game and Fish as Trophy Game Animals. (These Public Resources are Protected under not only the Indian Trust, but the Public Trust and cannot be managed at the hands of special interest hunter or rancher groups). Furthermore, Wyoming's shoot-on-sight approval in "Predatory Animal" areas has the effect of approving the unmanaged slaughter of wildlife held sacred by most if not all indigenous tribes in North America, and as such will be terminated immediately.

Further Wyoming Statute Title 23 shall be amended to ban all hunting of predators in the nighttime hours; this is defined as thirty minutes after sunset to thirty minutes before dawn or sunrise. The hunting and the killing of predator animals in the dark is likely to result in the mistaken ID take of predatory animals and of gray wolves.

A Further Amendment to Wyoming Statute Title 23 shall preclude and ban the use of the "Calls" of Predatory Animals in the SRPSZ. Hunters shall not be allowed to call the Grey Wolf and other predators from the safety zone of the park and refuge boundaries, and we request a 15 mile zone for No Calls outside of the Sacrad Resource Protection Zone.

Add New Line Item: Marked or Radio-Collared Animals – To be Illegal. It is liegal to shoot game animals that have radio collars, neck bands, ear tags and/or other markers,

Making it illegal to take an animal with a collar on it.

Wyoming Statue Title 23 shall also be amended to preclude the use of bear bait in the SRPSZ zone. This practice has resulted and does result in the mistaken ID shooting of Grizzly Bear a threatened and federally protected species. It is not legal for hunters to feed or chum wild animals with bait other than permitted bear bait sites. Many of these bear bait sites are in the SRPSZ and directly adjacent to cattle ranches. Bear Bait shall result in attracting the Gray Wolf to inappropriate locations. This shall not be allowed in the SRPSZ

8. Effective date This proposed change requires either immediate implementation,

or a delay in the setting or initiation of any wolf hunting season in Wyoming. Wyoming is

attempting to manage public resources without involving all parties that should

be included in the managament of our federal, public and Indian trust resources under mentioned trusts with those sacred resources (Indigenous Sites are but 1 of our Sacred Resources) within Yellowstone National Park are being currently federally protected.

#### 9. Supporting documentation: See Attachment A

10. Economic or Fiscal Impacts: Continued hunting as Trophy Animals, or as Predatory Animals will impact greatly the ability of not only Yellowstone National Park, but also all National Parks, and National Wildlife Refuges (being a designation to protect and preserve their natural heritage for the use and enjoyment of the people), impair the ability of these National Parks and National Wildlife Refuges to continue drawing visitors for the viewing of wolves and other wildlife.

11. Under Section 2, Definitions. For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes and we

petition the Commission also to adopt the following definition: (a) "Human-caused mortality" means any legal or illegal human-caused gray wolf death that occurs during an open gray wolf hunting season or at any other time, excluding gray wolves taken by the Department, gray wolves taken under the authority of W.S. § 23-3-115 (c), gray wolves taken under Lethal Take Permits and known natural and accidental gray wolf deaths.

12. Should Wyoming Game and Fish Commission refuse to give this matter the Public Comment Period worthy of a national resource, not merely a state resource, then Wyoming Game and Fish will be in direct conflict with the mandates placed upon them by the Trusts as a Trustee.

(a)Further The State of Wyoming needs to acknowledge the death of the female wolf known as "The White Lady" that Yellowstone National Park officials had to authanize due to the actions of an illegal poacher. Necropsy results prove this human-caused mortality was from gunshot wounds. While this crime most likely occurred in Montana, current lax regulations in Wyoming make this type of event likely in Wyoming as well. Wyoming Trustees need to be accountable for including resource loss and reflect such in their trophy areas.

The Grey Wolf Management Plan Shall include adequate regulatory mechanisms to ensure the preservation of the grey wolf species in the (SRPSZ). This requirement includes and is not limited to regulations, which clearly define each element of the crime of illegal take of a Gray Wolf. This shall include clear definition of the penalty for said illegal take which shall be a clear deterrent to a violation of this law. It is mandatory that the deterrent include a loss of hunting license/privilege for an appropriate period of time and restitution in the amount to be determined from public input and from the science of wolf management to date. The laws shall be clear and irrefutable if you kill a wolf illegally you will lose your ticket to hunt and you will pay. You may go to jail depending upon the gravity of your offense. The mandatory jail term offense shall be clearly defined

**SECTION 3: WGF Commission Staff Only** Date received: WGFC staff action: WGFC authority Tracking Number: Date petitioner was notified of receipt of petition and pending action:

Meeting date for WGFC consideration:

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# Tony Povilitis They have over 350,000 signatures on various patitions



## Progress

20,417 signed 4,583 more needed Invite friends

## 37 Updates

Trophy hunting Yellowstone Wolves - A National Disgrace!

Keep sharing this petition, dear friends...And thank you for pushing forward!https://www.facebook.com/WolfYellowstone/photos/a....

- Share
- Comments 16
- Like 0

Update #37 · 6 days ago

## • SIGN THIS ONE TOO! (Time sensitive: Before May 20, 2017)

This PETITION to the Montana Fish and Game Commission requests that a specific area right next to Yellowstone National Park be closed to wolf trophy hunting and trapping. It also calls for permanent protection of wolves along Montana's entire border with...

• Share

• <u>Comments 9</u> • <u>Like</u> 1 Update #36 · 11 days ago

## Sign the Petition to

## The Governors of Idaho, Montana, and Wyoming; the U.S. Secretary of the Interior; the U.S. Secretary of Agriculture; the Chief of the U.S. Forest Service; The President of the United States; selected members of the U.S. Congress

Please end trophy hunting and trapping of wolves near our Yellowstone and Grand Teton National Parks. We ask that you work with other federal and state authorities to create a no-hunt, safety zone for wolves around these national parks.

Frankly, we are outraged that wolf hunting and trapping near our parks was authorized in the first place. It makes absolutely no sense. Many thousands of people from all over the USA and the world travel visit these parks to see and enjoy wolves. Park wolves so cherished and enjoyed by so many people have already been killed, while others are now threatened by these hunts.

Please act in the greater public interest and uphold the "non-impairment" standard for our national parks.

A positive response from you on this matter will encourage us to visit the Yellowstone area and eagerly support its tourist industry and local communities.

We look forward to your kind reply. Thank you.

Signed,

**Tony Povilitis** 

Sign the Petition

## How this will help

It's an important part of a broader "Campaign for Yellowstone's Wolves" (see Facebook)

## 38 comments

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Campaign f Wolves	or Yellowstone's
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Stop Wolf Trophy Hunting Near Yellowstone National Park!

110,062 SUPPORTERS

130,000 GOAL

OTHER URGENT PETITIONS NEED YOUR HELP

## TAKE ACTION NOW





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1 to

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CURRENT PETITIONS 103,059 Tony Povilitis http:// www.thepetitionsite.com/ 793/703/287/no-wolf-trophyhunting-near-yellowstonenational-park/ targets the Montana Wildlife Commission 20,380 Tony Povilitis https:// www.causes.com/campaigns/ 76500-protect-the-wolves-ofyellowstone-national-park targets both federal and state governments

OLDER PETITIONS 57,330 Carole Altendorf, closed, https://





YOMING GAME & FISH WILDLIFE DIVISION

## **Chapter 47, Gray Wolf Hunting Seasons**

The Department welcomes public comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices. No individual Department response will be generated from questions submitted through this forum.

Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <u>https://wgfd.wyo.gov/Get-Involved/Public-Meetings</u>. Comments will not be accepted via *email, fax or telephone.* 

All written comments must be received at the below address no later than 5:00 p.m., June 19, 2017.

Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604

CASPER, WYOMING Comments: Ter Gray Sycsons

(Please use reverse for additional comments.)

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5-25-17 Date





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Dan White Wyoming Game and Fish Department Wildlife Division 56 Appaloosa **ATTN: Regulations** 3030 Energy Lane Casper WY 82604 Cody, wyo 82414 307-250-0517 VOMING GAME & FIS Comments: CASPER, WYOMING enthusicitic 2617 Wise for Con 10u (d Loolues Lo olf would this ancher season Sor May Wyoning Bow huter. expendence May 426 54 2017 Printed Name Date Area 2 Representive 5/2017 Bow hurters of W young Turn Over please )

there was a lot of enthusics of the wolf andre pre-season at this year's Bow huters of wroming committion in Cody this much Just the chance to hart a wolf while in the mountains in September is a "bucket lister" for many of us. Thank you for giving it

Name of the Association of the A



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Dear Sirs- regarding regulation snew decleans u trophy wolf hunt areas! if the quotazz HAND 2017 PAZ boundaries are kept as III 15, in a year, there will be no wolves left in Wyoming. This isn't "management" its slaughten. Mercy. somehow-talk to LLU Games 9 14 Regilations 30 Energy Lane s. They to the ran cher 30 even trying Casper wy 82604 are no coexist. The entire GALLY IS COUNT Matching . Rese Lampo 





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wolves of yenali by adding a buffer zone. Don't what like Alaska + have to fix the problem after its occurred. Be proactive and put in Place a SOKM Sacréd Resource Motection Safety Zone now While you have the Charle Your wolf management plan benefits Only I westock growers thunters. you have neglected and group of people that contribute for greater to your economy than either nutring or ranching and I have the numbers to prove it! Wake up WP come + Fish! For once be a champion for wildlife watchers & wildlife itself instead of selling out to your Ranchers + hunters!



WYOMING STOCK GROWERS ASSOCIATION

Guardian of Wyoming's Cow Country since 1872

President- Niels Hansen, Rawins Region I Vice President- Gwen Geis, Gillette Region III Vice President- Mantha Philips, Casper Region V Vice President- John Griffin, Riverton First Vice President- Dennis Sun, Casper Region II Vice President- Steve Paisley, Wheatland Region IV Vice President- Bill Resor, Jackson Executive Vice President- Jim Magagna, Cheyenne

June 5, 2017

Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604

**RE: Chapter 28, Proposed Changes** 

JUN 8 2017 JUN 8 2017 WYOMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING

Dear Game and Fish:

The Wyoming Stock Growers Association (WSGA) appreciates this opportunity to comment on the proposed revisions to Chapter 28, Damage Claims to incorporate legislative changes made during the 2017 Session.

WSGA generally supports the proposed changes as an accurate reflection of the legislation and intent of the legislature. However, we do have concerns with the proposed definition of "Contiguous tract of land".

The intent of the legislative changes was to address the inequity that exists when a landowner has a single tract of private land that lies partially within and partially without the Trophy Game Area. The presence of "a public road, highway or railroad right of way" that divides the land does not make it any less of a single parcel of fee title land. It is most often covered by a single deed and is treated as a single parcel for tax assessment purposes.

Except in those cases where the right of way is fenced, livestock move freely across the entire parcel and there is no practical basis for a distinction as to on which side the damage resulted. Furthermore, there is no language in the 2017 legislation that precludes a parcel divided by a fence line from being considered a single parcel so long as a portion of the parcel is contained within the boundary of the area where wolves are managed as trophy game animals.

WSGA requests that the phrase "except as may be divided by a public road, highway or railroad right of way" be stricken from the final rule.

Thank you for your careful consideration of our request.

Sincerely,

w Maggy

Jim Magagna Executive Vice President

mail

"Shaping and Living The Code of The West" P.O. BOX 206, CHEYENNE, WY 82003• PH: 307.638.3942 • FX: 307.634.1210 EMAIL: INFO@WYSGA.ORG •WEBSITE: WWW.WYSGA.ORG • BLOG: WWW.REALRANCHERS.COM

# Wyoming Game and Fish Department Comment Form



# Chapter 47, Gray Wolf Hunting Seasons

The Department welcomes public comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices. No individual Department response will be generated from questions submitted through this forum.

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### All written comments must be received at the below address no later than 5:00 p.m., June 19, 2017.

	Wyoming Game and Fish Department Wildlife Division ATTN: Regulations 3030 Energy Lane Casper WY 82604
Comments:	Noff Quotos: I feel these quotas are
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Western Watersheds Project 319 South 6th Street Laramie WY 82070 tel: (307) 399-7910 fox: (208) 475-4702 email. emolvar@westernwatersheds.org web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds and Wildlife

Wyoming Game and Fish Department 5400 Bishop Blvd Cheyenne, WY 82006



Via hand delivery to WGFD Laramie Office and First Class Mail

### Supplemental comments of WWP on Chapter 47 Gray Wolf Hunting Seasons

Dear Wyoming Game and Fish Commissioners,

The following are the supplemental comments of Western Watersheds Project on the Wyoming Gray Wolf Hunting Season regulations (Chapter 47), submitted on behalf of our over 5,000 members and supporters throughout Wyoming and the West. The comments supplement comments submitted by Wyoming Wildlife Advocates, to which we are signatories.

WWP opposes sport hunting for wolves in any form, but if wolf hunting is to be permitted major changes are necessary. The current proposal is scientifically unsound and unsupported, and likely to result in a number of cumulative human-caused wolf mortalities to threaten the overall survival and visbility of the wolf population in the greater Yellowstone ecosystem. In addition, the Trophy Game status applied to wolves across the vast majority of Wyoming is an abrogation of the State of Wyoming's responsibility to ensure that where wildlife populations are subjected to human-caused mortality, that the level of this mortality is managed in a responsible manner.

Wolves are of prime importance as part of the increasingly healthy ecosystems showcased in Yellowstone and Grand Teton National Parks. The return of the wolf has resulted in the redistribution of elk, fostering the rebound of willows, cottonwoods, and aspens previously suppressed by elk browsing. These rebounds in deciduous vegetation have fostered an increasing richness in passerine birds and supported the return of beavers. Wolf kills offer collateral benefits for grizzly bears, wolverines, and many smaller predators and scavengers. For all of these reasons, wolves are valuable contributors to the overall diversity and abundance of wildlife in the Yellowstone ecosystem. Arguments that wolves are devastating to elk populations are simply and demonstrably wrong: Yellowstone has some of the greatest abundance and density of elk anywhere in the United States, in the presence of wolves. What Yellowstone lacks (and likely is the defining benefit for elk populations) is domestic livestock.

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# WWP Supports Establishment of a 50 km (31-mile) no-kill zone around National Parks

WWP supports the proposal by Protect the Wolves<sup>134</sup> Pack to establish a 50-kilometer zone in which wolves are recognized as a sacred resource to Native American tribes and protected from killing in all forms.

This policy is needed to provide a secure population base for wolves in Wyoming, and will assist in meeting Endangered Species Act population targets established for wolves.

It will ensure that wolves inhabiting Yellowstone and Grand Teton National Parks, which are often individually recognized and followed by the public, from being shot when the leave the National Parks. This latter outcome is incompatible with the National Park Service's mandate to protect and preserve wildlife and Park resources for the use and enjoyment of the public. The popular wolf '06, the alpha female of the Lamar Canyon pack and arguably the most viewed and remarked-upon wolf in Yellowstone National Park, was killed in Wyoming while venturing outside the Park boundary during the period when the wolves lacked the protections of the Endangered Species Act. This was a widely-reported national scandal that made clear that the State of Wyoming was not responsibly managing it wolf hunting program. The establishment of a no-kill zone around the Parks would prevent such public relations embarrassments involving well-known National Park animals from happening.

In addition, the hunting and shooting of wolves immediately adjacent to National Parks will necessarily have a detrimental impact on the viewability of wolves inside the Parks, as wolves conditioned to being left alone by humans will come to view them as threats to be avoided. This will have a potentially devastating impact on the wolf viewing economic sector, a significant and nationally-known part of the overall tourism economy generated by Yellowstone and Grand Teton National Parks.

#### Hunting Should be Limited by Permits Issued

The number of wolves killed in each Hunt Area must be limited to the target number established in the regulations, yet the regulations as currently drafted fail to accomplish this. Under the current draft, a greater number of wolf tags than the total number of wolves permitted to be killed could be issued, and the season would be closed when the number of wolf kills reported reaches the limit for that hunt area. There are a number of problems with this approach.

First, hunters have 24 hours to report a wolf kill after it occurs. For the last wolf legally permitted to be killed in a hunt unit, that leaves 24 hours (even assuming perfect and immediate communication of the closure once the kill is reported) for additional wolves to be killed in that Hunt Area. This leads to the likelihood that a greater number of wolves will be shot that are allowed for a given hunt area, because hunters out in the field will continue to hunt (and potentially shoot wolves) up to the point that WGFD closes the season. Second, as hunters may be camped in the backcountry for extended periods while engaged in hunting for wolves, and beyond the range of cell pho9ne coverage, the WGFD has no way to promptly communicate the closure of the wolf season with hunters still in the field. It is readily likely that hunters may be camped in the backcountry for a week or more at a time, completely cut off from contact with the outside world, and in no way can WGFD contact these hunters once the trophy game quota is reached for their hunt unit. Thus, in blissful ignorance that the quota for the Hunt Area has been filled and the unit has been closed to further hunting, such hunters would be free to kill additional wolves over and above the quota because they had no way of knowing that the hunting season had closed. Because wolves often are located deep in the backcountry, this eventuality is likely to be a frequent and commonplace occurrence under the current regulations.

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Third, the regulations as currently drafted fail to account for hunter mortality for wolves wounded by not recovered and tagged. In many cases, hunters wound animals that are not recovered, and these animals often die. Such hunter-caused mortality is not counted toward the total allowable kill in a given hunt unit, so the regulations need to be strengthened to account for this mortality. For this reason, the kill quota in each hunt unit should be reduced by no less than one to two wolves to account for wounding mortality.

For all of these reasons, the hunter-caused mortality is likely to overshoot the 42 total animals proposed in the current regulations. The kill number must therefore be reduced, and stronger regulations need to be tightened to prevent these outcomes. The most obvious change would be to issue only the number of permits corresponding with the Hunt Area kill limit, and to reduce the number of permits by regulation to account for wounding mortality.

#### Predatory Animal Status Must Be Rescinded Outside the Trophy Game Area

The Wyoming Wolf Plan's designation of the gray wolf as a Predatory Animal throughout the vast majority of Wyoming – open to unlimited killing, without a license, with no established seasons, bag limits, or overall kill limits – is irresponsible and an abrogation of the State of Wyoming's requirement to manage wildlife as a part of its the public trust responsibilities. This approach violates every known tenet of wildlife management. Without any controls over how many wolves are killed, and in which areas, the State of Wyoming is not in a position to meet or exceed its minimum limit of 10 breeding packs and 100 wolves outside Yellowstone National Park. We are concerned that uncontrolled and unregulated wolf killing outside the Trophy Game area is likely to contribute to a failure to meet these targets. For these reasons, the new regulations should rescind the Predatory Animal status that wolves currently have across about 85% of the state by deleting the last sentence in §4(a) and Section 8 in its entirety.

The Predatory Animal status affords WGFD no mechanism to control the number of wolves killed outside the Trophy Game area. There is no mechanism to limit the total kill in the Predatory Animal area. There is no mechanism provided to close the season once the cumulative human-caused mortality exceeds thresholds. We are also concerned that the 24hour reporting requirement for wolf kills, which appears to apply in the Predatory Animal zone as well, The WGFD has made statements in the past that most of Wyoming is unsuitable as wolf habimt. Such statements misleading, scientifically unsupportable, and amounts to biological malpractice. All of Wyoming that is non-urban in nature (i.e., about 99% of the state) is fully suitable for wolf habitat and recolonization. It is true that the livestock industry is dead-set against the return of wolves to their native habitats across much of the state, this is a human problem, not a deficiency in habitat in any way. The WGFD should not be engaging in the business of misleading the public regarding the biological realities of the species for which the agency has management authority.

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Finally, in the Predatory Animal zone, there is no provision for compensation for livestock taken by wolves, which gives further incentive for livestock producers to shoot and kill any wolf venturing on their lands, or near their herds grazing on public lands.

### Baiting or Predstors Calls Must be Prohibited in the Context of Wolf Hunting

Wolves are protected in Yellowstone and Grand Teton National Parks, but we are concerned that hunters and guides will attempt to lure National Park wolves outside the Park boundaries, where they can be shot under the proposed regulations. Baiting of animals violates fair-chase principles of hunting ethics, and should be prohibited in the context of gray wolves. This prohibition should be explicitly included in the regulations, and defined to encompass any hunting over or associated with a carcass, meat, or scent station (whether natural or human-caused). It is illegal to bait elk using salt blocks; the use of baits and lures in wolf hunting should be prohibited for the same reasons. In addition, we are concerned that hunters and outfitters will use audible predator calls to lure wolves out of protected areas and onto lands where they legally can be shot. For these reasons, the regulations must be amended to include prohibitions on the use of predator calls, scent stations, or baits of any kind.

### The Regulations Fail to Account for All Forms of Human-Caused Wolf Mortality

Hunting, both in the Trophy Game area and in the Predatory Animal area, is the one form of human-caused mortality over which Wyoming Game and Fish Department has some control. But there are many other human causes of wolf mortality over which WGFD has limited if any control. In addition, wolves are known to be killed by collisions with automobiles. For some time, U.S. Fish and Wildlife Service, as well as USDA Wildlife Services, have been killing wolves in relatively large numbers in retribution for livestock "depredations." There is no evidence that the de-listing of wolves will result in any reduction in this type of mortality; if anything, it is likely to increase. Thus, wolf hunting is likely to be additive to these existing forms of mortality, and we are concerned that the combined human-caused mortality will drive Wyoming wolf populations below the population targets specified under the ESA agreement with USFWS.

#### Area 12 Should be Reallocated to Trophy Game Year-Round

While we reiterate that we do not support the hunting of wolves in any form, the part-year Predatory Animal status of wolves in Hunt Area 12 needs to be rescinded. Having a single hunt unit with Trophy Game management for part of the year and Predatory Animal management for the remainder is likely to cause confusion and lead to mistakes in which wolves are killed in contravention to WGFD regulations. Notably, most of the livestock grazing leases on public lands in this area have been bought out from willing sellers with the intention of retiring them from livestock use on a permanent basis. The designation of wolves as Predatory Animals during spring and summer in this unit in §4(j) must therefore be eliminated.

#### Conclusions

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Thank you for the opportunity to comment on proposed changes to the hunting regulations regarding gray wolves. It is important for the WGF Commission to recognize that the economic value of non-lethal wolf viewing in Yellowstone National Park is far greater to the Wyoming economy than the economic benefits of any wolf hunting that is allowed. Furthermore, the hunting of wolves, particularly those residing part or most of the year within our National Parks, will be a stain on Wyoming's national and international reputation as a tourism destination for wildlife viewers and nature lovers. The proposed regulations provide inadequate protections for wolves dwelling in Yellowstone and Grand Teton National Parks, fail to require fair chase in Trophy Game areas through allowing predator calls and hunting over baits, and utterly ignore the state's responsibility to manage and limit the killing of wolves in the Predatory Animal zone. For these reasons, the 50 km "no kill" zone around the National Parks should be incorporated into the regulations, and the amendments recommended in these comments should be implemented of wolf hunting is to be allowed at all. It is WWP's position that wolf hunting not be allowed, but if it is, we strongly urge you to adopt these common-sense recommendations.

Responsible wildlife management is a sacred trust with which the Wyoming Game and Fish Department is charged, to manage the state's wildlife species responsibly on behalf of the residents of Wyoming, and indeed all Americans. We urge the Commissioners to take this trust responsibility seriously, and make changes to the wolf hunting regulations accordingly.

Respectfully yours,

Etik Molvar Executive Director

OMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING IN SO & HUADLE HERACORD June 19 2017 Hoose wy SBOIZ (p. o. Bex 255) Mr. and Mrs. Yvon Choumard Dear Dr. Thompson We have loved in and about Wyoking since 1957. Our 150 ac were over run with Coyotes before the very occassional griz and wolf's arrival. Coyotes are now gone and our trees are thriving hunting. We cat what We oppose trophy hunting. We cat what we hunt. And we only cat hubbled meat. We 100% oppose trophy hunting grizzly ; wolves. If we see such knuckle hedded braggerers on our land be call the police.

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June 18, 2017

Wyoming Game and Fish Department 5400 Bishop Blvd Cheyenne, WY 82006

RE: Chapter 47 Gray Wolf Hunting Seasons

To Whom It May Concern:

YOMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING

The following are comments in regards to the Wyoming Game and Fish Department's (WGFD) proposed Chapter 47 Gray Wolf Hunting Seasons. Wyoming Untrapped, representing thousands of supporters across Wyoming and the country, is strongly opposed to any hunting of the gray wolf in Wyoming. Gray wolves are already subjected to high mortality due to disease, battles with prey and other packs, management actions due to depredation on livestock, and poaching (WGFD, 2015). Other studies (Berger, 2008; Conner et al, 1998; Mezquida et al, 2006; Mitchell et al, 2004; Wallach et al, 2015; Wielgus & Peebles, 2014) show that apex predator species are self-regulating and that hunting wolves only leads to disturbance in social structures which can lead to further human-wolf conflicts later.

Biologically, gray wolves in Wyoming have a relatively small population when compared with historical accounts of up to two million wolves (Leonard et al., 2005). Taking into account human development that has lessened the acceptable areas for wolves to inhabit, there is still ample habitat in Wyoming to support a much larger, healthler population of gray wolves. A biological principle that should be considered with wolf management is a minimum viable population (MVP). A MVP is the smallest isolated population (of a given species in a given habitat) having a 99% chance of remaining in existence for 1,000 years, despite the foreseeable effects of demographic stochasticity. genetic drift, environmental stochasticity (random changes in the environment), and natural catastrophes (Shaffer, 1981). Populations smaller than the MVP are considered to be at significant risk of entering into the extinction vortex and becoming extinct, so a conservation program can be considered successful only if it raises the effective population size above the MVP (Schafer, 1981). The population of gray wolves in the Northern Rocky Mountains is considered well under the MVP (Shaffer, 1981; Reed et al, 2003, Traill et al 2007). In 2014, 63 of 333 wolves were lethally removed from the population from hunting, poaching, livestock conflict, "preemptive damage control," vehicle accidents, natural causes, and capture mortality (WGFD, 2015). This figure is most likely a low estimate that does not include any unknown removals from poaching or trapping. With an almost 20% mortality rate, the population of gray wolves in Wyoming will decline without the necessity of a hunting season which will impair genetic processes and the ecosystem functions that wolves provide, and disrupt social interactions within the wolf population (Vucetich & Nelson, 2014). Managing our wolves for the lowest

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absolute numbers (100 or 10 breeding pairs) is not science-based wildlife management, not acceptable for wildlife held in the public trust, and not in the best interest of future wolf populations. The absolute minimum number of wolves in Wyoming should be at least 500, which is considered the least required number for acceptable genetic diversity according to the biological 50/500 rule (Franklin, 1980), but may need to be much higher for proper genetic diversity and perpetuation of the species as suggested by Lande (1995) and Reed & Bryant (2000).

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Due to the indiscriminate nature of traps, all trapping of any type should be prohibited adjacent to the parks. While specific trapping will not (and should never) be allowed for wolves in the Wolf Trophy Game Management Area (WTGMA), trapping for predators is allowed year-round on the borders of Yellowstone and Grand Teton National Parks therefore providing an opportunity for wolves to be trapped. In no circumstance should a trapped wolf be allowed to be taken with a furbearer and/or trophy game license. Chapter 47 does not address non-target trapping incidents of wolves and how these conflicts will be reported or managed. Current regulations state that only a trophy game animal that is injured to the point of death or dead must be reported. Even if traps do not directly kill the animal, they can cause significant amounts of injury, utimately leading to the death of the animal after it is released. It is highly likely that wolves trapped incidentally in the WTGMA will be injured and be unable to be released. A better solution would be to discontinue the use of all traps within 30 miles of the park borders in order to prevent non-target wolves from becoming victims of trapping.

It is also likely with the cultural intolerance exhibited by some Wyomingites toward wolves that incidentally trapped (or poached) wolves will go unreported therefore increasing the total mortality beyond what is known by wildlife managers. A recent study (Treves et al, 2017) indicated that "unregulated human-caused mortality was the major cause of death in endangered wolf populations in the United States. Observed poaching in all the populations studied outnumbered the primary other human cause of death, vehicle collisions, by a factor of 2 or more. That means most of the underestimation of other human causes was due to underestimating poaching. Indeed, for every wolf population examined, poaching was the greatest threat. In the Northern Rocky Mountain wolf populations from 1982 to 2004, poaching replaced legal killing as the major threat to wolves after correcting for the mathematical miscalculation of legal killing." The institution of a ban in all trapping within 30 miles of the borders of Yellowstone and Grand Teton National Parks and the John D. Rockefeller, Jr. Memorial Highway would ensure that no wolves are killed by traps or inadvertent poaching.

Predatory species status, in which no protection is offered, should be discontinued immediately for all gray wolves in Wyoming. The designation as a "predatory species" from March 1 to October 15 each year just south of the town of Jackson presents a dangerous situation for an increase in pet trapping Incidents. Wolf traps are much larger than traps that would be set for foxes, coyotes, or bobcats. Allowing larger traps and snares to be used for wolves listed as predators is reckless and endangers the lives of pets and the safety of people. An increase in pet trapping incidents is undoubtedly expected and completely preventable. We have received many comments from concerned citizens who are terrified at the prospect of traps being set so close to town. In the interest of the 60% of Wyoming households who are pet owners, predator status of wolves and all wolf trapping should be discontinued immediately.

If predatory species status is to remain, the boundary of the designated area must be moved further away from areas inhabited by humans that are also heavily used by

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recreationists and their pets. Larger leg-hold traps are used in these areas for trapping wolves and present a great risk of injury or death to pets, not to mention the vet bills incurred by such an incident. Moving the boundary much further south will help to limit the incidents of pets being caught, injured or killed by traps set for wolves.

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If Chapter 47 hunting seasons are going to go forth as planned, the only acceptable regulations would require a buffer around Yellowstone National Park, Grand Teton National Park and the John D. Rockefeller, Jr. Memorial Parkway. The buffer zone should be at least 30 miles of the park borders to allow for sufficient roaming of wolves and exchange of genetic material. If the Wyoming Game and Fish Department is truly interested in maintaining a healthy wolf population and a robust tourist industry, then it would behoove them to do as much as possible to protect park wolves. A buffer zone would do exactly that.

Under no circumstances should hunting licenses or any other lethal control be increased in response to declines in ungulate populations. Evidence is mounting which shows that control of predators does not lead to an increase in ungulate populations, particularly mule deer (Brown & Connover, 2011; Hurley et al, 2011). Elk hunting has seen continued levels of high success even while wolves have been protected by the Endangered Species Act.

A particularly concerning portion of the Chapter 47 regulations is the definition of mortality. Stating that "gray wolves taken by the Department, gray wolves taken under the authority of W.S. § 23-3-115 (c), gray wolves taken under Lethal Take Permits and known natural and accidental gray wolf deaths" as stated in Section 2 (a) of the proposed regulations are not to be considered as "mortality" is incorrect at best and deceitful at worst. It is the most basic of wildlife biology principles that mortality is any death of an individual in a given population. When managing any wildlife population, all mortality must be considered in order to ascertain accurate population estimates on which to base management directives. This definition of mortality must be changed to include any wolf deaths, be they from human-caused or natural causes.

In addition to biological and ecological reasons for no hunting of gray wolves in Wyoming, the economy of the state is greatly benefited by the presence of large carnivores, including the gray wolf. Tourism is the second largest industry in Wyoming and continues to grow throughout the state. A recent study (Borg et al, 2016) has found that wolf sightings in national parks decreased 45% when hunting is allowed at park boundaries in Denali and Yellowstone National Parks. In response to this, the state House of Representatives in Alaska have passed a bill that would provide a buffer zone around Denali National Park which is now set to move to the state Senate. Yellowstone and Grand Teton National Parks bring in billions of dollars to the Wyoming economy each year with many visitors coming to see large carnivores such as bears and wolves. A new report (Thomas & Koontz, 2016) concludes that visitors to GTNP in 2016 spent an estimated \$597 million in local gateway communities. The ripple effects of that spending had a cumulative benefit to the local economy of over \$779 million and supported 9,365 jobs in nearby communities. National park tourism is a significant driver in the national economy, returning more than \$10 for every \$1 invested in the NPS. Grand Teton National Park ranked among the top five national park areas in terms of economic benefit. To sacrifice the benefits to the people and economy of Wyoming to satisfy the bloodiust of a few trophy hunters is irresponsible and reckless.

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The recent poaching of a well-known white wolf in northern Yellowstone brought negative national attention to the Greater Yellowstone Ecosystem. The continued negative press of famous Yellowstone wolves being killed is something that Wyoming should want to avoid. The effects could be decreased tourist dollars which would have a cumulative negative financial impact to the state. People travel to the Greater Yellowstone Ecosystem to see large carnivores as it is one of the only places left where these animal exist. As numbers of hunters continue to decline, Wyoming wildlife managers should embrace the value of non-consumptive users nationwide who are willing to travel from all over the world to enjoy our wildlife.

Non-lethal measures have been proven to be more effective than lethal action (Hadidian, 2007; Pratt-Bergstrom, 2016; Fascione, Delach & Smith, 2004; Treves et al, 2016). The Wyoming Game and Fish Department should be a leader in the education and implementation of non-lethal measures to prevent wolf depredation on livestock. From January 1 to September 23, 2014, 100% of sheep depredations and 35% of cattle depredations by wolves occurred on private land. Whether on public or private land, livestock producers should be responsible for the protection of their animals. Wildlife in a state is held in public trust for the benefit of all citizens, not just the livestock industry.

The WGFD has an opportunity to be a leader in large carnivore management, but disappointingly continues to use antiquated management principles left over from the 1800s. In a recent article in the Jackson Hole News & Guide (May 10, 2017), Renny MacKay, Communication Director with the WGFD stated "that altering hunt units to create a no-hunting buffer along Yellowstone's periphery may be difficult to achieve at this time. "I think people could give us feedback on that," MacKay seid, "but I don't know if that could be done at this point." There is no feasible reason that the Wyoming Game and Fish Department cannot redraw the boundaries for gray wolf hunting seasons or redact all hunting of gray wolves in the state. If legislative action is needed to redraw the boundaries, then hunting seasons should be postconed until such action takes place. To kill these animals for bragging rights, fear, ignorance, and their fur is not justifiable. The loss of one or two wolves can have severe social implications for the wolf packs and their overall population as well as severe impacts on the ability of people to view wolves in their native habitats which brings in tourist dollars. Just because we can hunt predators does not mean that we should. The ethics of predator hunting is increasingly coming under scrutiny from the public as tolerance and appreciation for large carnivores grows (Vucetich & Nelson, 2014). We request that the Wyoming Game and Fish Department and Commission takes these considerations into account and takes positive action for Wyoming's citizens and its wildlife.

Sincerely,

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Kristin Combs Program Director

**References:** 

Berger, K.M. (2006). Carnivore-livestock conflicts: Effects of subsidized predator control and economic correlates on the sheep industry. *Conservation Biology (20)*, 751-761.

Wyominguntrapped.org P. O. Box 9004 Jackson, Wyoming B3002 Borg, B.L., Arthur, S.M., Bromen, N.A., Cassidy, K.A., McIntyre, R., & Smith, D.W. (2016). Implications of harvest on the boundaries of protected areas for large carnivore viewing opportunities. *PLoS ONE 11(4):* e0153808. https://doi.org/10.1371/journal.pone.0153808

1.

Brown, D. E. & Conover, M.R. (2011). Effects of large-scale removal of coyotes on pronghom and mule deer productivity and abundance. *Journal of Wildlife Management* (75)4, 876-882.

Conner, M.M., Jaeger, M.M., Weller, T.J., & McCullough, D.R. (1998). Effect of coyote removal on sheep depredation in northern California. *Journal of Wildlife Management.* (62), 690-699.

Fascione, N., Delach, A. & Smith, M.E. (2004). People and predators. Washington, D.C.: Island Press

Franklin, I. R. (1980). Evolutionary change in small populations. In M. E. Soule and B. A. Wilcox (Eds.), *Conservation Biology: An Evolutionary Ecological Perspective* (135-140). Sunderland, Mass.: Sinauer Associates.

Hadidian, J. (2007). Wild neighbors: The humane approach to living with wildlife. Washington, D.C.: The Humane Society Press.

Hurley, M. A., Unsworth, J. W., Zager, P., Hebblewhite, M., Garton, E. O., Montgomery, D. M., Skalski, J. R. & Maycock, C. L. (2011). Demographic response of mule deer to experimental reduction of coyotes and mountain lions in southeastern Idaho. Wildlife Monographs (178), pp.1-33.

Lande, R. (1995). Mutation and conservation. Conservation Biology (9), 782-791.

Leonard, J.A., Vila, C., & Wayne, R.K. (2005). Legacy lost: genetic variability and population size of extirpated U.S. grey wolves (*Canis lupus*). *Molecular Ecology. (14)1*, 9-17.

Mezquida, E.T., Slater, S.J., & Benkman, C.W. (2006). Sage-grouse and indirect interactions: Potential implications of coyote control on sage-grouse populations. *Condor* (108), 747-759.

Mitchell, B.R., Jaeger, M.M, & Barrett, R.H. (2004). Coyote depredation management: Current methods and research needs. Wildlife Society Bulletin (32), 1209-1218.

Pratt-Bargstrom, B. (2016). When mountain llons are neighbors: People and wildlife working it out in California. Berkeley, CA: Heyday Books.

Reed, D.H., & Bryant, E.H. (2000). Experimental tests of minimum viable population size. Animal Conservation (3), 7–14.

Reed, D. H. O'Grady, J.J., Brook, B.W., Ballou, J.D., & Frankham, R. (2003). Estimates of minimum viable population sizes for vertebrates and factors influencing those estimates. *Biological Conservation* 113, 23-34.

Wyominguntrapped.org P. O. Box 9004 Jackson, Wyoming 83002 Shaffer, M. L. (1981). Minimum population sizes for species conservation. *Bioscience* 31, 131–134.

Traili, L.W., Corey J.A., Bradshaw, Barry W. & Brook. (2007). Minimum viable population size: a metaanalysis of 30 years of published estimates. *Biological Conservation* 139, 159-166.

1.

Thomas C.C. & Koontz, L. (2017). National park visitor spending effects: Economic contributions to local communities, states, and the nation. (Natural Resource Report NPS/NRSS/EQD/NRR-2017/1421). Washington, D.C.: U.S. Department of the Interior. http://Go.nps.gov/vse

Treves, A., Artelle, K.A., Darimont, C.T., & Parsons, D.R. (2017). Mismeasured mortality: correcting estimates of wolf poaching in the United States. *Journal of Mammalogy (52).* doi: 10.1093/jmammal/gyx052

Vucetich, J. & Nelson, M.P. (2014). Wolf hunting and the ethics of predator control. Oxford University Press. doi: 10.1093/oxfordhb/9780199927142.013.007

Wallach A.D., izhaki I., Toms J.D., Ripple, W.J., & Shanas U. (2015), What is an apex predator?. Oikos (124), 1453–1461. doi:10.1111/oik.01977

Wielgus, R.B. & Peebles, K.A. (2014). Effects of wolf mortality on livestock depredations. *PLoS One* <u>http://dx.doi.org/10.1371/journal.pone.0113505</u>

Wyoming Game and Fish Department, National Park Service, USDA-APHIS-Wildlife Services, and U.S. Fish and Wildlife Service. (2015). 2014 Wyoming gray wolf population monitoring and management interim report: January 1, 2014 through September 23, 2014. Cheyenne, WY: Wyoming Game and Fish Department.

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# Wyoming Game and Fish Department Comment Form



# Chapter 47, Gray Wolf Hunting Seasons

he Department welcomes public comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices. No individual Department response will be generated from questions submitted through this forum.

Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <u>https://wgfd.wyo.gov/Get-Involved/Public-Meetings</u>. Comments will not be accepted via *email, fax or telephone*.

All written comments must be received at the below address no later than 5:00 p.m., June 19, 2017.

Wyoming Game and Fish Department Wildlife Division **ATTN: Regulations** 3030 Energy Lane Casper WY 82604 192017 OMING GAME & FISH WILDLIFE DIVISION CASPER, WYOMING Comments: lan 70 manage Ating Make a6026 2400 - Icloted Lenasino 0 01211

(Please use reverse for additional comments.)

ortuge 6-15-17 Date Name

CENTER for BIOLOGICAL DIVERSITY

June 15, 2017

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Wyoming Game and Fish Department Wildlife Division Attn: Regulations 3030 Energy Lane Casper, WY 82604



### Re: Comments of the Center for Biological Diversity on the Proposed Wyoming Gray Wolf Hunting Season

To the Wyoming Game and Fish Department:

Following are the comments of the Center for Biological Diversity ("Center") concerning Wyoming's Chapter 47 Draft Regulation on Gray Wolf Hunting Seasons ("Regulations"). The Center is a non-profit conservation organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has more than 1.3 million members and online activists dedicated to the protection and restoration of endangered species and wild places, including over 100 members in Wyoming. The Center has worked for many years to protect imperiled plants and wildlife, including gray wolves, as well as open space, air and water quality, and overall quality of life.

The Regulations proposed by the Wyoming Game and Fish Department ("WGFD") for hunting gray wolves during an open season will not properly manage their populations at a sustainable level, and do not sufficiently ensure that the minimum population levels will be met, as required by the U.S. Fish and Wildlife Service. They therefore risk the intervention of the Federal government for re-listing under the Endangered Species Act ("ESA"), which they are obligated to avoid as a condition of the de-listing of gray wolves. In addition, the hunting of wolves will lead to a great number of unintended consequences for the ecosystem as a whole, and a resultant decline in the attractiveness of Wyoming as a tourism destination. We provide recommendations herein that would improve the sustainability of any proposed harvest and reduce damage to the meta-population of wolves in the northern Rocky Mountains. The following comments address these topics.

### I. The Center Opposes the Trophy Hunting of Gray Wolves.

Trophy hunting of wolves is an unnecessary risk to the small population that was only recently restored to their historic range in the state of Wyoming and the Greater Yellowstone Ecosystem ("GYE"). The presence of a stable and healthy wolf population has been shown to have beneficial effects on the ecosystem as a whole through a series of trophic cascades, and the killing of even a single wolf can completely disrupt pack dynamics and lead to increased conflict with humans and livestock. In addition, these wolves are integral to the connectivity and genetic health of the population of wolves in the northern Rocky Mountains, and a hunting season may cause WGFD to fail to meet their stated management goals to "facilitate natural dispersal and genetic interchange within the NRM metapopulation" (WGFD 2011, p. 1). The hunting of wolves is a concession to hunters and ranchers, and non-lethal methods should be promoted as an alternative to hunting as the primary means of management. Each of these points is supported by the scientific literature, as described herein.

The hunting of wolves and corresponding reduction in pack size will have serious impacts across the entire food web and the GYE as a whole. Numerous studies have shown the impacts of apex predator removal on ecosystems around the world, including impacts on native plants, which can in turn lead to changes in the fire regime and biogeochemical cycles of an area (Beschta & Ripple 2009; Estes *et al.* 2011; Bergstrom *et al.* 2013). The removal of wolves initiates a series of trophic cascades that affect nearly every species in the GYE. For example, the removal of the top-level predators causes a "release" of mesopredators such as coyotes, foxes, and raccoons, and as their numbers increase they cause a decline of other native species such as pronghorn, rodents, and ground-nesting birds (Crooks & Soulé 1999; Prugh *et al.* 2009; Ripple 2013).

Additionally, reduction of the wolf population may change how and where elk forage, which has cascading impacts. Without wolves present in the ecosystem, the herds migrate less in winter and can graze on aspen and willow shoots at unsustainable levels. By keeping wolves on the landscape, elk are less likely to graze along waterways where they may be more vulnerable to predation, and stands of willow and other species are able to return and flourish. This then allows beavers to thrive, and the combination of reduced bank erosion from grazing and beaver dams can change the course of rivers (Ripple & Beschta 2011; Bergstrom *et al.* 2013; Estes *et al.* 2011). The return of willows and other riparian vegetation also leads to colder water temperatures which benefits native fish species.

While some cite the predation of elk as a reason that a wolf harvest is necessary, studies have shown that wolf are likely to prey on the old, weak, and sick elk, leading to a healthier population of elk overall (Mech *et al.* 2001; Wright *et al.* 2006). Predation of elk and other ungulates also lead to increased availability of carcasses for grizzly bears and other carrion feeders, boosting their populations in turn (Ripple & Beschta 2011). As all of these examples

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show, the removal of wolves can have drastic and often unforeseen consequences on all species that live in the GYE.

Further, the impacts of hunting on the wolf packs themselves can be much greater than a simple decline in numbers. While the WGFD suggests in their Management Plan and their Environmental Assessment that wolves are highly resilient to harvest, other studies have shown that even low rates of wolf harvest by humans lead to population decline (Creel & Rotella 2010). Even just removing a single adult wolf can have significant impacts on the social structure of a wolf population (Haber 1996; Rutledge *et al.* 2010; Borg *et al.* 2015). Losing a breeding wolf can particularly influence the populations, as it can affect social group persistence, reproduction, and population growth, especially in smaller packs (Borg *et al.* 2015). Demographic responses to mortality can be very complex, and often can vary from pack to pack depending on factors such as group size and population density (Murray *et al.* 2010), and so a population-scale approach to hunting may affect some groups more than others in ways that will not be captured by overall population trend data until it is too late.

The Regulations also do not properly protect genetic connectivity between Wyoming wolves and wolves in eastern and central Idaho. Although the D.C Circuit Court found that "the Service's acceptance of a non-binding commitment to genetic connectivity was not arbitrary and capricious" (*Defenders of Wildlife v. Zinke*, 849 F.3d 1077, 1087 (D.C. Cir. 2017)) and was therefore legally acceptable by the letter of the law, these Regulations exemplify why non-binding commitments are insufficient as the Department fails to protect important connectivity corridors which may endanger the health of the larger meta-population. By only limiting the hunting of wolves in a designated dispersal zone (Hunt Area 12) for a short portion of the year, the Department completely undermines this stated goal to preserve connectivity. Therefore, the hunting of wolves in these critical areas should be eliminated to ensure the ongoing health of wolves in the northern Rocky Mountains.

Finally, killing wolves as the primary means of conflict management is irresponsible and does not reflect the best available science. Recent analysis of publically available studies, including a thorough evaluation of their methodology, found that non-lethal methods of predator control were more successful and did not lead to any documented increases in predation. In contrast, lethal control methods often did not meet "gold standards" for true analysis of their effectiveness (Treves *et al.* 2016). Despite these flawed methodologies, it was still clear that in multiple cases of lethal control, predation and livestock conflict actually increased after the lethal methods were implemented, something that never occurred when non-lethal methods were instituted (Treves *et al.* 2016). Based on this assessment of the literature, lethal control methods including hunting seasons should be suspended until their effectiveness at reducing conflict can be scientifically demonstrated.

### II. Limitations on Hunting if Regulations Allow for Trophy Season.

Although we fully oppose trophy hunting of gray wolves, for the reasons outlined above, we have a number of suggestions for ways to improve the proposed system in the event that WGFD decides to move forward with the hunting season. The proposed Regulations do not sufficiently protect the wolves of Yellowstone National Park ("YNP") from the proposed harvest, and do not geographically allocate quotas in a manner that is consistent with facilitating connectivity and reducing conflict with livestock and property. The status of wolves as predatory animals in most of the state increases the likelihood that monitored populations in the Trophy Game Management Area ("TGMA") will decrease faster than what is anticipated by the Regulations, and quotas should be adjusted as such.

### A. A Buffer Zone Should be Established Around National Parks.

One of the major goals of the Regulations and of the Management Plan in general should be to protect the wolves that reside within Yellowstone and Grand Teton National Parks. Wolves are one of the main draws for people to visit Yellowstone and Grand Teton National Parks, as the opportunity to view wildlife is one of the reasons that the number of visitations to the Parks is steadily increasing (Richardson *et al.* 2014, p. 103). Wolves, along with grizzly bears, are often the species of animal that visitors most want to see, with 44% of visitors in a 2005 study listing wolves as the primary species they hope to see, and 41% saying that they personally benefit simply from hearing and seeing wolves in the Parks (Duffield *et al.* 2006).

This public interest in wolves provides a clear economic benefit to the area, increasing local spending through the number of visitors who come to see the wolves, as well as serving as a public symbol of the Parks. Despite this, and despite the protections that they are supposedly afforded by living in the Parks, wolves that spend most of their time within park boundaries are regularly hunted and killed by humans, seriously threatening this valuable resource. A study that looked at wolf mortality data from 2012, the first year that trophy hunting was allowed in all three states neighboring YNP, found that levels of mortality that were disturbingly high (Povilitis 2015, pp. 26-27).

Based on data obtained from YNP and Yellowstone Wolf Project annual reports, the authors found that 14 Yellowstone wolves were legally hunted that year, 8 of which wore radio collars (Povilitis 2015, pp. 26-27). The total number of wolves in the Park decreased to 83, about 14 fewer than in previous years (Povilitis 2015, pp. 26-27). Seven out of 11 packs that live primarily in YNP lost wolves to hunting in 2012, and when the period is extended to 2009-2012, at least five of the YNP packs lost two or more wolves to trophy hunts (Smith *et al.* 2010, 2013).

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The loss of individuals has had serious effects on the integrity of the packs. For example, the Lamar Canyon pack (a primary source of wolf viewing for the public) was reduced from 13 wolves all the way down to two after hunting eliminated the alpha female and beta male, causing the other animals to disperse or perish (Lynch 2014). This can further affect the visitor experience by causing wolves to become increasingly elusive, as Borg *et al.* found that harvest of wolves adjacent to protected areas can lead to reduced numbers of sightings within the protected area, even if the population size does not change substantially (2016).

All of this has occurred despite the fact that wolves residing in YNP are supposed to be protected from hunting. Clearly wolves do not observe park boundaries, and Yellowstone wolves will routinely be killed by the proposed trophy hunts within the current TGMA. This should be avoided at all costs, and therefore a study of the best available science should be conducted to determine a safe buffer distance away from the Park within which trophy hunts may not be conducted. A safe starting point would be to use a distance roughly equal to the radius of a typical wolf pack's home range. The implementation of this buffer zone around YNP and Grand Tetons NP would provide a true safe haven for the protected wolves of the National Parks, and allow them to continue to attract visitors.

### B. Hunting Should be Eliminated in Connectivity Corridors.

While the D.C. Circuit ruled that the Service's "non-binding commitment to genetic connectivity" was sufficient for the purposes of approving the WGFD Management Plan (*Defenders of Wildlife v. Zinke*, 849 F.3d at 1087), the proposed Regulations do not uphold this commitment. To allow for connectivity and dispersal of wolves to packs in Idaho, WGFD proposes designating a Seasonal TGMA (Hunt Area 12) to the southwest of the overall TGMA. However, the Regulations still permit hunting in this vital connectivity corridor area until December 31 or until the mortality quota is filled. Moreover, this gesture towards connectivity and genetic health is outweighed by the designation of wolves as predatory animals in the same area for most of the year.

As described in Section 4(j) of the Regulations:

Gray wolves located in Hunt Area 12 are designated as trophy game animals from October 15 through the last day of February in the subsequent year, but the hunting season shall end on December 31 or when the mortality quota is filled, whichever occurs first, as set forth in Section 4(h). Gray wolves located in Hunt Area 12 are designated as predatory animals from March 1 through October 14 and during this time period may be taken without a license.

The quota that is currently set for the described trophy hunting season is 2 wolves. If the second wolf is not reported killed until late in December, this would leave the wolves with only a minimum of two months to safely pass through the area without the risk of being shot. Even

assuming that the risk of hunting mortality is lower overall during the trophy hunting season, this only provides a maximum of four and a half months with lower risk of mortality during dispersal.

Given their status as predatory animals for the remaining seven and a half months, they cannot be ensured safe passage during the majority of the year while attempting to establish genetic connectivity between the Idaho and Wyoming populations. This is especially true when considering the fact that the average dispersal of a wolf moving between packs takes five and a half months, guaranteeing that a wolf attempting to pass through the area will be present through the open-season predatory zone for at least some length of time (*Defenders of Wildlife v. Zinke*, 849 F.3d at 1090).

To truly meet their commitment to protecting genetic connectivity among wolves in the northern Rocky Mountains, WGFD should adjust their Regulations to ensure year-round protections of wolves in this key region along the Wyoming border close to Idaho. At a minimum, this area should be made a permanent part of the TGMA to protect wolves throughout the year, and during hunting season the quota should be as close to zero as possible.

### C. Quotas Should be Concentrated in High-Conflict Areas.

While the Center remains opposed to the hunting of wolves in Wyoming, there exist areas where our goals may align with those of the ranching and hunting communities. In this case, all parties want to reduce conflict between wolves and livestock wherever possible. Wolf-livestock conflict leads to both the loss of property and the loss of wolf lives when they are lethally removed, and so any way in which the hunting season can reduce these conflicts would be beneficial to all.

If WGFD is able to identify areas within the TGMA where livestock ranching is concentrated or where high levels of wolf conflict have previously been reported, then we would recommend reallocating the current quotas so that they are more heavily concentrated in the areas of high conflict. This would not be an increase in the overall amount of hunting allowed, but rather a redistribution so that it can help prevent future conflict.

By principally removing wolves that currently reside in areas where conflict is more likely, this could preempt future management removals while still leaving the population mostly intact in other portions of the TGMA. Such an approach would likely lead to a decrease in the number of wolves killed in the state overall each year, since the additive nature of trophy hunting and lethal management would be reduced by possibly avoiding the conflicts in the first place.

### D. Wolves' Predator Status in WY Should Lead to Lower Quotas in the TGMA.

The existence of Wyoming's predator area presents a great danger to wolves in the state. The U.S. Fish and Wildlife Service ("the Service") has previously acknowledged that dispersing wolves may be killed while traversing the predator area (77 Fed. Reg. 55602, Sept. 10, 2012). This fact makes it unlikely that the number of wolves legally killed during hunting season in the TGMA is an accurate reflection of the true mortality for wolves in the protected region, and should thus encourage a more conservative approach to setting quotas.

If the state truly intends to keep an additional population buffer above the minimum levels of 10 breeding pairs and 100 wolves, it needs to lower the proposed quotas to reflect this. The initial quota levels proposed in the Regulations in 2014 allowed for 43 wolves to be killed in the TGMA in total, while the revised numbers from the currently proposed 2017 Regulations similarly allow for 44 wolves to be killed. Additionally, 54 wolves were killed in the state in 2015 as management responses to livestock conflicts (Koshmrl 2016). If similar numbers are removed for lethal control in future years, along with the 44 proposed trophy wolves under the proposed quotas, that will lead to almost 100 wolves being shot dead in the state every year. This number, of course, does not even reflect the number of wolves that may be killed in the predator area for simply being too close to a human with a gun, or wolves lost to poaching, nontarget incidental deaths, or natural causes.

It has been argued repeatedly by proponents of hunting that the allowance of predator control reduces poaching and increases social tolerance, including by the U.S. FWS in their 2016 proposal to delist the Yellowstone grizzly bear (USFWS 2016). However, the evidence to support this claim is largely nonexistent. Recent studies have confirmed that removing protections on wolves, whether through de-listing or the legalization of hunting, can rapidly decrease the population growth rate due to a complementary increase in poaching, regardless of the number of wolves that are killed through legal harvest (Chapron & Treves 2016). This increase in mortality from illegal methods may be a result of the devaluation of wolves in the public mind, as they are now able to be hunted like other game species.

The impacts of an increase in poaching may be even worse than they appear at face value, since most measurements of poaching significantly underestimate the number of wolves that are killed illegally (Treves *et al.* 2017). These chronic underestimations "have obscured the magnitude of poaching as the major threat to endangered wolf populations" (Treves *et al.* 2017). The combination of these two facts demonstrates that even a conservative hunting quota may still be doing far more damage than realized, by encouraging poaching and improperly accounting for its effects.

With a reported 2015 population of 382 wolves in the state (Koshmrl 2016), the addition of hunting on top of the allowed predator control and unknown levels of poaching would bring the gray wolves dangerously close to their proposed buffer of 150 total wolves in only a few years. To account for this, WGFD should lower the proposed hunting quotas in the Regulations to decrease the risk of possibly causing a Federal re-listing process.

### II. The Management of Wolves Under the Public Trust Doctrine.

More than 4.2 million people visited Yellowstone National Park in 2016 (NPS 2017), continuing a trend of surging tourism in the area. According to the Wyoming Office of Tourism, \$3.2 billion was spent in the state in 2016 by visitors (Dean Runyan Assoc. 2017). The main draw for tourism in the area is the spectacular natural beauty of YNP and Grand Tetons NP, as well as the opportunity to see rare and beautiful wildlife that can be seen in very few other places in the continental United States (Duffield *et al.* 2006). Through their visits and their spending, visitors have made it clear that Wyoming's unique natural ecosystems are highly valued for their aesthetic and recreational value.

The government, at both the State and Federal levels, has a duty under the public trust doctrine to manage the wildlife resources they have been entrusted with on behalf of the public at large, who are the beneficiaries of this trust (TWS 2010, p. 10). Under this doctrine, the government is expected to manage the natural resources and wildlife of the public lands for the benefit of all, yet too often the process "becomes undemocratic when special interests capture the administrative agencies" that are supposed to be managing the trust for the public at large (Treves *et al.* 2015, p. 7). Currently, the interests of a small number of hunters and ranchers have "captured" the priorities and decision-making of WGFD, and are driving a set of policies that do not reflect the views of the public at large.

Activities such as wildlife observation, photography, and others are harmed when the hunting of wolves is allowed and management occurs for the benefit of the few. This relationship is especially complicated and questionable when the narrow interest that is being served provides direct funding to the state agency making the decisions, as is the case with hunting in Wyoming.

Approximately 4,200 licenses were sold by WGFD to hunt gray wolves in 2012, during the first year of the legal harvest (WGFD 2013, p. 431), which pales in comparison to the millions of visitors who come to the area hoping to see or hear the wolves in their natural state. Catering to the views of such a small portion of the population does not properly fulfill the state's duties under the public trust doctrine. With that in mind, we propose that WGFD adjust their proposed Regulations to reduce the take of wolves in these tourism-driven areas near YNP to better meet the needs of all, and include language addressing the wider social benefits of wolves in their Management Plan.

#### CONCLUSION

The Center is firmly opposed to the hunting of wolves, for the reasons listed herein, and would prefer to see a complete elimination of the trophy hunting season in the proposed TGMA. Failing that, we have provided a number of considerations that would improve the sustainability of the population, reduce wolf-livestock conflict, and lower the chances of the wolf requiring re-listing under the ESA.

Sincerely,

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#### **References\***

- Bergstrom, Bradley et al. 2013. License to kill: reforming federal wildlife control to restore biodiversity and ecosystem function. Conservation Letters 00 (2013): pp. 1-12.
- Beschta, R.L. and W.J. Ripple. 2009. Large predators and trophic cascades in terrestrial ecosystems of the western United States. Biol. Conserv. 142(11): pp. 2401-2414.
- Borg, Bridget et al. 2016. Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities. PLoS ONE 11(4): e0153808. doi: 10.1371/journal.pone.0153808.
- Borg, Bridget et al. 2015. Impacts of breeder loss on social structure, reproduction and population growth in a social canid. Journal of Animal Ecology 84: pp. 177-187.
- Chapron, G. and Treves A. 2016 Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proc. R. Soc. B 283: 20152939. <u>http://dx.doi.org/10.1098/rspb.2015.2939</u>
- Creel, S. and J.J. Rotella. 2010. Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (Canis lupus). PLoS ONE 5(9): e12918. doi: 10.1371/journal.pone.0012918.
- Crooks, K. R., and M. E. Soule. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. Nature 400(5): pp. 563-566.
- Dean Runyan Associates. 2017. Wyoming travel impacts, 2000-2016. Prepared for the Wyoming Office of Tourism, April, 2017.
- Defenders of Wildlife v. Zinke. 849 F.3d 1077 (D.C. Cir. 2017).
- Duffield, J., C. Neher, and D. Patterson. 2006. Wolves and People in Yellowstone: Impacts on the Regional Economy. Bozeman: Yellowstone Park Foundation.
- Estes, J.A. et al. 2011. Trophic Downgrading of Planet Earth. Science 333: pp. 301-306.
- Haber, G.C. 1996. Biological, Conservation, and Ethical Implications of Exploiting and Controlling Wolves. Conservation Biology 10(4): pp. 1068-1081.
- Koshmrl, Mike. 2016. With end of hunting, Wyo. wolf numbers hit a high. Jackson Hole News & Guide. April 13, 2016.

Lynch, K. 2014. Yellowstone 19 years after wolf re-introduction. The Wildlife News, January 20. Online at: http://www.thewildlifenews.com/2014/01/20/yellowstone-19-years-afterwolf-re-introduction/

1 . . .

- Mech, David L., Douglas W. Smith, Kerry M. Murphy, and Daniel R. MacNulty. 2001. Winter Severity and Wolf Predation on a Formerly Wolf-Free Elk Herd. Journal of Wildlife Management 65(4): 998-1003.
- Murray, D.L. et al. 2010. Death from anthropogenic causes is partially compensatory in recovering wolf populations. Biological Conservation 143: pp. 2514-2524.
- National Park Service. 2017. National Park Service Visitor Use Statistics: Park Reports: Yellowstone NP. Accessed June 12, 2017. Available at: <u>https://irma.nps.gov/Stats/Reports/Park/YELL</u>
- Povilitis, Tony. 2015. Preserving a natural wolf population in Yellowstone National Park, USA. The George Wright Forum 32(1): pp. 25-34.
- Prugh, L.R., C.J. Stoner, C.W. Epps, W.T. Bean, W.J. Ripple, A.S. Laliberte and J.S. Brashares. 2009. The Rise of the Mesopredator. BioScience 59(9): 779.
- Richardson, Leslie et al. 2014. The economics of roadside bear viewing. Journal of Environmental Management 140: pp. 102-110. doi: 10.1016/j/jenvman.2014.01.051.
- Ripple, W.J.and Beschta, R.L. 2011. Trophic cascades in Yellowstone: The first 15 years after wolf reintroduction. Biological Conservation 145: 205.
- Ripple, William J., Aaron J. Wirsing, Christopher C. Wilmers, and Mike Letnic. 2013. Widespread mesopredator effects after wolf extirpation. Biological Conservation 160: 70-79.
- Rutledge, L.Y. et al. 2010. Protection from harvesting restores the natural social structure of eastern wolf packs. Biological Conservation 143: pp. 332-339.
- Smith, D.W. et al. 2013. Yellowstone Wolf Project: Annual Report, 2012. YCR-2013-02. Yellowstone National Park, WY: National Park Service, Yellowstone Center for Resources.
- Smith, D.W. et al. 2010. Yellowstone Wolf Project: Annual Report, 2009. YCR-2010-06. Yellowstone National Park, WY: National Park Service, Yellowstone Center for Resources.

- Treves, A. et al. 2017. Mismeasured mortality: correcting estimates of wolf poaching in the United States. Journal of Mammalogy, gyx052: pp. 1-9. doi: 10.1093/jmammal/gyx052
- Treves, A. et al. 2016. Predator control should not be a shot in the dark. Frontiers in Ecology and the Environment 14(7): pp. 380-388.
- Treves, A. et al. 2015. Predators and the public trust. Biological Reviews. doi: 10.1111/brv.12227.
- USFWS. 2016 Removing the Greater Yellowstone Ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. Fed. Regist. FWS-R6-ES-2016-0042.
- The Wildlife Society. 2010. The public trust doctrine: implications for wildlife management and conservation in the United States and Canada. Technical Review 10-01, September, 2010.
- Wright, Gregory J., Rolf O. Peterson, Douglas W. Smith, and Thomas O. Lemke. 2006. Selection of Northern Yellowstone Elk by Gray Wolves and Hunters. Journal of Wildlife Management 70(4): 1070-1078.
- Wyoming Game and Fish Department. 2013. Annual Report of Big & Trophy Game Harvest 2012. June 29, 2013. pp. 1-445. Available at: <u>https://wgfd.wyo.gov/WGFD/media/content/PDF/Hunting/Harvest%20Reports/HR2012\_FullReport.pdf</u>

Wyoming Game and Fish Department. 2011 Wyoming Gray Wolf Management Plan. September 14, 2011. pp. 1-61. Available at: <u>https://wgfd.wyo.gov/WGFD/media/content/PDF/Wildlife/Large%20Carnivore/WYWOL</u> <u>F\_MANAGEMENT\_PLAN\_FINAL.pdf</u>

\*References may be provided upon request.

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Charles S. 155 West Deerpath Rd. Lake Forest, Illinois May, 16th 2017

mail-





Scott Talbott CASPE Wyoming Fish and Game Department 5400 Bishop Boulevard Cheyenne, Wyoming 82006 Dear Scott Talbott,

Recently the Wyoming Fish and Game department removed the gray wolf from the endangered species list. I ask that this decision be reversed because wolves are essential for the state of Wyoming and they must be protected. When most people think of Yellowstone National Park and the state of Wyoming, they think of the fascinating animals that call k their home. Since its founding, Yellowstone has been a safe haven and educational environment for a variety of species of flora and fauna, but there is one exception to this rule. Wolves. In 1926 wolves were hunted to extinction in Yellowstone and the surrounding area. But efforts from people and organizations around the country have convinced the national park service to approve the Wolf Reintroduction Project. Wolf reintroduction into Yellowstone was a success but it has ignited extreme controversy from some of the locals who live there. Although k was controversial, wolf reintroduction into Yellowstone was the correct decision because we created a country without wolves. It is crucial that we don't rest on our laurels after this success, we have to make sure wolves remain healthy and abundant within Wyoming.

Wolves have been hunted to the extreme and even though both federal and state governments have tried to put rules and regulations on the killing, wolves are continually killed both legally and illegally. According to United States Department of Agriculture and Idaho department of Fish and Game, 1,470 wolves were killed from 2009 to 2013 in the state of Idaho alone. The state of Idaho also plans to lower their wolf population to only 150 wolves by 2018. This can not be allowed to happen in Wyoming. The creation of hunting seasons allows for a great number of wolves to be killed. As of January 2016, there are a meager 528 wolves in the greater Yellowstone area. Approving plans to kill thousands of wolves brings their numbers down, bringing them closer and closer to extinction within the United States. This already happened in the 1920's and we are in danger of it happening again. Removing the hunting season in Wyoming would allow for the wolves numbers to remain balanced and stable.

Many ranchers argue that hunting seasons are necessary so they can achieve retribution for livestock killed. However, it turns out that wolves killing livestock is rare and it occurs almost only when there is a shortage of food. According to the U.S Fish and Wildlife Service, "wolf predation of livestock; sheep, poultry, and cattle does occur, but is uncommon enough behavior in the species as a whole that it can be called aberrant." In other words, wolves rarely kill livestock and when they do it is to survive. Wolves only kill to survive and the killings are not frequent enough to warrant the extermination of their species. Furthermore, many wildlife organizations offer to compensate ranchers for livestock lost by wolves. On the contrary, wolves are killed all the time by ranchers. Legalized killings of wolves are what caused their extinction.

Wolves are also an important part of our history as a country and attract many to places such as Yellowstone national park. Wolves are a big part of Yellowstone national park and the sumounding area's income. According to a study by BioEconomics in Missoula Montana, there has been a 4% increase in tourism since the reintroduction of wolves. This may not seem like a lot but with 3 million people visiting Yellowstone a year it makes a strong impact. The same study also showed that potential wolf based outfitters or programs that involve wolves are a potentially a 4 million 690 thousand dollar market for 2005. According to these studies, wolves create income for the national park service and the state of Wyoming. They are also highly sought after attraction by people from both the U.S and the entire world.

Wolves also make an extremely large impact on the ecosystem of Yellowstone national park and Wyoming. When the wolf was killed off from Yellowstone in the 1920's a trophic cascade occurred. A trophic cascade is when the top predator of an ecosystem changes the behavior of the animals below them in the food chain causing a chain reaction

that disrupts the entire ecosystem. The wolf's main source of prey is the elk. With the wolves gone the elk numbers and heavy grazing amounts have increased. But this is starting to change. According to Scott Creel an ecology professor at Montana State University, "Elk have proven to be pretty adaptable, when wolves are around they are more vigilant and do less forging." Furthermore, Doug Smith, project leader for the reintroduction of wolves into Yellowstone said, "wolves provide predatory pressure on elk which controls their numbers and their grazing." In other words, the predatory pressure that wolves put on elk keeps them from grazing in the same spot for long periods of time. Without intense browsing plants such as the willow are able to flourish. A study by the U.S Geological Survey found that "willow stem biomass was 10 times greater on unbrowsed plants than browsed plants. Unbrowsed plants recovered 84 percent of their pre-cut biomass after two growing seasons while browsed plants recovered 6 percent." In other words, plants that are not being constantly grazed by elk are able to reproduce better and create more substantial groves. This increases the number of beavers and songbirds. The reintroduction of wolves has fixed the problems in the Yellowstone and Wyoming ecosystems. In order for these ecosystems to remain healthy a large and stable population of wolves is necessary.

Some argue that wolves have brought the population of Elk down. While it is true that the Elk population had decreased in recent years, this is largely due to human hunting and other factors. Researchers have noted both high human harvest levels and seven years of drought during the drop in elk numbers. Furthermore, Wolf Biologists Doug Smith and Daniel Stahler and Michigan Tech Biologist John Vacetich said, "Our Analysis indicates that there is greater justification for believing that the harvest rate and severe climate, together, account for at least much of the decline." In other words, human hunting and the climate have been the leading factors in the decline of Elk population recently, the wolves have not been the leading cause. The hunting of Elk is also necessary for the species to survive. According to the U.S Fish and Wildlife service, "Grizzly bears, black bears, mountain lions, wolves, and coyotes prey on elk. By weeding out the weak, predators help maintain healthy vigorous elk herds." In other words, the predation of wolves is an important part of natural selection. It also keeps the elk herds healthy and maintains a stable population. Although the Elk numbers have dropped the reintroduction of the wolves has started to reverse the trophic cascade and restore the Yellowstone and Wyoming ecosystems back to its original place.

The reintroduction of wolves into Yellowstone had not only helped to save the species but it has restored balance to the fragile ecosystems of the national park and reinstated an iconic symbol of our country. This reintroduction has been extremely successful and serves as a role model for many similar projects all over the world. We caused the death of thousands of wolves in the 20th century and the destruction of a great ecosystem, and now it is up to us to conect this terrible mistake that we committed. It is crucial that we protect wolves to the best of our ability and the quickest and most effective step will be to put wolves back on the endangered species list.

Sincerely, Charles S.

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June 15, 2017

Wyoming Game and Fish Department Wildlife Division Attn: Regulations 3030 Energy Lane Casper, WY 82604



Comments on Chapter 47, Gray Wolf Hunting Seasons 🐝

Thank you for accepting these comments. Some are broader in scope than just addressing the quotas per hunt unit, but are intended to be considered in the rationale for setting those numbers.

The bar Wyoming has set for recovery is, in my opinion, too low. Better information about minimum viable populations, and genetic considerations unavailable pre-recovery has prompted biologists to push for higher numeric goals. Bergstrom et al. (2009) argued that ecosystem recovery should be a recovery criterion for wolves in the northern Rockies. Bergstrom et al (2009) cited Leonard et al (2005), who determined by DNA analysis that the pre-settlement wolf population of the western conterminous U.S. and Mexico was around 380,000, and noting, "and that it is likely to be an underestimate, (and) it is compatible with the estimate of Seton (1929) of about two million wolves in North America."

I would define a healthy population as one that is ecologically effective. While we are on the topic of population, perhaps it is fair to point out that, free of exploitation, wolves control their own numbers. Smith et al (2012), using 14 years of data from a long-term study of wolves in Yellowstone, noted, "At the population level, litter size and survival decreased with increasing wolf population size and canine distemper outbreaks." In the 2011 annual report of the Yellowstone wolf project, we read: "Intraspecific mortality was again the leading cause (of wolf deaths)." Flatly put, when wolf populations rise, wolves kill each other.

Speaking of mortality, I have to wonder why it is necessary to construct an arcane definition such as that you have written in Section 2, a. Wolves killed by whatever means are eliminated from the system of which they are an integral part. This applies to the greater Yellowstone ecosystem. Rutledge et al (2010) wrote, "Legal and illegal killing of animals near park

borders can significantly increase the threat of extirpation for populations living within ecological reserves, especially for wide-ranging large carnivores that regularly travel into unprotected areas." And, "Our results indicate that even in a relatively large protected area, human harvesting outside park boundaries can affect evolutionarily important social patterns within protected areas."

Based on recent research, I question any justification for killing wolves. Cariappa et al (2011) analyzed data collected at 32 sites across North America using linear and nonlinear regression and found that the evidence supported wolf population regulation by density-dependence as much as limitation by prey availability. The data suggested that wolf populations are self regulated rather than limited by prey biomass by at least a 3:1 margin. They wrote: "In establishing goals for sustainable wolf population levels, managers of wolf reintroductions and species recovery efforts should account for the possibility that some regulatory mechanism plays an important role in wolf population dynamics."

Cassidy et al (2015) concluded: "With the recent findings that densitydependent intraspecific aggression regulates the survival of northern Yellowstone wolves (Cubaynes et al. 2014), our study demonstrates a socially mediated mechanism by which this vital rate is influenced in this population. Our findings also have management implications for social carnivores where human exploitation may alter group composition through the removal of specific individuals. Such anthropogenic influence could indirectly affect competitive abilities of groups, altering natural social dynamics with fitness and population-level consequences."

Cubaynes et al (2014). cited by Cassidy et al, concluded: "Our results indicate that density-dependent intraspecific aggression is a major driver of adult wolf survival in northern Yellowstone, suggesting intrinsic densitydependent mechanisms have the potential to regulate wolf populations at high ungulate densities."

In pursuit of adaptive management, I hope that Wyoming will not box itself in to arbitrary numbers, but instead will state a goal of allowing wolves to reach densities in low-conflict wild areas that would allow them to become ecologically functional as strongly interacting species. The goal of wolf management might better be to establish ecologically effective populations of wolves (Lee et al. 2012) wherever the absence of conflicts with livestock make that feasible.

Ordiz et al (2013) wrote, "Large terrestrial carnivores, e.g. wolves or bears, often play a key ecological role from their position at the apex of trophic systems. Changes to their populations reverberate through ecological communities...(W)e question whether a large carnivore that has to "look over its shoulder" for human hunters can still fully perform its ecological role at the apex of a trophic system."

Here's a definitive look at the results of greatly reducing top carnivores: Prugh et al wrote in BioScience (2009) that, "Apex predators have experienced catastrophic declines throughout the world as a result of human persecution and habitat loss. These collapses in top predator [wolf] populations are commonly associated with dramatic increases in the abundance of smaller predators. [coyotes, foxes, skunks, raccoons] (T)his trophic interaction has been recorded across a range of communities and ecosystems. Mesopredator outbreaks often lead to declining prey populations, sometimes destabilizing communities and driving local extinctions....—mesopredator outbreaks are causing high ecological, economic, and social costs around the world."

I applaud you for not allowing trapping in the trophy game zone, and urge you to reduce the quota in any hunt unit where a wolf is killed there illegally.

In Sec. 4 (a), I ask for buffer zones in the trophy game areas to prevent the take of wolves that range both in and out of the parks. The cost of collaring wolves, and the loss to both research and recreational viewing of killing them, is far beyond the value of one hunter's trophy. Hardly insignificant is the cost to science of losing radio-collared wolves whose collaring cost Yellowstone Park Foundation donors as much as \$21,000 each. Those wolves were integral to the longest continuous studies of wolf population dynamics and wolf-elk relationships in the world, all in a uniquely complete suite of naturally present carnivores.

It seems to me that WGFD should consider the values and desires of the hundreds of thousands of visitors who come to Wyoming's national parks to

see wolves. Wolves are also an important driver of economic activity in the greater Yellowstone area. Borg et al (2016) examined the effect of legal harvest of wolves (Canis lupus) along the boundaries of two North American National Parks, Denali (DNPP) and Yellowstone (YNP), on wolf viewing opportunities within the parks during peak tourist season (YNP from 2008 to 2013). Sightings in YNP increased by 45% following years with no harvest of a wolf from a pack, and sightings in DNPP were more than twice as likely during a period with a harvest buffer zone than in years without the buffer. These findings show that harvest of wolves adjacent to protected areas can reduce sightings within those areas despite minimal impacts on the size of protected wolf populations.

In Sec. 4 (d), I support the prohibition of the use of radio tracking gear in wolf hunting. From 2011 through 2015, 9 radio-collared wolves from Yellowstone have been killed during state-managed seasons.

Sec. 4 (g). would require surrendering radio collars of wolves killed by hunters. That's a step in the right direction, but prohibition of killing radio collared animals would be far better.

Sec. 4 (j). I have to wonder why WGFD needs to push killing of wolves as predators outside the season in Hunt Area 12.

6 (a) Area 1, Clark's Fork: Isn't this where collared wolves from the park have been killed? Wouldn't this be a good area to serve as a buffer, if only to demonstrate that WGFD is a good neighbor to Yellowstone National Park?

Sec. 6 (a) Area 2, Sunlight: Ditto

Sec. 8, Take of wolves designated as predatory animals. Why not let these wolves function as strongly interacting species to prevent the spread of Chronic Wasting Disease? Chronic wasting disease is marching inexorably across the North American landscape. We should consider the services wolves provide that can avert epizootics of wildlife diseases. Bruce L. Smith, in his 2012 book, Where Elk Roam, warns us of the danger of concentrating elk on feed grounds, because of two serious diseases: brucellosis and chronic wasting disease (CWD). Noting that Wisconsin had

spent \$27 million depopulating its whitetail deer to curb CWD (and no CWD had been detected where wolves live), he traced the inexorable march of CWD across Wyoming. "Recent modeling suggests wolf predation may suppress CWD emergence in deer." Wolves and other large carnivores are essential to the health of the ecosystems on which our game animals and we depend. Wolves have been shown to be capable of reducing or eliminating the spread of brucellosis and chronic wasting disease (Hobbs 2006, Wild et al 2011), in part by reducing density and group sizes of elk and deer. Wild et al (2011) concluded, "We suggest that as CWD distribution and wolf range overlap in the future, wolf predation may suppress disease emergence or limit prevalence." Cross et al (2010) wrote, "(T)he data suggest that enhanced elk-to-elk transmission in free-ranging populations may be occurring due to larger winter elk aggregations. Elk populations inside and outside of the GYE that traditionally did not maintain brucellosis may now be at risk due to recent population increases." Wise et al (2011) also observed that Wisconsin had extended their hunting season one year to over 100 days, in an attempt to reduce white-tailed deer, to little effect. Hunters can't contain CWD. But wolves can: they are on the hunt 365 days of the year, 24 hours of every day, with 100 times our sensory capacity, sifting and sorting for disabled or disadvantaged prey that is less likely to kick their teeth out.

Justifying killing wolves to protect livestock is questionable. In 2014, the NRM (MT, ID, and WY) wolf population was >1,657 wolves in >282 packs (including >85 breeding pairs). MT estimated 554 wolves in 134 packs with 34 breeding pairs; ID 770 wolves in 104 packs with 26 breeding pairs; WY 333 wolves in 44 packs with 25 breeding pairs; Total confirmed depredations by wolves in 2014 included 140 cattle, 172 sheep, 4 dogs, 1 horse, and 1 donkey. Private and state agencies paid \$274,885.90 in compensation for wolf-damage to livestock in 2014. Federal, State and Tribal agencies spent approximately \$3,146,006.00 of federal funding for wolf management and research.

There were about 6,000,000 cattle in the NRM in 2014. The 140 cattle taken by wolves made up 1 in 43,000, or 0.000023% of cattle in the states. There were about 825,000 sheep in the NRM in 2014. The 172 sheep taken by wolves made up 1 in 4,800, or 0.000208% of sheep in the states.

Wielgus and Peebles (2014) assessed the effects of wolf mortality on reducing livestock depredations in Idaho, Montana and Wyoming from 1987–2012 using a 25 year time series. The number of livestock depredated, livestock populations, wolf population estimates, number of breeding pairs, and wolves killed were calculated for the wolf-occupied area of each state for each year. They found that the number of livestock depredated the following year was positively, not negatively, associated with the number of wolves killed the previous year. The odds of livestock depredations increased 4% for sheep and 5–6% for cattle with increased wolf control. I urge WFGD to work with producers and NGOs to undertake preventive, versus retributive, activities to reduce the incidence of depredation.

Another rationale for killing wolves is to prevent their reducing hunter opportunity. Yet, numbers from Idaho, Montana, and Wyoming show increases in harvests in the last twenty years. In Wyoming, in 1996, 59,179 elk licenses were sold; in 2014, 71,890. In 1996, 30,612 elk were harvested; in 2014, 25,905. In 1996, the success rate was 38%; in 2014, 45%. Elk populations were 108,111 in 1996; 114,600 in 2014.

Self introduction: Through several positions at Yellowstone National Park, I was involved in drafting two editions of Wolves for Yellowstone? (1990 and 1992), and the 1994 wolf reintroduction EIS. I was the park's principal public educator on wolves and their recovery from 1985 to 1997, when I retired. Then I taught field courses on wolves for the Yellowstone Association Institute through 2005. I am a board member of the Wolf Recovery Foundation, an advisory board member of Living With Wolves, and a member of the Montana Fish, Wildlife and Parks Region 3 Citizens' Advisory Committee. I am a member of numerous conservation NGOs, but I do not claim to speak for any of them. As a Wyoming resident 1980-97, I successfully hunted antelope, deer, elk, and moose.

## **References cited**

Bergstrom, Bradley J., Sacha Vignieri, Steven R. Sheffield, Wes Sechrest, and Anne A. Carlson. 2009. The Northern Rocky Mountain Gray Wolf Is Not Yet Recovered. BioScience 59(11): 991-999.

Borg BL, Arthur SM, Bromen NA, Cassidy KA, McIntyre R, Smith DW, et al. (2016) Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities. PLoS ONE 11(4): e0153808. doi: 10.1371/journal.pone.0153808

Cariappa, C. A., John K. Oakleaf, Warren B. Ballard, and Stewart W. Breck. 2011. A Reappraisal of the Evidence for Regulation of Wolf Populations. The Journal of Wildlife Management 75(3):726–730; DOI: 10.1002/jwmg.74

Cassidy, Kira A., Daniel R. McNulty , Daniel R. Stahler, Douglas W. Smith, and L. David Mech. Group composition effects on aggressive interpack interactions of gray wolves in Yellowstone National Park. Behav Ecol (2015) 26 (5): 1352-1360. DOI: https://doi.org/10.1093/beheco/arv081

Cross P. C., E. K. Cole, A. P. Dobson, W. H. Edwards, K. L. Hamlin, G. Luikart, A. D. Middleton, B. M. Scurlock, and P. J. White. 2010. Probable causes of increasing brucellosis in free-ranging elk of the Greater Yellowstone Ecosystem. Ecological Applications, 20(1):278–288.

Cubaynes S. MacNulty DR, Stahler DR, Quimby KA, Smith DW, Coulson T. 2014. Density-dependent intraspecific aggression regulates survival in northern Yellowstone wolves (Canis lupus). J Anim Ecol . 83:1344–1356.

Hobbs, N. Thompson. 2006. A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park.

Lee, Yohan, Jane L. Harrison, Cristina Eisenberg, Byungdoo Lee. 2012. Modeling Biodiversity Benefits and External Costs from a Keystone Predator Reintroduction Policy. J. Mt. Sci. (2012) 9: 385–39 DOI: 10.1007 s11629-009-2246-1.

Leonard J.A., Vila C., Wayne R.K. 2005. Legacy lost: Genetic variability and population size of extirpated US grey wolves (Canis lupus). Molecular Ecology 14: 9–17.

Ordiz, Andrés, Richard Bischof, and Jon E. Swenson. 2013. Saving large carnivores, but losing the apex predator? Biological Conservation 168 (2013) 128–133.

Prugh, Laura R., Chantal J. Stoner, Clinton W. Epps, William T. Bean, William J. Ripple, Andrea S. Laliberte, Justin S. Brashares. 2009. The Rise of the Mesopredator BioScience 59(9):779-791. October.

Rutledge, Linda Y., Brent R. Patterson, Kenneth J. Mills, Karen M. Loveless, Dennis L. Murray, Bradley N. White. 2010. Protection from harvesting restores the natural social structure of eastern wolf packs. Biological Conservation 143(1):332-339.

Smith, Bruce L. 2012. Where Elk Roam - Conservation and Biopolitics of our National Elk Herd. Lions Press. 266 pages.

Smith, Douglas, Daniel Stahler, Erin Stahler, Matthew Metz, Richard McIntyre, Joshua Irving, Rebecca Raymond, Colby Anton, Ryan Kindermann, and Nate Bowersock. 2011. Yeliowstone Wolf Project Annual Report. National Park Service Yellowstone Center for Resources Yellowstone National Park, Wyoming YCR-2012-01.

Wielgus, Robert B., and Kaylie A. Peebles. 2014. Effects of Wolf Mortality on Livestock Depredations DOI: 10.1371/journal.pone.0113505.

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P.S.

I attempted repeatedly to send these comments online, without success, and also tried to print a comment form, without success. NB

I can email this letter to you it it will make distribution of it easier for you. MB

#### **CHAPTER 47**

#### **GRAY WOLF HUNTING SEASONS**

**Section 1. Authority.** This regulation is promulgated by the authority of Wyoming Statutes § 23-1-101, § 23-1-102, § 23-1-108, § 23-1-302, § 23-1-304, § 23-2-104, § 23-2-303, § 23-3-111, § 23-3-115 and § 23-3-304.

**Section 2. Definitions.** For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes and the Commission also adopts the following definitions:

(a) "Mortality" means any legal or illegal human-caused gray wolf death that occurs during an open gray wolf hunting season, excluding gray wolves taken by the Department, gray wolves taken under the authority of W.S. § 23-3-115 (c), gray wolves taken under Lethal Take Permits and known natural and accidental gray wolf deaths.

Section 3. Hunting Seasons Established. There shall be open seasons during 2017 for the hunting of gray wolves as set forth in this regulation. This regulation shall go into effect from and after the date gray wolves are removed from the federal list of experimental nonessential populations, endangered species or threatened species in Wyoming. This regulation shall remain in effect until modified or repealed by the Commission.

# Section 4. Hunting Regulations for Gray Wolves Designated as Trophy Game Animals.

(a) All gray wolves within the Wolf Trophy Game Management Area and Seasonal Wolf Trophy Game Management Area as described in W.S. §23-1-101(a) (xii) (B) (I) and (II) are designated as trophy game animals. These regulations, and any allowance for hunting, do not apply to lands administered by the National Park Service within Grand Teton National Park or the National Elk Refuge. Gray wolves in Wyoming are designated as predatory animals as defined in W.S. §23-1-101(a) (viii) (B) except for:

(i) Those areas where gray wolves are designated as trophy game animals;

and,

- (ii) Yellowstone National Park; and,
- (iii) The Wind River Reservation, except on non-Indian owned fee titled lands.

(b) Gray wolves designated as trophy game animals shall only be taken during open gray wolf hunting seasons with legal firearms and archery equipment as set forth in Commission regulation, except as otherwise provided by Wyoming statutes.

(c) Open hours for the taking of gray wolves. Gray wolves may only be taken from one-half (1/2) hour before sunrise to one-half (1/2) hour after sunset.

(d) No person, except as authorized by the Department, shall take a gray wolf with the use of or by the aid of radio tracking equipment.

(e) Bag and possession limit. The bag and possession limits for any person with a proper license shall be one (1) gray wolf during any one (1) calendar year (January 1 - December 31). Licensed hunters may take any gray wolf.

(f) Reporting and registering kills. Hunters taking a gray wolf in the hunt areas described in Section 6 shall retain the pelt and skull from each gray wolf for registration purposes. Even if the skull is damaged, it shall accompany the pelt for registration purposes. Visible external evidence of sex shall remain naturally attached to the pelt. The pelt and skull shall be presented in an unfrozen condition to allow collection of biological samples and to determine the age and sex of the gray wolf.

(i) Within twenty-four (24) hours after taking a gray wolf, the licensee shall report the taking of a gray wolf by calling toll free 1-800-264-1280. The report shall include the name and phone number of the person making the report, hunter's name and license number, date of the kill and location of the site of kill to include hunt area.

(ii) Within five (5) days after taking a gray wolf, the licensee taking the gray wolf shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office during business hours for registration. The licensee shall provide his license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iii) Any person who makes a false statement on the registration form shall be in violation of this regulation and, such violation shall be punishable as provided by Title 23, Wyoming Statutes for violation of Commission regulations.

(g) Surrender of electronic radio tracking devices. Any person taking a gray wolf wearing an electronic radio tracking device within the hunt areas described in Section 6 shall surrender the device to the Department in accordance with registration dates in Section 4(f) (ii).

	Season Dates		
Hunt Area	Opens	Closes	Mortality Quota
1	Oct. 1	Dec. 31	2
2	Oct. 1	Dec. 31	4
3	Oct. 1	Dec. 31	6
4	Oct. 1	Dec. 31	5
5	Oct. 1	Dec. 31	6
6	Oct. 1	Dec. 31	3; SEE SECTION 4(i)
7	Oct. 1	Dec. 31	1

(h) Hunt Areas, Season Dates, Mortality Quota and Limitations.

	Season Dates		
Hunt Area	Opens	Closes	Mortality Quota
8	Oct. 1	Dec. 31	7
9	Oct. 1	Dec. 31	2
10	Oct. 1	Dec. 31	3
11	Oct. 1	Dec. 31	3
12	Oct. 15	Dec. 31	2; SEE SECTION 4(j)

(i) Gray wolf hunting shall be closed in that portion of Hunt Area 6 in the John D. Rockefeller Jr. Memorial Parkway.

(j) Gray wolves located in Hunt Area 12 are designated as trophy game animals from October 15 through the last day of February in the subsequent year, but the hunting season shall end on December 31 or when the mortality quota is filled, whichever occurs first, as set forth in Section 4(h). Gray wolves located in Hunt Area 12 are designated as predatory animals from March 1 through October 14 and during this time period may be taken without a license.

(k) Hunt area mortality quota limitation. The gray wolf hunting season shall close in each gray wolf hunt area when the mortality quota for that area has been reached. If the mortality quota is not reached, the season shall close upon the date specified in Section 4(h). Prior to hunting, it is the hunter's responsibility to confirm the hunt area the person intends to hunt is open. The status of hunt area closures shall be available twenty-four (24) hours a day by calling toll free **1-800-264-1280**.

**Section 5.** Archery. Gray wolves may be taken with legal archery equipment in all hunt areas as set forth in Section 4 of this Chapter.

#### Section 6. Hunt Area Descriptions.

(a) Area and Number.

Area 1. Clarks Fork. All of the area north of the Clark's Fork River and west of Wyoming Highway 120; all of the drainage of Pat O'Hara Creek, Paint Creek, Newmeyer Creek and Dead Indian Gulch west of Wyoming Highway 120; all of the drainage of Jim Creek, Trout Creek and Rattlesnake Creek north of the North Fork of the Shoshone River; all of the drainage of Cottonwood Creek, Dry Creek and Trail Creek west of Wyoming Highway 120.

Area 2. Sunlight. All of the drainage of Soda Butte Creek outside of Yellowstone National Park; all of the south drainage of the Clark's Fork River down to and including the drainage of Dead Indian Creek.

Area 3. Absaroka. All of the north and west drainage of the North Fork of the Shoshone River down to but excluding the drainage of Jim Creek; all of the south drainage of the North Fork of the Shoshone River outside of Yellowstone National Park; all of the north and west drainage of the South Fork of the Shoshone River below and including the drainage of

Ishawooa Creek; all of the drainage of the Yellowstone River upstream from Yellowstone Lake outside of Yellowstone National Park.

**Area 4. Greybull.** Beginning where Wyoming Highway 120 crosses the Shoshone River in the town of Cody; southerly along said highway to the Greybull River in the town of Meeteetse; southwesterly up said river to the Wood River; southwesterly up said river to the Shoshone National Forest boundary; southerly along said boundary to the Hot Springs County-Fremont County line; northwesterly along said county line to the Park County-Fremont County line; northwesterly then southwesterly along said county line to the Continental Divide at Crescent Mountain; northerly along said divide to the divide between the Yellowstone River drainage and the South Fork of the Shoshone River drainage; northerly along said divide to the divide between Ishawooa Creek and the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly down said river to the Shoshone River at Buffalo Bill Reservoir; easterly down said river to Wyoming Highway 120.

Area 5. Wind River. All of the drainage of the Wind River west of the west boundary of the Wind River Reservation.

**Area 6. Pacific Creek.** Beginning where the Continental Divide crosses the south boundary of Yellowstone National Park; southeasterly then southwesterly along said divide to U.S. Highway 26-287 at Togwotee Pass; westerly along said highway to the east boundary of Grand Teton National Park; northwesterly along said boundary to the Targhee National Forest boundary; northerly along said boundary to the southern boundary of Yellowstone National Park; easterly along said boundary to the Continental Divide.

Area 7. Targhee. Beginning where Wyoming Highway 22 crosses the Wyoming-Idaho state line; northerly along said line to the southern boundary of Yellowstone National Park; easterly along said boundary to the Caribou-Targhee National Forest boundary with the John D. Rockefeller Jr. Memorial Parkway boundary; southerly along said boundary to the Grand Teton National Park boundary; southerly along said boundary to the Bridger-Teton National Forest boundary; southerly along said boundary to Teton Pass and Wyoming Highway 22; westerly along said highway to the Wyoming-Idaho state line.

**Area 8. Fish Creek.** Beginning where U.S. Highway 26-287 crosses the east boundary of Grand Teton National Park; easterly along said highway to the Continental Divide at Togwotee Pass; southerly along said divide to the Union Pass Road (U.S.F.S. Road 600); westerly then southerly along said road to the Darwin Ranch Road (U.S.F.S. Road 620); westerly along said road to Kinky Creek; northwesterly down said creek to the Gros Ventre River; northwesterly down said river to the east boundary of Grand Teton National Park east of the town of Kelly; northerly along said boundary to U.S. Highway 26-287. In addition, a noncontiguous area shall be included in the hunt area described as beginning where the Caribou-Targhee National Forest boundary crosses Wyoming Highway 22 at Teton Pass; northerly along said boundary to U.S. Highway 26-89-191; southerly along said highway to its junction with Wyoming Highway 22; westerly along said highway to Teton Pass.

Area 9. Crystal Creek. Beginning where the Gros Ventre River crosses the National Elk Refuge boundary near the town of Kelly; southeasterly up said river to Kinky Creek; southeasterly up said creek to the Darwin Ranch Road (U.S.F.S. Road 620); southerly along said road to the divide between the Green River and Gros Ventre River; southwesterly along said divide to the divide between the Gros Ventre River and Hoback River north of Hodges Peak; northwesterly along said divide to the divide between Flat Creek northwest of Pyramid Peak; southwesterly along said divide to the divide between Flat Creek and Cache Creek at Cache Peak; northwesterly along said divide to the divide between Twin Creeks and Cache Creek; northwesterly along said divide to the National Elk Refuge boundary; northeasterly along said boundary to the Gros Ventre River.

**Area 10. Rim.** Beginning where U.S. Highway 26-89-191 crosses Flat Creek at the north edge of the town of Jackson; due east to the National Elk Refuge boundary; easterly along said boundary to the Bridger-Teton National Forest boundary and the ridge between Twin Creeks and Cache Creek; southeasterly along said ridge and the divide between Flat Creek and Cache Creek to Cache Peak; easterly along the divide between Flat Creek and Granite Creek to Pyramid Peak; southeasterly along the divide between the Gros Ventre River and the Hoback River to Steamboat Peak; southeasterly along said divide to the divide between the Green River and the Hoback River at Hodges Peak; southerly along said divide to U.S. Highway 189-191 at Hoback Rim; northwesterly along said highway to the intersection with U.S. Highway 26-89-191; northerly along said highway to where it crosses Flat Creek at the north edge of the town of Jackson.

**Area 11. Green River.** Beginning where the Union Pass Road (U.S.F.S. Road 600) intersects the Continental Divide; southerly along said divide to the Middle Fork of Boulder Creek; westerly down said creek to Boulder Creek; westerly down said creek to the Bridger-Teton National Forest boundary; northwesterly along said boundary to its intersection with U.S. Highway 189-191 at the divide between the Hoback River and the Green River (Hoback Rim); northerly along said divide to the divide between the Green River and the Gros Ventre River at Hodges Peak; northeasterly along said divide to the Darwin Ranch Road (U.S.F.S. Road 620); easterly along said road to the Union Pass Road (U.S.F.S. Road 600); northerly then easterly along said road to the Continental Divide.

**Area 12. Alpine.** Beginning where the Bridger-Teton National Forest boundary intersects U.S. Highway 189-191 at the divide between the Hoback River and the Green River (Hoback Rim); westerly and then southerly along said forest boundary to its intersection with McDougal Gap Road (U.S.F.S. Road 10125); westerly along said road to Grey's River Road (U.S.F.S. Road 10138); southerly along said road to Sheep Creek; westerly down said creek to Grey's River; southwesterly up said river to Bear Creek; southwesterly up said creek to the hydrographic divide between Bear Creek and Willow Creek; west from said divide to Willow Creek Road (U.S.F.S. Road 10080); northwesterly along said road to Lincoln County Road 123; southerly along said road to Grover Park Road (U.S.F.S. Road 10081); southerly then westerly along said road to Lincoln County Road 172; westerly along said road to the junction with Wyoming Highway 237; westerly along said highway to Wyoming Highway 238; southerly along said state line; north along said state line to Wyoming Highway 22; easterly along said

highway to the intersection with U.S. Highway 26-89-191 in the town of Jackson; southerly along said highway to the intersection with U.S. Highway 189-191; southeasterly along said highway to the Bridger-Teton National Forest boundary at the divide between the Hoback River and the Green River (Hoback Rim).

**Section 7. Area Closures.** Areas administered by the U.S. Forest Service, Bureau of Land Management or the Wyoming Game and Fish Commission in which human presence is prohibited to protect wintering wildlife shall be closed to gray wolf hunting during the time period for which the areas have been closed to human presence.

### Section 8. Take of Wolves Designated as Predatory Animals.

(a) Any person who takes a gray wolf designated as a predatory animal as set forth in Section 4(a) shall be required to report the kill to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office within ten (10) days after the date the gray wolf was killed. The person shall be required to provide his or her name and address, the date the gray wolf was killed, the sex of the gray wolf and the location of the site of kill (identified by the section, range and township, or UTM coordinates). In addition, the Department may request the person to voluntarily provide a genetics sample from the gray wolf for testing to assess genetic connectivity.

(b) Surrender of electronic radio tracking devices. Any person taking a gray wolf designated as a predatory animal as set forth in Section 4(a) wearing an electronic radio tracking device shall surrender the device to the Department when registering a gray wolf in accordance with registration dates in Section 8(a).

**Section 9. Violation of Commission Regulations.** Failure to abide by the provisions of this regulation shall be punishable as provided by Wyoming statutes for violation of Commission regulations.

**Section 10. Savings Clause.** If any provision of this regulation shall be held to be illegal or unconstitutional, such a ruling shall not affect other provisions of this regulation which can be given effect without the illegal or unconstitutional provision; and, to this end, the provisions of this regulation shall be severable.

WYOMING GAME AND FISH COMMISSION

Keith Culver, President

Dated: July 19, 2017

#### WYOMING GAME AND FISH COMMISSION

#### CHAPTER 47

#### **GRAY WOLF HUNTING SEASONS**

**Section 1. Authority.** This regulation is promulgated by the authority of <del>W.S.</del> <u>Wyoming Statutes</u> § 23-1-101, § 23-1-102, § 23-1-108, § 23-1-302, § 23-1-304, § 23-2-104, § 23-2-303, § 23-3-111, § 23-3-115 and § 23-3-304.

**Section 2. Definitions.** For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes and the Commission also adopts the following definitions:

(a) "Mortality" means any legal or illegal human-caused gray wolf death that occurs during an open <u>gray wolf</u> hunting season, excluding gray wolves taken by the Department, gray wolves taken under the authority of W.S. § 23-3-115 (c), gray wolves taken under Lethal Take Permits and known natural and accidental gray wolf deaths.

Section 3. Hunting Seasons Established. There shall be open seasons during 20142017 for the hunting of gray wolves as set forth in this regulation. This regulation shall go into effect from and after the date gray wolves are removed from the federal list of experimental nonessential populations, endangered species or threatened species in Wyoming. This regulation shall remain in effect until modified or repealed by the Commission.

# Section 4. Hunting Regulations for Gray Wolves Designated as Trophy Game Animals.

(a) All gray wolves within the Wolf Trophy Game Management Area and Seasonal Wolf Trophy Game Management Area as described in W.S. §23-1-101(a) (xii) (B) (I) and (II) are designated as trophy game animals. These regulations, and any allowance for hunting, do not apply to lands administered by the National Park Service within Grand Teton National Park or the National Elk Refuge. Gray wolves in Wyoming are designated as predatory animals as defined in W.S. §23-1-101(a) (viii) (B) except for:

(i) Those areas where gray wolves are designated as trophy game animals;

and,

- (ii) Yellowstone National Park; and,
- (iii) The Wind River Reservation, except on non-Indian owned fee titled lands.

(b) Gray wolves designated as trophy game animals shall only be taken during open <u>gray wolf hunting</u> seasons with legal firearms and archery equipment as set forth in Commission regulation, except as otherwise provided by Wyoming statutes.

(c) Open hours for the taking of gray wolves. Gray wolves may only be taken from one-half (1/2) hour before sunrise to one-half (1/2) hour after sunset.

(d) No person, except as authorized by the Department, shall take a gray wolf with the use of or by the aid of radio tracking equipment.

(e) Bag and possession limit. The bag and possession limits for any person with a proper license shall be one (1) gray wolf during any one (1) calendar year (January 1 - December 31). Licensed hunters may take any gray wolf.

(f) Reporting and registering kills. Hunters taking a gray wolf in the hunt areas described in Section 6 shall retain the pelt and skull from each gray wolf for registration purposes. Even if the skull is damaged, it shall accompany the pelt for registration purposes. Visible external evidence of sex shall remain naturally attached to the pelt. The pelt and skull shall be presented in an unfrozen condition to allow collection of biological samples and to determine the age and sex of the gray wolf.

(i) Within twenty-four (24) hours after taking a gray wolf, the licensee shall report the taking of a gray wolf by calling toll free 1-800-264-1280. The report shall include the name and phone number of the person making the report, hunter's name and license number, date of the kill and location of the site of kill to include hunt area.

(ii) Within five (5) days after taking a gray wolf, the licensee taking the gray wolf shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office during business hours for registration. The licensee shall provide his license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iii) Any person who makes a false statement on the registration form shall be in violation of this regulation and, such violation shall be punishable as provided by Title 23, Wyoming Statutes for violation of Commission regulations.

(g) Surrender of electronic radio tracking devices. Any person taking a gray wolf wearing an electronic radio tracking device within the hunt areas described in Section 6 shall surrender the device to the Department in accordance with registration dates in Section 4(f) (ii).

	Season Dates		
Hunt Area	Opens	Closes	Mortality Quota
1	Oct. 1	Dec. 31	<u>32</u>
2	Oct. 1	Dec. 31	<u>54</u>
3	Oct. 1	Dec. 31	7 <u>6</u>
4	Oct. 1	Dec. 31	4 <u>5</u>
5	Oct. 1	Dec. 31	6
6	Oct. 1	Dec. 31	3; SEE SECTION 4(i)
7	Oct. 1	Dec. 31	1
8	Oct. 1	Dec. 31	<u>67</u>
9	Oct. 1	Dec. 31	2
10	Oct. 1	Dec. 31	3
11	Oct. 1	Dec. 31	2 <u>3</u>
12	Oct. 15	Dec. 31	4 <u>2;</u> SEE SECTION 4(j)

(h) Hunt Areas, Season Dates, Mortality Quota and Limitations.

(i) Gray wolf hunting shall be closed in that portion of Hunt Area 6 in the John D. Rockefeller Jr. Memorial Parkway.

(j) Gray wolves located in Hunt Area 12 are designated as trophy game animals from October 15 through the last day of February in the subsequent year, but the hunting season shall end on December 31 or when the mortality quota is filled, whichever occurs first, as set forth in Section 4(h). Gray wolves located in Hunt Area 12 are designated as predatory animals from March 1 through October 14 and during this time period may be taken without a license.

(k) Hunt area mortality quota limitation. The gray wolf hunting season shall close in each <u>gray</u> wolf hunt area when the mortality quota for that area has been reached. If the mortality quota is not reached, the season shall close upon the date specified in Section 4(h). Prior to hunting, it is the hunter's responsibility to confirm the hunt area the person intends to hunt is open. The status of hunt area closures shall be available twenty-four (24) hours a day by calling toll free **1-800-264-1280**.

**Section 5.** Archery. Gray wolves may be taken with legal archery equipment in all hunt areas as set forth in Section 4 of this Chapter.

#### Section 6. Hunt Area Descriptions.

(a) Area and Number.

Area 1. Clarks Fork. All of the area north of the Clark's Fork River and west of Wyoming Highway 120; all of the drainage of Pat O'Hara Creek, Paint Creek, Newmeyer Creek and Dead Indian Gulch west of Wyoming Highway 120; all of the drainage of Jim Creek, Trout

Creek and Rattlesnake Creek north of the North Fork of the Shoshone River; all of the drainage of Cottonwood Creek, Dry Creek and Trail Creek west of Wyoming Highway 120.

Area 2. Sunlight. All of the drainage of Soda Butte Creek outside of Yellowstone National Park; all of the south drainage of the Clark's Fork River down to and including the drainage of Dead Indian Creek.

Area 3. Absaroka. All of the north and west drainage of the North Fork of the Shoshone River down to but excluding the drainage of Jim Creek; all of the south drainage of the North Fork of the Shoshone River outside of Yellowstone National Park; all of the north and west drainage of the South Fork of the Shoshone River below and including the drainage of Ishawooa Creek; all of the drainage of the Yellowstone River upstream from Yellowstone Lake outside of Yellowstone National Park.

**Area 4. Greybull.** Beginning where Wyoming Highway 120 crosses the Shoshone River in the town of Cody; southerly along said highway to the Greybull River in the town of Meeteetse; southwesterly up said river to the Wood River; southwesterly up said river to the Shoshone National Forest boundary; southerly along said boundary to the Hot Springs County-Fremont County line; northwesterly along said county line to the Park County-Fremont County line; northwesterly then southwesterly along said county line to the Continental Divide at Crescent Mountain; northerly along said divide to the divide between the Yellowstone River drainage and the South Fork of the Shoshone River drainage; northerly along said divide to the divide between Ishawooa Creek and the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly along said divide to the South Fork of the Shoshone River; northeasterly down said river to the Shoshone River at Buffalo Bill Reservoir; easterly down said river to Wyoming Highway 120.

Area 5. Wind River. All of the drainage of the Wind River west of the west boundary of the Wind River Reservation.

Area 6. Pacific Creek. Beginning where the Continental Divide crosses the south boundary of Yellowstone National Park; southeasterly then southwesterly along said divide to U.S. Highway 26-287 at Togwotee Pass; westerly along said highway to the east boundary of Grand Teton National Park; northwesterly along said boundary to the Targhee National Forest boundary; northerly along said boundary to the southern boundary of Yellowstone National Park; easterly along said boundary to the Continental Divide.

Area 7. Targhee. Beginning where Wyoming Highway 22 crosses the Wyoming-Idaho state line; northerly along said line to the southern boundary of Yellowstone National Park; easterly along said boundary to the Caribou-Targhee National Forest boundary with the John D. Rockefeller Jr. Memorial Parkway boundary; southerly along said boundary to the Grand Teton National Park boundary; southerly along said boundary to the Bridger-Teton National Forest boundary; southerly along said boundary to Teton Pass and Wyoming Highway 22; westerly along said highway to the Wyoming-Idaho state line.

Area 8. Fish Creek. Beginning where U.S. Highway 26-287 crosses the east boundary of Grand Teton National Park; easterly along said highway to the Continental Divide at

Togwotee Pass; southerly along said divide to the Union Pass Road (U.S.F.S. Road 600); westerly then southerly along said road to the Darwin Ranch Road (U.S.F.S. Road 620); westerly along said road to Kinky Creek; northwesterly down said creek to the Gros Ventre River; northwesterly down said river to the east boundary of Grand Teton National Park east of the town of Kelly; northerly along said boundary to U.S. Highway 26-287. In addition, a noncontiguous area shall be included in the hunt area described as beginning where the Caribou-Targhee National Forest boundary crosses Wyoming Highway 22 at Teton Pass; northerly along said boundary to U.S. Highway 26-89-191; southerly along said highway to its junction with Wyoming Highway 22; westerly along said highway to Teton Pass.

Area 9. Crystal Creek. Beginning where the Gros Ventre River crosses the National Elk Refuge boundary near the town of Kelly; southeasterly up said river to Kinky Creek; southeasterly up said creek to the Darwin Ranch Road (U.S.F.S. Road 620); southerly along said road to the divide between the Green River and Gros Ventre River; southwesterly along said divide to the divide between the Gros Ventre River and Hoback River north of Hodges Peak; northwesterly along said divide to the divide between Flat Creek and Cache Creek at Cache Peak; northwesterly along said divide to the divide between Twin Creeks and Cache Creek; northwesterly along said divide to the National Elk Refuge boundary; northeasterly along said boundary to the Gros Ventre River.

**Area 10. Rim.** Beginning where U.S. Highway 26-89-191 crosses Flat Creek at the north edge of the town of Jackson; due east to the National Elk Refuge boundary; easterly along said boundary to the Bridger-Teton National Forest boundary and the ridge between Twin Creeks and Cache Creek; southeasterly along said ridge and the divide between Flat Creek and Cache Creek to Cache Peak; easterly along the divide between Flat Creek and Granite Creek to Pyramid Peak; southeasterly along the divide between the Gros Ventre River and the Hoback River to Steamboat Peak; southeasterly along said divide to the divide between the Green River and the Hoback River at Hodges Peak; southerly along said divide to U.S. Highway 189-191 at Hoback Rim; northwesterly along said highway to the intersection with U.S. Highway 26-89-191; northerly along said highway to where it crosses Flat Creek at the north edge of the town of Jackson.

**Area 11. Green River.** Beginning where the Union Pass Road (U.S.F.S. Road 600) intersects the Continental Divide; southerly along said divide to the Middle Fork of Boulder Creek; westerly down said creek to Boulder Creek; westerly down said creek to the Bridger-Teton National Forest boundary; northwesterly along said boundary to its intersection with U.S. Highway 189-191 at the divide between the Hoback River and the Green River (Hoback Rim); northerly along said divide to the divide between the Green River and the Gros Ventre River at Hodges Peak; northeasterly along said divide to the Darwin Ranch Road (U.S.F.S. Road 620); easterly along said road to the Union Pass Road (U.S.F.S. Road 600); northerly then easterly along said road to the Continental Divide.

Area 12. Alpine. Beginning where the Bridger-Teton National Forest boundary intersects U.S. Highway 189-191 at the divide between the Hoback River and the Green River

(Hoback Rim); westerly and then southerly along said forest boundary to its intersection with McDougal Gap Road (U.S.F.S. Road 10125); westerly along said road to Grey's River Road (U.S.F.S. Road 10138); southerly along said road to Sheep Creek; westerly down said creek to Grey's River; southwesterly up said river to Bear Creek; southwesterly up said creek to the hydrographic divide between Bear Creek and Willow Creek; west from said divide to Willow Creek Road (U.S.F.S. Road 10080); northwesterly along said road to Lincoln County Road 123; southerly along said road to Grover Park Road (U.S.F.S. Road 10081); southerly then westerly along said road to Lincoln County Road 172; westerly along said road to the junction with Wyoming Highway 237; westerly along said highway to Wyoming Highway 238; southerly along said state line to Wyoming Highway 22; easterly along said highway to the intersection with U.S. Highway 26-89-191 in the town of Jackson; southerly along said highway to the Bridger-Teton National Forest boundary at the divide between the Hoback River and the Green River (Hoback Rim).

**Section 7. Area Closures.** Areas administered by the U.S. Forest Service, Bureau of Land Management or the Wyoming Game and Fish Commission in which human presence is prohibited to protect wintering wildlife shall be closed to gray wolf hunting during the time period for which the areas have been closed to human presence.

### Section 8. Take of Wolves Designated as Predatory Animals.

(a) Any person who takes a <u>gray</u> wolf designated as a predatory animal as set forth in Section 4(a) shall be required to report the kill to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office within ten (10) days after the date the <u>gray</u> wolf was killed. The person shall be required to provide his or her name and address, the date the <u>gray</u> wolf was killed, the sex of the <u>gray</u> wolf and the location of the site of kill (identified by the section, range and township, or UTM coordinates). In addition, the Department may request the person to voluntarily provide a genetics sample from the <u>gray</u> wolf for testing to assess genetic connectivity.

(b) Surrender of electronic radio tracking devices. Any person taking a gray wolf designated as a predatory animal as set forth in Section 4(a) wearing an electronic radio tracking device shall surrender the device to the Department when registering a <u>gray</u> wolf in accordance with registration dates in Section 8(a).

**Section 9. Violation of Commission Regulations.** Failure to abide by the provisions of this regulation shall be punishable as provided by Wyoming statutes for violation of Commission regulations.

**Section 10. Savings Clause.** If any provision of this regulation shall be held to be illegal or unconstitutional, such a ruling shall not affect other provisions of this regulation which can be given effect without the illegal or unconstitutional provision; and, to this end, the provisions of this regulation shall be severable.

## WYOMING GAME AND FISH COMMISSION

By:

Richard KloudaKeith Culver, President

Dated: July 8, 2014July 19, 2017