



Certification Page Regular and Emergency Rules

Revised September 2016

☐ **Emergency Rules** (After completing all of Sections 1 through 3, proceed to Section 5 below)

☐ **Regular Rules**

1. General Information

a. Agency/Board Name		
b. Agency/Board Address	c. City	d. Zip Code
e. Name of Agency Liaison	f. Agency Liaison Telephone Number	
g. Agency Liaison Email Address	h. Adoption Date	
i. Program		

2. Legislative Enactment

For purposes of this Section 2, "new" only applies to regular rules promulgated in response to a Wyoming legislative enactment not previously addressed in whole or in part by prior rulemaking and does not include rules adopted in response to a federal mandate.

a. Are these rules new as per the above description and the definition of "new" in Chapter 1 of the Rules on Rules?

☐ No. ☐ Yes. Please provide the Enrolled Act Numbers and Years Enacted:

3. Rule Type and Information

a. Provide the Chapter Number, Title, and Proposed Action for Each Chapter.

(Please use the Additional Rule Information form for more than 10 chapters and attach it to this certification)

Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed
Chapter Number:	Chapter Name:	<input type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Repealed

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 rules were: April 29, 2019
- approved as to form by the Registrar of Rules; and
 - provided to the Legislative Service Office and Attorney General:

4. Public Notice of Intended Rulemaking

- a. Notice was mailed 45 days in advance to all persons who made a timely request for advance notice. ☐ No. ☒ Yes. ☐ N/A
- b. A public hearing was held on the proposed rules. ☐ No. ☒ Yes. Please complete the boxes below.

Date: Please see attached	Time:	City:	Location:
---------------------------------	-------	-------	-----------

- c. If applicable, describe the **emergency** which requires promulgation of these rules without providing notice or an opportunity for a public hearing:

5. Final Filing of Rules

- a. Date on which the Certification Page with original signatures and final rules were sent to the Attorney General's Office for the Governor's signature: July 26, 2019
- b. Date on which final rules were approved as to form by the Secretary of State and sent to the Legislative Service Office: July 26, 2019
- c. ☒ The Statement of Reasons is attached to this certification.

6. Agency/Board Certification

The undersigned certifies that the foregoing information is correct.

Signature of Authorized Individual



Printed Name of Signatory

David Rael

Signatory Title

President

Date of Signature

July 18, 2019

7. Governor's Certification

I have reviewed these rules and determined that they:

1. Are within the scope of the statutory authority delegated to the adopting agency;
2. Appear to be within the scope of the legislative purpose of the statutory authority; and, if emergency rules,
3. Are necessary and that I concur in the finding that they are an emergency.

Therefore, I approve the same.

Governor's Signature

Date of Signature

<u>Date</u>	<u>Time</u>	<u>City</u>	<u>Location</u>
May 21, 2019	6:00 p.m.	Laramie	Game and Fish Office
May 28, 2019	6:00 p.m.	Cody	Park County Library
May 29, 2019	6:00 p.m.	Green River	Game and Fish Office
May 29, 2019	6:00 p.m.	Dubois	Headwaters Arts & Conference Center (CH 47)
May 29, 2019	6:00 p.m.	Jackson	Game and Fish Office (CHs 4, 25, 32 and 44)
May 29, 2019	4:00 p.m.	Sundance	Crook County Courthouse
May 30, 2019	6:00 p.m.	Pinedale	Game and Fish Office
May 30, 2019	6:00 p.m.	Worland	Washakie County Fairgrounds
June 4, 2019	6:00 p.m.	Lander	Game and Fish Office (CHs 4, 25, 32, 42 and 44)
June 5, 2019	6:00 p.m.	Jackson	Teton County Library (CH 42)
June 6, 2019	6:00 p.m.	Jackson	Teton County Library (CH 47)
June 6, 2019	6:00 p.m.	Sheridan	Game and Fish Office

STATEMENT OF REASONS

WYOMING GAME AND FISH COMMISSION

CHAPTER 4

FURBEARING ANIMAL HUNTING OR TRAPPING SEASONS

W.S. § 23-1-302(a)(i) directs and empowers the Commission to fix seasons and bag limits, open, shorten or close seasons on any species or sex of wildlife except predatory animals, predacious birds, protected animals and protected birds.

W.S. § 23-2-303 provides for the trapping of furbearing animals, license requirements to trap, tagging requirements for traps, types of traps and time periods for checking traps.

Section 2, Definitions. The definitions of “Drainage” and “Trapping or Trap” are being modified to add clarity.

Section 3, Hunting or Trapping Seasons. Edits have been made to remove limited quota beaver trapping in trapping areas 101, 102, 103 and 104. Trapping area 605 has been added to the list of trapping areas closed to take of beaver.

Section 4, Furbearing Animal Hunting or Trapping Areas. Trapping areas 101, 102, 103 and 104 have been removed. Trapping Area 605, Green Mountain, has been added to the beaver trapping areas. Five additional areas in Section 4 (b) (ii) subsections (J), (K), (L), (M) and (N) have been added to the list of areas closed to the taking of all furbearing animals.

Section 6, Limited Quota Furbearing Animal Trapping Area Permits. Subsection (c) indicates a new application date for limited quota trapping permits which will begin in 2020.

Section 10, Mandatory Bobcat Registration. The “method of take” is being added as required information for mandatory bobcat registration.

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



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

GOVERNOR
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEL – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer, Brad Hovinga and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 4, Furbearing Animal Hunting or Trapping Seasons

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission (Commission) Regulation Chapter 4, Furbearing Animal Hunting or Trapping Seasons. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received 154 total comments for Chapter 4. Twenty-three of these comments did not address this proposed regulation and were meant for consideration with other regulations.

Ninety comments were opposed to all trapping regardless of the Department's proposal. The Department recommends continuing to utilize trapping as part of ongoing management efforts of furbearing animals in the state.

Fifteen comments were opposed to shifting from a limited quota to general license structure for select beaver areas in Teton County. The Department does not believe changing this license structure will necessarily affect the take of beaver in these areas. In response to these comments, and in keeping with localized beaver management efforts, the Department modified its draft regulation in Section 4(b) and included additional closures to the take of beaver in Teton, Lincoln and Sublette counties.

One comment was in support of the Department proposal.

Eleven comments requested to close beaver areas 101, 102, 103 and 104 until a survey and population count is completed. The Department has scheduled a beaver survey to be conducted prior to the 2019-2020 trapping season.

Fourteen comments requested a closure for Bobcat Management Area (MA) 1 until a survey and population count is completed. The Department conducted additional reviews of age and sex data from harvested bobcats for MA 1 which did not indicate a higher than normal proportion of females or juveniles in recent harvest or over time. Based on historical license sales and trapping

Summary of Public Comments and Responses; Chapter 4, Furbearing Animal Hunting or
Trapping Seasons

July 26, 2019

Page 2

effort in Teton County, the Department anticipates bobcat harvest in MA 1 will continue to be lower than elsewhere in the state. The Department made no additional recommendations to bobcat management for MA 1.

The Commission also considered all the public comments they received and made no additional changes to the proposed regulation.



**THE HUMANE SOCIETY
OF THE UNITED STATES**

1255 23rd Street, NW
Suite 450
Washington, DC 20037
P 202-452-1100
F 202-778-6132
humanesociety.org

Susan Atherton
Co-Chair

Thomas J. Sabatino
Co-Chair

Kitty Block
President and CEO and
Chief International Officer

G. Thomas Waite III
Treasurer
Chief Financial Officer and
Acting Chief Operating Officer

Katherine L. Karl
General Counsel and
Chief Legal Officer

Michaelen Barsness
Controller and
Deputy Treasurer

Johanie V. Parra
Secretary

DIRECTORS

Jeffrey J. Arciniaco
Susan Atherton
Eric L. Bernthal, Esq.
Georgina Bloomberg
J. Elizabeth Bradham
Jerry Cesak
Neil B. Fang, Esq., CPA
Caren M. Fleit
Spencer B. Haber
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
Mary I. Max
C. Thomas McMillen
Judy Ney
Sharon Lee Patrick
Marsha R. Perelman
Jonathan M. Ratner
Thomas J. Sabatino, Jr.
Walter J. Stewart, Esq.
Jason Weiss
David O. Wiebers, M.D.

June 17, 2019

David Rael, President
Wyoming Game and Fish Commission
P.O. Box 628
Cowley, WY 82420
david.rael@wyo.gov

Brian Nesvik, Director
Wyoming Game and Fish Department
5400 Bishop Boulevard
Cheyenne, Wyoming 82006
brian.nesvik@wyo.gov

Re: "Furbearing" and animal hunting for trapping seasons

Dear President Rael, Director Nesvik and Members of the Commission:

On behalf of the Humane Society of the United States and our Wyoming supporters we urge you to better protect iconic bobcats (*Lynx rufus*) and the incidental take of lynx (*Lynx canadensis*) from traps. Bobcats are not killed for food but are targeted so trappers can sell pelts on overseas fur markets for individual gain, in direct opposition to the tenants of the North American Model of Wildlife Conservation. Turning bobcats into a commercial commodity impoverishes Wyoming tourism and local economies reliant on tourism. One bobcat, viewed and photographed by many, can bring in thousands of dollars to local economies. But if that same bobcat is trapped and killed, only one individual profits. Removing bobcats for personal profit also harms the gene pool and thus, wild cat conservation in Wyoming.

Wyoming's bobcats are being turned into the commodity fur for markets, primarily in Asia and Russia. According to the IUCN

(<https://www.iucnredlist.org/species/12521/50655874#threats>):

World demand for Bobcat fur rose gradually in the late 1960s and early 1970s and jumped in the mid-1970s after CITES entered into force, when the pelts of cats listed on Appendix I became legally unobtainable for the commercial fur trade (Nowell and Jackson 1996). Of particular concern is the recent increase in Bobcat pelt prices from \$85 in 2000, to record highs of \$589 in 2013, \$447 in 2014, and \$305 in 2015, driven by high demand for fur in China, Europe, and Russia (Knudson 2016). The number of Bobcat pelts exported from the U.S. has quadrupled in recent years, climbing to a high of 65,000 in 2013 when pelt prices were highest.

Furthermore, killing trapped bobcats is frequently completed using the most cruel and inhumane methods including strangulation from catch poles.

Bobcats' density estimates vary widely, including 4 to 6 bobcats per 100 km² (e.g., in Idaho, Minnesota, Utah) and 20 to 28 per 100 km² (e.g. Arizona and Nevada). Yet, Wyoming, like most other states, has neither reliable statewide population nor trend data; state wildlife managers are wholly reliant on untrustworthy anecdotal data including from hunter/trapper surveys, sightings and vehicle collisions. This is not excellent wildlife management.





Brian Nesvik, Director
Wyoming Game and Fish Department
5400 Bishop Boulevard
Cheyenne, Wyoming 82006

May 23, 2019

Dear Brian,



We write to you following our review of data published in Wyoming Game and Fish Department (WGFD) harvest reports¹. These reports reflect that the Management Area 1 (MA1) bobcat harvest has declined to such a low number that the immediate closure of bobcat hunting and trapping in that area is warranted.

Wyoming Game and Fish Department Bobcat Harvest Reports¹ serve as a record of the continued, significant decline in the MA1 bobcat harvest. While harvest and population data are two different studies, the bobcat harvest variance between 2008-2018 suggests analogous population decline. At the same time, the value of bobcat pelts is at a historic high. This economic incentive drives more aggressive bobcat harvesting, a significant threat when harvest numbers drop to single digits, and the animals harvested include a high percentage of female and juvenile cats.

Time is of the essence. An immediate, temporary, hunting and trapping moratorium in bobcat MA1 provides timely intervention, preserving the existence of bobcats in this region. Professional bobcat population research should be conducted during the temporary closure. The area should not be opened to hunting and trapping until such research supports the existence of a bobcat population that is sustainable with the presence of human predation. Failure to act quickly removes the most effective tool we have to protect MA1 bobcats, data-informed wildlife management.

Failing to amend management practices invites catastrophic decline of the bobcat population, even potentially eradicating their presence in this area. Most Wyoming taxpayers are unaware of the negative trend revealed in WGFD reports. However, the Wyoming Game and Fish Department and Wyoming Untrapped are aware of this situation. Wyoming Untrapped will ensure that a greater percentage of the public is informed and continue to advocate for immediate intervention as a necessary action to protect the Bobcats in MA1. We look forward to hearing from you and learning what Wyoming Game and Fish intends to do.

Sincerely,

Lisa Robertson, President
On behalf of the Wyoming Untrapped Board of Directors

Cc: Tim Wooley, WGF State Wildlife Management Supervisor
Brad Hovinga, WGF Regional Wildlife Supervisor
Doug McWhirter, WGF Regional Wildlife Coordinator
Editors, Jackson Hole News and Guide

David Rael, WGF Commission President
Mike Schmid, WGF Commission
Governor Mark Gordon
Tricia O'Connor, BTNF Supervisor

¹ WGFD Management Area Map, the Wyoming Game and Fish License Data Summary, CITES Tagging Report, and Bobcat Method of Take by Area Report for years 2017-2018 and 2018-2019



Dear Laramie WGFD,

I've included in this envelope my public comments with regards to current, WGFD-proposed hunting and trapping regulations. While I have made these documents public and have submitted them via the online WGFD comment-portal, I would like my local Laramie Office to have these hard copies for your own review.

I hope you'll take these documents and the positions they express into consideration at the Rock Springs Commission Meeting in July.

Sincerely,

A handwritten signature in black ink, appearing to be "DMB", written over a horizontal line.

Douglas Balmain
(307) 331-7043
dmb@douglasbalmain.com
Albany County, Wyoming

online & laramie regional office.

FOR IMMEDIATE RELEASE

**Wyoming Game & Fish Department Seeks To Pass Further Trapping
Deregulation**

Proposed Regulations Exist In Conflict With The Public Interest

Laramie, Wyoming - June 10, 2019 - The public comment period for Wyoming citizens to voice their opinions with regards to *Wyoming Game & Fish Department's (WGFD)* new, proposed regulations regarding hunting, trapping, and wildlife management is coming to a close on Monday, June, 17th at 5:00PM MST.

While many of Wyoming's citizens remain largely uninformed about current trapping regulations, now more than ever the issue of trapping and predator-control has a reverberating effect across our state.

New regulations being proposed in *WGFD Chapter 4, Furbearing Animal Hunting or Trapping Seasons* and *Chapter 47: Gray Wolf Hunting Seasons* pose the greatest, immediate concern to public interest.

Four beaver harvest areas, in Teton and Lincoln counties, have been restricted to limited trapping quotas since 1992. Today, *WGFD*, without any scientific foundation for the proposed change, is recommending opening these areas to unlimited beaver quotas for the sake of offering a "recreational opportunity" to more trappers.

The cost of these increased "recreational opportunities" will weigh heavily on the rest of the state. Beavers are vital eco-engineers, essential to water accumulation and distribution, vegetation growth, and habitat-creation for myriad other species; the diverse wetland ecosystems they create are truly invaluable. Compromising the habitats they create to allow a minority-faction to eliminate them without limit for the sake of recreation and private gain would be in direct opposition to public interest and responsible wildlife management practices.

While *WGFD* is proposing a continued, unlimited bobcat trapping quota in Management Area 1 (MA1), the data published in their *WGFD* harvest reports have shown a drastic decline in the bobcat take. While last season's sale of trapping licenses increased by 613 compared to the previous year, 737 fewer bobcats were reported harvested.

A recent study published in the reputable journal *Biodiversity and Conservation* showed the living Yellowstone bobcat to be worth more than \$308,000 for the regional economy in a single season. Currently, a Wyoming fur trapper can purchase an annual license for \$45 that allows them to trap and destroy as many bobcats as possible in one season. What that means to the citizens of Wyoming is that a single, living bobcat is worth more than 6,800 times the revenue generated by the sale of a trapping license—annually.

The continued unlimited quota trapping of MA1 bobcat, as suggested by WGFD, poses a significant threat to the remaining bobcat population in Teton County and its surrounding areas. Each bobcat eliminated by trappers represents the loss of a significant and recurring state revenue resource that would have otherwise directly benefited Wyoming's citizens.

Despite the Wyoming wolf population count being at an all-time low since WGFD took over their management seven years ago, WGFD continues to promote wolf trophy/sport hunting to reduce their population to minimum numbers.

While there continues to be great pressure from our state's stock growers to eliminate wolves, recent research published in the *Frontiers in Ecology and the Environment* journal revealed—after studying predator management techniques and their effects on livestock predation—there is little evidence to support that killing predators effectively protects livestock. In fact, the research suggested that non-lethal methods of predator control have the ability to be significantly more economic and effectual means of protecting our livestock than the traditional model of lethal control.

With Wyoming's traditional economy in a state of flux, our greatest asset is our state's wildlife and natural ecosystems. Tourists and wildlife watchers travel from all over the globe for an opportunity to catch a glimpse of our wild lands and wild animals. In recent years, there has been a boom in tourists who are passionate about viewing and experiencing our state's predators and fur bearing animals in particular.

"Greater Yellowstone's 'predator guild' of wolves, grizzly and black bears, lions and coyotes makes it a draw for wildlife watchers from around the world, helping to fuel a \$1-billion annual nature-tourism economy." (Lloyd Dorsey, Conservation Director, *Wyoming Sierra Club*.)

The decisions our state makes with regards to our wildlife are not for an isolated few to make, nor for one department to make, they are ours—our state's citizens—to make. Our wild lands and wildlife are not to be treated as objects or mere "recreational opportunities" available for the individual to exploit for private gain. Now more than ever Wyoming needs its wild ecosystems healthy and its wild animals alive.

The *United State's Fish & Wildlife Service* document *The North American Model Of Wildlife Conservation* states directly that, "Wildlife is a public resource," that, "Wildlife can only be killed for a legitimate purpose," and that, "Science is the proper tool for discharge of wildlife policy." We need to hold our state and our WGFD regulations accountable to those standards.

"Predators are a public trust asset, their destruction cannot be undertaken lightly without evidence of effectiveness, nor for the sole benefit of a narrow minority of private interests such as livestock owners." (Adrian Treves, *Nelson Institute for Environmental Studies* at the University of Wisconsin, Madison.)

Please visit this page to learn of the current, proposed regulation take-actions that are of the greatest, immediate concern:

<http://bit.ly/wyominglastchancetakeactionalert> and take the time to submit your public comment to the *Wyoming Game & Fish Department* before Monday, June 17th at 5:00PM MST: <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>

###

**Author Contact:
Douglas Balmain
(307) 331-7043
dmb@douglasbalmain.com
P.O. Box 2092
Laramie, Wyoming 82073**

June 7, 2019

Wyoming Game and Fish Department Wildlife Division
3030 Energy Land
Casper WY 82604

Attn: Regulations Chapter 4, Furbearing Animal Hunting Or Trapping Seasons

Dear Wyoming Game & Fish Department,

#74
#77
After reviewing the harvest report data as published by the *Wyoming Game & Fish Department (WGFD)* with regards to the bobcat take in Management Area 1 (MA1), I believe that MA1 must be immediately closed to bobcat trapping.

While our state sold significantly more MA1 bobcat trapping licenses last season, drastically fewer bobcats were harvested in comparison to the previous year. As a keystone species, bobcats have a pronounced effect on the habitats they occupy; their diminished presence puts the healthy function of our state's ecosystems as a whole at risk.

"Bobcats and other predators help to keep ecosystems balanced. In ecosystems that are short on predators, consumers lower in the food chain rapidly increase in population size. This over-taxes food resources, leading to poorer condition of individuals and higher rates of starvation. Eventually, low birth rate and high mortality will cause consumer populations to crash, but in the meantime, the effects have filtered down to plant communities. Over-grazing by herbivores can result in very low biomass of some plant species. This in turn affects invertebrate communities, and can inhibit nutrient cycling." (Kirsten Campbell, M.S., Ecology and Conservation. *"The Ecosystem of Bobcats."*)

Given that the current market price for bobcat furs is at an all time high, and the Wyoming bobcat take is simultaneously diminishing, it is now more than ever that we must be proactive in protecting our native bobcat population. The market demand for their pelts will invariably lead to an increase in trapping interest and increasingly more aggressive trapping practices.

In the absence of any hard data with regard to their actual population count in our state, and no reliable information with regards to their population density in Wyoming's MA1, the only responsible action for us to take would be to immediately suspend all bobcat trapping until we can obtain professionally gathered population research in this area.

Furthermore, the exploitation of our state wildlife by fur trapping is inherently shortsighted—bringing the least good to the fewest number of individuals. There is no scientific evidence to support that trapping is a beneficial or effective means of wildlife management, and now more than ever our wild animals are most valuable alive, rather than dead.

A recent study published in the reputable journal *Biodiversity and Conservation* showed the Yellowstone bobcat was worth more than \$308,000 for the regional economy in a single season. Currently, a Wyoming fur trapper can purchase an annual license for \$44 that allows them to trap as many bobcats as possible in one season. Each bobcat harvested represents the loss of a large and recurring state revenue resource.

Given the most current scientific evidence, which directly supports the theory that disturbing the natural ecosystem and the predator-prey dichotomy is overtly detrimental to all species and the environment as a whole, alongside the recently discovered economic value of a living, Wyoming bobcat, the continued trapping of this species in MA1 is inadmissible.

“Scientists have recently begun to understand the vital role played by top predators in ecosystems and the profound impacts that occur when those predators are wiped out. Now, researchers are citing new evidence that shows the importance of lions, wolves, sharks, and other creatures at the top of the food chain. (*“The Crucial Role of Predators.”* Yale School of Forestry & Environmental Studies.)

Wyoming’s state wildlife are a public trust asset, the decisions made with regards to their management belong to the state and its citizens as a whole; our wildlife does not belong solely to the interested-minority.

To continue MA1 bobcat trapping in spite of the evidence we have would be in direct violation to the terms of harvest as stated by the U.S. *Game & Fish* document *The North American Model of Wildlife Conservation* (which states “Wildlife can only be killed for a legitimate purpose,” and that, “Science is the proper tool for discharge of wildlife policy”) and would also be directly detrimental to the health of our state’s ecosystems and economy.

For these reasons, I ask that the WGFD please place an immediate moratorium on bobcat trapping in MA1.

Sincerely,
Douglas Balmain

June 6, 2019

Wyoming Game and Fish Department
Wildlife Division
3030 Energy Land
Casper WY 82604

Attn: Regulations Chapter 4, Furbearing Animal Hunting Or Trapping Seasons

Dear Wyoming Game & Fish Department,

As a concerned Wyoming citizen, taxpayer, and sportsman, I must express my opposition to the proposed discontinuation of limited quota areas for beaver trapping in Teton and Lincoln counties.

The Statement Of Reasons, Chapter 4: Furbearing Animal Hunting Or Trapping Seasons published by the *Wyoming Game & Fish Commission* provides no scientific justification for removing the limited quota beaver trapping in areas 101, 102, 103, and 104.

I have read statements made by representatives of the *Wyoming Game & Fish Department (WGFD)* with regards to this proposal stating that an unlimited beaver quota will provide our state with *"the opportunity to address beaver damage"* and *"increase recreational opportunities."* The same representatives expressed the opinion that beaver trapping is a, *"legitimate use of a renewable resource."*

While I respect the work that our Game & Fish Department does, these statements express unfounded opinions that do not provide justifiable grounds for a state wildlife entity to lobby for trapping deregulation; especially given the fact that our state has no reliable count on our current beaver population, nor a viable population count for any of our state's fur bearing animals.

Beavers are inarguably capable of causing us some inconvenience, but utilizing independent trappers as a means of regulating our beaver population—and thereby their impacts—is neither a professional nor responsible mechanism for mitigating their suggested damages.

Beavers are an integral, uniquely capable and beneficial species of our natural world. They are vital eco-engineers that are essential to water accumulation and distribution, vegetation growth, and habitat-creation; the diverse wetland ecosystems they create are truly invaluable and grossly overshadow any inconveniences they may cause us.

"Beavers, long known for their beneficial effects on the environment near their dams, are also critical to maintaining healthy ecosystems downstream. Researchers have found that ponds created by beaver dams raised downstream groundwater

levels in the Colorado River valley, keeping soil water levels high and providing moisture to plants in the otherwise dry valley bottom." (Dr. Cherie Westbrook, Ph.D. "Beaver Assisted River Valley Formation." River Research and Applications.)

The idea that trapping beavers is a legitimate use of a renewable resource is at best an empty and uninformed statement, at worst it is manipulative/subversive word-play being used to protect the continued, private exploitation of our state's true resource: the living beaver.

Castoreum is no longer used by the modern medical industry, and—while still used by a select few entities in rare instances—it is no longer a necessary or practical product for use in the food or perfume industry.

"In the flavor industry, you need tons and tons of material to work with, it's not like you can grow fields of beavers to harvest. There aren't very many of them. So it ends up being a very expensive product—and not very popular with food companies." (Gary A. Reineccius, Ph.D. *Department of Food Science and Nutrition*. University of Minnesota.)

Beaver pelt can no longer be considered a necessary or legitimate resource in today's world—a world of modern clothing, heated shelter, and faux fur. Since we no longer have need of the beaver's natural resources, it is no longer justifiable to set indiscriminate traps—that will invariably kill and/or injure any number of wild and domestic species—for the sake of harvesting their pelts.

Promoting the idea that it is still permissible to trap our state wildlife for the sake of harvesting fur projects an attitude that suggests our state wildlife exists for the sake of individual pleasure and/or monetary gain, that it is acceptable to unnecessarily exploit our wildlife populations—to inflict undue suffering upon them—for the sake of recreation and private interest. I strong oppose this sentiment and I do not believe it is a sentiment that ought to be expressed by an entity of our state.

Wyoming's greatest asset is our living wildlife and our protected wildlands. If left unimpeded, our beavers and the habitats they build, the myriad flora and fauna species their wetlands support, and the water storage and distribution patterns that their dams create, will prove vastly more profitable to our state and citizens than any number of trapping licenses sold. The beaver's living presence, and their beneficial impact on our ecosystems, will greatly outweigh any inconvenience they may cause us in the course of their natural pursuit.

"Elevated moisture levels found in soil surrounding the [beaver] dams would otherwise require water from a very large natural flood, which they estimate as the 200-year flood, to achieve the same expansive water availability to the valley bottom. Additionally, beaver dams built away from natural river channels further redirect water across the valley, enhancing the depth, extent, and duration of inundation associated with smaller floods; they also elevate the water table to

sustain plant and animal life during the dry summer season." (Science News. "*Beaver Dams Create Healthy Downstream Ecosystems.*" American Geophysical Union.)

The issue of imposing an unlimited beaver quota in areas 101, 102, 103, and 104 as proposed by the *WGFD Chapter 4* not only lacks any legitimate scientific justification, the proposition suggests we take action in spite of the best available, and current, scientific data; this proposition directly contradicts the *United State's Game & Fish* document *The North American Model Of Wildlife Conservation* that states that, "Science is the proper tool for discharge of wildlife policy."

In the absence of a reliable beaver population count in our state, and with consideration to recent scientific findings that shed light on the vital role that beavers fill in our wild ecosystems, it is only responsible that we close the State of Wyoming to beaver trapping and reject the proposition to instate unlimited beaver trapping quotas in Teton and Lincoln counties.

Thank you for your time and the opportunity to voice my position.

Sincerely,
Douglas Balmain

June 6, 2019

Wyoming Game and Fish Department
Wildlife Division
3030 Energy Land
Casper WY 82604

Attn: Regulations Chapter 47, Gray Wolf Hunting Season

Dear Wyoming Game & Fish Department,

I fully appreciate that the subject of wolves in our state is a profoundly polarizing subject. As the entity that has been tasked with managing our wolf population, I know the *Wyoming Game & Fish Department's* job is a difficult one, a job that I'm sure feels impossible to do to the satisfaction of our citizens due to pronounced, opposing opinions on the matter.

Modern scientific and economic research suggests that the current management technique of keeping our Wyoming wolf population at the minimum possible count without being re-listed on the Endangered Species Act is directly detrimental to our state's economy and our ecosystems.

It is now well-established that apex predators, the wolf in particular, have a pronounced trophic cascade effect that greatly benefits the healthy operation of the ecosystems they interact with. Wolves don't decimate prey populations, they disperse them—keeping their target-prey species from overgrazing and over-populating while keeping the herds split into smaller, healthier, more sustainable herd-groups.

It has been scientifically proven, beyond reasonable doubt, that when left unimpeded wolves effectively manage their own numbers. They are hyper-aware of pack boundaries, pack sizes, and prey availability. They will not overpopulate, nor will they over-predate. They are a self-regulating species with myriad reverberating effects that are vital to the health and sustainability of our state's natural ecosystems.

"Scientists have recently begun to understand the vital role played by top predators in ecosystems and the profound impacts that occur when those predators are wiped out. Now, researchers are citing new evidence that shows the importance of lions, wolves, sharks, and other creatures at the top of the food chain. ("The Crucial Role of Predators." *Yale School of Forestry & Environmental Studies*.)

While there is great pressure from our state's stock growers to eliminate wolves, the overruling decision made by Wyoming's Legislature more than a decade ago to classify our state's wolf population as varmints to be killed indiscriminately by

whatever means available throughout our state's *Predator Zone* is an embarrassing example of abhorrent wildlife mismanagement.

Recent research published in the *Frontiers in Ecology and the Environment* journal revealed, after studying predator management techniques and their effects on livestock predation, that there is little evidence to support that killing predators effectively protects livestock.

Modern scientific evidence now suggests that non-lethal predator control has the potential to be significantly more effectual than lethal control measures. Practices such as implementing fladry, livestock guarding animals, predator lights, motion sensor stimuli (even low-investment tools such as Halloween decorations), random-location radios set to talk radio around livestock perimeters, and—most promisingly—conditioned taste aversion (CTA) have the ability to be significantly more economic and effectual methods of protecting our livestock than the traditional model of lethal control.

Apex predators are highly intelligent and intuitive species; it's well documented that wolves pass information down to their young generation after generation. By practicing non-lethal predator control with today's wolf population, we will be effectively teaching/training next generation's wolves how to act. Inversely, by continuing to indiscriminately kill wolves in the manner that our state allows, we are supporting a continued model of wolf destabilization. This causes packs and territories to dissolve and reform sporadically, dispersing more young, roving individuals across the state—many of whom are desperate and uneducated. The destabilization of pack structure also creates the formation of young and inexperienced packs with unestablished territories. This inevitably leads to our livestock being preyed upon as our livestock are the easiest-available prey, and the destabilized wolves have not learned through negative-reinforcement to avoid hunting them. That is to say, the more lethal interference we impose upon our state's wolf population, the more trouble we make for ourselves and our agricultural efforts.

I fully appreciate that our state's stock growers face tremendous economic difficulty, and each added burden to the course of their work further over-leverages their operations. While adopting and developing this new method of non-lethal management will inevitably lead to short-term frustrations, the long-term benefit of this shift in predator control ideology could prove to be far more beneficial both to our livestock operations and our state's wildlife than our current model of management.

The idea of modifying our hunting regulations to cater to trophy and/or sport hunters should be dismissed entirely. The practice of sport hunting wolves—that is to say deriving pleasure from the act of killing itself in the absence of harvesting the carcass for any utilitarian means—exists in direct opposition *The North American Model of Wildlife Conservation* (which states “Wildlife can only be killed for a

legitimate purpose," and that, "Science is the proper tool for discharge of wildlife policy.") as well as our state's values of good sportsmanship and land stewardship.

"Predators are a public trust asset, their destruction cannot be undertaken lightly without evidence of effectiveness, nor for the sole benefit of a narrow minority of private interests such as livestock owners." (Adrian Treves, *Nelson Institute for Environmental Studies* at the University of Wisconsin, Madison.)

Finally, recent studies suggest that the economic value of live, healthy wolves—and the recurring revenue that they have the ability to generate—eclipses any value that could be derived from the killing of wolves. With more and more individuals across the globe taking direct interest in observing and learning about wildlife, wolves have proven to be a tourist favorite. They've inspired a brand new population of tourist called 'wolf-watchers' that travel from all over the world to see Wyoming's wildlife and wild places. By cultivating this new tradition of respect and interest in our unimpeded natural world, our state is in the unique position to create a best-of-all-worlds scenario where our wildlife, our citizens, our agricultural industry, and our state's economy can all benefit from a healthy relationship with our state's apex predators.

"Greater Yellowstone's 'predator guild' of wolves, grizzly and black bears, lions and coyotes makes it a draw for wildlife watchers from around the world, helping to fuel a \$1-billion annual nature-tourism economy." (Lloyd Dorsey, Conservation Director, *Wyoming Sierra Club*.)

For these reasons, I strongly urge the *Wyoming Game & Fish Department* to reassess and reform our methods of wolf management and predator control—to replace our detrimental, traditional practices with new techniques that will see wolves respected and treated as the invaluable asset to our state's ecosystems and economy that they are.

Sincerely,
Douglas Balmain

P.O. Box 2092
Laramie, Wyoming 82073
(307) 331-7043
dmb@douglasbalmain.com

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 1** There is no scientific reason to expand the beaver hunting harvest rules in Teton County. Please base Wyoming Wildlife management strategies on substantiated science. Beavers are part of our ecosystem and provide important elements of our riparian environment. I walk every single day and watch all the species that rely upon beavers ponds, dams, and their effect on the wooded areas where they feed. Please do not change the beaver harvest regulations unless you have a good reason. At \$10 a pelt, economics is not a reason.

Final Comment	Eriksen-Meier, Susan	Jackson, WY	5/20/2019 10:39:00 AM
----------------------	-----------------------------	--------------------	-----------------------

- 2** There is no scientific reason to expand the beaver hunting harvest rules in Teton County. Please base Wyoming Wildlife management strategies on substantiated science. Beavers are part of our ecosystem and provide important elements of our riparian environment. I walk every single day and watch all the species that rely upon beavers ponds, dams, and their effect on the wooded areas where they feed. Please do not change the beaver harvest regulations unless you have a good reason. At \$10 a pelt, economics is not a reason.

Final Comment	Eriksen-Meier, Susan	Jackson, WY	5/20/2019 10:40:00 AM
----------------------	-----------------------------	--------------------	-----------------------

- 3** Hi Guys, I am a fan of beavers and the work they do. I don't think there is a good handle on the beaver population in areas 101, 102, 103 and 104 to open to trapping. Please consider closing these areas. Thank you.

Final Comment	Royster, Whitney	Jackson, WY	5/20/2019 1:47:00 PM
----------------------	-------------------------	--------------------	----------------------

- 4** To whom it may concern, I strongly oppose the idea of allowing beaver or any type of animal trapping currently being considered in the Fall Creek, Ditch Creek, Game Creek and Little Horse Creek areas of Teton County. Not only do a large majority of individuals who live in these areas prefer this type of hunting not take place, many of us see this is an archaic and inhumane fashion of taking an animal. Being a resident of one of the areas mentioned above, I would like to pass along that I strongly reject such a proposal, especially one taking place close to my home. In fact, I would love to prefer to see these areas entirely closed to trapping. This indiscriminate form of hunting unfortunately kills or wounds too many unintended victims, and again, is quite inhumane in general. Thank you in advance for your time and consideration.

Final Comment	White, Matthew	Wislon, WY	5/20/2019 1:51:00 PM
----------------------	-----------------------	-------------------	----------------------

- 5** Hi I hunt Mnt lion in area 5 & 6 I think we have plenty of lions & would like to see the quota a little higher . Thanks for your time . Wesley

Final Comment	Rosengreen, Wesley	Wheatland, WY	5/21/2019 9:15:00 AM
----------------------	---------------------------	----------------------	----------------------

- 6** Re: proposed increase of beaver trapping in Teton County, in Fall Creek, Ditch Creek, Game Creek and Little Horse Creek, and Willow Creek (areas 101, 102, 103, and 104). There should be no increase in beaver take in these areas until population counts have been determined, the consequences of increased take have been assessed, and non-lethal alternatives to drainage management have been studied--and implemented where appropriate.

Final Comment	Slocum, Scott	White Bear Lake, MN	5/21/2019 7:29:00 PM
----------------------	----------------------	----------------------------	----------------------

- 7** To whom it may concern, Its truly time to put an end to the war on bobcats. There is no scientific evidence that supports the amount of trapping that is aimed at this particular animal. Residents in Teton County are truly tired of the unnecessary war on animals, such as bobcats. I strongly support a closure of MA1 to all bob cat hunting, trapping and snaring until true and professional research can be conducted and prove that a sustainable population warrants these hunts. Thank you in advance for considering my email as well as the majority of those who live in and around the area in question, please consider our voices. Kind Regards, Matt White

Final Comment	White, Matthew	Wilson, WY	5/22/2019 9:31:00 AM
----------------------	-----------------------	-------------------	----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

8 Dear Brad Hovinga, This is a follow up to part of a conversation we had over the phone in February of this year. We spoke briefly about the trapping of beavers who are such industrious and valuable engineers for our eco-system. I see that beavers are still being needlessly and gratuitously targeted for the bloodlust and money lust of trappers. Please permanently close areas 101,102,103,104 in Teton County to beaver trapping harvest at least until these areas are surveyed and a population count is established, although I advocate for non lethal management and preservation in lieu of "harvesting". Trapping is an archaic and barbaric form of "management". Trapping occurs today in the shadows because science cannot support trapping as a management tool. Nor would public sentiment. Trapping lacks compassion and is void of any scientific justification. I also urge you in the strongest terms to read "Eager, The Surprising, Secret Life of Beavers and Why They Matter" by Ben Goldfarb. Every manager of this incredible engineer must have a complete understanding of this amazing animal to appreciate its contributions to our natural world. The value of these eco-engineers to the health of our public landscapes far outweighs the supposed value of harvesting beavers. Beavers are recognized today by scientists, ranchers and observers as ingenious, industrious and very capable eco-engineers able to restore and preserve wetland eco-systems far more efficiently and faster than any human means of restoration. Opportunities exist to co-exist with beavers and what better place than Teton County to set the example???? Only ignorance can explain the ongoing mentality that supports trapping of beavers today. Wyoming Game and Fish Department leaders, commissioners and game wardens should gain the knowledge to protect and preserve these crucial eco-engineers. Beavers can help us fight drought, flooding, wildfire, extinction, and the ravages of climate change. There is no good that trapping accomplishes that cannot be accomplished through a more humane and sustainable way. Nor is there any harm that a beaver can inflict on a landscape or private property that cannot be resolved in a non-lethal, sustainable way. Tradition is NOT a reason to continue the inane, cruel, barbaric practice of trapping. In terms of revenue for the Wyoming Game and Fish department this can be achieved by replacing trapping licenses with licenses for non-consumptive users who would happily support the PRESERVATION of an animal that is so critical to the health of an eco-system. I strongly believe that with some education and marketing, the Wyoming Game and Fish department would easily gain more funds for preservation through non consumptive user licenses or a wildlife preservation stamp than what is currently earned through trapping licenses. Beavers, like all wild animals are a national heritage. They belong to all American citizens, the vast majority of whom would not support the cruelty of trapping if they were made aware of it. All animals, all of nature is part of a global Web of Life that cannot be discounted. Birds and butterflies migrate across countries and rely on wetland landscapes and healthy, complete eco-systems for their survival. The Web of Life is intricately interconnected and every creature, from the smallest to the largest, plays a unique and important role in keeping the Web of Life alive and well. A beaver's role is exceptionally important and should be valued, not discounted for the bloodlust and monetary self-interest of a few trappers. Not to mention the collateral cost of injuring and killed non target species. This is unconscionable and discounts the worth of every creature's right to survive and to contribute to our interconnected ecosystem. Trapping regulations should be made to respect the ultimate importance and inviolability of every living creature's life and right to life. Trapping causes painful injuries, exposure, dehydration and mental stress, and often immense suffering. Clearly, there is a need for more compassion, more humanity and for far more accountability on behalf of trappers. Trapping regulations need to be revised and better reporting and public information is a must. There is no justifiable reason to continue to let trapping operate under the cloak of the unknown. Trappers should be required to report all non-target animals. This information should be made widely available to the general public. We are responsible for preserving our precious wildlife which is only more and more threatened with time. Habitat fragmentation, increasing access to motorized recreation, increased pollution, climate change, etc... all increase the odds against our wildlife. Allowing beavers to create and restore wetlands is one way to improve habitat and to help clean water for all living creatures. They are a foundation to a better, healthier, more natural landscape and a building block for improved habitat opportunities for countless living creatures. PLEASE permanently close areas 101,102,103,104 in Teton County to beaver trapping harvest and PLEASE promote preservation, sustainable and non-lethal management practices, and PLEASE offer non consumptive users an opportunity to contribute to the PRESERVATION of beavers and the wetlands they create by offering beaver preservation stamps as a source of preservation revenue for the Wyoming Game and Fish Department. Respectfully, Valerie Conger

Final Comment

Conger, Valerie

Jackson, WY

5/23/2019 9:55:00 AM

9 WGFD, Please close all Beaver areas around Jackson to trapping while inventory monitoring is completed. We are ranching horses and hay along the river and appreciate the value of beavers in riparian areas. If there is a conflict with beavers and landowners, please provide live trapping and transplant to another suitable site for the beavers. S / Meredith Taylor

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

Final Comment	Taylor, Meredith	Dubois, WY	5/24/2019 4:16:00 AM
---------------	------------------	------------	----------------------

- 10** Wyoming Game and Fish Commission, In respect I urge you to permanently close areas 101-102-103-and 104 in Teton County to beaver trapping! Beavers are an important part of our eco-system and should NOT be trapped. Allowing trapping in these areas opens up the possibility of people and their pets getting trapped in one or in a snare! Rethink your position for so many reasons. In my opinion it is extremely cruel and inhumane for starters and should be a thing of the past...To promote the thrill and killing of an animal is incomprehensible to me and to so many others.... Thank you for your attention to this and I hope you do the right thing! Many of us would love to see all animals in the wild. Not in a trap suffering or dead! Deb Reis

Final Comment	Reis, Deb	Cincinnati, OH	5/24/2019 4:51:00 AM
---------------	-----------	----------------	----------------------

- 11** Seriously???? Folks still get their jollies out of torturing animals? This practice is torture and plain and simple- immoral. If this is a state that supports pro life (mostly Republicans) then all life should matter. Please, please put a moratorium on hunting bobcats...and have the guts to stop this sport of killing for fun.

Final Comment	Ottman, Jayne	Jackson, WY	5/25/2019 8:58:00 AM
---------------	---------------	-------------	----------------------

- 12** I come to Wyoming as tourist for the wildlife and the scenery. Teton County is a must visit. I am sorry to see new areas opened for trapping, the least sportsman like activity that should be banned over the whole state. We need beavers and diverse wildlife everywhere. To sum it up: Every animal including pet dogs, in Wyoming, including endangered species, is a possible victim of traps and snares. Is it fair chase not to know your target? Or to sit at home on a couch and wait for a catch? This reflects badly on hunters, and on our state. the pure cruelty of trapping causing injuries, exposure, dehydration and mental stress, and often immense suffering; Should all trap-check time requirements for beavers be reduced to 24-hour trap checks instead of 3 – 13 days, or should traps be eliminated from our landscapes? Jeremy Bentham famously asked, "The question is not, 'Can they reason?' Nor, 'Can they talk?' But, "can they suffer?" how our public lands should remain safe havens for all; All people, pets and wildlife should have a reasonable expectation for safety on our public lands, which means trap-free areas for all, including areas 101, 102, 103, and 104. how the overall management of trapping is rarely cost-effective; A beaver (furbearer) trapping license costs \$45 for all you can catch. How can that be cost-effective for our state? If beaver (furbearer) trapping/snaring continues then one license should be required for each beaver (furbearer) trapped, similar to game animals. how trapping, which is not based on a science foundation, does little or nothing for effectively managing any species population; We don't have a population count on our state beavers (and all furbearers), but we allow unlimited quotas. We should place quotas on all beaver (furbearer trapping), or better just end trapping altogether. Where is the science? Trapping long ago lost its charm as a Wyoming tradition, let alone an American one; A growing debate about the legitimacy of trapping shows that a shift is coming. Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment	schutt, paul	breckenridge, CO	5/25/2019 11:46:00 AM
---------------	--------------	------------------	-----------------------

- 13** It's the 21st Century! Nobody needs to be trapping wildlife anymore. Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately and kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. I loved seeing the beaver up Game Creek, it was a thrill seeing them every time I walked or biked up that drainage. Then I heard they were trapped and killed over the winter. Disgraceful this barbaric practice is still going on in 2019. As a 30 year citizen of this state it should not all be about killing, the enjoyment the majority of citizens get from wildlife far out weighs the number of trappers. WGF it's 2019, we don't want nor need trapping anymore!

Final Comment	Quinlivan, Laura	Jackson, WY	5/25/2019 4:20:00 PM
---------------	------------------	-------------	----------------------

- 14** "Man is rich in proportion to the number of things he can afford to let alone." - Henry David Thoreau

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

Final Comment	SCHUSTER, mike	Deming, WA	5/26/2019 12:48:00 PM
----------------------	-----------------------	-------------------	------------------------------

- 15** "Man is rich in proportion to the number of things he can afford to let alone." - Henry David Thoreau I trapped as a kid and that is now my biggest regret as a nature lover and photographer. To trap you have to not have empathy for other living things. To trap, you have to practice cruelty to innocent living beings. To trap, you have to not think beyond yourself. If Wyoming stil has more hunters and trappers than wildlife observers, photographers, and nature lovers, then that's sad. In WA, we're welcoming the return of grizzlies and wolves to our state.

Final Comment	SCHUSTER, MIKE	Deming, WA	5/26/2019 1:30:00 PM
----------------------	-----------------------	-------------------	-----------------------------

- 16** I am completely opposed to all trapping and call upon you to eliminate Wyoming sanctioning this barbaric and cruel practice. Our wildlife is much more valuable alive than dead. People spend hundreds of millions of dollars in Wyoming just to see wild animals and take some pictures. The small amount of money that trappers pay in license fees is not comparable to the actual economic value that tourists spend. How can the Wyoming Game and Fish Department allow this outdated and inhumane torture and maiming of our magnificent wildlife heritage to continue and even attempt to profit from it? It is beyond my comprehension. It must stop. Thank you for your consideration. Bob Skaggs

Final Comment	Skaggs, Bob	Jackson, WY	5/27/2019 9:17:00 AM
----------------------	--------------------	--------------------	-----------------------------

- 17** I am writing to request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. The value of beavers to important public lands for outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any science foundation. Sincerely, Cory Curtis Jackson, WY

Final Comment	Curtis, Cory	Jackson, WY	5/27/2019 10:59:00 AM
----------------------	---------------------	--------------------	------------------------------

- 18** I am writing to request that the Wyoming Game and Fish Department and the Wyoming Game Commission immediately close Bobcat Trapping Management Area 1 in Teton County to bobcat trapping, hunting and killing harvest until these areas are surveyed and a population count is established. Wyoming bobcats in Bobcat Trapping Management Area 1 (Teton County +) show a history of significant decline in bobcat harvest. Although trappers have been active in Area 1, zero bobcats have been reported trapped this season. We need to shift to a modern world of coexistence with our wild bobcats and initiate non-lethal controls if necessary. Sincerely, Cory Curtis

Final Comment	Curtis, Cory	Jackson, WY	5/27/2019 11:08:00 AM
----------------------	---------------------	--------------------	------------------------------

- 19** Currently the Shoshone National Forest 20 year plan dictates that the Forest must identify 5 new areas for beaver reintroduction. SNF is using GIF mapping to look at suitable habitat where no beavers now exist. WGFD has made it pretty clear they aren't willing to impose restrictions for beaver trapping as this effort gets underway. Where I live in the Sunlight/Crandall area there are essentially no viable beavers. In the late 1990s, Montana FWP introduced beavers into Soda Butte creek with the hopes they'd go into the Park. A few have made their way down the Clark's fork. They are trapped out within a year or two. There are no beavers in Sunlight Creek or Elk Creek, historic range for them. I have seen 100+ year old beaver lodges where no beavers now exist. Beavers are a keystone species. Our warden in Sunlight has been working to grow more moose. Beavers are essential for providing habitat for moose. The WG&F just spent \$1 million to re-route Sunlight creek for 1 mile around the G&F cabins as the creek was running too hard and washing the banks out. If we had beavers upstream, this would not be necessary. \$1 million could have been saved for other important projects. WG&F is continuing to zone the areas for Shoshone National Forest reintroduction as Area 1--no limits for seven months of the year. This is not in good faith to help support the forest's efforts and mandate for reintroduction into areas with no or low beavers. One of many scientific studies on the important role of beavers in the GYE: Beaver Habitat Selection for 24 Yr Since Reintroduction North of Yellowstone National Park

Final Comment	Patten, Leslie	Cody, WY	5/27/2019 11:33:00 AM
----------------------	-----------------------	-----------------	------------------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 20** Reading on how so many animals are becoming extinct in our near future why does a state like Wyoming continue to take the lives of the natural ecosystem? I'm disgusted to read how trappers continue to kill and kill. When will it stop? I hope Wyoming fixes their trapping and hunting issues. It's disgusting!

Final Comment **Rodriguez, Alex** **Tucson, AZ** 5/28/2019 7:48:00 AM

- 21** I am writing to state my dismay about allowing the trapping of beavers in so many local streams in Teton County. These are places where dogs or even people may swim. I am concerned for both human, animal and the beaver existence. Do we really have an overpopulation of beaver that we can allow a select few to harvest the animals and sell the pelts? Is there science behind the reasoning?

Final Comment **Verna, Diane** **Alta, WY** 5/28/2019 11:18:00 AM

- 22** I am writing as a concerned citizen that cares about wildlife. I am writing to express my concern about the trapping of bobcats. Traps are cruel and inhumane and target more species than just the bobcat. We should not allow this practice any longer. I would also question the science behind the justification. Do we have any accurate date of how many bobcats there are out there? I spend a considerable amount of time in the mountains and hills and never even see a track, let alone the actual cat. I would like to express concern for more data based decision making before we allow needless killing of a predator like this. Thank you for your time.

Final Comment **Verna, Diane** **Alta, WY** 5/28/2019 11:24:00 AM

- 23** beavers and all furbearers are a public treasure; Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. unacceptable deaths and severe injuries to non-target species; even animals released alive may later die from their injuries; In addition to beavers, protected animals, migratory birds and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. It is a barbaric practice that is not a sport and it is unnecessary and outdated and archaic as a means of supplying humans as food. the absence of sportsmanship, fair chase, and compassion in trapping; Every animal in Wyoming, including endangered species, is a possible victim of traps and snares. Is it fair chase not to know your target? Or to sit at home on a couch and wait for a catch? This reflects badly on hunters, and on your state. All people, pets and wildlife should have a reasonable expectation for safety on our public lands, which means trap-free areas for all, including areas 101, 102, 103, and 104. A growing debate about the legitimacy of trapping shows that a shift is coming. Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment **Botes, Tarryn** **Timsrand AH,** 5/28/2019 12:10:00 PM

- 24** Hi Guys, Please consider closing MA1 to bobcat hunting and trapping. We just don't know the population, and anecdotally it seems very low to me. Thanks!

Final Comment **Royster, Whitney** **Jackson, WY** 5/28/2019 2:50:00 PM

- 25** Please do not open this area to trapping for "recreational" purposes or any other. My understanding is that NO scientific studies on beavers have been done, so to simply open the area to trapping is reckless. Trapping in general is a terrible way for an animal to die, and kills non-target animals, too. Animals SUFFER. Please end all trapping, and start by closing this area to veteran trappers and new. Thank you for your consideration.

Final Comment **Werner, Sandra** **Laramie, WY** 5/29/2019 6:22:00 AM

- 26** According to Wyoming Untrapped, "Wyoming bobcats in Bobcat Trapping Management Area 1 (Teton County +) show a history of significant decline in bobcat harvest. Although trappers have been active in Area 1, zero bobcats have been reported trapped this season." Also, "Wyoming Untrapped stresses that immediate cessation of bobcat hunting, trapping and snaring is necessary to protect the existence of bobcats in this area." Please take Wyoming Untrapped studies seriously. Please consider the fact that

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

trapping is barbaric, cruel, and often kills non-target animals. It isn't a "sport" and animals can take days to die in fear and pain, thirst and starvation, depending on whether or not the trapper decides to check his traps within a certain time. And even a day in a trap is too much. Please end all trapping! It is unnecessary and can hardly be called a "sport". Thank you for your consideration.

Final Comment	Werner, Sandra	Laramie, WY	5/29/2019 6:30:00 AM
---------------	----------------	-------------	----------------------

27 "Wildlife managers are reporting reduced numbers throughout wolf range in Wyoming, the fewest animals counted since the Wyoming Game and Fish Department (WGFD) took over management and initiated hunting seven years ago. The overall Wyoming wolf population, estimated at 286 as the calendar turned to 2019, was down 61 animals from a year ago." "Wyoming wolves are trapped and killed in almost any manner in over 85% of the state. But yet, the WGFD continues to reduce the population to minimum numbers." I respectfully ask that WGFD let go of its prejudice of wolves and start paying attention to realistic consequences of opening nearly statewide hunting of wolves, trophy and pest, by trapping, cyanide bombs, snares, etc., and also to the numbers on non-target animals killed by these same means. Our predators are endangered, and without predators complete ecosystems fail. If you must allow "controlled hunts" allow them with guns only, and stop the barbaric practice of trapping altogether. Guns are fast and hopefully accurate. Until then, please consider all studies and do the right thing. Thank you for your consideration.

Final Comment	Werner, Sandra	Laramie, WY	5/29/2019 6:39:00 AM
---------------	----------------	-------------	----------------------

28 Dear Commissioners, We write to convey our comments over the proposed changes to beaver trapping regulations for areas 101, 102, 103, and 104 as proposed in Draft 4-10-19.3, CHAPTER 4, FURBEARING ANIMAL HUNTING OR TRAPPING SEASONS. We are opposed to changing these areas from limited quota to unlimited take, and believe they do not uphold the recommendations set forth by the state in the State Wildlife Action Plan (SWAP 2017). Unlimited trapping of beaver has the potential to inflict negative population impacts and potentially lead to localized extirpation. The presence of healthy beaver populations directly meets the recommendations in State Wildlife Action Plan and provides benefits for both game and non-game species, with a large number of Species of Greatest Conservation Need being dependent on their engineering. We support the language provided in Wyoming Game and Fish Department recommendations of "In cooperation with land management agencies and private landowners, reintroduce beavers into stream systems where they have been extirpated or occur at low densities and where appropriate food, security, and dam-building vegetation exist." (SWAP 2017). We also believe that additional limited quota systems can strike a balance between trapping opportunity and supporting wetlands. A keystone species on the landscape of the arid west, beaver create vast amounts of habitat not limited to aspen stands and wetlands, with effects disproportionate to their total numbers (SWAP 2017). Considered an ecosystem engineer, beaver build dams to impound water and are beneficial to overall stream and riparian health in numerous ways. Recent average estimated harvest rates float around 3,000 beaver per year and help bring in \$200,000, the state has declared that the "economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds" (U.S Department of the Interior 2016, WGFD 2019). Benefits include; creating or expanding wetland areas, elevated water tables, improved vegetation growth, reduced erosion, reduced sediment transportation, reduced downstream flooding, and providing constant water flow throughout drier summer months (Olson and Hubert 1994, SWAP 2017). A complex of beaver dams can reduce extreme fluctuations in stream water temperature to the benefit of sensitive cold water fish species in Wyoming (Webber et al. 2017, SWAP 2017). Beaver impounded stream reaches in Wyoming are documented to average 3.4 hectares of wetlands, while those without beaver ponds average only 1.1 hectares of wetlands (McKinstry et al. 2001). Duck density and trout biomass are greater in streams with beaver ponds than those without (Naiman et al. 1988, McKinstry et al. 2001). Beaver are also considered to be critical to the state's four native cutthroat trout, and seventy-five percent or more of Wyoming's native fauna use wetland landscapes at some point in their lifecycle (Knight 1994, WGFD 2019). Unregulated trapping in the 19th Century lead to the extirpation of beaver from much of Wyoming, and while beaver have re-occupied large portions of their historic range, they have only done so at roughly 10% of densities found prior to European contact (Naiman et al. 1988). The impacts of climate change are identified as one of the greatest threats to Wyoming's landscapes and its wildlife (SWAP 2017), and it is unwise to remove with so little regulation a species that can help mitigate these impacts. A recent report from the North American Fur Auction had beaver castor selling for 80-90 dollars a pound. This value could increase the demand for beaver even if their pelt prices are down to roughly \$10 a pelt. Three of the four areas with proposed changes (101, 103, and 104) are easily accessible by roads and trails. Easy access makes these areas easier to trap and likely

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

more attractive to trappers. While the enforcement of trapping is inherently difficult, the stipulation that only one individual is permitted for these regions does provide management. The Wyoming Wetlands Society (WWS) has been working to restore beaver to Ditch Creek drainage (Area 101), and has served as a release site every year of the WWS's Beaver Wetland Restoration Project since 2009. Current removal quotas can surpass re-introduction efforts in a single year in an area that has seen an increase in beaver colonies and wetland complexes. Our efforts fall in line with the WGFD's annual efforts of being involved in 18 projects that surpass 760 acres and translocate ten beaver (SWAP 2017). We are following suggestions from the state in using advanced GIS tool Beaver Restoration Assessment Tool (BRAT; Wheaton and MacFarlane 2014) to better identify beaver relocation sites moving forwards (SWAP 2017). We believe trapping is part of Wyoming's heritage, but do not believe the proposed regulations stipulating an increase in unregulated trapping areas is warranted. The 'Statements of Reasons' does not provided a reason for these changes, and only states that the regulations will be changed. We understand that participation in trapping is on a declining trend but that does not mean trapping is not having an impact on the resource. We thank you for the opportunity to provide comment. We encourage you to consider keeping limited quota areas as they currently are in the trapping regulations. Beaver are a valuable resource for multiple reasons as we stated above. Sincerely, Carl Brown, Executive Director Cory Abrams, Wildlife Biologist William Long, Wildlife Biologist References Knight, D. H., 1994. Mountains and plains: the ecology of Wyoming landscapes, New Haven, CT: Yale University Press. McKinstry, M. C., Caffrey, P., and S. H. Anderson. 2001. The importance of beaver to wetland habitats and waterfowl in Wyoming. Journal of the American Water Resources Association, 37: 1571–1577 Naiman, R.J., Melillo, J.M. & Hobbie, J.E. (1986) Ecosystem alteration of boreal forest streams by beaver (*Castor canadensis*). Ecology, 67, 1254–1269. Olson, R. and W. A. Hubert. 1994. Beaver: water resources and riparian habitat manager. Laramie: University of Wyoming U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. Weber, N., Bouwes, N., Pollock, M. M., Volk, C., Wheaton, J. M., Wathen, G., Wirtz, J., and Jordan, C. E.: Alteration of stream temperature by natural and artificial beaver dams, PLoS ONE, 12, e0176313, 2017. Wheaton, J. M. and B. Zollitsch. BRAT (Beaver Restoration Assessment Tool) for Planning & Prioritizing Watershed Restoration. 2017. 2017 Spring Soil, Water, Air, Fisheries and Aquatics, and Riparian Forum, Webinar, Bureau of Land Manager, DOI:10.13140/RG.2.2.10896.81922. Wyoming Game and Fish Department. 2019. Beaver benefits: What role do beavers play in riparian habitat management. Wyoming Game and Fish Department. 2010. State Wildlife Action Plan.

Final Comment	Brown, Carl	Jackson, WY	5/29/2019 9:40:00 AM
----------------------	--------------------	--------------------	-----------------------------

29 I really can't believe there's room for Wyoming to be worse about trapping. Then something like this comes along. Not sure if you've heard, but this is a pretty dire time for the planet. Beavers are incredibly important to entire ecosystems. Beavers can help us fight drought, flooding, wildfires, and because they are keystone species in riparian zones, they carry the fate of countless other animals, trees and erosion-preventing vegetation on their shoulders. What's more, traps don't discriminate. After all I've learned about Wyoming's trapping practices, I couldn't imagine hiking with my dog there, or riding horseback through what I once saw as beautiful places. Please reconsider this change. Thank you.

Final Comment	Helfer, Gail	Kansas City, MO	5/30/2019 11:19:00 AM
----------------------	---------------------	------------------------	------------------------------

30 Dear Brad Hovinga and members of the Game and Fish Department, I am writing once more, this time to request the immediate temporary closure of MA1 (Teton County) to all bobcat hunting, trapping and snaring until professional bobcat population research supports the existence of a sustainable bobcat population which can withstand the presence of human predation. If indeed trapping licenses increased by 613 from last year, but yet 737 fewer bobcats were harvested, then this is startling information and warrants scrutiny and caution. Without proper research on bobcats we risk endangering their populations. Allowing trapping to continue under these auspices is catering to the blood lust and money lust of a few over recognizing and honoring the value these animals have as an integral part of our ecosystem and their value to those who appreciate a healthy and complete ecosystem and its merits in terms of nurturing the human soul and providing solace. The Wyoming Game and Fish Department's mandate should include the preservation of animals under its management, for the benefit of all— not the management of animals for the benefit of a few hunters. In terms of monetary value, bobcats are worth far more alive, than dead. Authors of an article in Biodiversity and Conservation, an internationally-recognized science journal, calculated the value of a free-roaming bobcat in Yellowstone National Park to the economy versus its value as a trapped and hunted animal. The article is a unique collaboration between researchers from Panthera, the global wild cat conservation organization, and advocates with Wyoming Untrapped. The authors

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

estimated a conservative, non-consumptive economic value of \$308,105 for this single bobcat in Yellowstone National Park in northwest Wyoming for one winter season, a figure nearly 1000 times greater than the average exploitive value of \$315.17 per bobcat trapped or hunted in Wyoming that same year (\$130.53 per bobcat harvested in revenue earned by the state of Wyoming in trapping license sales + \$184.64 per pelt sold by successful trappers and hunters). Also consider, that this same bobcat could generate the same figure again the following year, should it survive the summer season in Yellowstone. Over its life, this one bobcat could generate well over \$1 million in economic activity, shared across countless people involved in travel and tourism. Protect and preserve bobcats on our public landscapes for the significant impact of wildlife watching on tourism – Wyoming's 2nd largest industry. For the Wyoming Game and Fish Department to favor trapping of bobcats over their preservation is shortsighted, ill-informed and misguided. The Wyoming Game and Fish Department leaders and game wardens should gain the knowledge to value these animals and their unique contributions to the health and balance of our eco-system. Trapping is not based on a sound scientific foundation, nor does it accomplish anything positive in terms of effectively managing any species population. It is archaic, cruel, INHUMANE, unconscionable and warrants absolutely no justification whatsoever. If we are pretending to be a civilized population, we must show compassion and value of all LIVING and BREATHING creatures. It is not our place to decide if an animal should have a right to survive, especially if what is at stake is their beautiful fur coat. Monetary gain and blood lust are not justifiable reasons to inflict such cruelty on a living creature and at the same time risk hurting and/or killing non target animals as well. Trapping is NOT a moral right- heritage and tradition are no bases for continued inhumane practices. In fact, it is morally and ethically wrong. It is unacceptable in my opinion to allow increase quotas or allow unlimited quotas when no scientific evidence exists to support such decisions. Managing without information, without science, is not managing. It is catering to a minority- to trappers whose interests are short sighted and selfish, motivated by blood lust, monetary gain and ego. In every case, better, more humane, scientific based regulations must be established for trapping. The Wyoming Game and Fish Department needs to catch up to science based management and realize that trapping is not a right – however legal it may be. Nor is it the best solution to ANY wildlife problem. I encourage the Wyoming Game and Fish Department to demonstrate more compassion and respect for the wildlife under its mandate. The animals are individual creatures with hearts and souls and are not just things that a few self-interested trappers get to kill. I urge you to shift to a solid science based management approach as well as shift the emphasis away from killing and more towards preservation and conservation. Respectfully, Valerie Conger

Final Comment	Conger, Valerie	Jackson, WY	5/30/2019 3:41:00 PM
----------------------	------------------------	--------------------	----------------------

- 31** As an avid traveler to view wildlife, I am appalled that you are considering going backward in time to open areas that have previously been closed to beaver hunting. Your rationale of a "recreational opportunity" is ridiculous. How is setting a trap and finding a dead animal or one that has been suffering, recreational? Instead it is barbaric and involves no skill whatsoever just bloodlust. Beavers are important to the ecosystem and, if you had conducted any scientific research prior to putting forth this proposal, you would know this. If your state continues to inflict cruelty on animals, I will be spending my vacation dollars elsewhere

Final Comment	Varga, Dolores	San Tan Valley, AZ	5/30/2019 6:37:00 PM
----------------------	-----------------------	---------------------------	----------------------

- 32** I am horrified that you want to use a 17th century technique - trapping - to kill beavers. I oppose trapping of beavers in all 4 areas. WU believes that the value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. We request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established.

Final Comment	Doucet, Lisha	Wellington, CO	5/31/2019 10:16:00 AM
----------------------	----------------------	-----------------------	-----------------------

- 33** I want you to stop bobcat trapping in the state of Wyoming. Bobcat population has dwindled so much that we need to protect our remaining bobcats. I would like to point out that killing and trapping of animals is not supported by the majority of Americans. There are many more of us who would like to see our wildlife alive rather than hanging as a trophy on a wall. Also the science backs up protecting our wildlife. Trapping and sport hunting should be relegated to the dustbin of the 17th century where it belongs. So much of our

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

wildlife is threatened by human overpopulation that we should do everything we can to protect them and not hunt them to oblivion.

Final Comment	Doucet, Lisha	Wellington, CO	5/31/2019 10:22:00 AM
----------------------	----------------------	-----------------------	-----------------------

- 34** Stop the wolf hunt. If you won't end it in the entire state, at least set a buffer zone around Yellowstone. Our tourist dollars are going elsewhere this year after seeing the total kill numbers from last season.

Final Comment	Kreimann, Kim	Neosho, WI	5/31/2019 4:52:00 PM
----------------------	----------------------	-------------------	----------------------

- 35** To Whom it May Concern, I was fortunate enough to draw the Falls Creek

Final Comment	Turvey Jr, Daniel	Belgrade, MT	5/31/2019 5:54:00 PM
----------------------	--------------------------	---------------------	----------------------

- 36** To Whom it May Concern, I was fortunate enough to draw the Falls Creek tag several years ago when I was a Wyoming resident. I worked with Warden Kyle Lash to try and address his areas of concern first and foremost. I had an absolutely great time trapping this historical fur trade country and managed to find a little success as well. At the time i was trapping there Kyle asked my opinion on making it general and I heartily agreed that making it general would be a great decision! The populations in those drainages are more than robust and trappers are conservationists by nature meaning they will not exhaust the resource. We both agreed that the limited draw system was very vulnerable to activist targeting, especially in that area of the state. I could not applaud the commission more for bringing management of such a loved resource back into the hands of some of the counties finest wildlife managers. Well done for standing up for wildlife, trappers and game managers! Best, Dan Turvey, Jr

Final Comment	Turvey Jr, Daniel	Belgrade, MT	5/31/2019 6:05:00 PM
----------------------	--------------------------	---------------------	----------------------

- 37** I oppose all hunting of our wildlife. I especially oppose hunting that is allowed anywhere near our national parks like Yellowstone. These wolves do not know about an invisible line where murderers are waiting to shoot them. NO to murdering the wolves in this state. Will continue not to spend my tourist dollars where this is allowed. Continuing to share the tourist pledge.

Final Comment	Shabbott, Mary	Punta gorda, FL	6/1/2019 6:56:00 AM
----------------------	-----------------------	------------------------	---------------------

- 38** Reasons stated by Wyoming Game and Fish Department to discontinue limited quota areas for beaver trapping in four drainages in the Jackson Region: • The area has seen reduced interest in beaver trapping. • The limited quota is said to limit opportunity for others who have interest in trapping (seems to contradict the above statement). • Discontinuing the limited quota will increase the opportunity to address beaver damage. It doesn't make sense to me that WG&FD is apparently trying to enhance the beaver population in the region with releases, while allowing an unlimited take. If few people are interested in trapping, it is probably part of a trend: we are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. I wonder what kind of damage beavers are causing in the trap areas listed. With the exception of Fall Creek, these are backcountry areas whose wetlands benefit from beavers. Where the road has been built too close to the creek in Fall Creek, the USFS is taking measures to prevent flooding by beaver ponds. Beavers do a lot more good than damage. If the Game and Fish Department seeks to ensure that "beavers maintain their important role on the landscape" I am not sure an unlimited take will be compatible. WG&FD states that it is developing a beaver monitoring program that could be employed should unlimited trapping become a problem for the population. Why not monitor the population first, before deciding to eliminate the quota? This seems backwards to me. The four areas where unlimited trapping is to take place are heavily used for recreation. Has the WG&FD coordinated with the Forest Service about this proposal? What is the response? Specific concerns about the effect of existing and potential increase of trapping in the 4 areas: • Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. I have been keeping mine on a leash during trapping season when anywhere near known trapping areas. Encouraging more trapping will have increasing negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. I prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so I wonder who is going to be trapping there. Perhaps on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures I've experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, I would urge the WG&FD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg hold traps or snares, the more public outrage will turn toward trapping in general. If, as WG&FD states, trapping is a legitimate use of a renewable resource, let it please be conducted responsibly. I have heard enough stories about people finding severed legs in traps (perhaps there are more people trapping than is believed?) as well as encountering "non-target" species killed in beaver traps myself, that I can understand why the general opinion about trapping might be on the negative side. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. Thank you.

Final Comment	Marsh, Susan	Jackson, WY	6/1/2019 7:51:00 AM
----------------------	---------------------	--------------------	----------------------------

- 39** Looking at the statistics of bobcat population in Teton County, there has been an alarming decline in the number of bobcats in Management Area #1. This warrants immediate closure of to hunting and trapping bobcats in this area. Time is of the essence to preserve the existence of bobcats until research supports that the bobcat population can sustain itself.

Final Comment	Lazarus, Marianne	Melbourne, FL	6/1/2019 8:14:00 AM
----------------------	--------------------------	----------------------	----------------------------

- 40** Beavers are ecological and hydrological Swiss Army knives, capable in the right circumstances of tackling just about any landscape scale problem you might confirm. The beavers mitigate floods and improve water quality. Today, a growing coalition of "Beaver Believers", including scientists, ranchers and passionate citizens, recognizes that ecosystems with beavers are far healthier, for humans and non-humans alike, than those without them. Wyoming Game & Fish Department stated in a recent newsletter: "The economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds". Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately and kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public. Trapping is inhumane way of killing an animal. Trapping is pure cruelty causing injuries, exposure, dehydration and mental stress and often immense suffering. What type person would allow such suffering on an animal? Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment	Kendrick, Joanne	Sedona, AZ	6/1/2019 3:34:00 PM
----------------------	-------------------------	-------------------	----------------------------

- 41** We value and protect bobcats as vital contributors to the health of our public landscapes. Ecosystems with bobcats are far healthier, for humans and non-humans alike, than those without them. We need to shift to a modern world of coexistence with our wild bobcats and initiate non-lethal controls if that is ever necessary. We should teach the public and wildlife managers to coexist, harmoniously and even beneficially, with our wildlife, in particular bobcats. We should place quotas on all bobcat trapping, or preferably end trapping altogether. It is a cruel and inhumane way of killing an animal. What type person could do that? Wyoming should act and do what is best and right for all residents and visitors in Wyoming. Respect our wildlife, don't trap them.

Final Comment	Kendrick, Joanne	Sedona, AZ	6/1/2019 3:46:00 PM
----------------------	-------------------------	-------------------	----------------------------

- 42** We believe that the value of wolves to the health of our public landscapes outweighs the recreational opportunity to trap and kill with cruel and inhumane steel devices year round without any scientific foundation. We request that you end hunting of wolves in the Trophy Zone. Wolves are not trophies. The

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

sport hunting of wolves by the general public serves no purpose other than as an expression of "blood lust". There is no derived food value, only ego gratification. Many hunters were taught that you only kill what you will eat. The indiscriminate hunting of wolves can have significant impacts that will reverberate throughout the ecological systems. Wolves are apex species and exist not as individuals but as social units-as packs. Leave them alone and they will flat out control their own numbers. We respectfully submit our comments and we ask that you not support sport hunting of wolves, whether as trophy game or as predators.

Final Comment	Kendrick, Joanne	Sedona, AZ	6/1/2019 3:53:00 PM
----------------------	-------------------------	-------------------	---------------------

- 43** Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. unacceptable deaths and severe injuries to non-target species; even animals released alive may later die from their injuries; In addition to beavers, protected animals, migratory birds and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. My husband and I visit Wyoming regularly to enjoy the beauty and serenity of your state. Please do the right thing and protect the animals of Wyoming from those few who don't understand the ecological value of these wonderful animals.

Final Comment	Grote, Jacqueline	Frisco, TX	6/2/2019 11:36:00 AM
----------------------	--------------------------	-------------------	----------------------

- 44** Greetings, My husband and I love the State of Wyoming -- the splendor of the state's natural beauty, the diversity of wildlife, the recreational opportunities for people like us who enjoy hiking. We are appalled that some in your state support the trapping of bobcats with cruel and inhumane steel devices. Please do the right thing for your state and ban this barbaric practice. Thanks so much.

Final Comment	Grote, Jacqueline	Frisco, TX	6/2/2019 11:45:00 AM
----------------------	--------------------------	-------------------	----------------------

- 45** Greetings, My husband and I visit Wyoming regularly. We enjoy the natural beauty of your state and appreciate being in an area of the world that is still, to some extent, untouched by the greed and avarice of humans. We are dismayed to learn that Wyoming is considering expanding the hunting season on wolves. We ask that you please research the ecological importance of apex predators, including wolves. And we ask you to understand the negative impact that the cruel treatment of animals has upon all of us. Please do the right thing and enact legislation to protect wolves in the State of Wyoming. Thanks so much.

Final Comment	Grote, Jacqueline	Frisco, TX	6/2/2019 12:10:00 PM
----------------------	--------------------------	-------------------	----------------------

- 46** Animals have lived without humans for millions of years humans have never lived without animals and will always be the killers and murderers and abusers and problem. Humans are invading their land not the other way around so leave the wild alive and free and safe and protected and let nature take its own course. Animals are not ours to kill and abuse .

Final Comment	Sciolino , Robert	Amherst , NY	6/2/2019 12:41:00 PM
----------------------	--------------------------	---------------------	----------------------

- 47** Dear WY Game and Fish, As a tourism industry professional living in WY, I want to encourage you to not to continue to increase wold hunting and trapping in our state. It is bad for tourism when you continue to promote old fashioned approaches to managing this and other species deemed problematic simply because they are predators. Traps are especially noxious as they are equally affecting dogs in many areas of the state. Please reconsider, and limit or end hunting and trapping. Problem animals that predate on cattle or sheep can be managed on a case by case basis. Thank you.

Final Comment	Cartier, Christina	Jackson, WY	6/2/2019 10:04:00 PM
----------------------	---------------------------	--------------------	----------------------

- 48** Please consider a moratorium on bobcat trapping in area 1. I have lived in Teton County 20 years, seen and head mountain lions, yet did not even know we had bob cats in the area. That none was trapped last season shows that they need a chance to recover. Is the profit and "history" worth the killing and eradication of this non noxious predator? No. Thank you for considering my concerns.

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

Final Comment	Cartier, Christina	Jackson, WY	6/2/2019 10:07:00 PM
----------------------	---------------------------	--------------------	----------------------

- 49** Please, no unlimited beaver trapping. I have lived off of Game Creek Road for 20 years and seen the amazing work that the beavers have done to our micro ecosystem first hand. Trapping poses a risk to the hundreds of weekly visitors up game creek who are much more important recreaters in the area than the trappers. Dogs are at risk. The beavers are an integral and much appreciated asset of the game creek area and I am sure are to the other trapping zones being discussed. I will be deeply disappointed in your so called conservation efforts if you open up the are to no limit trapping. Please reconsider.

Final Comment	Cartier, Christina	Jackson, WY	6/2/2019 10:10:00 PM
----------------------	---------------------------	--------------------	----------------------

- 50** Please do not allow the trapping of beavers, nor bobcats. I and my neighbors live here because we like to see wildlife. It is already exceptionally rare to see beavers, bobcats, or mountain lions. This is not something the ecosystem can afford to eliminate.

Final Comment	Ra, Jacqueline	Moose, WY	6/3/2019 6:18:00 AM
----------------------	-----------------------	------------------	---------------------

- 51** Dear WYG&F, Increasing opportunity for unlimited Beaver trapping in high use areas is irresponsible and also seems to go against recent scientific evidence regarding the Beaver's influence on wetland health. Furthermore, it seems like a bad deal for the State of Wyoming to allow folks to take an unlimited amount of our resources for a small fee. The areas where trapping is to be increased are either high use areas with folks recreating with their pets or are areas where Beavers have enhanced wetlands and been a benefit to the ecosystem. Wyoming Game and Fish should consider what is best for users of our public lands, not just the desires of a few trappers. At this point, the primary users of the land, including hikers, bikers, birders, photographers, of whom a vast, vast majority oppose trapping, outnumber trappers by a massive margin. The needs of the many should outweigh the needs of the (very) few. As a hunter, I fully stand with Game and Fish in working to responsibly manage our wildlife populations. I have had nothing but great experiences with our always helpful Game and Fish staff here in town and when I'm out in the field. Also, as a hunter who believes in an ethical harvest, I vehemently oppose trapping, it's an unnecessarily cruel, lazy and unfair method of taking our natural resources. As a hiker, mountain biker and pet owner, I strongly oppose increasing the potential for trapping in areas where our pets or even children could be harmed by this archaic, cruel and needless unfair take of OUR resources. Do not allow more trapping in areas 101-104 (Game Creek, Horse Creek, Willow Creek, Fall Creek). Also, please work toward eliminating trapping in the State of Wyoming. It's had it's day and needs go the way of land rushes and stagecoach robberies. Sincerely, Destin Peters

Final Comment	Peters, Destin	Jackson, WY	6/3/2019 8:36:00 AM
----------------------	-----------------------	--------------------	---------------------

- 52** As a resident of the Game Creek area, I am very much opposed to the trapping of beavers. I have hiked the Game Creek trail for 30 years now, and I delight in seeing the beaver dams that often appear in the ponds and streams. Beavers are a critical component of these wetland areas and I am beyond distressed that the Wyoming Game and Fish Department thinks that unlimited trapping is a good idea. Do you have any scientific data to back up this proposal?

Final Comment	Shibuya, Nancy	Jackson, WY	6/3/2019 9:33:00 AM
----------------------	-----------------------	--------------------	---------------------

- 53** Beavers can help us fight drought, flooding, wildfire, extinction, and the effects of climate change. The public and our wildlife managers to learn to coexist, harmoniously and even beneficially, with our fellow travelers on this planet. No to any killing of these animals.

Final Comment	Shabbott, Mary	Punta gorda, FL	6/3/2019 2:25:00 PM
----------------------	-----------------------	------------------------	---------------------

- 54** The 2019 bobcat data report, and previous years, reveals an alarming decline which warrants closure of Bobcat Management Area 1 (Teton County) to hunting and trapping until professional bobcat population research supports the existence of a sustainable bobcat population. I want our bobcats valued and protected on our landscapes! No trapping, snaring and hunting.

Final Comment	Shabbott, Mary	Punta gorda, FL	6/3/2019 2:31:00 PM
----------------------	-----------------------	------------------------	---------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

55 “Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront.” – Ben Goldfarb, author of *Eager, The Surprising Secret Lives of Beaver and Why They Matter* “Beavers can help us fight drought, flooding, wildfire, extinction, and the ravages of climate change. Our challenge is to encourage the public and our wildlife managers to learn to coexist, harmoniously and even beneficially, with our fellow travelers on this planet.” Friends, relatives and colleagues of Wyoming Untrapped: NOW is the time to Take Action for beavers! The public and our most valuable eco-engineers, beavers, face a new challenge and need immediate action. Our local wildlife managers and game wardens continue to resist trapping reform, placing beavers under fire. Four beaver harvest areas (Teton County and Lincoln County) have been restricted to limited quotas for one trapper since 1992 (22 years). Today, instead of closing these areas to trapping and snaring, Wyoming Game and Fish Department (WGFD), without any scientific foundation, is recommending opening these areas to unlimited quotas by any trapper to offer a “recreational opportunity” to more trappers. We want these areas permanently closed to trapping, snaring, shooting or killing in any manner. Emerging trends in beaver wildlife management WU believes that the value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. We request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. hook-n-bullet 1820s thinking always seems to trump the good work being done. It's not just beavers that suffer from being trapped out, there goes the habitat for amphibians, fish, songbirds, herons, on and on. There is nothing scientifically justifiable for an unlimited trapping zone – it's plain irresponsible. beavers as eco-engineers, not trophies; These areas have seen reduced interest in beaver trapping. Beaver pelts continue to decline in value, averaging around \$10-13 each. We value beavers as eco-engineers, not trophies. If few people are interested in trapping, it is probably part of a trend: we are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. furbearer licenses used to “trap'em with a camera”; Wyoming citizens with furbearer trapping licenses (this trapping season and the previous season) applied for limited quota draw areas, and due to lack of general trapper interest, won the privilege to use their permits as they choose. All four permit owners made the legal choice not to trap beavers, or any other furbearer or non-target animal, on these public areas. Instead of preventing non-consumptive recreational opportunity, WGFD should provide for all of the public to participate however they choose. specific concerns about the effect of existing and potential increase of trapping in the 4 areas; Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increased negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general. beavers as an ecosystem; Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront. Trying to mitigate floods or improve water quality? There's a beaver for that. Concerned about sedimentation, wildlife? Take two families of beaver and check back in a year. a growing coalition of “Beaver Believers”; Today, a growing coalition of “Beaver Believers” – including scientists, ranchers, and passionate citizens – recognizes that ecosystems

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

with beavers are far healthier, for humans and non-humans alike, than those without them. Wyoming Game and Fish Department stated in a recent newsletter: "The economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds." beavers and coexistence; Zero-tolerance mentality remains more rule than the exception, but that is rapidly changing. We need to shift to a modern world of coexistence with our wild beavers, and initiate non-lethal controls if necessary. WGFD states: "We recognize the keystone nature of beavers," McWhirter said, "and their extremely valuable role on the landscape. We don't want to see that impacted", but they set an uncapped harvest quota. beavers' myriad skills; A better understanding of beavers' myriad skills will have us all wanting to restore beaver populations in our local environment. We believe that the WGFD leaders and game wardens should gain the knowledge to protect and preserve these crucial eco-engineers. Beavers can help us fight drought, flooding, wildfire, extinction, and the ravages of climate change. Our challenge is to teach the public and our wildlife managers to coexist, harmoniously and even beneficially, with our fellow travelers on this planet. beavers and all furbearers as a public treasure; Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately and kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. unacceptable deaths and severe injuries to non-target species; even animals released alive may later die from their injuries; In addition to beavers, protected animals, migratory birds and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. We need to know about these hundreds, perhaps thousands of casualties each year. Trappers should be required to report all non-target animals. the absence of sportsmanship, fair chase, and compassion in trapping; Every animal in Wyoming, including endangered species, is a possible victim of traps and snares. Is it fair chase not to know your target? Or to sit at home on a couch and wait for a catch? This reflects badly on hunters, and on our state. the pure cruelty of trapping causing injuries, exposure, dehydration and mental stress, and often immense suffering; Should all trap-check time requirements for beavers be reduced to 24-hour trap checks instead of 3 – 13 days, or should traps be eliminated from our landscapes? Jeremy Bentham famously asked, "The question is not, 'Can they reason?' Nor, 'Can they talk?' But, 'can they suffer?'" how our public lands should remain safe havens for all; All people, pets and wildlife should have a reasonable expectation for safety on our public lands, which means trap-free areas for all, including areas 101, 102, 103, and 104. how the overall management of trapping is rarely cost-effective; A beaver (furbearer) trapping license costs \$45 for all you can catch. How can that be cost-effective for our state? If beaver (furbearer) trapping/snaring continues then one license should be required for each beaver (furbearer) trapped, similar to game animals. how trapping, which is not based on a science foundation, does little or nothing for effectively managing any species population; We don't have a population count on our state beavers (and all furbearers), but we allow unlimited quotas. We should place quotas on all beaver (furbearer trapping), or just end trapping altogether. Where is the science? how trapping has long ago lost its charm as a Wyoming tradition, let alone an American one; A growing debate about the legitimacy of trapping shows that a shift is coming. Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment	Hodges, Suzanne	RNCHO CORDOVA, CA	6/3/2019 4:02:00 PM
----------------------	------------------------	--------------------------	----------------------------

56 Please reconsider unlimited trapping quotas for fur bearers in Teton and Lincoln Counties. If few people are interested in trapping, it is probably part of a trend: we are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. We request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. Trapping is a 19th century mind set with no scientific or moral place in the 21st century. Thank you.

Final Comment	Moran, Chris	Jackson, WY	6/3/2019 6:54:00 PM
----------------------	---------------------	--------------------	----------------------------

57 Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increased negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general.

Final Comment	Frank, Mitzi	Sharon Center, OH	6/4/2019 2:42:00 AM
----------------------	---------------------	--------------------------	---------------------

58 Authors of an article in Biodiversity and Conservation, an internationally-recognized science journal, calculated the value of a free-roaming bobcat in Yellowstone National Park to the economy versus its value as a trapped and hunted animal. The article is a unique collaboration between researchers from Panthera, the global wild cat conservation organization, and advocates with Wyoming Untrapped. The authors estimated a conservative, non-consumptive economic value of \$308,105 for this single bobcat in Yellowstone National Park in northwest Wyoming for one winter season, a figure nearly 1000 times greater than the average exploitive value of \$315.17 per bobcat trapped or hunted in Wyoming that same year (\$130.53 per bobcat harvested in revenue earned by the state of Wyoming in trapping license sales + \$184.64 per pelt sold by successful trappers and hunters). Also consider, that this same bobcat could generate the same figure again the following year, should it survive the summer season in Yellowstone. Over its life, this one bobcat could generate well over \$1 million in economic activity, shared across countless people involved in travel and tourism. Protect and preserve bobcats on our public landscapes for the significant impact of wildlife watching on tourism – Wyoming's 2nd largest industry.

Final Comment	Frank, Mitzi	Sharon Center, OH	6/4/2019 2:45:00 AM
----------------------	---------------------	--------------------------	---------------------

59 DO NOT HUNT... TRAP... OR IN ANY WAY... KILL WOLVES IN AND AROUND THE NATIONAL PARKS! BETTER YET... STOP KILLING WOLVES ENTIRELY! IT IS NOTHING BUT A BLOOD LUST EGO TRIP TO KILL WOLVES. SCIENCE REPEATEDLY PROVES AND PROVIDES TRUTHFUL INFORMATION ABOUT THE NEED FOR WOLVES IN THE ENVIRONMENT! STOP BELIEVING LIES, MYTHS AND FAIRY TALES... AND REALIZE THAT THIS IS A BLOODY, MURDEROUS GENOCIDE OF AN APEX PREDATOR... VITALLY NEEDED TO KEEP BALANCE IN NATURE!

Final Comment	Bear, Valerie	Meadow Grove, NE	6/4/2019 2:28:00 PM
----------------------	----------------------	-------------------------	---------------------

60 Hello, I am writing to express my opposition to the changes in furbearing animal hunting and trapping seasons and permits. I have ties to the area and have experienced firsthand how important this species is to the region. I strongly oppose any change to this and feel that allowing trapping of the beaver at all is an antiquated practice. Any increase would have a significant and unnecessary impact on the region's biodiversity. Thank you. Zoey Davol

Final Comment	Davol, Zoey	Louisville, CO	6/4/2019 2:47:00 PM
----------------------	--------------------	-----------------------	---------------------

61 Please stop pointless killings, stop trapping, stop killing contests stop trapping for fur.

Final Comment	rubel, john	flagstaff , AZ	6/4/2019 4:53:00 PM
----------------------	--------------------	-----------------------	---------------------

62 I write to you today in support of maintaining the trapping ban in Teton County and Lincoln County. Beavers are an integral part of a healthy ecosystem! "Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront." – Ben Goldfarb, author of Eager, The Surprising Secret Lives of Beaver and Why They Matter. Beavers can help us fight drought, flooding, wildfire,

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

extinction, and the ravages of climate change. Our challenge is to encourage the public and our wildlife managers to learn to coexist, harmoniously and even beneficially, with our fellow travelers on this planet. Beavers Matter, and "recreational" trapping should not be allowed now or in the future in these areas. Thank you Sandra Holloway

Final Comment	holloway, saundra	San Diego , CA	6/5/2019 7:50:00 AM
----------------------	--------------------------	-----------------------	----------------------------

63 Wyoming Game and Fish Department, I oppose any hunting of wolves in your state. They represent a critical balance in nature and are vital to the ecosystems in which they exist. Their numbers have been decimated over time due to excessive trophy hunting, protecting livestock and the fur trade. Wolves, among other predators, represent our great national heritage and we should allow their numbers to grow for future generations to enjoy. We have evidence of their beneficial impact when reintroduced to Yellowstone in 1995. Think what they can do for other regions as well. I feel it's our duty to protect this great national resource and allow them the right to survive and thrive. The decisions of today have huge impacts on the environment tomorrow. Please review this short 4 min video <https://www.youtube.com/watch?v=ysa5OBhXz-Q> Thank you for your time. Regards, Mark D. Alfano

Final Comment	Alfano, Mark	Macedon, NY	6/5/2019 8:32:00 AM
----------------------	---------------------	--------------------	----------------------------

64 I'm writing to strongly protest the unlimited beaver trapping policy proposed by the WGFD. In these times of catastrophic global species extinction, the assault from invasive species, climate warming, etc., these draconian, unscientific policies that are vestiges from another, exploitative and ignorant age have no place in your mission of wildlife protection. Please protect the resources in your charge (natural selection has "designed" the beaver to do just that!) and do not operate on some sense of fairness to those who still cling to the devastating practice of trapping. I implore you to use the best available science in making your decisions. The proposal you have put on the table flies in the face of good, science-based, resource management. Wyoming can be (and often has been) an example to the world. Make us proud, not ashamed. Thank you for your consideration of these heartfelt comments.

Final Comment	Round, Phil	Wilson, WY	6/5/2019 11:07:00 AM
----------------------	--------------------	-------------------	-----------------------------

65 I say no to the no-quota beaver trapping season. Their contribution to the environment is far more valuable than the annual revenue to the state from trapping. Data is not available on how many beavers inhabit these areas. Not having a quota would be the downfall of the immense value the beavers dams create in our local wildlife. I say no to the no-quota beaver trapping season.

Final Comment	Diaz, Sonia	Jackson , WY	6/5/2019 1:37:00 PM
----------------------	--------------------	---------------------	----------------------------

66 Beaver trapping is for the most part senseless this day and age. Relocating a better alternative

Final Comment	Furman, Duane	Jackson, WY	6/5/2019 2:40:00 PM
----------------------	----------------------	--------------------	----------------------------

67 I read recently that beaver trapping now has no limits. In looking at Chapter 4 "Seasons", I am not sure that is what it says, but I also don't know if the limitless trapping has gone into effect. I think for many reasons not limiting trapping of beavers is irresponsible and reckless. Beaver's are a big part of our ecosystem and help to keep our watersheds healthy! The results benefit many fish, birds, plants, amphibians and people. I hope you will reconsider and put a reasonable limit on the trapping of these industrious aquatic rodents!

Final Comment	Nicholson, Cynthia	Jackson, WY	6/5/2019 11:00:00 PM
----------------------	---------------------------	--------------------	-----------------------------

68 Trapping of large furbearers, in particular Bobcats needs to be given a respite until more scientific data can be collected on true population numbers and until trappers are more highly regulated. The rules and lifestyle of the Wild West no longer apply today. With Climate Change, growth of human populations and loss of habitat, our native furbearers and predators are under survival stresses that have never before existed on this planet, We humans must change our behaviors toward our wildlife management policies accordingly.

Final Comment	Libby, Susan	Ashland, WI	6/6/2019 7:52:00 AM
----------------------	---------------------	--------------------	----------------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

69 "Many land managers have realized that beavers can play a very cost-effective role in riparian habitat management and enhancement. ... Without beavers on our Wyoming headwaters, downstream flooding would be more severe each spring, and water conservation would be a much more serious concern." This is from your own G&F recent publication. I don't understand then why you'd recommend opening the Ditch Creek, Willow Creek, Game and Horse Creeks, and Fall Creek, including Mosquito and Dog Creeks drainage areas to unlimited trapping from October 1 to April 30th. Could you please reconsider this recommendation. While I consider trapping the lowest hanging fruit on the hunting tree, I recognize it can't be eliminated but at the very least it can be regulated. I hope you'll limit trapping quotas for beavers in these areas. Thank you, Sharon Brown sharonbrwn8@gmail.com

Final Comment

Brown, Sharon

Palm Springs, CA

6/6/2019 1:40:00 PM

70 Dear Wyoming Game & Fish Department, As a concerned Wyoming citizen, taxpayer, and sportsman, I must express my opposition to the proposed discontinuation of limited quota areas for beaver trapping in Teton and Lincoln counties. The Statement Of Reasons, Chapter 4: Furbearing Animal Hunting Or Trapping Seasons published by the Wyoming Game & Fish Commission provides no scientific justification for removing the limited quota beaver trapping in areas 101, 102, 103, and 104. I have read statements made by representatives of the Wyoming Game & Fish Department (WGFD) with regards to this proposal stating that an unlimited beaver quota will provide our state with "the opportunity to address beaver damage" and "increase recreational opportunities." The same representatives expressed the opinion that beaver trapping is a, "legitimate use of a renewable resource." While I respect the work that our Game & Fish Department does, these statements express unfounded opinions that do not provide justifiable grounds for a state wildlife entity to lobby for trapping deregulation; especially given the fact that our state has no reliable count on our current beaver population, nor a viable population count for any of our state's fur bearing animals. Beavers are inarguably capable of causing us some inconvenience, but utilizing independent trappers as a means of regulating our beaver population—and thereby their impacts—is neither a professional nor responsible mechanism for mitigating their suggested damages. Beavers are an integral, uniquely capable and beneficial species of our natural world. They are vital eco-engineers that are essential to water accumulation and distribution, vegetation growth, and habitat-creation; the diverse wetland ecosystems they create are truly invaluable and grossly overshadow any inconveniences they may cause us. "Beavers, long known for their beneficial effects on the environment near their dams, are also critical to maintaining healthy ecosystems downstream. Researchers have found that ponds created by beaver dams raised downstream groundwater levels in the Colorado River valley, keeping soil water levels high and providing moisture to plants in the otherwise dry valley bottom." (Dr. Cherie Westbrook, Ph.D. "Beaver Assisted River Valley Formation." River Research and Applications.) The idea that trapping beavers is a legitimate use of a renewable resource is at best an empty and uninformed statement, at worst it is manipulative/subversive word-play being used to protect the continued, private exploitation of our state's true resource: the living beaver. Castoreum is no longer used by the modern medical industry, and—while still used by a select few entities in rare instances—it is no longer a necessary or practical product for use in the food or perfume industry. "In the flavor industry, you need tons and tons of material to work with, it's not like you can grow fields of beavers to harvest. There aren't very many of them. So it ends up being a very expensive product—and not very popular with food companies." (Gary A. Reineccius, Ph.D. Department of Food Science and Nutrition. University of Minnesota.) Beaver pelt can no longer be considered a necessary or legitimate resource in today's world—a world of modern clothing, heated shelter, and faux fur. Since we no longer have need of the beaver's natural resources, it is no longer justifiable to set indiscriminate traps—that will invariably kill and/or injure any number of wild and domestic species—for the sake of harvesting their pelts. Promoting the idea that it is still permissible to trap our state wildlife for the sake of harvesting fur projects an attitude that suggests our state wildlife exists for the sake of individual pleasure and/or monetary gain, that it is acceptable to unnecessarily exploit our wildlife populations—to inflict undue suffering upon them—for the sake of recreation and private interest. I strong oppose this sentiment and I do not believe it is a sentiment that ought to be expressed by an entity of our state. Wyoming's greatest asset is our living wildlife and our protected wildlands. If left unimpeded, our beavers and the habitats they build, the myriad flora and fauna species their wetlands support, and the water storage and distribution patterns that their dams create, will prove vastly more profitable to our state and citizens than any number of trapping licenses sold. The beaver's living presence, and their beneficial impact on our ecosystems, will greatly outweigh any inconvenience they may cause us in the course of their natural pursuit. "Elevated moisture levels found in soil surrounding the [beaver] dams would otherwise require water from a very large natural flood, which they estimate as the 200-year flood, to achieve the same expansive water availability to the valley bottom. Additionally, beaver dams built away from natural river channels further redirect water across the valley, enhancing the depth, extent, and duration of

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

inundation associated with smaller floods; they also elevate the water table to sustain plant and animal life during the dry summer season." (Science News. "Beaver Dams Create Healthy Downstream Ecosystems." American Geophysical Union.) The issue of imposing an unlimited beaver quota in areas 101, 102, 103, and 104 as proposed by the WGFD Chapter 4 not only lacks any legitimate scientific justification, the proposition suggests we take action in spite of the best available, and current, scientific data; this proposition directly contradicts the United State's Game & Fish document The North American Model Of Wildlife Conservation that states that, "Science is the proper tool for discharge of wildlife policy." In the absence of a reliable beaver population count in our state, and with consideration to recent scientific findings that shed light on the vital role that beavers fill in our wild ecosystems, it is only responsible that we close the State of Wyoming to beaver trapping and reject the proposition to instate unlimited beaver trapping quotas in Teton and Lincoln counties. Thank you for your time and the opportunity to voice my position. Sincerely, Douglas Balmain

Final Comment	Balmain, Douglas	Laramie, WY	6/6/2019 4:16:00 PM
----------------------	-------------------------	--------------------	---------------------

71 Please stop killing our wolves! Please allow these animals to live out their lives in nature. And the trapping is so barbaric. Please stop or truly limit all trapping. These animals have their own ecosystems for a reason. Thank you for your time!

Final Comment	Rodriguez, Alex	Tucson, AZ	6/6/2019 5:29:00 PM
----------------------	------------------------	-------------------	---------------------

72 My comment on proposed changes to beaver trapping regs. I say NO to a no-quota trapping season. Beaver are very important to the ecosystem. When beavers make a dam, they slow the flow of water in the stream and, subsequently, a pond or area of wetland is formed. Roughly 85 percent off all native North American fauna rely on wetlands, so beaver are extremely important to the ecosystem.

Final Comment	Shea, Nancy	Kelly, WY	6/6/2019 5:43:00 PM
----------------------	--------------------	------------------	---------------------

73 Beavers provide important benefits to riparian habitat and contribute to the health of the total riparian ecosystem. Allowing trappers unlimited quotas on beaver pelts would cause long term damage to our rivers and streams. Do not allow unlimited trapping of beavers. Thank you for your consideration. Joy Steiner

Final Comment	Steiner, Joy	Jackson, WY	6/6/2019 7:11:00 PM
----------------------	---------------------	--------------------	---------------------

74 I say no to the no-quota beaver trapping seasons. -Rose

Final Comment	Caiazzo, Rose	Jackson, WY	6/6/2019 8:37:00 PM
----------------------	----------------------	--------------------	---------------------

75 Hi. Thank you for the opportunity to comment. I'm an elk hunter, angler and 27-year Wyoming resident, and I appreciate the department's efforts to steward the state's wildlife responsibly. I have great admiration for the work of our local Game and Fish staff in particular. But I'm a little dismayed by the proposed changes to Chapter 4, Furbearing Animal Trapping Seasons, draft 4-10-19.3. I oppose unlimited quotas for beaver trapping. This seems excessive and shortsighted. Ditch, Willow, Game, Little Horse and Fall creeks are places people go generally to enjoy observing wildlife like beavers in their natural habitat. The overharvesting of beaver around the West in the early 1800s was a shameful part in the history of exploration. We ought to learn from that and respect the important role beavers play in healthy riparian ecosystems. This isn't 1825, and we don't need to kill beavers for recreational opportunities. Sorry to complain. It's rare that I object to proposed rule changes, but I feel strongly about this issue. Thanks for your consideration, and best wishes. Jim Stanford

Final Comment	Stanford, Jim	Jackson, WY	6/7/2019 10:13:00 AM
----------------------	----------------------	--------------------	----------------------

76 Dear Wyoming Game & Fish Department, After reviewing the harvest report data as published by the Wyoming Game & Fish Department (WGFD) with regards to the bobcat take in Management Area 1 (MA1), I believe that MA1 must be immediately closed to bobcat trapping. While our state sold significantly more MA1 bobcat trapping licenses last season, drastically fewer bobcats were harvested in comparison to the previous year. As a keystone species, bobcats have a pronounced effect on the habitats they occupy; their diminished presence puts the healthy function of our state's ecosystems as a whole at risk. "Bobcats and

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

other predators help to keep ecosystems balanced. In ecosystems that are short on predators, consumers lower in the food chain rapidly increase in population size. This over-taxes food resources, leading to poorer condition of individuals and higher rates of starvation. Eventually, low birth rate and high mortality will cause consumer populations to crash, but in the meantime, the effects have filtered down to plant communities. Over-grazing by herbivores can result in very low biomass of some plant species. This in turn affects invertebrate communities, and can inhibit nutrient cycling.” (Kirsten Campbell, M.S., Ecology and Conservation. “The Ecosystem of Bobcats.”) Given that the current market price for bobcat furs is at an all time high, and the Wyoming bobcat take is simultaneously diminishing, it is now more than ever that we must be proactive in protecting our native bobcat population. The market demand for their pelts will invariably lead to an increase in trapping interest and increasingly more aggressive trapping practices. In the absence of any hard data with regard to their actual population count in our state, and no reliable information with regards to their population density in Wyoming’s MA1, the only responsible action for us to take would be to immediately suspend all bobcat trapping until we can obtain professionally gathered population research in this area. Furthermore, the exploitation of our state wildlife by fur trapping is inherently shortsighted—bringing the least good to the fewest number of individuals. There is no scientific evidence to support that trapping is a beneficial or effective means of wildlife management, and now more than ever our wild animals are most valuable alive, rather than dead. A recent study published in the reputable journal Biodiversity and Conservation showed the Yellowstone bobcat was worth more than \$308,000 for the regional economy in a single season. Currently, a Wyoming fur trapper can purchase an annual license for \$44 that allows them to trap as many bobcats as possible in one season. Each bobcat harvested represents the loss of a large and recurring state revenue resource. Given the most current scientific evidence, which directly supports the theory that disturbing the natural ecosystem and the predator-prey dichotomy is overtly detrimental to all species and the environment as a whole, alongside the recently discovered economic value of a living, Wyoming bobcat, the continued trapping of this species in MA1 is inadmissible. “Scientists have recently begun to understand the vital role played by top predators in ecosystems and the profound impacts that occur when those predators are wiped out. Now, researchers are citing new evidence that shows the importance of lions, wolves, sharks, and other creatures at the top of the food chain. (“The Crucial Role of Predators.” Yale School of Forestry & Environmental Studies.) Wyoming’s state wildlife are a public trust asset, the decisions made with regards to their management belong to the state and its citizens as a whole; our wildlife does not belong solely to the interested-minority. To continue MA1 bobcat trapping in spite of the evidence we have would be in direct violation to the terms of harvest as stated by the U.S. Game & Fish document The North American Model of Wildlife Conservation (which states “Wildlife can only be killed for a legitimate purpose,” and that, “Science is the proper tool for discharge of wildlife policy”) and would also be directly detrimental to the health of our state’s ecosystems and economy. For these reasons, I ask that the WGFD please place an immediate moratorium on bobcat trapping in MA1. Sincerely, Douglas Balmain

Final Comment

Balmain, Douglas

Laramie, WY

6/7/2019 12:28:00 PM

77

Dear Wyoming Game & Fish Department, After reviewing the harvest report data as published by the Wyoming Game & Fish Department (WGFD) with regards to the bobcat take in Management Area 1 (MA1), I believe that MA1 must be immediately closed to bobcat trapping. While our state sold significantly more MA1 bobcat trapping licenses last season, drastically fewer bobcats were harvested in comparison to the previous year. As a keystone species, bobcats have a pronounced effect on the habitats they occupy; their diminished presence puts the healthy function of our state’s ecosystems as a whole at risk. “Bobcats and other predators help to keep ecosystems balanced. In ecosystems that are short on predators, consumers lower in the food chain rapidly increase in population size. This over-taxes food resources, leading to poorer condition of individuals and higher rates of starvation. Eventually, low birth rate and high mortality will cause consumer populations to crash, but in the meantime, the effects have filtered down to plant communities. Over-grazing by herbivores can result in very low biomass of some plant species. This in turn affects invertebrate communities, and can inhibit nutrient cycling.” (Kirsten Campbell, M.S., Ecology and Conservation. “The Ecosystem of Bobcats.”) Given that the current market price for bobcat furs is at an all time high, and the Wyoming bobcat take is simultaneously diminishing, it is now more than ever that we must be proactive in protecting our native bobcat population. The market demand for their pelts will invariably lead to an increase in trapping interest and increasingly more aggressive trapping practices. In the absence of any hard data with regard to their actual population count in our state, and no reliable information with regards to their population density in Wyoming’s MA1, the only responsible action for us to take would be to immediately suspend all bobcat trapping until we can obtain professionally gathered population research in this area. Furthermore, the exploitation of our state wildlife by fur trapping is inherently shortsighted—bringing the least good to the fewest number of individuals. There is no scientific evidence to support that trapping is a beneficial or effective means of wildlife management, and now more

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

than ever our wild animals are most valuable alive, rather than dead. A recent study published in the reputable journal Biodiversity and Conservation showed the Yellowstone bobcat was worth more than \$308,000 for the regional economy in a single season. Currently, a Wyoming fur trapper can purchase an annual license for \$44 that allows them to trap as many bobcats as possible in one season. Each bobcat harvested represents the loss of a large and recurring state revenue resource. Given the most current scientific evidence, which directly supports the theory that disturbing the natural ecosystem and the predator-prey dichotomy is overtly detrimental to all species and the environment as a whole, alongside the recently discovered economic value of a living, Wyoming bobcat, the continued trapping of this species in MA1 is inadmissible. "Scientists have recently begun to understand the vital role played by top predators in ecosystems and the profound impacts that occur when those predators are wiped out. Now, researchers are citing new evidence that shows the importance of lions, wolves, sharks, and other creatures at the top of the food chain. ("The Crucial Role of Predators." Yale School of Forestry & Environmental Studies.) Wyoming's state wildlife are a public trust asset, the decisions made with regards to their management belong to the state and its citizens as a whole; our wildlife does not belong solely to the interested-minority. To continue MA1 bobcat trapping in spite of the evidence we have would be in direct violation to the terms of harvest as stated by the U.S. Game & Fish document The North American Model of Wildlife Conservation (which states "Wildlife can only be killed for a legitimate purpose," and that, "Science is the proper tool for discharge of wildlife policy") and would also be directly detrimental to the health of our state's ecosystems and economy. For these reasons, I ask that the WGFD please place an immediate moratorium on bobcat trapping in MA1. Sincerely, Douglas Balmain

Final Comment	Balmain, Douglas	Laramie, WY	6/7/2019 1:23:00 PM
----------------------	-------------------------	--------------------	---------------------

78 We are writing to protest the no-quota beaver trapping season being proposed. How can you propose any number of killings without even knowing the number of beaver we currently have? Beaver are crucial to habitat preservation and are worth more than the monies you will be getting from the license fees. Please reconsider your options. At least have sustainable limits. Thank you. Shirley & Dan Thomas Jackson, WY

Final Comment	Thomas, Shirley	Jackson, WY	6/7/2019 1:26:00 PM
----------------------	------------------------	--------------------	---------------------

79 Please cease trapping Beaver , Bobcat until studies can e made about sustainable populations. And a method of sustaining sustainable populations can be established.

Final Comment	Carroll, Robert	Cocolalla , Idaho 83813, ID	6/10/2019 9:15:00 AM
----------------------	------------------------	------------------------------------	----------------------

80 It is very clear that scientific data warrants a closure/end to bob cat trapping in mgt area 1, Teton County. The unethical and unjustified trapping against these animals must end. Thank you in advance for listening to the tax paying residents of this county, archaic and inhumane trapping against animals whose populations warrant no further hunting to begin with must end.

Final Comment	White, Matthew	Jackson, WY	6/10/2019 10:29:00 AM
----------------------	-----------------------	--------------------	-----------------------

81 I am against trapping, baiting, and trophy hunting of any animal. Trapping is indiscriminate and cruel. The lives of wild animals is sure worth more than the paltry trapping and hunting fees. Wildlife should be valued and we all know how much money wildlife viewing, not killing wildlife , brings into the state. Seems all to often managing means killing. Wyoming should not be "managing" it's wildlife with 1800s mentality. Thak you for considering my comments.

Final Comment	Jelinek, Cheryl	Jackson, WY	6/10/2019 10:42:00 AM
----------------------	------------------------	--------------------	-----------------------

82 No scientific analysis has been undertaken to assess the impacts and sustainability of increasing fur animal harvest in the specific drainages mentioned in your plan. I see it as a knee-jerk and unfounded idea to increase the harvest on these enterprising creatures who do so much to sustain wildlife habitat and water quality in a time of otherwise deteriorating conditions. Please keep these places wild and protect beavers and other fur animals. Thank you, Thomas Turiano

Final Comment	Turiano, Thomas	Wilson, WY	6/10/2019 11:44:00 AM
----------------------	------------------------	-------------------	-----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

83 I would like to express my thoughts and concerns regarding the proposed deregulating of hunting and trapping in Wyoming. It concerns me greatly that there is so little protection given to Wyoming's wildlife. Most recently I have been made aware of the proposals to keep wolves reduced to minimal numbers. Wolves now may be killed in any manner in all "predator" zones of the state with zero regulation. This makes it impossible for stable packs to form. A stable pack could exercise a positive influence on the animals it preys on by encouraging herd movement and general health. Unlimited quotas on trapping bobcats has been proposed in Management Area 1. This in spite of the fact that there is no information regarding the number of bobcats in the area. What is the justification for this? Increased Recreational opportunity for trappers. Trappers who can buy inexpensive permits, trap at will, and sell pelts at a profit. This is certainly an idea that benefits the few, at an unknown cost for the many. It is my opinion that bobcat trapping should be ceased outright in Management Area 1 until reliable information with regards to their current population can be scientifically and responsibly obtained. Unlimited quotas on trapping beaver in area 101, 102, 103, and 104 is up for consideration. This in spite of the wealth of data that shows how uniquely beneficial beavers are to the environment. What is the justification for this? Again apparently the "recreation" and personal interests of the few. The idea of opening these historically limited areas to unlimited trapping permits is completely unacceptable to me. And why is it freely allowed, with no consequence whatsoever, to run animals to death on snowmobiles? Another recreational activity I presume. I would like to believe that we as a people, as a state, can be better than this. I would like to see this made to be illegal. It is, in my opinion, fantastically shortsighted to continue to allow - even encourage the senseless, brutal killing of what is surely a valuable Wyoming resource. There are many residents who are here because of the unique opportunities to view wildlife in its natural habitat. There are many tourists who come to this state, spending time and money, specifically because of these rich opportunities. I believe our voices should be heard and considered, not just the voices of the few who profit from the exploitation of these wondrous resources. Please consider the inherent value of our wildlife and wild places. Please consider the future ramifications of depleting these resources cruelly and needlessly. Please consider thoughtful, scientifically based actions that take into account the values of all of Wyoming's residents and visitors when making policy. Thank you for your time and consideration, Lisa Balmain Laramie, Wyoming

Final Comment	Balmain, Lisa	Laramie, WY	6/10/2019 11:45:00 AM
----------------------	----------------------	--------------------	-----------------------

84 No trapping. No trapping. That time has passed. It is inappropriate for our era and puts humans and their pets in danger. It is an unequal manner of hunting and an inhumane act altogether. Please stop this anachronistic activity.

Final Comment	Buhler, Tina	Jackson, WY	6/10/2019 11:55:00 AM
----------------------	---------------------	--------------------	-----------------------

85 I'm writing you to let you know that I oppose all trapping. Period. It is not a "sport" to place traps for animals of any kind, and should be disallowed, in my opinion. That said, it's especially critical to not allow trapping of animal species that aren't present in good numbers. I realize that I may be extreme, but the idea of trapping bobcats and beavers is abhorrent to me. The cruelty involved... don't get me started. In earlier days when animal pelts were used for clothing, or by people who used the whole animal, trapping made a certain kind of sense(altho the beaver hat era was pretty awful). I can't imagine in this day and age that a father would take a child out into the wilderness and teach him or her that setting a pain-causing death trap for an unsuspecting wild creature is a fun "sport", for which some pittance of a payment from somewhere can be "earned". Please, for the sake of the much-diminished numbers of bobcats and beavers please don't allow this to go on. Thank you for your time.

Final Comment	McGregor, Kim	Jackson, WY	6/10/2019 12:00:00 PM
----------------------	----------------------	--------------------	-----------------------

86 Beavers are beneficial to the landscape and should not be hunted. Beaver harvest areas should be permanently closed to trapping, snaring, shooting or killing in any manner.

Final Comment	Haberfeld, Louise	Jackson, WY	6/10/2019 12:25:00 PM
----------------------	--------------------------	--------------------	-----------------------

87 Cats are important predators on our landscape. Bobcats, in particular, are in decline in Bobcat Management Area 1 in Teton County. This area should be closed to all hunting and trapping until scientific research supports the existence of a sustainable bobcat population.

Final Comment	Haberfeld, Louise	Jackson, WY	6/10/2019 12:33:00 PM
----------------------	--------------------------	--------------------	-----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 88** Allow for night hunting of coyotes on public lands. Added safety measures could include a 1-2 mile buffer on any occupied structure. Scouting or being on location prior to the hunt to identify any possible hazards such as cattle, roads, equipment, etc. This would allow for better predator control and minimize domestic and wildlife losses. Thank you for your time.

Final Comment	Thies, Tyler	Casper, WY	6/10/2019 1:10:00 PM
----------------------	---------------------	-------------------	----------------------

- 89** NO MORE BEAVER TRAPPING! It's time to stop BRUTALIZING the animal kingdom! They are sentient creatures, as meaningful a part of God's creation as humans are. We are not BETTER. We are DIFFERENT. Beavers double as an ecosystem, & are ecologically efficient. They can help us fight drought, flooding, wildfire, extinction, & climate change. We must coexist benevolently with our fellow Earth companions.

Final Comment	Gilbert, Valerie	new york, NY	6/10/2019 5:34:00 PM
----------------------	-------------------------	---------------------	----------------------

- 90** Trapping animals is entering the realm of the psycho deviant. Surely civilization has evolved past the point where trapping is even considered decent. It is cruel, it promotes violence, it destroys nature. Stop destroying nature. Stop destroying wildlife. This is not an activity that should be promoted.

Final Comment	Southwell, Margaret	Fanwood , NJ	6/11/2019 3:22:00 AM
----------------------	----------------------------	---------------------	----------------------

- 91** We want our wildlife protected, not exposed yet even further to cruelty and death. Four beaver harvest areas (Teton County and Lincoln County) have been restricted to limited quotas for one trapper since 1992 (22 years). Today, instead of closing these areas to trapping and snaring, the Wyoming Game and Fish Department (WGFD), without any scientific foundation, is stepping back in time to recommend opening these areas to unlimited quotas by any trapper to offer a "recreational opportunity" to more trappers. We believe these areas should be permanently closed to trapping, snaring, shooting or killing in any manner.

Final Comment	Kasper, Tanya	WIMBERLEY, TX	6/11/2019 1:12:00 PM
----------------------	----------------------	----------------------	----------------------

- 92** Let's leave the beaver alone in Wyoming and let them go about their peaceful business of engineering their environment! They are superb at enhancing riparian habitat and creating good places for willows, birds, insects, and amphibians can thrive. Their dams prevent downstream flooding in addition to stabilizing the watershed. I am opposed to all trapping because it is barbaric, unbelievably cruel, and unnecessary in the Wyoming of the future. But, especially to this no quota trapping season, I say "NO!" Bob Skaggs

Final Comment	Skaggs, Bob	Jackson , WY	6/11/2019 3:31:00 PM
----------------------	--------------------	---------------------	----------------------

- 93** WG&F Commission: Much effort has been made by Bridger-Teton NF Watershed Specialists to enhance areas of Teton County, such as the Fall Creek drainage to improve the habitat for beaver. Beavers are critical to improving fisheries and high quality watersheds such as Fall Creek. Where beaver activity exists fisheries improve. This is science and modern biologists support the presence and sustainability of beaver populations in the Rocky Mountain Ecosystem. Rather than modify current trapping regulations to damage and possibly eliminate beavers from Fall, Horesthief, Game and other watersheds in Teton and Lincoln Countys; I would request that the current limited trapping quota remain in these important and currently high quality watersheds. Thank you

Final Comment	Wilkinson, DL	Jackson, WY	6/11/2019 8:04:00 PM
----------------------	----------------------	--------------------	----------------------

- 94** I think trapping is a thing of the past. As a civilised & caring society we should not be trapping animals. Trapping is cruel & barbaric & totally unnecessary. Wildlife Services kill millions of animals every year. Humans are causing the 6th Mass Extinction. Give these animals a chance to live.

Final Comment	Lang, Diane	Seattle , WA	6/12/2019 8:30:00 AM
----------------------	--------------------	---------------------	----------------------

- 95** Wyoming Untrapped has made me aware of the low numbers of bobcats trapped in Teton County and I would like to have my voice be heard to not allow any more trapping in that area. Thanks.

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

Final Comment	Cavigelli, JP	Casper, WY	6/12/2019 11:37:00 AM
---------------	---------------	------------	-----------------------

- 96** Elk draw changes. This is a bad idea. I'm an 8 point holder and the reason I started buying points in Wyoming is because of the current system. I as a lot of other out of state hunters schedule my vacation for hunting seasons in October of the year before the January draw, so the current system allows us time to change things if we don't draw a elk tag. If we don't draw elk then we can change our vacation time and apply for antelope or mule deer, if you change to the new system your talking about we won't be able to do that.

Final Comment	Riley, Timothy	Veedersburg, IN	6/13/2019 3:32:00 AM
---------------	----------------	-----------------	----------------------

- 97** Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increased negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general.

Final Comment	Umphries, Andrew	Tucson, AZ	6/13/2019 10:17:00 AM
---------------	------------------	------------	-----------------------

- 98** The value of bobcats to the health of our public landscapes outweighs the recreational opportunity to trap and kill bobcats with cruel and inhumane steel devices four months of the year without any scientific foundation. I request that the Wyoming Game and Fish Department and the Wyoming Game Commission immediately close Bobcat Trapping Management Area 1 in Teton County to bobcat trapping, hunting and killing harvest until these areas are surveyed and a population count is established, but, even then, the act of trapping is inherently cruel and unethical. Thank you for your time . . .

Final Comment	Umphries, Andrew	Tucson, AZ	6/13/2019 10:21:00 AM
---------------	------------------	------------	-----------------------

- 99** Your proposal is headed the wrong direction. We need rules and regs that are in touch with science and reflect the values and worth of wildlife. A balance in nature is the goal and trapping which is not totally selective has more and more accidents with the wrong species. Trapping is not recreation and is inhuman and not thoughtful as we strive for a intact ecosystem and not personal dollars for sold pelts. Let's respect nature and with fair regs to reduce, or balance or control populations based on modern science, and methods and not TRAPS.

Final Comment	Lichtendahl, Ken	Powell, WY	6/13/2019 3:31:00 PM
---------------	------------------	------------	----------------------

- 100** I oppose the proposal to extend the wolf hunting season to March 31 in order to save the Whiskey Mountain bighorn sheep herd which has no scientific basis because wolves are not preying on these sheep and researchers still don't understand why lambs aren't surviving. The herd took a hit from pneumonia back in 1991 and hasn't recovered since. Wolves were absent from the area for most of this time and bighorns suffer mostly from disease transmission from domestic sheep.

Final Comment	Shabbott, Mary	Punta gorda , FL	6/14/2019 6:05:00 PM
---------------	----------------	------------------	----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

101 I do not live full time in Wyoming but we travel to Jackson several times a year and stay for long periods of time. Our group is very upset with Wyoming's treatment of wildlife. I implore you to stop the outrageous trapping of beavers. This caters to specific sl interests who want to sell the fur. How does a tiny minority of special interests become more important than the voices of the taxpaying public who spends a lot of money in taxes or tourism? I believe that the value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. We request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. hook-n-bullet 1820s thinking always seems to trump the good work being done; It's not just beavers that suffer from being trapped out, there goes the habitat for amphibians, fish, songbirds, herons, on and on. There is nothing scientifically justifiable for an unlimited trapping zone – it's plain irresponsible. These areas have seen reduced interest in beaver trapping. Beaver pelts continue to decline in value, averaging around \$10-13 each. We value beavers as eco-engineers, not trophies. If few people are interested in trapping, it is probably part of a trend: we are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. specific concerns about the effect of existing and potential increase of trapping in the 4 areas; Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increased negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general.

Final Comment	Sutz , Eileen	Chicago, IL	6/14/2019 7:27:00 PM
----------------------	----------------------	--------------------	-----------------------------

102 I believe the natural ecosystem should rule. Please protect the wolves. Look at the outcome of wolves being reintroduced to Yellowstone.

Final Comment	Stewart, Vera	Dallas, TX	6/14/2019 8:51:00 PM
----------------------	----------------------	-------------------	-----------------------------

103 Trapping is incredibly cruel. Why does WY still advocate and encourage this? As much as I abhor killing of animals in any fashion, trapping seems to embody all the most inhumane, painful, indiscriminate and horrible parts. I would gladly buy all the trapping tags to stop this. Yes, I know hunters like to shout that they are the face of conservation. I would argue that at the rate they are going, there will be nothing left to conserve except cows, chickens and pigs.

Final Comment	Osnos, Annette	Jackson, WY	6/15/2019 5:14:00 AM
----------------------	-----------------------	--------------------	-----------------------------

104 I guess Wyoming doesn't get the picture. In a time of need to protect our environment you choose to kill more wildlife. Beaver as well as other wildlife should be protected as they provide much to sustain the

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

environment. Beaver are builders and engineers, they can help with flooding and forest fires. Please consider what you are doing, this is not good for the environment or our ecosystems.

Final Comment	Zawadzky, Paula	Chestertown, NY	6/15/2019 7:24:00 AM
----------------------	------------------------	------------------------	----------------------

- 105** Please, OPPOSE the longer hunting season on wolves. Wolves are essential in so many ways. They help ecosystems run as they should. Wolves pick off weak and sick animals, which helps to strengthen the gene pool of these animals. The sheep numbers that have been declining is related to disease, not wolves. When the wolves were absent, the numbers of the sheep were still declining.. keep domestic flocks away from the wild sheep in order to prevent disease. Wolves are ESSENTIAL, and have a purpose in our landscapes. Again, the STRENGTHEN gene pools of these larger quadrupeds. Even CWD (chronic wasting disease) has no match for wolves. Wolves are the answer to a collapsing ecosystem.

Final Comment	McGuire, Emm	St. Johnsbury , VT	6/15/2019 8:00:00 AM
----------------------	---------------------	---------------------------	----------------------

- 106** I say "No!" To the no-quota beaver trapping season for the following reasons: 1. Wyoming Game and Fish is the only state agency charged with protecting and maintaining all of the public's wildlife. 2. The beavers are stewards of the natural watershed which support a variety of plants, insects, birds, and fish. 3. This also protects our headwaters from downstream flooding. 4. This proposal is not science based. The department cannot "maintain" a species if it doesn't even know how many beavers are in these areas. With habitat encroachment across the board for wildlife in Teton County we need to protect all the species on public land. Period. Thank You, Carol Poole

Final Comment	Poole, Carol	Wilson, WY	6/15/2019 11:53:00 AM
----------------------	---------------------	-------------------	-----------------------

- 107** I oppose changing the limited quota draw for areas 101,102, 103, 104. I have the permit for area 101. I chose not to trap this year because my permit allows me to trap 5 beavers. I do not believe there are five beavers in that drainage of Ditch Creek. I choose to protect the right to trap beaver in that drainage for future generations by preserving the very limited beaver population. A beaver population area should not be the subject of an unlimited quota unless a "wipe out" of the beaver in area 101 is intended. Your decision to make this area unlimited is a sad testament to the fact that you do not manage wildlife based upon science but on politics and whim. While I oppose this action vehemently. Thank you. I shall use this latest ploy. You will not manage the grizzly bear. Thanks.

Final Comment	Bainbridge, Deidre	Jackson, WY	6/15/2019 9:17:00 PM
----------------------	---------------------------	--------------------	----------------------

- 108** WU believes that the value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. We request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. It's not just beavers that suffer from being trapped out, there goes the habitat for amphibians, fish, songbirds, herons, on and on. There is nothing scientifically justifiable for an unlimited trapping zone – it's plain irresponsible. These areas have seen reduced interest in beaver trapping. Beaver pelts continue to decline in value, averaging around \$10-13 each. We value beavers as eco-engineers, not trophies. We are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. effect of the existing and potential increase of trapping in the 4 areas; Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increasingly negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

on the elk feedground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general. Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront. Trying to mitigate floods or improve water quality? There's a beaver for that. Concerned about sedimentation, wildlife? Take two families of beaver and check back in a year. Today, a growing coalition of "Beaver Believers" – including scientists, ranchers, and passionate citizens – recognizes that ecosystems with beavers are far healthier, for humans and non-humans alike, than those without them. Wyoming Game and Fish Department stated in a recent newsletter: "The economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds." Zero-tolerance mentality remains more rule than the exception, but that is rapidly changing. We need to shift to a modern world of coexistence with our wild beavers, and initiate non-lethal controls if necessary. WGFD states: "We recognize the keystone nature of beavers," McWhirter said, "and their extremely valuable role on the landscape. We don't want to see that impacted", but they set an uncapped harvest quota. A better understanding of beavers' myriad skills will have us all wanting to restore beaver populations in our local environment. We believe that the WGFD leaders and game wardens should gain the knowledge to protect and preserve these crucial eco-engineers. Beavers can help us fight drought, flooding, wildfire, extinction, and the ravages of climate change. Our challenge is to teach the public and our wildlife managers to coexist, harmoniously and even beneficially, with our fellow travelers on this planet. Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately and kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. In addition to beavers, protected animals, migratory birds and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. We need to know about these hundreds, perhaps thousands of casualties each year. Trappers should be required to report all non-target animals. □the absence of sportsmanship, fair chase, and compassion in trapping; Every animal in Wyoming, including endangered species, is a possible victim of traps and snares. Is it fair chase not to know your target? Or to sit at home on a couch and wait for a catch? This reflects badly on hunters, and on our state. Pure cruelty of trapping causing injuries, exposure, dehydration and mental stress, and often immense suffering: Should all trap-check time requirements for beavers be reduced to 24-hour trap checks instead of 3 – 13 days, or should traps be eliminated from our landscapes? Jeremy Bentham famously asked, "The question is not, 'Can they reason?' Nor, 'Can they talk?' But, 'can they suffer?'" Public lands should remain safe havens for all: All people, pets and wildlife should have a reasonable expectation for safety on our public lands, which means trap-free areas for all, including areas 101, 102, 103, and 104. Overall management of trapping is rarely cost-effective; A beaver (furbearer) trapping license costs \$45 for all you can catch. How can that be cost-effective for our state? If beaver (furbearer) trapping/snaring continues then one license should be required for each beaver (furbearer) trapped, similar to game animals. Trapping, which is not based on a science foundation, does little or nothing for effectively managing any species population: We don't have a population count on our state beavers (and all furbearers), but we allow unlimited quotas. We should place quotas on all beaver (furbearer trapping), or just end trapping altogether. Where is the science? A growing debate about the legitimacy of trapping shows that a shift is coming. Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment

Scrima, Lawrence

Aurora, CO

6/16/2019 9:29:00 AM

109

I write to ask WGFD and the commission immediately close Bobcat Trapping Management Area 1 in Teton County for the trapping, hunting and killing of bobcats until a population count of bobcats in that region is performed. Without a population count, it makes no scientific sense to have unlimited quotas. This endangers the population and could lead to overhunting and over-trapping of the species. There should be quotas on trapping or trapping should be eliminated entirely or at least until a population count is performed. Trapping is indiscriminate and can maim or kill many non-target species including endangered or threatened species, migratory birds and more. These animals suffer terribly while they wait

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

for a trapper to come and dispatch them. Trapping should be eliminated entirely or until population counts are done. Bobcats provide great economic value. Tourists love to view wildlife, in particular charismatic bobcats. Myself a tourist to the Teton region, I can speak to this. My family and I have gone looking for wildlife on many of our trips and would love to spot and photograph a bobcat. We would pay for photographing safaris and the like but never for a pelt. Further, bobcats provide important ecosystem services, keeping rodents in check. If there are any problems with coexisting with bobcats, non-lethal methods should be the go-to.

Final Comment	MacKenzie, Michelle	Menlo Park, CA	6/16/2019 12:33:00 PM
----------------------	----------------------------	-----------------------	-----------------------

110 You are a despicable agency playing god to our wildlife.. you are a puppet to ranchers and hunters and stealing money from the rest of the public.

Final Comment	Murphy, Thomas	Stacy, MN	6/16/2019 2:20:00 PM
----------------------	-----------------------	------------------	----------------------

111 Hello, I am a dog lover, yes, this is true. I also love wolves. A long time ago I had friends from Wyoming that had found a wolf pup after her mother had been murdered and they raised the pup, a female, themselves. This pup became a very well mannered, loyal, intelligent friend of everyone. They are a very family oriented creature and crucial to the environment. When we have wolves that cull the deer population, vegetation can grow unobstructed. This makes way for homes for beavers, eagles, falcons, hawks and many other assorted species of wildlife. They are a keystone species that are necessary for the benefit of the environment. Wolves prefer to be left alone and are not a danger to the public. Wolves in most cases do not prefer livestock and besides, with today's electronics it is very easy to keep away any creature that would take an interest in livestock. Wolves should not be hunted or trapped, they are too necessary, too intelligent and too innocent to be victims of such insane and cruel treatment. Please protect them?

Final Comment	Coast, Sean	Ashland, OR	6/16/2019 4:50:00 PM
----------------------	--------------------	--------------------	----------------------

112 It is alarming that during active bobcat trapping season no bobcats have been reported as trapped. This representation of a decline in bobcat numbers should mandate an immediate closer to bobcat trapping. CA banned bobcat trapping and other are starting to follow suit. Please consider ending this horrible practice. Where is the science behind the opening of unlimited quotas for beaver trapping for recreational opportunities? This should not be allowed and the practice should be terminated permanently. Why are we hunting wolves? They are not harvested for meat. Their removal destroys ecosystems. Wolf hunting is strictly done for sport and it is an embarrassment we allow this blood sport in the United States today. Please close hunting of wolves permanently and give them full protections. Thank you.

Final Comment	Dietrich, Daniel	Point Reyes, CA	6/16/2019 9:29:00 PM
----------------------	-------------------------	------------------------	----------------------

113 The public and our most valuable beaver eco-engineers face a new challenge and need immediate action. Our local wildlife managers and game wardens continue to resist trapping reform, placing beavers under fire. Four beaver harvest areas (Teton County and Lincoln County) have been restricted to limited quotas for one trapper since 1992 (22 years). Today, instead of closing these areas to trapping and snaring, the Wyoming Game and Fish Department (WGFD), without any scientific foundation, is stepping back in time to recommend opening these areas to unlimited quotas by any trapper to offer a "recreational opportunity" to more trappers. I believe these areas should be permanently closed to trapping, snaring, shooting or killing in any manner.

Final Comment	holloway, saundra	El Cajon, CA	6/16/2019 9:30:00 PM
----------------------	--------------------------	---------------------	----------------------

114 Our review of the 2019 bobcat harvest data report, and previous years, reveals an alarming decline which warrants closure of Bobcat Management Area 1 (Teton County) to hunting and trapping until professional bobcat population research supports the existence of a sustainable bobcat population. Wyoming Untrapped stresses that immediate cessation of bobcat hunting, trapping and snaring is necessary to protect the existence of bobcats in this area. We want our bobcats valued and protected on our landscapes!

Final Comment	holloway, saundra	El Cajon, CA	6/16/2019 9:31:00 PM
----------------------	--------------------------	---------------------	----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 115** Do not allow our wolves be hunted and killed for SPORT or TROPHY hunting. They deserve to be there leave them alone and let them live in peace as they have for thousands of years. Now you all want to allow these barbarians to CONTINUE their lives and drive another species to extinction. They were here long before us all. DO NOT ALLOW OUR GOVERNMENT TO DO THIS TO DESTROY THE WOLVES. LET PEOPLE HAVE THE OPPORTUNITY TO BE ABLE TO SEE THEM IN THEIR LIVES MATTER. I'M A VOICE FOR THE WOLVES.

Final Comment	Yoakam , Robin	Wichita Falls, TX	6/16/2019 11:34:00 PM
----------------------	-----------------------	--------------------------	-----------------------

- 116** I am deeply concerned about WGFD's problematic management of beaver trapping as revealed in the proposal to open four drainages in Teton and Lincoln County to unlimited beaver trapping. Many biologists and the public understand that beaver are essential components of watersheds, thus your proposal underscores deep problems in WGFD's ability to manage wildlife in our State. Clinging to the past and a sentimental or romantic attachment to trapping is ruinous for the Department and for our wildlife. As a biologist monitoring amphibian breeding habitat in Grand Teton NP and the National Elk Refuge, I am convinced that beaver numbers in our region are severely depressed; there are not enough beavers to fill the empty niches. If you are going to increase the killing of this species, I implore you to at least acquire scientific and credible information on which to base your policies, which seem increasingly radical and reckless.

Final Comment	Patla, Debra	MORAN, WY	6/17/2019 8:58:00 AM
----------------------	---------------------	------------------	----------------------

- 117** I have lived and recreated in northwest Wyoming for decades and have seen many rare and elusive species including wolverines and mountain lions, but I have never seen a bobcat here. This may be one of the most mis-managed species in Teton County. It is past time to end bobcat trapping.

Final Comment	Patla, Debra	MORAN, WY	6/17/2019 9:04:00 AM
----------------------	---------------------	------------------	----------------------

- 118** Please stop this cruel and unusual punishment of these furbearing animals. We do not reside in Barbaric times anymore. This may be our world. BUT it is THEIRS TOO! Wyoming Bobcats, especially in area 1 are at an all time low. People are killing and trapping them in all these Wyoming areas and not even bothering to call it in. I know of this!! I hear it ALL THE TIME!! YOU CAN DO BETTER WYOMING! ITS OUR WORLD. THEIRS TOO!!!

Final Comment	straube, gloria	hannibal, MO	6/17/2019 9:33:00 AM
----------------------	------------------------	---------------------	----------------------

- 119** There is no scientific or other valid reason for having a bobcat hunting season. These elusive animals are worth far more alive to the majority of people, rather than a few people profiting off public wildlife for the price of a coffee.

Final Comment	Courts, Ian	Evergreen, CO	6/17/2019 9:33:00 AM
----------------------	--------------------	----------------------	----------------------

- 120** The trapping of any species and the hunting of any predators is inhumane. Trapping should end, and predators should be protected, not killed.

Final Comment	Shellenberger, David	Bethel, CT	6/17/2019 9:43:00 AM
----------------------	-----------------------------	-------------------	----------------------

- 121** Please stop the killing.

Final Comment	Sandoval , Cynthia	Covina , CA	6/17/2019 10:19:00 AM
----------------------	---------------------------	--------------------	-----------------------

- 122** Please ban the practice of trapping. It is cruel and should not be tolerated for that reason.

Final Comment	Higdon, Ben	Ypsilanti, MI	6/17/2019 10:20:00 AM
----------------------	--------------------	----------------------	-----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

123 Please consider changes to limit the bobcat, coyote and wolf trapping/snaring across the state. It has become a significant problem. With a dropping population of Bobcats comes a increase in non target animals being trapped and killed. Especially when it comes to snares which seriously need to be banned. In this day and age there is hardly a reason for this cruel practice to continue. I grew up in a Wyoming where a bobcat was once a common sight. Those days are gone with the increase in trapping over the last several years. Please stand up for our wildlife. Today's trapping for profit is completely unnecessary. Everyday more and more corporations are going fur-free.

Final Comment	Roich, Adam	Rock springs, WY	6/17/2019 10:38:00 AM
----------------------	--------------------	-------------------------	------------------------------

124 The hunting of wolves, an apex predator, is both bad for the balance of nature and bad for the economy of the area. I ONLY started visiting Yellowstone AFTER the reintroduction of wolves. Many others visit for the same reason, a chance to see a magnificent animal that had been missing for too long...leaving the park UNNATURAL. The loss of wolves will be the loss of visits from me AND the groups of people I bring there annually. Wolves need a buffer zone around the park and Wyoming should listen to science and environmentalists, not people motivated by fear or money. That will only leave a zone of weak prey animals and fewer visitors. Very short sighted. To extend the hunt to save bighorn sheep is a knee jerk reaction that only satisfies wolf haters. The hunts should be less or not at all since predators numbers stabilize naturally based on prey. How is it that humans think they can argue with evolution? That is the only reason I visit and bring visitors to Yellowstone...it is a fully functioning ecosystem! Leave it that way!

Final Comment	Liss, Denise	Oakland , NJ	6/17/2019 10:45:00 AM
----------------------	---------------------	---------------------	------------------------------

125 Trapping should be banned. It is a cowardly and cruel practice that serves no purpose in wildlife management.

Final Comment	Baldassare, Mark	Portsmouth , NH	6/17/2019 11:12:00 AM
----------------------	-------------------------	------------------------	------------------------------

126 The decimation of our nation's wildlife MUST STOP!!! These animals are invaluable to the ecosystem and their lives are worth more than a few bucks for their fur. Trapping of fur bearing animals needs to be abolished before all wildlife is forever gone.

Final Comment	Pedersen, Sally	Red Wing, MN	6/17/2019 11:18:00 AM
----------------------	------------------------	---------------------	------------------------------

127 To: Wyoming Game and Fish Department From: Sierra Wildlife Coalition Re: Beaver trapping in Wyoming We are writing to urge your agency to NOT allow unlimited beaver trapping in the four drainages proposed (Ditch, Willow, Game & Little Horse, and Fall Creeks). My sister has lived in the Jackson Hole area for 45 years, and we have visited Wyoming and the Yellowstone area frequently for all that time. Beavers provide far more benefits to the environment, and the economy, than trapping. As the science from numerous studies shows, beavers and their ponds not only improve watersheds by reducing flooding and erosion, reducing sediment, and increasing water storage and year-round flows, they also provide excellent habitat for all wildlife, especially fish. Beaver ponds provide refuge and quiet water for juvenile fish, along with deep, cold water and a variety of habitat for the invertebrates that fish eat. And good fishing contributes considerably to Wyoming's economy, both in employment and visitor spending. Our non-profit group, Sierra Wildlife Coalition, works with agencies and homeowners to promote practical and proven solutions for living with beavers and other native wildlife. We have worked with agencies including the US Forest Service, US Army Corps of Engineers, State Parks, and local counties to mitigate any problems from beaver activity. We have installed simple fence and pipe devices that prevent flooding, and protected dozens of trees from chewing. Solutions to any problems are simple and inexpensive. As the state agency charged with protecting the public's wildlife, there is no good reason to allow increased trapping of beavers. People from our area and all over the world come to Wyoming to enjoy seeing the incredible diversity of wildlife there, and beavers make a major contribution to increasing that diversity. Please reconsider your proposal. Thank you for your consideration, Sherry Guzzi, Co-Director Sierra Wildlife Coalition PO Box 7763, Tahoe City, CA, 96145

Final Comment	Guzzi, Sherry	Tahoe City, CA	6/17/2019 11:25:00 AM
----------------------	----------------------	-----------------------	------------------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 128** Please consider the suffering of a live animal held in a trap. Please do what you can to limit this suffering. Limit the time trap lines can go unchecked; limit the season that trapping can be done. Thank you.

Final Comment	Alaksa, Jan	Catawba, SC	6/17/2019 11:27:00 AM
----------------------	--------------------	--------------------	-----------------------

- 129** Wolves are the most important animal in the ecosystem. Wolves hold the entire balance together of the lands together. Without the wolves the entire land scape collapses. Not sorry your elk herds struggle after wolves are removed. The wolves only take the sick hurt or old. With wolves the elk herds are kept strong. Now all the people that blame wolves for the elk herds shrinking, are wrong. It's all the hunters killing every elk in sight. No that doesn't work or the ranchers that can't keep their livestock out of wolf territory. Why can't the cows be kept in a secure area then right up in the mountains. Wolves are needed and they matter immensely.

Final Comment	Wilkinson, Ally	Ellicott City, MD	6/17/2019 11:30:00 AM
----------------------	------------------------	--------------------------	-----------------------

- 130** Please put a moratorium on trapping Bobcats cougars lynx etc. I love visiting Wyoming but prefer to spend my vacation money where this sort of cruelty is banned

Final Comment	Logan , Patricia	Palm city , FL	6/17/2019 12:03:00 PM
----------------------	-------------------------	-----------------------	-----------------------

- 131** June 16, 2019 Wyoming Game and Fish Department Wildlife Division 3030 Energy Land Casper, Wyoming 82604 Re: Regulations Chapter 4, Furbearer Animal Hunting and Trapping Season Dear Commissioners: Thank you for the opportunity to submit the following comments for the Draft Chapter 4, Furbearer Animal Hunting and Trapping Season (Plan) on behalf of the 25,000-plus regional and national followers of Wyoming Untrapped (WU). Wyoming Untrapped is a 501©3, not-for-profit organization, based in Jackson, Wyoming whose mission it is to "create an environment safe for people, pets and wildlife through education, trapping reform and advocacy." Living and working in Wyoming for decades, we much appreciate the state's unparalleled wildlife diversity and abundance. We also recognize and respect that what we have is, in many ways, the result of the excellent work of the Wyoming Game and Fish Commission's (Commission) dedicated biologists and the agency's leadership. We thank you for that. STATEMENT WU wants to make clear that, while we respectfully submit these comments for your consideration, in no way should this be construed as support for the trapping/hunting of beavers as trophy animals. WGFD UNLIMITED BEAVER TRAPPING QUOTA PROPOSAL The Wyoming Game and Fish Department (WGFD) states that it is "proposing to discontinue limited quota areas for beaver trapping in the Jackson Region" and is recommending unlimited trapping/hunting in four beaver harvest areas (Teton County and Lincoln County) which have been restricted to limited quotas for one trapper since 1992 (22 years). . Area 101: Ditch Creek. Ditch Creek drainage in Teton County – a public recreation area. . Area 102: Willow Creek. Willow Creek drainage in Teton County. . Area 103: Game Creek and Little Horse Creek. Game Creek and Little Horse Creek drainages in Teton County. . Area 104: Fall Creek. Fall Creek, Mosquito Creek and Dog Creek drainages on U.S. Forest Service lands in Teton County and Lincoln County – a local use area. Families and kids enjoy Coburn Meadow on Fall Creek. A leg-hold trap with a beaver foot was found in open space by the creek. WHY DO WE NEED UNLIMITED BEAVER QUOTAS Why this proposal is being made remains unclear — it is undoubtedly not science-based. Instead of closing these areas to trapping and snaring, WGFD, the one and only state agency charged with protecting and maintaining all of the public's wildlife, is proposing to open four accessible drainages without any scientific foundation, opening these areas to unlimited quotas by any trapper to offer a "recreational opportunity" to more trappers. WU believes that the value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. In the absence of a reliable beaver population count in our state, and with consideration to recent scientific findings that shed light on the vital role that beavers fill in our wild ecosystems, WU requests that the Wyoming Game and Fish Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping, snaring and hunting harvest, at the very least until these areas are surveyed and a population count is established. WGFD states in a recent statement of justification: "In general, the Jackson region has seen a greatly reduced interest in beaver trapping over the past several years, and those holding the few limited quota permits have harvested few or no animals. This current approach may be limiting the opportunity for others who have an interest in trapping." Yes, these areas have seen reduced interest in beaver trapping. Beaver pelts continue to decline in value, averaging around \$10-13

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

each. Beaver pelts can no longer be considered a necessary or legitimate resource in today's world – a world of modern clothing, heated shelter, and faux fur. Since we no longer require the beaver's natural resources, it is no longer justifiable to set indiscriminate traps that will invariably injure and kill any number of domestic or wild species. Regarding opportunity, no WGFD records are indicating that trapper opportunities were limited. WU values beavers as eco-engineers, not trophies. We see an increase in understanding about the benefits of this species and the wetlands it inhabits. Also, less than .5% of the state's population are trappers, showing a significant number of people are interested in viewing beavers and their ponds rather than trapping them, and that furbearer management is not managed for the majority public, especially in Teton County. If a few people are interested in trapping, why invite more? WGFD states: "It is not anticipated this change will result in an overharvest of beavers in the future, but as a safeguard, the Jackson region is developing a beaver monitoring program. Should undesirable impacts be documented, the Commission maintains the ability to close certain areas if deemed necessary." If the department's proposal prevails, these areas will open to unlimited trapping – any licensed trapper with a \$45 permit can set traps and kill as many beavers as they want between October 1 and April 30. The department does not know how many beavers inhabit these areas. The "triggers" or circumstances that will bring about an early closure have not been shared, which seems like a backward process and a decision made in haste. Why not monitor the population first, before deciding to eliminate the quota, and focus on solutions to long term protection, preservation and coexistence? WGFD states: "Trapping is a legitimate use of a renewable resource. The Jackson region currently has a healthy and robust beaver population and can provide the proposed recreational opportunity." However, the department or the public do not know the "renewable resource" population in these areas. WGFD states: Beavers are building dams and flooding the property, in one case flooding a hunting camp. Perhaps hunting camps should not be sited so close to streams or on low ground. They can be moved. Plus, the beavers are most certainly on U.S. Forest Service land, where native wildlife should have top priority. Has the WGFD coordinated with the Forest Service about this proposal? Beavers are nature's consummate environmental engineers. They are the most intelligent wild creature when it comes to shaping their habitat. Their dam building skills are phenomenal and are a tremendous asset to the environment. Dams create ponds that hold water, elevate water tables, collect silt and nourish willow communities, which in turn support a myriad of plant, insect, bird, fish and amphibian species. WGFD states: in a recently released WGFD publication opens with these sentences: "Many land managers have realized that beavers can play a very cost-effective role in riparian habitat management and enhancement. ...Without beavers on our Wyoming headwaters, downstream flooding would be more severe each spring, and water conservation would be a much more serious concern." Why is WGFD trying to enhance the beaver population in the region with releases, while allowing an unlimited take? The same WGFD publication states that while beaver trapping contributes "over \$200,000 in annual revenues to the state...the economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds". Ben Goldfarb, in his award-winning book *Eager: The Surprising, Secret Life of Beavers and Why They Matter*, states: "Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront. Trying to mitigate floods or improve water quality? There's a beaver for that. Concerned about sedimentation, wildlife? Take two families of beaver and check back in a year." WU agrees. CONCERNS ABOUT THE EFFECT OF EXISTING AND POTENTIAL INCREASE OF TRAPPING . Area 101: Ditch Creek. People use this area for all kinds of recreation, including walking and swimming with their dogs. Encouraging more trapping will have increasingly negative impacts on other uses. . Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish and camp and safety for children and dogs remains a concern. . Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in, others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and vast in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder, who is going to be trapping there? Perhaps on the elk feed ground by permission? . Area 104: Fall Creek, Mosquito Creek, and Dog Creek. More great wetlands are here, thanks to beavers. There are more concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. "Instead of going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

toward trapping in general. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. There is nothing scientifically justifiable for an unlimited trapping zone – it is plain irresponsible". Susan Marsh, Raynes Citizen Conservation Award ADDITIONAL REASONS THE WGFD PROPOSAL IS A BAD CALL . Beavers as an ecosystem; "Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront. Trying to mitigate floods or improve water quality? There's a beaver for that. Concerned about sedimentation, wildlife? Take two families of beaver and check back in a year." Ben Goldfarb in his book, "Eager". . A growing coalition of "Beaver Believers"; Today, a growing coalition of "Beaver Believers" – including scientists, ranchers, and passionate citizens – recognizes that ecosystems with beavers are far healthier, for humans and non-humans alike than those without them. WGFD stated in a recent newsletter: "The economic benefits of trapping to the state cannot compare with the economic benefits derived from the beavers' stabilizing influence on watersheds." . Beavers and coexistence; Zero-tolerance mentality remains more rule than the exception, but that is rapidly changing. We need to shift to a modern world of coexistence with our wild beavers and initiate non-lethal controls if necessary. WGFD states: "We recognize the keystone nature of beavers," Doug McWhirter said, "and their treasured role on the landscape. We don't want to see that impacted", but yet WGFD set an uncapped harvest quota, which makes no sense. . Beavers' myriad skills; A better understanding of beavers' myriad skills will have us all wanting to restore beaver populations in our local environment. We believe that the WGFD leaders and game wardens should gain the knowledge to protect and preserve these crucial eco-engineers. Beavers can help us fight drought, flooding, wildlife, extinction, and the ravages of climate change. Our challenge is to teach the public and our wildlife managers to coexist, harmoniously even beneficially, with our fellow travelers on this planet. . Beavers and all furbearers as a public treasure; All wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to kill this wildlife indiscriminately. Trapping and snaring dramatically reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure . Beaver trapping causes unacceptable deaths and severe injuries to non-target species; In addition to beavers, protected animals, migratory birds, and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. There are hundreds, perhaps thousands of casualties each year. IN SUMMARY "Beavers, their ponds and wetlands also provide unquantifiable benefits to visitors and residents alike. These habitats offer a tranquil retreat from life's hectic pace – places to relax and re-create one's soul, to remind ourselves of the incredibly wild and interconnected nature in our area. And it is our wildlife that indeed provides this rich landscape with its beating heart. It is our responsibility to steward this precious resource forward in as good or better condition than was given to us." Franz J. Camenzind, Ph.D., WU Advisory Council Board of Directors. In the absence of a reliable beaver population count in our state, and with consideration to recent scientific findings that shed light on the vital role that beavers fill in our wild ecosystems, WU requests that the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping, snaring and hunting harvest, at the very least until these areas are surveyed and a population count is established. Respectfully, Lisa Robertson, President Wyoming UNtrapped

Final Comment	Robertson, Lisa	Jackson, WY	6/17/2019 12:05:00 PM
---------------	-----------------	-------------	-----------------------

- 132** All trapping of animals should immediately be banned in the state of Wyoming except for animals caught in live trap system relocated for the purpose of private property protection.

Final Comment	Poole, Steven	Wilson, WY	6/17/2019 12:28:00 PM
---------------	---------------	------------	-----------------------

- 133** I think hunting quotas should be much lower and that the state of Wyoming shouldn't be managing wolves down to the lowest possible numbers. Tourists to Yellowstone and Grand Teton National Parks bring in over \$1 billion to the economy of Wyoming. Many travel here just to see wolves. The state of Wyoming needs to stop their relentless war on wolves and start valuing them for the allies they are. They are now t your enemy. There are many 99.9% successful areas of non lethal and frankly , the population is so snnikilated you will render them extinct and tourists won't like that at all. Thank you for your consideration

Final Comment	Sutz, Eileen	Chicago, IL	6/17/2019 12:36:00 PM
---------------	--------------	-------------	-----------------------

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

- 134** I realize that the hunters and trappers of these animals are not doing it out of necessity they're doing it out of trophy and pelt. So if they want to continue to have these creatures available then there needs to be a time for nature to rejuvenate because there is an Overkill of our predatory animals. When we reach 0 that number will never change. I am against trophy hunting. But I do know that it exists. The poaching laws need to be stringent applied with the maximum power at upheld. please please understand that these creatures are national treasures and once they are gone there's no ready mix to create new ones.

Final Comment **Varanai, Patricia** **Jamestown, ND** 6/17/2019 12:36:00 PM

- 135** Please STOP the cruel and barbaric trapping of young and female bobcats! These animals are God's creations and do not deserve to be treated in this manner. If this is God's country, please ensure animals are treated humanely as God would expect!

Final Comment **Dupuis, Audrey** **Asheville , NC** 6/17/2019 12:44:00 PM

- 136** Please place a moratorium on killing these beautiful cats! They bother no one. And the fur trade needs to be SHUT DOWN!!!!.

Final Comment **Shelley, Marsha** **Hauser, ID** 6/17/2019 12:56:00 PM

- 137** The Center for Biological Diversity ("Center") provides the following comments concerning Wyoming's Chapter 4 Draft Regulations on Furbearing Animal Hunting or Trapping Seasons ("Regulations"). The Regulations proposed by the Wyoming Game and Fish Department ("WGFD") for trapping beaver contradict WGFD's published stance on the benefit of beaver. The impetus for WGFD's proposal is unclear. Ms. Santarsiere, Senior Attorney with the Center, attended WGFD's meetings on its beaver proposals and was informed trappers did not request more opportunities for beaver harvesting. The Center provides the following comments to reaffirm WGFD's 2019 perspective regarding the myriad benefits beaver provide to Wyoming and all ecosystems they inhabit, and to urge WGFD to withdraw its proposal to permit increased beaver trapping in the Jackson Hole area. A. WGFD recognizes the importance of beaver to Wyoming. WGFD recognizes the important impact beaver have on Wyoming's land and published this perspective in its 2019 report (WGFD 2019). WGFD explains in the report that beaver can modify their environments more dramatically than any other species in North America. Additionally, WGFD recognizes beaver help maintain and protect riparian habitats, which improve "water quantity and quality, increase herbaceous forage production and quality, diversify wildlife," and provide recreational benefits to Wyoming residents and visitors throughout the year (WGFD 2019). WGFD also states "[b]eaver can . . . be reintroduced to further enhance habitat recovery. . . In all recovery efforts, a commitment to livestock and beaver population management is necessary to prevent a return to former, degraded [land] conditions" (WGFD 2019). Beaver are a keystone species for ecosystems throughout the world (Hossack et al. 2015; Puttock et al. 2017). They positively influence their environment in dramatic ways that are disproportionate to their biomass (Barry et al. 2019). Beaver dams prevent floods and help sediment and nutrient storage, which improves water quality and promotes the health of riparian wetlands. In Wyoming, beaver protect species that researchers considered endangered or imperiled, including the northern leopard frog (*Rana pipiens*) (Smith & Keinath 2004), and the Columbia spotted frog (*Rana luteiventris*) (Patla & Keinath 2005). In Canada, beaver increase Canada geese (*Branta canadensis*) populations and breeding success rates because their dams provide optimal nesting sites for the birds (Bromley & Hood 2013). The Center encourages WGFD to conduct research to determine whether beaver improve breeding rates for Wyoming's native waterfowl and other neighboring fauna. Additionally, beavers are critical ecosystem engineers that maintain the health of Wyoming's fisheries, which promote greater profit for Wyoming than does trapping. Beaver are "eco-engineers," which means they "play an important role in ecological engineering designs" through "creation, modification, and maintenance of ecosystems" (Saalink 2018). Researchers found beaver help manage 25% of local ecosystems' native flora and fauna. Beaver dam building and foraging increase soil moisture and nitrogen levels which promote healthy forestation. Their presence also decreases populations of animals who would normally deplete these regions' biodiversity in search of food (Wright 2002). Beaver dams improve the health of surrounding ecosystems because the water buildup creates expansive wetlands (Naiman 1988), which "trap and filter" impurities from urban runoff (NOAA). This filtering process is critical to maintain the health of fisheries, especially in states such as Wyoming, where fishing is immensely more popular than beaver trapping. For instance, the most recent FWS survey from 2011 shows 303,000 people spent 3,123,000 days in Wyoming to fish, but only 140,000 people spent 1,726,000 days to hunt (including trapping) (FWS 2014). Beaver trapping, of course,

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

represents just a small fraction of these hunting and trapping figures. WGFD even refers to its use of beaver ponds as a method to enhance fisheries throughout the state (WGFD 2019). Beaver dams decrease stream temperatures by retaining water in areas that restore riparian wetlands. The lower water temperatures increase abundance of fish species in the affected rivers and improve species health (FWS et al. 2017). The National Oceanic and Atmospheric Administration and the U.S. Fish & Wildlife Service ("FWS") recognized the critical role of beaver in river regulation and preservation for the coho salmon. The two agencies continue to coordinate with local and tribal authorities to restore salmon runs using beaver dams and beaver dam analogues (FWS et al. 2017). WGFD could likely increase their annual fishing revenue by using beaver dams to improve riparian wetlands and decrease water temperatures that surround popular fishing destinations, because they would increase salmon and other fish populations. Beaver naturally prevent drought, floods, wildfires, and extinction of neighboring species, all of which combat the effects of climate change. The value of beavers to the longevity of Wyoming's ecosystems and to its visitors who spend millions of dollars each year to observe wildlife, \$350,256,000 in 2011 (FWS 2016), far outweighs their value as a taken commodity. WGFD only receives \$45 per license for up to 30 taken beaver, depending on the area (WGFD 2016), which only provides \$200,000 annually in state revenue (WGFD 2019). By contrast, a Utah study showed beaver populations could provide Utah and local residents millions of dollars per year in landscape restoration costs (ECONorthwest 2011). Wyoming could experience the same benefit, in addition to revenue from wildlife recreation, with healthy beaver populations unimpeded by human consumption.

B. WGFD has not scientifically proven overpopulation of beaver is a concern. WGFD states it does not have an "accurate method for estimating beaver population size" and that "precise numbers of individuals [cannot] be readily determined" but has not indicated overpopulation is a concern (WGFD 2019). WGFD also states "beaver may only occupy one third their original Wyoming range" (WGFD 2019). WGFD presents alternative, non-lethal methods in its report to manage beaver, should land owners come into conflict with the species. In fact, WGFD encourages use of non-lethal methods over trapping, because the "riparian habitat benefits lost with total beaver control often outweigh the elimination of [beaver as] a nuisance problem" (WGFD 2019). The Center encourages WGFD to follow its own recommendations and use methods like population relocation, should WGFD find beaver are overpopulated in particular areas. WGFD has not conducted scientific research to properly estimate Wyoming's beaver populations. Scientific-based research is critical to accurate population estimates and to understand the benefits of beaver on ecosystems where WGFD still permits trapping. WGFD now proposes to conduct population monitoring simultaneous with increasing trapping. However, the Center urges WGFD to complete accurate monitoring before considering increasing trapping in these areas. This will allow WGFD to make an educated decision about allowing unlimited quotas. The Center encourages WGFD's plan to use aerial photography to monitor beaver populations as this technique proved successful in the United Kingdom (Puttock et al. 2015). However, WGFD will not be able to record accurate data regarding beaver populations if it allows trappers to prematurely take beaver. Trapping will expose select beaver populations to human activity, which will change beavers' natural habits, social dynamics, and interactions with their environment. WGFD should prohibit any trapping increases to allow scientists time to collect accurate data on population and population trends of this eco-engineer.

C. WGFD should prohibit the use of submerged traps for beaver. Submerged traps of any kind are inhumane, indiscriminate, and cause severe injuries to beaver, but also pose substantial risk of injury to non-target animals including pets, and children who use public waterways (FBA). Trappers place these traps – usually body-gripping traps – under water and are only required to check them for animals once every seventy-two hours (WGFC 2016). Researchers found submerged body-gripping traps inhumane because they do not instantly kill caught animals, but rather, can take as long as eleven minutes to make animals go unconscious and drown (MSPCA). Submerged traps make animals experience intense suffering from panic, physical injury, and ultimately, death by "drowning-induced hypoxia" (Iossa et al. 2007). Non-target animals experience similar injury because they unknowingly walk through streams or swim around submerged traps. At least 17 dogs have been reported to have died from being caught in body-gripping traps since 2012 (Anderson 2015). However, the actual number of trapped dogs and cats who have survived but suffered from serious injury and amputations is much higher. Traps catch more non-target animals than actual beaver. Trappers are only required to report to WGFD game or statutorily protected animals the traps killed or caused serious injury that led to death. However, "some national studies have estimated that as many as two non-target animals are caught in traps for every one" beaver or furbearing animal. This data indicates that in Wyoming alone, 66,000 to 100,000 target and non-target animals are caught in traps every year (Wyo. Untrapped 2014). In another study, 57 non-target animals – "cottontails (76%), opossums (20%), armadillos (1.7%), deer (1.7%), and dogs (1.7%) – were caught just in body-gripping traps alone (MSPCA). In 2017, WGFD only sold 1,272 licenses and only 279 trappers harvested 1,794 beaver (WGFD 2018). The damage traps cause to thousands of non-target animals and children does not justify the comparatively small revenue WGFD receives from selling trapping licenses. Many states have introduced legislation that prohibits the use of body-gripping traps, Wyoming should take the same action (Batcheller 2007). Children unsuspectingly encounter submerged traps because trappers place them in ponds without marking them. Children experience excruciating pain because of the initial injury, but also because the complicated settings require time and,

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

usually, multiple people to remove the contraptions (Powell 2015). Children do not often know what traps are, and activate them by touching them because of curiosity. Families choose Jackson Hole as a destination for vacation and participate in various water sports and swimming, which create high levels of activity on public waterways. Children can easily fall prey to submerged traps and possibly drown, because they do not expect the traps in public areas. WGFD should ban submerged traps to protect children from this unnecessary risk. Hunting enthusiasts developed ethics regulations in the sport known as “fair chase,” which requires hunters use humane methods of taking animals and gives animals a genuine opportunity to escape their pursuers. Fair chase hunting excludes traps and environments that force animals into helplessness (Pope & Young Club). Submerged traps fundamentally contradict any aspect of fair chase. Trappers can place body-gripping or live traps under water to lie in wait for unsuspecting beaver who pass by. These traps do not allow beaver and non-target animals the opportunity to escape from drowning, and cause innumerable injuries, as well as unimaginable psychological and emotional suffering (Proulx & Barrett 1989). The United States is home to an expansive social movement by people who want to preserve and responsibly conserve wildlife. Banning submerged traps will improve the perspectives of animal advocates, conservation groups, and wildlife enthusiasts of WGFD when it protects beaver and wildlife by incorporating humane practices. WGFD’s social tolerance will also influence trappers and landowners to act similarly on public and private land, which will help all beings flourish. D. Conclusion Beaver are a keystone species that benefit Wyoming’s ecosystems and fisheries. We urge WGFD to withdraw its proposal to increase beaver trapping in areas near Jackson Hole. WGFD should complete its newly proposed monitoring program to determine populations numbers and trends before considering increasing trapping in these areas, and especially should forego a proposal to permit trapping in unlimited numbers during the season. There is not a demand from trappers to increase trapping and the risks to public safety far outweigh any reasons to increase trapping. Similarly, we encourage WGFD to reconsider permitting trappers to use submerged traps throughout Wyoming, especially in areas of high recreational use. Jessica Chapman Law Clerk Center for Biological Diversity P.O. Box 11374 Portland, OR 97211-0374 Tel: (503) 283-5474 Email: jchapman@biologicaldiversity.org Andrea Santarsiere Senior Attorney Center for Biological Diversity P.O. Box 469 Victor, ID 83455 Tel: (303) 854-7748 Email: asantarsiere@biologicaldiversity.org References* D. Anderson. 2015. Proposed changes to ‘body-grip’ trap traps have not gained traction. StarTribune. Available at: <http://www.startribune.com/anderson-proposed-changes-to-body-grip-traps-have-not-gained-traction/303837131/>. Assoc. for Protection of Fur-Bearing Animals (“FBA”). Trapping Incidents. Last visited June 12, 2019. Available at: <https://thefurbearers.com/trapping-and-wildlife/trapping-incidents>. J. Barry et al. 2019. Pumas as ecosystem engineers: ungulate carcasses support beetle assemblages in the Greater Yellowstone Ecosystem. 2018. *Oecologia*. 189(3): pp. 577-586. doi: <https://doi.org/10.1007/s00442-018-4315-z>. G. Batcheller. 2007. Summary of Trapping Regulations for Fur Harvesting in the United States. Other Publications in Wildlife Management. 48: pp. 1-55. Available at: <https://digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1047&context=icwdmother>. C. Bromley & G. Hood. 2013. Beaver (*Castor canadensis*) facilitate early access by Canada geese (*Branta canadensis*) to nesting habitat areas of open water in Canada’s boreal wetlands. *Mamm Biol*. 78(1): 73-77. doi: <https://doi.org/10.1016/j.mambio.2012.02.009>. ECONorthwest. 2011. The Economic Value of Beaver Ecosystem Services, Escalante River Basin, Utah. Eugene, OR. Available at: https://www.grandcanyontrust.org/sites/default/files/ut_2011escalanteBeaverReport.pdf. B. Hossack et al. 2015. Trends in Rocky Mountain amphibians and the role of beaver as a keystone species. *Biol Conserv*. 187: pp. 260-269. doi: <https://doi.org/10.1016/j.biocon.2015.05.005>. G. Iossa et al. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Anim Welf*. 16: pp. 335-352. Available at: <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.973.5675&rep=rep1&type=pdf>. MSPCA. Last visited June 14, 2019. About the Humane Care of Certain Traps. Available at: https://www.mspsca.org/animal_protection/about-leg-hold-traps/. R. Naiman. 1988. Animal Influences on Ecosystem Dynamics. *BioScience*. 38(11): pp. 750-752. doi: 10.2307/1310783. NOAA Fisheries. Last visited June 11, 2019. Coastal Wetlands: Too Valuable to Lose. Available at: <https://www.fisheries.noaa.gov/coastal-wetlands-too-valuable-lose>. D. Patla & D. Keinath. 2005. Species Assessment for Columbia Spotted Frog (*Rana luteiventris*) in Wyoming. U.S. Dept. of Interior. Available at: https://www.uwyo.edu/wyndd/_files/docs/reports/speciesassessments/spottedfrog-jan2005.pdf. Pope & Young Club. Last visited June 11, 2019. Rules of Fair Chase. Available at: <https://pope-young.org/fairchase/default.asp>. B. Powell. 2015. Animal Trap Catches, Injures 12-Year-Old Triad Boy. WFMY News 2. Available at: <https://www.wfmynews2.com/article/news/animal-trap-catches-injures-12-year-old-triad-boy/224019006>. G. Proulx & M. Barrett. 1989. Animal Welfare Concerns and Wildlife Trapping: Ethics, Standards and Commitments. *Trans. West. Sect. Wildl*. 25: pp. 1-6. Available at: http://www.wildlifeprofessional.org/western/transactions/transactions_1989_1.pdf. A. Puttock et al. 2015. Aerial photography collected with multirotor drone reveals impact of Eurasian beaver reintroduction on ecosystem structure. *J. Unmanned Veh. Syst*. 3: pp. 123-130. doi: [dx.doi.org/10.1139/juvs-2015-0005](https://doi.org/10.1139/juvs-2015-0005). A. Puttock et al. 2017. Eurasian beaver activity increases water storage, attenuates flow and mitigates diffuse

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

pollution from intensively-managed grasslands. Sci. Total Environ. 576: pp. 430-443. doi: <https://doi.org/10.1016/j.scitotenv.2016.10.122>. R. Saaltink. Wetland Eco-engineering with fine sediment. Arnhem, The Netherlands: Netherlands Organization for Scientific Research. B. Smith & D. Keinath. 2004. Species Assessment for the Northern Leopard Frog (*Rana pipiens*) in Wyoming. U.S. Dept. of Interior. Available at: https://www.uwyo.edu/wyndd/_files/docs/reports/speciesassessments/northernleopardfrog-jan2004.pdf. U.S. Fish & Wildlife Service. 2014. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. pp. 1-94. Available at: <https://www.census.gov/prod/2013pubs/fhw11-wy.pdf>. J. Wright et al. 2002. An Ecosystem Engineer, the Beaver, Increases Species Richness at the Landscape Scale. Oecologia. 132(1): 96-101. doi: 10.1007/s00442-002-0929-1. Wyo. Game & Fish Comm. 2016. 2018-2019 Furbearing Animal Hunting or Trapping Seasons. Available at: https://wgfd.wyo.gov/Regulations/Regulation-PDFs/REGULATIONS_CH4_BROCHURE.pdf. Wyo. Game & Fish Dept. 2019. Beaver Benefits: What role do beaver play in riparian habitat management? Available at: <https://wgfd.wyo.gov/WGFD/media/content/PDF/Habitat/Extension%20Bulletins/B38-The-Role-of-Beaver-in-Riparian-Habitat-Management.pdf?fbclid=IwAR32ti-rt3ygWXBk7o0RiWkxzvgsmPX6yh-f7jVZU27VxTEYICQ1JvO0PHk>. Wyoming Untrapped. 2014. Analysis of Trapping in Wyoming. Available at: <https://wyominguntrapped.org/overview-trapping-issues/>. *References may be provided upon request.

Final Comment	Santarsiere, Andrea	Victor, ID	6/17/2019 1:01:00 PM
----------------------	----------------------------	-------------------	----------------------

138 Please do not allow fur trapping as it is cruel and inhumane. Our previous natural resources are becoming endangered.

Final Comment	Amondson, Susan	Grand Marais , MN	6/17/2019 1:04:00 PM
----------------------	------------------------	--------------------------	----------------------

139 Trapping is a cruel antiquated practice that has been banned in over 100 countries not to mention the plight of the bob cat: Wyoming bobcats in Bobcat Trapping Management Area 1 (Teton County +) show a history of significant decline in bobcat harvest. Although trappers have been active in Area 1, zero bobcats have been reported trapped this season. The immediate cessation of bobcat hunting, trapping and snaring is necessary to protect the existence of bobcats in this area.

Final Comment	KASPER, GARY	Wimberley, TX	6/17/2019 2:33:00 PM
----------------------	---------------------	----------------------	----------------------

140 Dear Sirs, I have recently found out the plight of Bobcats. We are requesting that the Game and Fish department place a moratorium on Bobcat trapping, hunting, snaring and killing during the fur bearing harvest season. Bobcats in Teton county and surrounding areas include females and juveniles to a zero count. We would like to wait until a sustainable Bobcat population can be established and counted. Thank you Lorna Schaefer

Final Comment	Schaefer, Lorna	Laveen, AZ	6/17/2019 2:44:00 PM
----------------------	------------------------	-------------------	----------------------

141 Please commit to a halt on trapping bobcats or any other animal. It is cruel, unnecessary, and dangerous for any animal or human who is unaware of an area where trapping is being done. It would seem that by this time we all ought to realize that this type of cruelty is entirely inappropriate. Thank you for stopping it.

Final Comment	MacMichael, Ann	Cornville, ME	6/17/2019 2:51:00 PM
----------------------	------------------------	----------------------	----------------------

142 Trapping is cruel and unnecessary and should be BANNED!

Final Comment	Rayner, Deb	Rocky Face, GA	6/17/2019 2:56:00 PM
----------------------	--------------------	-----------------------	----------------------

143 I am a frequent visitor to Yellowstone NP, I've worked there as well. I believe the value of free roaming predators, which includes the bobcat, is such a boon to the local economy that there is very little in the way of value that a trapped bobcat presents except for the person that is promoting the cruelty of letting an animal sit in a trap for days while starving and in incredible pain. The public opinion has shifted and will continue to shift towards paying hard earned money to see these animals wild and free and not as a trophy, stuffed or a pelt to wear like the fur trappers back in the 1800s. Bobcats are also extremely valuable to the ecosystem, they balance the ecosystem out and without them you have over production in your prey species which throws the entire ecosystem off. Trapping does nothing to effectively manage species population anyway. In addition to bobcats, protected animals, migratory birds and other non-

WGFD Web Comment Report

Chapter 4, Furbearing Animal Hunting or Trapping Seasons

target animals (game animals, mountain lions, Grizzlies) are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. We need to know about these hundreds, perhaps thousands of casualties each year. Trappers should be required to report all non-target animals. I feel that trapping should be phased out, it is a thing of the past and like the horse and buggy, we moved on to cars, we need to move away from trapping. Bobcat numbers are down and trapping kills too many animals indiscriminately.

Final Comment	Carter, Ashli	Franklin, KY	6/17/2019 3:15:00 PM
----------------------	----------------------	---------------------	----------------------

144 Dear Wyoming Wildlife Managers: On behalf of the Humane Society of the United States and our Wyoming supporters we urge you to better protect iconic bobcats (*Lynx rufus*) and the incidental take of lynx (*Lynx canadensis*) from traps. Bobcats are not killed for food but are targeted so trappers can sell pelts on overseas fur markets for individual gain, in direct opposition to the tenants of the North American Model of Wildlife Conservation. Turning bobcats into a commercial commodity impoverishes Wyoming tourism and local economies reliant on tourism. One bobcat, viewed and photographed by many, can bring in thousands of dollars to local economies. But if that same bobcat is trapped and killed, only one individual profits. Removing bobcats for personal profit also harms the gene pool and thus, wild cat conservation in Wyoming. Wyoming's bobcats are being turned into the commodity fur for markets, primarily in Asia and Russia. According to the IUCN (<https://www.iucnredlist.org/species/12521/50655874#threats>): World demand for Bobcat fur rose gradually in the late 1960s and early 1970s and jumped in the mid-1970s after CITES entered into force, when the pelts of cats listed on Appendix I became legally unobtainable for the commercial fur trade (Nowell and Jackson 1996). Of particular concern is the recent increase in Bobcat pelt prices from \$85 in 2000, to record highs of \$589 in 2013, \$447 in 2014, and \$305 in 2015, driven by high demand for fur in China, Europe, and Russia (Knudson 2016). The number of Bobcat pelts exported from the U.S. has quadrupled in recent years, climbing to a high of 65,000 in 2013 when pelt prices were highest. Furthermore, killing trapped bobcats is frequently completed using the most cruel and inhumane methods including strangulation from catch poles. Bobcats' density estimates vary widely, including 4 to 6 bobcats per 100 km² (e.g., in Idaho, Minnesota, Utah) and 20 to 28 per 100 km² (e.g. Arizona and Nevada). Yet, Wyoming, like most other states, has neither reliable statewide population nor trend data; state wildlife managers are wholly reliant on untrustworthy anecdotal data including from hunter/trapper surveys, sightings and vehicle collisions. This is not excellent wildlife management. Bobcats are relatively slow to reproduce. A female is not sexually mature until two years of age, while males are generally mature at three years old. A female will only produce about three kittens per litter, with birth intervals occurring only once per year or every two years. Bobcat populations are further limited by a variety of factors including prey (usually hares and rabbits) densities. Unlike other carnivores, bobcats are an obligate carnivore. Meaning that they, unlike coyotes or bears, cannot survive on some plant materials. Bobcats also compete for food with foxes, coyotes or are killed by predators including mountain lions and coyotes. For all of these reasons, we ask that the Commission end the commercial and recreational seasons on bobcats in Wyoming.

Final Comment	Kauffman, Lisa	Boise, ID	6/17/2019 3:37:00 PM
----------------------	-----------------------	------------------	----------------------

145 The regulations proposed are in humane and not within reason for killing vast numbers of beaver so there is ample recreational resources for trappers. It is 2019, not the 1800s. There is no need to have killing sprees where animals are trapped and either drown or die a prolonged death, all for the amusement of the trapper. There is no need for trapping ever. Faux fur is being used on garments and as far as trapping just to kill, this is abusive and unfair to the animal. Beavers help the environment and should not be wiped out, plus, it is birthing season. You trap beaver and it's kits starve to death. Please reconsider this change in regulations.

Final Comment	Wolfe, Shelley	Rock Springs, WY	6/17/2019 4:11:00 PM
----------------------	-----------------------	-------------------------	----------------------

146 Stop this unnecessary trapping. It's barbaric!!!

Final Comment	Kachold, Tina	Chicago, IL	6/17/2019 4:29:00 PM
----------------------	----------------------	--------------------	----------------------

147 Beavers are a bell-weather animal for a healthy eco-system. Like the "canary in the mine," beavers tell us the habitat is healthy! The ponds they build allow other animals to use the area because of water

WGFD Web Comment Report
Chapter 4, Furbearing Animal Hunting or Trapping Seasons

availability all year round. Trapping beavers in the Teton & Lincoln counties should be totally discontinued because of the population density of these 2 counties. Not only are there trails for Wyoming tourists to use to be out in nature, the preponderance of 3-10 acre mini-ranches are everywhere. Therefore, domesticated dogs and cats—and even exploring children— can easily be maimed in traps and snares set for these animals. There has even been a case of someone on Teton county shooting a beaver because the beaver was bothering his dog—which was off leash! Please, allow beavers to do their building in Teton and Lincoln Counties and not allow trapping or snaring.

Final Comment

Hipp, Jane

Jackson, WY

6/17/2019 4:56:00 PM

CHAPTER 4

FURBEARING ANIMAL HUNTING OR TRAPPING SEASONS

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statute § 23-1-302, § 23-2-303, § 23-2-304, § 23-2-305 and § 23-3-109.

Section 2. Definitions. Definitions shall be as set forth in Title 23, Wyoming Statutes, Commission regulations, and the Commission also adopts the following definitions:

- (a) “Drainage” means all lands within the watershed of a named river or stream, including all tributaries and standing waters that drain into the named river or stream.
- (b) “Leg-hold Trap” means any device using a mechanical trigger that springs the jaws or loop shut for capturing furbearing or predatory animals.
- (c) “Live Trap” means any device designed to capture or trap a live animal inside a cage or structure. Such traps include, but are not limited to box traps and cage traps.
- (d) “Owner” means the person who physically sets any trap or snare in any fashion that may result in the take of any furbearing or predatory animal.
- (e) “Pet” means any domestic or tamed animal kept for companionship or pleasure.
- (f) “Quick-kill Body-grip Trap” means a device that closes around the body or head of the animal in such a manner as to almost immediately kill the animal caught.
- (g) “Raw Fur” means the untanned hide or skin, or the unskinned carcass of a furbearing animal.
- (h) “Snare” means a device consisting of a loop with no mechanical trigger for capturing furbearing or predatory animals.
- (i) “Tamper” means to disturb, obstruct, damage, steal or interfere with any legally placed trap or snare except for releasing any pet or livestock from a trap or snare.
- (j) “Trapping” or “trap” means the taking of a furbearing or predatory animal by trap-or snare, or taking of a furbearing animal with a firearm or archery equipment.
- (k) “Trap Identification Number” means an identification number assigned to the owner of traps or snares by the Department.
- (l) “Week” means the seven (7) day period starting on Monday through the following Sunday.

Section 3. Hunting or Trapping Seasons.

Species, hunting or trapping areas, season dates and limitations.

Species	Trapping Area	Season Dates		Limitations
		Opens	Closes	
Mink	1	Oct. 1	Apr. 30	Any mink
Bobcat	1	Nov. 15	Mar. 1	Any bobcat
Muskrat	1	Oct. 1	Apr. 30	Any muskrat
Weasel	1	Oct. 1	Mar. 31	Any weasel
Badger	1	Jan. 1	Dec. 31	Any badger
Marten	1	Oct. 1	Mar. 1	Any marten
	2	Dec. 1	Mar. 1	Any marten
Beaver	1	Oct. 1	Apr. 30	Any beaver
	301	CLOSED		
	302	CLOSED		
	303	CLOSED		
	304	CLOSED		
	305	CLOSED		
	401	CLOSED		
	404	CLOSED		
	405	CLOSED		
	406	CLOSED		
	407	CLOSED		
	408	Oct. 1	Apr. 30	1 trapper; 25 beaver
	409	Oct. 1	Apr. 30	1 trapper; 15 beaver
	410	Oct. 1	Apr. 30	1 trapper; 20 beaver
	411	Oct. 1	Apr. 30	1 trapper; 35 beaver
	412	Oct. 1	Apr. 30	1 trapper; 15 beaver
	413	Oct. 1	Apr. 30	1 trapper; 30 beaver
	414	Oct. 1	Apr. 30	1 trapper; 30 beaver
	501	Oct. 1	Apr. 30	1 trapper; 10 beaver
	502	Oct. 1	Apr. 30	1 trapper; 10 beaver
	503	CLOSED		
	504	CLOSED		
	505	CLOSED		
	605	CLOSED		
	606	CLOSED		

Section 4. Furbearing Animal Hunting or Trapping Area Descriptions.

(a) Area and number.

(i) All furbearing animals, excluding marten and beaver.

Area 1. The entire State of Wyoming, excluding those areas closed in Section 4(b).

(ii) Marten.

Area 1. The entire State of Wyoming, excluding Area 2 as listed in this subsection and those areas closed in Section 4(b).

Area 2. Snowy Range. Beginning at the junction of Interstate Highway 80 and U.S. Highway 287 in the city of Laramie; southerly along U.S. Highway 287 to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 230 in Carbon County; northerly along said highway to Wyoming Highway 130; northerly along said highway to Interstate Highway 80; easterly along said highway to its junction with U.S. Highway 287.

(iii) Beaver.

Area 1. The entire State of Wyoming, excluding those limited quota trapping areas listed in this subsection and those areas closed in Section 4(b).

Area 301. North Tongue River. North Tongue River drainage in Sheridan County.

Area 302. South Tongue River. South Tongue River drainage in Sheridan County.

Area 303. East Fork of Big Goose Creek. East Fork of Big Goose Creek drainage upstream of Park Reservoir in Johnson County.

Area 304. Clear Creek. Clear Creek drainage on U.S. Forest Service lands in Johnson County.

Area 305. Crazy Woman Creek. Crazy Woman Creek drainage on U.S. Forest Service lands in Johnson County.

Area 401. South Rock Springs. That portion of Sweetwater County south of I-80 between the Green River, Flaming Gorge Reservoir and Wyoming Highway 430.

Area 404. Henrys Fork. Henrys Fork River, Louse Creek and Sage Creek drainages on the Wasatch-Cache National Forest in Uinta County.

Area 405. Cottonwood Creek. Cottonwood Creek drainage on the Wasatch-Cache National Forest in Uinta County.

Area 406. East Fork of Smiths Fork. Drainages of Gilbert Creek and East Fork of Smiths Fork River upstream from Wasatch-Cache National Forest boundary in Uinta County.

Area 407. West Fork of Smiths Fork. West Fork of the Smiths Fork River and Willow Creek drainages upstream from Wasatch-Cache National Forest boundary in Uinta County.

Area 408. Salt Creek. Salt Creek drainage on U.S. Forest Service lands, Salt Creek Proper and Raymond Creek drainage on public lands in Lincoln County.

Area 409. Upper Smiths Fork. Smiths Fork drainage on U.S. Forest Service lands in Lincoln County.

Area 410. Hobble Creek. Hobble Creek drainage on U.S. Forest Service lands, Coal Creek, and Saw Mill Creek drainages in Lincoln County.

Area 411. Hams Fork River (Hams Fork). Beginning where the Hams Fork River crosses the Bridger-Teton National Forest boundary to where the river crosses U.S. Forest Service Road 062 and all tributaries lying east of the Hams Fork River in Lincoln County.

Area 412. South Fork Fontenelle Creek. Beginning where the South Fork of Fontenelle Creek crosses the Bridger-Teton National Forest boundary to its headwaters and all tributaries in Lincoln County, including all of the drainages of the South Fork of Fontenelle Creek upstream from the Bridger-Teton National Forest boundary within Lincoln County.

Area 413. Fontenelle Creek. Beginning where Fontenelle Creek crosses the Bridger-Teton National Forest boundary to the confluence of Camp Fire Creek and all tributaries in Lincoln County, including all of the drainages of Fontenelle Creek between the Bridger-Teton National Forest boundary and Camp Fire Creek within Lincoln County.

Area 414. LaBarge Creek and South LaBarge Creek (main streams). Beginning where LaBarge Creek crosses the Bridger-Teton National Forest boundary to its headwaters and the main channel of South LaBarge Creek in Lincoln County. LaBarge Creek Proper will be closed one (1) mile each direction from the confluence of Nameless Creek and LaBarge Creek in Lincoln County.

Area 501. North Pole Mountain. All of the drainages of Brush Creek, Crow Creek, Lodgepole (Pole) Creek, McKechnie Creek and Horse Creek within the boundaries of the Pole Mountain Division of the Medicine Bow National Forest and north of the Happy Jack Road (Wyoming Secondary Highway 210-U.S.F.S. 722) in Albany County.

Area 502. South Pole Mountain. All of the drainages of Brush Creek, Lodgepole (Pole) Creek, Crow Creek and Dale Creek within the boundaries of the Pole Mountain Division of the Medicine Bow National Forest and south of the Happy Jack Road (Wyoming Secondary Highway 210-U.S.F.S. 722) in Albany County.

Area 503. Woods Landing. All public lands within Boswell Creek, Eagle Creek, Shellrock Creek, Bear Creek, Jelm Creek and Porter Creek drainages in Albany County.

Area 504. Lake Owen. All public lands south and east of U.S.F.S Roads 552 and 540 within Fox Creek, Squirrel Creek, Squaw Creek, Lake Owen Creek and Strain Creek drainages in Albany County.

Area 505. Sheep Mountain. All public lands within Fence Creek, Hecht Creek and Buckeye Creek drainages in Albany County.

Area 605. Green Mountain. All public lands within the Crooks Creek, Cottonwood Creek, Cooper Creek and Willow Creek drainages on Green Mountain in Fremont County.

Area 606. East Fork Wind River. All lands within the Spence and Moriarity Wildlife Management Area and the Kirk Inberg/Kevin Roy Wildlife Habitat Management Area in Fremont County.

(b) Closed areas.

(i) The following areas shall be closed to the taking of all furbearing animals.

(A) Bighorn Canyon National Recreation Area in Bighorn County;

(B) Grand Teton National Park in Teton County;

(C) John D. Rockefeller Jr. Memorial Parkway in Teton County;

(D) National Elk Refuge in Teton County; and,

(E) Rawhide Wildlife Management Area, Springer Wildlife Habitat Management Area and the Table Mountain Wildlife Habitat Management Area in Goshen County shall be closed October 1 through February 15.

(ii) The following areas shall be closed to the taking of beaver.

(A) Beaver Creek drainage from Wyoming Highway 70 downstream to its confluence with the North Fork of the Encampment River in Carbon County;

- (B) Cache Creek drainage in Teton County;
- (C) Cliff Creek drainage in Sublette County;
- (D) Granite Creek drainage from the Granite Hot Springs swimming pool downstream to the confluence with the Hoback River in Teton and Sublette Counties;
- (E) Nameless Creek proper in Lincoln County;
- (F) Nash Fork drainage south of Wyoming Highway 130 from the Snowy Range Ski Area Road downstream to its confluence with the North Fork of the Little Laramie River in Albany County;
- (G) South Fork Hog Park Creek drainage from the Colorado/Wyoming state line downstream to its confluence with Hog Park Creek in Carbon County;
- (H) South Fork Lake Creek and Goetze Creek drainages on the Pennock Mountain Wildlife Habitat Management Area in Carbon County; and,
- (I) The head of the Rock Creek drainage north and east of the Sand Lake Road (U.S.F.S. Road 101) downstream to its confluence with the South Fork of Rock Creek in Carbon County.
- (J) Bolton Creek drainage in Carbon and Natrona counties.
- (K) Stinking Creek drainage (including Lone Tree Creek and Elk Creek) in Carbon and Natrona counties.
- (L) Ditch Creek drainage from the confluence of the North Fork and Middle Fork of Ditch Creek downstream to the U.S.F.S. – Private Land Boundary in Teton County.
- (M) Willow Creek drainage upstream from the confluence of Willow Creek and Sourdough Creek in Teton, Lincoln and Sublette counties.
- (N) Game Creek drainage in Teton County.
- (iii) The following areas shall be closed to the taking of Marten.
 - (A) All lands within the Pole Mountain Unit of the Medicine Bow National Forest in Albany County.

Section 5. Common Season Boundary. Wherever a stream or river forms a boundary between two (2) trapping areas with differing seasons for the same furbearing animal, the stream or river channel proper shall open for trapping on the earliest opening date and close on the latest closing date of the two (2) seasons involved.

Section 6. Limited Quota Furbearing Animal Trapping Area Permits. Only the holder of a permit for a limited quota trapping area(s) shall be allowed to trap the limited quota area for the designated species during the trapping season for which the permit is valid. Permit holders shall be determined by a random computer selection.

(a) Application for Limited Quota Furbearing Animal Trapping Permits. Applications shall be available from Wyoming Game and Fish Department Regional Offices, the Cheyenne Headquarters Office and game wardens. Any qualified person may submit one (1) application for a limited quota trapping area drawing and may list as many as three (3) choices.

(b) When trapping, each permit holder shall present his permit and a valid Wyoming furbearing animal trapping license for inspection upon request to any law enforcement officer empowered to enforce these regulations.

(c) Application Date. Applications shall be submitted on a form provided by the Department to the Headquarters Office from July 1 through September 1. Beginning in 2020, applications shall be submitted from April 1 through May 31.

(d) Drawing. Only correct and complete applications received in the Headquarters Office during the application dates shall be entered in the random computer selection. Successful applicants shall be notified by mail.

(e) Leftover Limited Quota Trapping Area Permits. After the regular drawing, applicants may apply for limited quota trapping area permits not issued in the drawing for limited quota furbearing animal trapping areas. Applicants shall apply to the Headquarters Office. Permits shall be issued in the order the applications are processed or until quotas are reached. Submission of an application either through the mail or hand delivered shall not guarantee a permit

Section 7. Authorization to Trap.

(a) Any person holding a valid Wyoming furbearing animal trapping license shall be authorized to trap furbearing animals in any trapping area specified in the current trapping regulations, excluding those species within limited quota furbearing animal trapping areas for which a limited quota furbearing animal trapping permit is required and excluding closed areas in Section 4(b) of this regulation.

(b) Individuals issued limited quota furbearing animal trapping permits shall contact the game warden listed on the notice for instructions prior to taking furbearing animals authorized by this permit in the limited quota furbearing animal trapping areas.

Section 8. Trap and Snare Specifications.

(a) All snares used for furbearing or predatory animals shall be equipped with a break-away device located at the point of the snare lock;

(b) Break-away devices shall release at two hundred ninety-five (295) pounds of pressure or less;

(c) Snare capture loop size shall not exceed twelve (12) inches in diameter measured from side to side;

(d) Snares shall be solidly anchored to ensure the break-away device properly functions to release at two hundred ninety-five (295) pounds of pressure or less, and;

(i) Snares shall not be anchored to any wire of a fence.

(ii) Snares shall not be anchored to any moveable object such as a drag.

(e) A quick-kill body-grip trap having a jaw measurement of ten (10) inches or greater when measured vertically at its widest part of the jaw shall not be set, other than on private land, unless the bottom of the quick-kill body-grip trap is at least partially submerged in water when set.

Section 9. Check Period for Leg-Hold Traps, Live Traps, Snares and Quick-Kill Body-Grip Traps.

(a) All leg-hold traps and live traps shall be checked by the owner a minimum of once during each seventy-two (72) hour period.

(b) All snares and quick-kill body-grip traps shall be checked by the owner a minimum of one time each week, except during the initial week the snares or quick-kill body-grip traps were set.

Section 10. Mandatory Bobcat Registration. All bobcats harvested in Wyoming shall be registered with the Department by the person taking the bobcat, regardless of the final disposition of the raw fur. Bobcat raw furs may be registered throughout the bobcat season, but registration shall end at 5:00 p.m. on March 11 of each year. If the registration deadline date occurs on a weekend when the Department Regional Offices are closed, bobcat raw furs may be registered on the next business day until 5:00 p.m. Mountain Standard Time. The properly licensed trapper shall present a bobcat raw fur in an unfrozen condition to a game warden or a Department Regional Office. It shall be unlawful to possess an untagged bobcat raw fur after the registration period expires.

(a) Before a Wyoming bobcat tag shall be issued, the person taking a bobcat shall provide to the Department at the time of registration, the age and sex of the bobcat, the number of the Department's bobcat management area in which the bobcat was taken, the method of take, the date the bobcat was taken, the number of traps that were set, and the number of days traps were set or days hunted with a firearm.

(b) A Wyoming bobcat tag shall be attached to a bobcat raw fur by an employee of the Department. Wyoming bobcat tags shall be issued free of charge.

(c) 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.

Section 11. Trapping of Non-target Wildlife; Disposition of Furbearing Animals at the Trap Site.

(a) All big or trophy game animals, game birds, protected animals or protected birds that are trapped shall be released unharmed.

(b) If a big or trophy game animal, game bird, protected animal or raptor is trapped and has been injured in such a way that the injury may result in death of the animal or if the animal has been killed, the trapper shall notify a Department law enforcement officer as soon as is reasonably possible.

(c) Furbearing animals that are trapped during a closed season shall be released unharmed. If a furbearing animal is caught during a closed season and injured in such a way that may result in death of the animal or if the furbearing animal has been killed, the trapper shall notify a Department law enforcement officer as soon as is reasonably possible.

(d) Furbearing animals legally taken shall be either killed at the trap site or immediately released to the wild. If the trapper holds both a furbearing animal trapping license and a license to capture furbearing animals for domestication, the furbearing animals do not have to be killed at the trap site.

(e) Nothing in this Section shall prohibit a person from releasing any pet or livestock from a trap or snare.

Section 12. Use of Dogs. Persons possessing a valid furbearing animal trapping license may use dogs to take bobcats during the bobcat hunting or trapping season.

Section 13. Trap Identification Numbers. All traps and snares used for furbearing or predatory animals shall be permanently marked or tagged with the name and address of the owner or the trap identification number assigned to the owner by the Department.

(a) A person may apply for a trap identification number from the Department. Each individual shall be issued only one (1) trap identification number for the life of the trapper. Trap identification numbers shall be transferable from one (1) person to another only upon completion of an application and approval by the Department.

(b) Trap identification numbers shall consist of the prefix WY, followed by the last two (2) digits of the calendar year in which the number is issued, followed by a number generated by the Department. A hyphen shall separate the three (3) portions of the number. For example, the first trap identification number issued in calendar year 2001 shall be WY-01-001. Numbers shall be legible, at least one-eighth (1/8) inch in height and affixed to traps in such a

manner as to read left to right. The trap identification number shall be stamped on the trap or on a metal tag that is affixed to the trap.

(c) Application for a trap identification number shall include the full name and complete home address of the applicant and shall be submitted on a form provided by the Department. Applications shall be submitted to the Wildlife Division, at the Headquarters Office of the Wyoming Game and Fish Department.

(d) Any person who has obtained a trap identification number shall notify the Department by telephoning (307) 777-4686 within thirty (30) days of any change in address.

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

CHAPTER 4

FURBEARING ANIMAL HUNTING OR TRAPPING SEASONS

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statute § 23-1-302, § 23-2-303, § 23-2-304, § 23-2-305 and § 23-3-109.

Section 2. Definitions. Definitions shall be as set forth in Title 23, Wyoming Statutes, Commission regulations, and the Commission also adopts the following definitions:

(a) “Drainage” means all lands within the watershed of a named river or stream, including all tributaries and standing waters ~~which~~that drain into ~~that~~the named river or stream.

(b) “Leg-hold Trap” means any device using a mechanical trigger that springs the jaws or loop shut for capturing furbearing or predatory animals.

(c) “Live Trap” means any device designed to capture or trap a live animal inside a cage or structure. Such traps include, but are not limited to box traps and cage traps.

(d) “Owner” means the person who physically sets any trap or snare in any fashion that may result in the take of any furbearing or predatory animal.

(e) “Pet” means any domestic or tamed animal kept for companionship or pleasure.

(f) “Quick-kill Body-grip Trap” means a device that closes around the body or head of the animal in such a manner as to almost immediately kill the animal caught.

(g) “Raw Fur” means the untanned hide or skin, or the unskinned carcass of a furbearing animal.

(h) “Snare” means a device consisting of a loop with no mechanical trigger for capturing furbearing or predatory animals.

(i) “Tamper” means to disturb, obstruct, damage, steal or interfere with any legally placed trap or snare except for releasing any pet or livestock from a trap or snare.

(j) “Trapping” or “trap” means the taking of a furbearing or predatory animal by trap, or snare, or taking of a furbearing animal with a firearm or archery equipment.

(k) “Trap Identification Number” means an identification number assigned to the owner of traps or snares by the Department.

(l) “Week” means the seven (7) day period starting on Monday through the following Sunday.

Section 3. Hunting or Trapping Seasons.

Species, hunting or trapping areas, season dates and limitations.

Species	Trapping Area	Season Dates		Limitations
		Opens	Closes	
Mink	1	Oct. 1	Apr. 30	Any mink
Bobcat	1	Nov. 15	Mar. 1	Any bobcat
Muskrat	1	Oct. 1	Apr. 30	Any muskrat
Weasel	1	Oct. 1	Mar. 31	Any weasel
Badger	1	Jan. 1	Dec. 31	Any badger
Marten	1	Oct. 1	Mar. 1	Any marten
	2	Dec. 1	Mar. 1	Any marten
Beaver	1	Oct. 1	Apr. 30	Any beaver
	101	Oct. 1	Apr. 30	1 trapper; 5 beaver
	102	Oct. 1	Apr. 30	1 trapper; 20 beaver
	103	Oct. 1	Apr. 30	1 trapper; 10 beaver
	104	Oct. 1	Apr. 30	1 trapper; 25 beaver
	301	CLOSED		
	302	CLOSED		
	303	CLOSED		
	304	CLOSED		
	305	CLOSED		
	401	CLOSED		
	404	CLOSED		
	405	CLOSED		
	406	CLOSED		
	407	CLOSED		
	408	Oct. 1	Apr. 30	1 trapper; 15 25 beaver
	409	Oct. 1	Apr. 30	1 trapper; 15 beaver
	410	Oct. 1	Apr. 30	1 trapper; 15 20 beaver
	411	Oct. 1	Apr. 30	1 trapper; 35 beaver
	412	Oct. 1	Apr. 30	1 trapper; 15 beaver
	413	Oct. 1	Apr. 30	1 trapper; 30 beaver
	414	Oct. 1	Apr. 30	1 trapper; 30 beaver
	501	Oct. 1	Apr. 30	1 trapper; 10 beaver
	502	Oct. 1	Apr. 30	1 trapper; 10 beaver
	503	CLOSED		
	504	CLOSED		
	505	CLOSED		
	<u>605</u>	<u>CLOSED</u>		
	606	CLOSED		

Section 4. Furbearing Animal Hunting or Trapping Area Descriptions.

(a) Area and number.

(i) All furbearing animals, excluding marten and beaver.

Area 1. The entire State of Wyoming, excluding those areas closed in Section 4(b).

(ii) Marten.

Area 1. The entire State of Wyoming, excluding Area 2 as listed in this subsection and those areas closed in Section 4(b).

Area 2. Snowy Range. Beginning at the junction of Interstate Highway 80 and U.S. Highway 287 in the city of Laramie; southerly along U.S. Highway 287 to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 230 in Carbon County; northerly along said highway to Wyoming Highway 130; northerly along said highway to Interstate Highway 80; easterly along said highway to its junction with U.S. Highway 287.

(iii) Beaver.

Area 1. The entire State of Wyoming, excluding those limited quota trapping areas listed in this subsection and those areas closed in Section 4(b).

~~**Area 101. Ditch Creek.** Ditch Creek drainage in Teton County.~~

~~**Area 102. Willow Creek.** Willow Creek drainage in Teton and Lincoln Counties.~~

~~**Area 103. Game Creek and Little Horse Creek.** Game Creek and Little Horse Creek drainages in Teton County.~~

~~**Area 104. Fall Creek.** All of the Fall Creek, Mosquito Creek and Dog Creek drainages on U.S. Forest Service lands in Teton and Lincoln Counties.~~

Area 301. North Tongue River. North Tongue River drainage in Sheridan County.

Area 302. South Tongue River. South Tongue River drainage in Sheridan County.

Area 303. East Fork of Big Goose Creek. East Fork of Big Goose Creek drainage upstream of Park Reservoir in Johnson County.

Area 304. Clear Creek. Clear Creek drainage on U.S. Forest Service lands in Johnson County.

Area 305. Crazy Woman Creek. Crazy Woman Creek drainage on U.S. Forest Service lands in Johnson County.

Area 401. South Rock Springs. That portion of Sweetwater County south of I-80 between the Green River, Flaming Gorge Reservoir and Wyoming Highway 430.

Area 404. Henrys Fork. Henrys Fork River, Louse Creek and Sage Creek drainages on the Wasatch-Cache National Forest in Uinta County.

Area 405. Cottonwood Creek. Cottonwood Creek drainage on the Wasatch-Cache National Forest in Uinta County.

Area 406. East Fork of Smiths Fork. Drainages of Gilbert Creek and East Fork of Smiths Fork River upstream from Wasatch-Cache National Forest boundary in Uinta County.

Area 407. West Fork of Smiths Fork. West Fork of the Smiths Fork River and Willow Creek drainages upstream from Wasatch-Cache National Forest boundary in Uinta County.

Area 408. Salt Creek. Salt Creek drainage on U.S. Forest Service lands, Salt Creek Proper and Raymond Creek drainage on public lands in Lincoln County.

Area 409. Upper Smiths Fork. Smiths Fork drainage on U.S. Forest Service lands in Lincoln County.

Area 410. Hobble Creek. Hobble Creek drainage on U.S. Forest Service lands, Coal Creek, and Saw Mill Creek drainages in Lincoln County.

Area 411. Hams Fork River (Hams Fork). Beginning where the Hams Fork River crosses the Bridger-Teton National Forest boundary to where the river crosses U.S. Forest Service Road 062 and all tributaries lying east of the Hams Fork River in Lincoln County.

Area 412. South Fork Fontenelle Creek. Beginning where the South Fork of Fontenelle Creek crosses the Bridger-Teton National Forest boundary to its headwaters and all tributaries in Lincoln County, including all of the drainages of the South Fork of Fontenelle Creek upstream from the Bridger-Teton National Forest boundary within Lincoln County.

Area 413. Fontenelle Creek. Beginning where Fontenelle Creek crosses the Bridger-Teton National Forest boundary to the confluence of Camp Fire Creek and all tributaries in Lincoln County, including all of the drainages of Fontenelle Creek between the Bridger-Teton National Forest boundary and Camp Fire Creek within Lincoln County.

Area 414. LaBarge Creek and South LaBarge Creek (main streams). Beginning where LaBarge Creek crosses the Bridger-Teton National Forest boundary to its headwaters and the main channel of South LaBarge Creek in Lincoln County. LaBarge Creek

Proper will be closed one (1) mile each direction from the confluence of Nameless Creek and LaBarge Creek in Lincoln County.

Area 501. North Pole Mountain. All of the drainages of Brush Creek, Crow Creek, Lodgepole (Pole) Creek, McKechnie Creek and Horse Creek within the boundaries of the Pole Mountain Division of the Medicine Bow National Forest and north of the Happy Jack Road (Wyoming Secondary Highway 210-U.S.F.S. 722) in Albany County.

Area 502. South Pole Mountain. All of the drainages of Brush Creek, Lodgepole (Pole) Creek, Crow Creek and Dale Creek within the boundaries of the Pole Mountain Division of the Medicine Bow National Forest and south of the Happy Jack Road (Wyoming Secondary Highway 210-U.S.F.S. 722) in Albany County.

Area 503. Woods Landing. All public lands within Boswell Creek, Eagle Creek, Shellrock Creek, Bear Creek, Jelm Creek and Porter Creek drainages in Albany County.

Area 504. Lake Owen. All public lands south and east of U.S.F.S Roads 552 and 540 within Fox Creek, Squirrel Creek, Squaw Creek, Lake Owen Creek and Strain Creek drainages in Albany County.

Area 505. Sheep Mountain. All public lands within Fence Creek, Hecht Creek and Buckeye Creek drainages in Albany County.

Area 605. Green Mountain. All public lands within the Crooks Creek, Cottonwood Creek, Cooper Creek and Willow Creek drainages on Green Mountain in Fremont County.

Area 606. East Fork Wind River. All lands within the Spence and Moriarity Wildlife Management Area and the Kirk Inberg/Kevin Roy Wildlife Habitat Management Area in Fremont County.

- (b) Closed areas.
 - (i) The following areas shall be closed to the taking of all furbearing animals.
 - (A) Bighorn Canyon National Recreation Area in Bighorn County;
 - (B) Grand Teton National Park in Teton County;
 - (C) John D. Rockefeller Jr. Memorial Parkway in Teton County;
 - (D) National Elk Refuge in Teton County; and,

(E) Rawhide Wildlife Management Area, Springer Wildlife Habitat Management Area and the Table Mountain Wildlife Habitat Management Area in Goshen County shall be closed October 1 through February 15.

(ii) The following areas shall be closed to the taking of beaver.

(A) Beaver Creek drainage from Wyoming Highway 70 downstream to its confluence with the North Fork of the Encampment River in Carbon County;

(B) Cache Creek drainage in Teton County;

(C) Cliff Creek drainage in Sublette County;

(D) Granite Creek drainage from the Granite Hot Springs swimming pool downstream to the confluence with the Hoback River in Teton and Sublette Counties;

(E) Nameless Creek proper in Lincoln County;

(F) Nash Fork drainage south of Wyoming Highway 130 from the Snowy Range Ski Area Road downstream to its confluence with the North Fork of the Little Laramie River in Albany County;

(G) South Fork Hog Park Creek drainage from the Colorado/Wyoming state line downstream to its confluence with Hog Park Creek in Carbon County;

(H) South Fork Lake Creek and Goetze Creek drainages on the Pennock Mountain Wildlife Habitat Management Area in Carbon County; and,

(I) The head of the Rock Creek drainage north and east of the Sand Lake Road (U.S.F.S. Road 101) downstream to its confluence with the South Fork of Rock Creek in Carbon County.

(J) Bolton Creek drainage in Carbon and Natrona counties.

(K) Stinking Creek drainage (including Lone Tree Creek and Elk Creek) in Carbon and Natrona counties.

(L) Ditch Creek drainage from the confluence of the North Fork and Middle Fork of Ditch Creek downstream to the U.S.F.S. – Private Land Boundary in Teton County.

(M) Willow Creek drainage upstream from the confluence of Willow Creek and Sourdough Creek in Teton, Lincoln and Sublette counties.

(N) Game Creek drainage in Teton County.

(iii) The following areas shall be closed to the taking of Marten.

(A) All lands within the Pole Mountain Unit of the Medicine Bow National Forest in Albany County.

Section 5. Common Season Boundary. Wherever a stream or river forms a boundary between two (2) trapping areas with differing seasons for the same furbearing animal, the stream or river channel proper shall open for trapping on the earliest opening date and close on the latest closing date of the two (2) seasons involved.

Section 6. Limited Quota Furbearing Animal Trapping Area Permits. Only the holder of a permit for a limited quota trapping area(s) shall be allowed to trap the limited quota area for the designated species during the trapping season for which the permit is valid. Permit holders shall be determined by a random computer selection.

(a) Application for Limited Quota Furbearing Animal Trapping Permits. Applications shall be available from Wyoming Game and Fish Department Regional Offices, the Cheyenne Headquarters Office and game wardens. Any qualified person may submit one (1) application for a limited quota trapping area drawing and may list as many as three (3) choices.

(b) When trapping, each permit holder shall present his permit and a valid Wyoming furbearing animal trapping license for inspection upon request to any law enforcement officer empowered to enforce these regulations.

(c) Application Date. Applications shall be submitted on a form provided by the Department to the Headquarters Office from July 1 through September 1. Beginning in 2020, applications shall be submitted from April 1 through May 31.

(d) Drawing. Only correct and complete applications received in the Headquarters Office during the application dates shall be entered in the random computer selection. Successful applicants shall be notified by mail.

(e) Leftover Limited Quota Trapping Area Permits. After the regular drawing, applicants may apply for limited quota trapping area permits not issued in the drawing for limited quota furbearing animal trapping areas. Applicants shall apply to the Headquarters Office. Permits shall be issued in the order the applications are processed or until quotas are reached. Submission of an application either through the mail or hand delivered shall not guarantee a permit

Section 7. Authorization to Trap.

(a) Any person holding a valid Wyoming furbearing animal trapping license shall be authorized to trap furbearing animals in any trapping area specified in the current trapping regulations, excluding those species within limited quota furbearing animal trapping areas requiring for which a limited quota furbearing animal trapping permit as specified in this regulation is required and excluding closed areas in Section 4(b) of this regulation.

(b) Individuals issued limited quota furbearing animal trapping permits shall contact the game warden listed on the notice for instructions prior to taking furbearing animals authorized by this permit in the limited quota furbearing animal trapping areas.

Section 8. Trap and Snare Specifications.

(a) All snares used for furbearing or predatory animals shall be equipped with a break-away device located at the point of the snare lock;

(b) Break-away devices shall release at two hundred ninety-five (295) pounds of pressure or less;

(c) Snare capture loop size shall not exceed twelve (12) inches in diameter measured from side to side;

(d) Snares shall be solidly anchored to ensure the break-away device properly functions to release at two hundred ninety-five (295) pounds of pressure or less, and;

(i) Snares shall not be anchored to any wire of a fence.

(ii) Snares shall not be anchored to any moveable object such as a drag.

(e) A quick-kill body-grip trap having a jaw measurement of ten (10) inches or greater when measured vertically at its widest part of the jaw shall not be set, other than on private land, unless the bottom of the quick-kill body-grip trap is at least partially submerged in water when set.

Section 9. Check Period for Leg-Hold Traps, Live Traps, Snares and Quick-Kill Body-Grip Traps.

(a) All leg-hold traps and live traps shall be checked by the owner a minimum of once during each seventy-two (72) hour period.

(b) All snares and quick-kill body-grip traps shall be checked by the owner a minimum of one time each week, except during the initial week the snares or quick-kill body-grip traps were set.

Section 10. Mandatory Bobcat Registration. All bobcats harvested in Wyoming shall be registered with the Department by the person taking the bobcat, regardless of the final disposition of the raw fur. Bobcat raw furs may be registered throughout the bobcat season, but registration shall end at 5:00 p.m. on March 11 of each year. If the registration deadline date occurs on a weekend when the Department Regional Offices are closed, bobcat raw furs may be registered on the next business day until 5:00 p.m. Mountain Standard Time. The properly licensed trapper shall present a bobcat raw fur in an unfrozen condition to a game warden or a

Department Regional Office. It shall be unlawful to possess an untagged bobcat raw fur after the registration period expires.

(a) Before a Wyoming bobcat tag shall be issued, the person taking a bobcat shall provide to the Department at the time of registration, the age and sex of the bobcat, the number of the Department's bobcat management area in which the bobcat was taken, the method of take, the date the bobcat was taken, the number of traps that were set, and the number of days traps were set or days hunted with a firearm.

(b) A Wyoming bobcat tag shall be attached to a bobcat raw fur by an employee of the Department. Wyoming bobcat tags shall be issued free of charge.

(c) 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.

Section 11. Trapping of Non-target Wildlife; Disposition of Furbearing Animals at the Trap Site.

(a) All big or trophy game animals, game birds, protected animals or protected birds that are trapped shall be released unharmed.

(b) If a big or trophy game animal, game bird, protected animal or raptor is trapped and has been injured in such a way that the injury may result in death of the animal or if the animal has been killed, the trapper shall notify a Department law enforcement officer as soon as is reasonably possible.

(c) Furbearing animals that are trapped during a closed season shall be released unharmed. If a furbearing animal is caught during a closed season and injured in such a way that may result in death of the animal or if the furbearing animal has been killed, the trapper shall notify a Department law enforcement officer as soon as is reasonably possible.

(d) Furbearing animals legally taken shall be either killed at the trap site or immediately released to the wild. If the trapper holds both a furbearing animal trapping license and a license to capture furbearing animals for domestication, the furbearing animals do not have to be killed at the trap site.

(e) Nothing in this Section shall prohibit a person from releasing any pet or livestock from a trap or snare.

Section 12. Use of Dogs. Persons possessing a valid furbearing animal trapping license may use dogs to take bobcats during the bobcat hunting or trapping season.

Section 13. Trap Identification Numbers. All traps and snares used for furbearing or predatory animals shall be permanently marked or tagged with the name and address of the owner or the trap identification number assigned to the owner by the Department.

(a) A person may apply for a trap identification number from the Department. Each individual shall be issued only one (1) trap identification number for the life of the trapper. Trap identification numbers shall be transferable from one (1) person to another only upon completion of an application and approval by the Department.

(b) Trap identification numbers shall consist of the prefix WY, followed by the last two (2) digits of the calendar year in which the number is issued, followed by a number generated by the Department. A hyphen shall separate the three (3) portions of the number. For example, the first trap identification number issued in calendar year 2001 shall be WY-01-001. Numbers shall be legible, at least one-eighth (1/8) inch in height and affixed to traps in such a manner as to read left to right. The trap identification number shall be stamped on the trap or on a metal tag that is affixed to the trap.

(c) Application for a trap identification number shall include the full name and complete home address of the applicant and shall be submitted on a form provided by the Department. Applications shall be submitted to the Wildlife Division, at the Headquarters Office of the Wyoming Game and Fish Department.

(d) Any person who has obtained a trap identification number shall notify the Department by telephoning (307) 777-4686 within thirty (30) days of any change in address.

WYOMING GAME AND FISH COMMISSION

~~T. Carrie Little~~David Rael, President

Dated: ~~November 9, 2016~~July 18, 2019

STATEMENT OF REASONS

WYOMING GAME AND FISH COMMISSION

CHAPTER 25

FALCONRY AND RAPTOR PROPAGATION REGULATION

W.S. §23-1-302 (a)(i) directs and empowers the Commission to fix season and bag limits, open, shorten or close seasons on any species or sex of wildlife for any type of legal weapon, except predatory animals, predacious birds, protected animals and protected birds, in any specified locality of Wyoming, and to give notice thereof.

W.S. §23-1-302 (a)(xxii) provides the Commission the authority to promulgate such orders as the commission considers necessary to carry out the intent of this act.

Edits have been made through this regulation to update references to federal regulations and submission of necessary information to the U.S. Fish and Wildlife Service ePermit System.

Section 7, Raptor Capture Licenses. Edits have been incorporated to clarify that the allocation of golden eagles to be taken from designated depredation areas shall be in accordance with standards developed by the National Flyway Council and the adoption of Golden Eagle Allocation Procedures, which went into effect March 2019.

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
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEI – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 25, Falconry and Raptor Propagation Regulation

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission (Commission) Regulation Chapter 25, Falconry and Raptor Propagation Regulation. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received one total public comment. This comment did not address the proposed Chapter 25 regulation and was meant for another regulation.

The Department made no changes to the proposed draft regulation as a result of public comments. The Commission also considered all the public comments they received and made no additional changes to the proposed regulation.

WGFD Web Comment Report
Chapter 25, Falconry and Raptor Propagation Regulation

- 1** Wyoming Game and Fish Department: Wyoming bobcats need a break from unlimited hunting, trapping, snaring and killing in almost any manner during the furbearer harvest season. Sadly, Bobcats in Teton County, WY have been trapped, including females and juveniles, to a possible zero count. We are requesting that you place a moratorium on bobcat trapping in Teton County and surrounding areas until a population survey is initiated, and a sustainable bobcat population is established. COEXIST WITH NATURE DON'T DESTROY IT! Thank you for your consideration. Sincerely, Greg Griffin

Final Comment

Griffin , Gregory

Shelbyville , IN

6/17/2019 10:26:00 AM

CHAPTER 25

FALCONRY AND RAPTOR PROPAGATION REGULATION

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 23-1-103, § 23-1-302, § 23-2-101 and § 23-2-105.

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) “Abatement Activities” means the use of trained raptors to flush, haze or take birds or other wildlife where allowed to mitigate depredation problems, including threats to human health and safety.

(b) “Adult Golden Eagle” means a golden eagle without any immature or sub-adult feathers in either the wings or the tail.

(c) “Aerie” means the nest of any raptor.

(d) “Captive-bred” means raptors, including eggs, hatched in captivity from parents that mated or otherwise transferred gametes in captivity.

(e) “CFR” means the Code of Federal Regulations.

(f) “Department” means the Wyoming Game and Fish Department whose mailing address is: 5400 Bishop Boulevard, Cheyenne, WY 82006.

(g) “Eyas Raptor” means a young raptor not yet capable of flight.

(h) “Falconry” means taking wild quarry by means of a trained raptor. Falconry includes the taking of raptors from the wild to use in falconry and caring for, training, and possessing raptors held for falconry.

(i) “Falconry Permit” means a permit to possess, transport, sell, purchase, barter, or offer to sell, purchase or barter raptors for falconry purposes.

(j) “General Raptor Capture License” means a license to capture one (1) raptor, except peregrine falcons (*Falco peregrinus*), from the wild in accordance with this regulation.

(k) “Hacking” means the temporary release to the wild of a raptor held for falconry for conditioning or for the preparation of permanent release of a raptor to the wild.

(l) “Hybrid” means offspring produced by crossing species.

(m) “Imping” means to graft new feathers to existing feather shafts on a raptor’s wing(s) or tail to repair damage or to increase flying capacity.

(n) “Imprint” means a raptor that is hand-raised from two weeks of age until it is fully feathered and has identified itself with humans rather than its own species. An imprinted raptor is considered to be so for its entire lifetime.

(o) “License to Hunt with Falcon” means a license to take game birds and small game animals with raptors.

(p) “Limited Quota Raptor Capture License” means a license to capture one (1) peregrine falcon (*Falco peregrinus*) from the wild.

(q) “Livestock Depredation Area” means a specific geographic location in which depredation by golden eagles has been recognized. The boundaries and duration of a livestock depredation area are declared by the United States Department of Agriculture (U.S.D.A.) Wildlife Services or by the governor.

(r) “Permittee” means a person who has been issued a valid Wyoming falconry permit or a falconry permit from another state, tribe, or territory that complies with federal falconry standards.

(s) “Raptor” means any bird of the Order Accipitriformes, Falconiformes or Strigiformes listed in 50 CFR 10.13, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; to be used in falconry. A copy of 50 CFR Part 10.13 can be viewed at any Department Regional Office or the Headquarters Office.

(t) “Service” means the U.S. Fish and Wildlife Service.

(u) “Wild Raptor” means a non-captive bred raptor taken from its natural environment.

Section 3. Falconry Permit. Persons desiring to take, transport, receive or possess any raptor(s) shall make written application for a falconry permit to the Department in accordance with the following provisions:

(a) An application for a falconry permit shall include proof of successful completion of a falconry examination administered by the Department or proof of a previously held falconry permit for the class applied for.

(b) Falconry Permit Conditions.

(i) A Wyoming falconry permit or a falconry permit from another state, tribe, or territory meeting federal falconry standards shall be required before any person may take, transport, receive or possess any raptor for falconry purposes or practice falconry in Wyoming.

A falconry permit expires five (5) years from the date of issuance or renewal unless otherwise restricted or revoked in writing by the Department or suspended by court action. The Department may revoke any falconry permit for failure to comply with any condition of the permit or this regulation. A permittee dissatisfied with the Department's decision to revoke a permit may request a hearing before the Wyoming Game and Fish Commission. A request for hearing shall be made in writing to the Chief of the Wildlife Division within ten (10) business days after receipt of the notice from the Department revoking the permit. The hearing shall be conducted in accordance with commission Regulation Chapter 27, Rules of Practice Governing Contested Cases before the Wyoming Game and Fish Commission, revised as of January 22, 2014, and which does not include any later amendments or editions of the incorporated matter. A copy of all Commission regulations can be viewed at any Department Regional Office or the Headquarters Office.

(A) If a falconry permit has lapsed for less than five (5) years, it may be reinstated at the previous class the permittee held if proof of falconry certification for that class is furnished to the Department.

(B) If a falconry permit has lapsed for five (5) years or more, it may be reinstated at the previous class the permittee held if proof of certification at that class is furnished to the Department and the permittee correctly answers at least eighty percent (80%) of the questions on a supervised falconry examination administered by the Department. The permittee's facilities shall pass inspection by the Department prior to possessing any raptor(s).

(C) In cases where a permit has been revoked or suspended by the Department for failing to comply with conditions of the permit or this regulation, the Department shall reissue a permit after the applicant has provided satisfactory documentation that the conditions which resulted in the revocation or suspension have been corrected and the revocation/suspension period has ended.

(ii) No permittee may take, purchase, receive or otherwise acquire, sell, barter, transfer or otherwise dispose of any raptor unless such permittee enters the required information, including band number or microchip information, in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department within ten (10) calendar days of any such transaction.

(iii) Permittee(s) shall be in immediate possession of their falconry permit(s) or legible copies of their falconry permit(s), if not at the location of their falconry facilities while trapping, transporting, working with, or flying falconry raptor(s).

(iv) Applicants who have experience in falconry and are visiting the United States or are a new resident in the United States shall qualify for a falconry permit appropriate for their experience. To demonstrate knowledge of U.S. falconry laws and regulations, applicants must correctly answer at least eighty percent (80%) of the questions on the supervised examination for falconers administered by the Department. The Department shall determine which class of falconry permit the applicant is qualified for, consistent with the class

requirements in Sections 3 and 4. To do so, the Department shall base its decision on the applicant's documentation of his experience. The applicant's falconry facilities shall meet the standards in Section 6 (a) before keeping any raptors for falconry.

(A) A visitor may use any raptor for falconry that he possesses legally in his country of residence for that purpose, provided import of that species to the United States is not prohibited and provided he has met all permitting requirements of his country of residence.

(B) If a raptor brought into the United States dies or is lost while in Wyoming, the visitor shall report the loss to the Department before leaving Wyoming.

(C) When flown free, any raptor brought to this country temporarily shall have two (2) attached radio transmitters that will allow the falconer to locate it.

(v) A permittee shall notify the Department within thirty (30) days of moving outside of the state of Wyoming with raptors in possession.

(vi) A falconer permitted in another state or jurisdiction who moves to Wyoming with raptors in possession shall notify the Department within thirty (30) days.

Section 4. Classes of Permits to Practice Falconry. The Department shall issue three (3) classes of falconry permits: Apprentice, General and Master, based upon their experience in falconry as follows:

(a) Apprentice Falconer Permit Requirements and Provisions.

(i) Shall be at least twelve (12) years of age and if less than eighteen (18) years of age, shall have a parent or legal guardian who is legally responsible for the apprentice's activities, sign the permittee's application.

(ii) Shall correctly answer at least eighty percent (80%) of the questions on a supervised falconry examination administered by the Department.

(iii) Shall submit a letter from a Master Falconer or a General Falconer with a valid state, tribal, or territorial falconry permit who is at least eighteen (18) years old and has at least two (2) years experience as a General Falconer or equivalent, stating that he shall assist the permittee as necessary, in: learning about husbandry and training of raptors held for falconry; relevant wildlife laws and regulations; and deciding what species of raptor is appropriate for the permittee to possess while an Apprentice.

(iv) Shall possess no more than one (1) raptor for use in falconry in accordance with 50 CFR 21.29, revised as of October 1, 2018, and does not include any later amendments or editions of the incorporated matter; including wild, captive-bred, or hybrid raptors. A copy of 50 CFR Part 21.29 can be viewed at any Department Regional Office or the Headquarters Office.

- (v) May take any wild raptor less than one (1) year old, except an eyas.
- (vi) Shall not possess a raptor taken from the wild as an eyas.
- (vii) Shall not possess an imprinted raptor.

(b) General Falconer Permit Requirements and Provisions.

- (i) Shall be at least sixteen (16) years of age and if less than eighteen (18) years of age, shall have a parent or legal guardian who is legally responsible for their activities, sign the permittee's application.
- (ii) Shall submit documentation to the Department from a General Falconer or Master Falconer stating that the permittee has practiced falconry at the Apprentice Falconer class or equivalent for at least two (2) years, including maintaining, training, flying and hunting the raptor(s) for at least four (4) months in each year.
- (iii) Shall have practiced falconry at the apprentice class with his own raptor for at least two (2) years.
- (iv) May take and possess any wild, captive-bred or hybrid raptor, except a golden eagle (*Aquila chrysaetos*), bald eagle (*Haliaeetus leucephalus*), white-tailed eagle (*Haliaeetus albicilla*) or Steller's sea-eagle (*Haliaeetus pelagicus*).

- (v) Shall possess no more than three (3) raptors.
- (vi) Shall not sponsor more than two (2) Apprentice Falconers at one time.

(c) Master Falconer Permit Requirements and Provisions.

- (i) Shall have practiced falconry at the General Falconer class with his own raptor(s) for at least five (5) years and submit documentation attesting to such experience.
- (ii) May take and possess any wild, captive-bred, or hybrid raptor, except a bald eagle. Shall only take and possess a golden eagle, white-tailed eagle or Steller's sea eagle by meeting the qualifications as set forth in subsection (c)(iv) of this section.
- (iii) Shall possess no more than five (5) wild raptors.
- (iv) May take and possess up to three (3) eagles of the following species: golden eagle, white-tailed eagle or Steller's sea eagle. In order for the Department to approve a request to possess an eagle for use in falconry, the permittee shall provide the following documentation to the Department:

(A) The permittee's experience in handling large raptors, including information about species handled and the type and duration of the activity in which the experience was gained.

(B) At least two (2) letters of reference from people with experience handling or flying large raptors such as eagles, ferruginous hawks (*Buteo regalis*), northern goshawks (*Accipiter gentilis*) or great horned owls (*Bubo virginianus*). Each letter must contain a concise history of the author's experience with large raptors, which can include, but is not limited to, handling of raptors held by zoos, rehabilitating large raptors or scientific studies involving large raptors. Each letter must also assess the permittee's ability to care for eagles and fly them in falconry.

(v) May possess any number of captive-bred raptors as long as they have been trained in the pursuit of wild game or used in hunting.

Section 5. Falconry Examination.

(a) The examination administered by the Department shall cover care and handling of raptors, federal and state laws and regulations relevant to falconry and other appropriate subject matter.

(b) Any applicant failing to correctly answer at least eighty percent (80%) of the questions on the examination shall be allowed to retake the examination at thirty (30) day intervals.

Section 6. Facilities, Care, and Equipment Requirements. No person may possess a raptor without first providing adequate facilities and equipment to humanely house and care for the raptor under the following provisions:

(a) All raptors held under a falconry permit shall be kept in humane and healthy conditions.

(i) Raptor facilities shall protect raptors from the environment, excessive disturbance, predators, domestic animals and other raptors. The permittee is responsible for the maintenance and security of raptors in his possession.

(A) Raptors may be housed together untethered if they are compatible with each other.

(ii) Raptor facilities shall be inspected and approved by the Department before a permittee may obtain a raptor to use in falconry. The Department shall certify that a permittee's facilities and equipment meet the following standards:

(A) The facility shall have a suitable perch for each raptor, at least one opening for sunlight, and shall provide a healthy environment for raptors inside.

(B) Each raptor shall have an area large enough to allow it to fly if it is untethered, or if tethered, to fully extend its wings or bate (attempt to fly while tethered) without damaging its feathers or contacting other raptors.

(C) Each raptor shall have access to a pan of clean water available unless weather conditions, the perch type or some other factor makes it unsafe for the raptor.

(D) The facility shall be large enough to allow easy access for the care and feeding of raptors.

(E) If raptors are not tethered, all walls that are not solid must be covered in such a manner as to protect the bird from striking or injuring itself against them. Suitable materials may include vertical bars spaced narrower than the width of the body of the smallest raptor housed in the enclosure or heavy-duty netting.

(F) Other innovative housing systems may be acceptable if they provide the enclosed raptors with protection and maintain healthy feathers.

(iii) A permittee may keep raptors outside in the open if they are under constant watch by a designated individual.

(iv) A permittee shall inform the Department within five (5) business days after a permanent change in location of their facilities.

(b) A permittee's falconry facilities may be located on property owned by another individual.

(i) A permittee shall submit to the Department a signed and dated statement showing that the property owner agrees that the falconry facilities, equipment, and raptors may be inspected without advance notice by Department personnel during reasonable hours on any day of the week. Permittees shall be present during inspections.

(c) A permittee shall have jesses or the materials and equipment to make them, leash and swivel, bath container, and appropriate scales or balances for weighing raptor(s) possessed.

(d) When transporting the raptor or using it for hunting, the permittee shall ensure that the raptor has a suitable perch and is protected from the environment and excessive disturbance.

(e) Permittees may house raptors, when not transporting or hunting, in temporary facilities for no more than one-hundred twenty (120) consecutive calendar days provided the raptor has a suitable perch and is protected from the environment, excessive disturbance, predators, domestic animals, and each other. Temporary facilities utilized in excess of one-hundred twenty (120) days shall be deemed permanent facilities and shall meet the requirements set forth in Section 6 (a).

(f) Another falconry permittee may care for a raptor(s) at the original permittee's facilities or at their own facilities for no more than one-hundred (120) consecutive calendar days. The permittee providing such care must have a signed and dated statement authorizing the temporary possession, plus a copy of Service Form 3-186A that shows the original permittee is the owner of the raptor(s). The statement must include information about the time period for which he will keep the raptor(s) and what he is allowed to do with the raptor(s).

(i) The raptor(s) will remain on the original permittee's falconry permit and will not be counted against the possession limit of the person caring for the raptor(s).

(ii) If the person caring for the raptor(s) holds the appropriate class falconry permit, he may fly the raptor(s) in whatever way authorized by the owner.

(iii) Temporary care of another permittee's raptor(s) may be extended indefinitely in extenuating circumstances such as illness, military service, or for a family emergency. The Department shall consider such instances on a case-by-case basis.

(g) A person who does not have a falconry permit may care for falconry raptor(s) at the permittee's facilities for no more than forty-five (45) consecutive calendar days.

(i) The raptor(s) shall remain on the permittee's falconry permit.

(ii) The raptor(s) shall remain in the permittee's facilities.

(iii) Temporary care of raptors may be extended indefinitely in extenuating circumstances, such as illness, military service, or for a family emergency. The Department shall consider such instances on a case-by-case basis.

(iv) The person(s) caring for the raptor(s) shall not fly them for any reason.

(h) Permittees may keep raptor(s) inside their residence. Facilities shall meet the standards in Section 6 (a) except that permittees are not required to modify windows or other openings of the structure. Raptors kept in the home shall be tethered when they are not being moved into or out of the residence.

(i) Raptor(s), facilities, equipment and records may be inspected in the presence of the permittee during reasonable hours on any day of the week by Department Law Enforcement personnel.

Section 7. Raptor Capture Licenses. Any person with a valid falconry permit desiring to take raptors from the wild shall make written application for a general or limited quota raptor capture license from the Department in accordance with the following provisions:

(a) A permittee shall not receive more than two (2) general raptor capture licenses or one (1) general raptor capture license and one (1) limited quota raptor capture license in any

calendar year. No person shall receive more than one (1) limited quota raptor capture license in any calendar year.

(b) For a general raptor capture license, an applicant shall submit a separate application and fee for each license applied for. The general raptor license capture area shall be the entire State of Wyoming. In accordance with the conditions contained in this Chapter, any species of raptor, except peregrine falcons (*Falco peregrinus*), may be taken from the wild under the authority of a general raptor capture license. Golden eagles shall only be taken in accordance with subsection (k)(iii) of this section.

(c) For a limited quota raptor capture license, a completed application and proper fee shall be submitted for limited quota raptor capture licenses for peregrine falcons (*Falco peregrinus*) to Headquarters not later than March 1 during the calendar year in which the licensee intends to take a peregrine falcon. If the deadline date occurs on a day when Headquarters has been closed to mail delivery or for license sales (weekends, holidays, etc.), applications received on the next business day by 5:00 pm mountain standard time shall be accepted as meeting the application deadline. The Department may issue a maximum of five (5) limited quota raptor capture licenses to capture peregrine falcons annually by drawing. In the drawing, four (4) licenses shall be reserved for residents and one (1) license shall be reserved for a nonresident. To establish the number of leftover licenses, the Department may continue to alternately draw from the list of unsuccessful applicants of each the resident and nonresident drawing against the established quota, until there are no unissued licenses for which there are applications. In the event there are more limited quota licenses available than applications received, the licenses shall be issued on a first come, first served basis beginning March 15 at 8:00am. The capture area shall be the entire state of Wyoming, except the lands within the Middle Fork of the Popo Agie River, Baldwin Creek or Sawmill Creek drainages in Fremont County are closed.

(d) Any wild raptor captured in the field shall be counted as one of the raptors the permittee is allowed to take from the wild that calendar year, unless the raptor is immediately released at the capture site.

(e) A permittee may not intentionally capture a raptor species that their classification as a falconer does not allow them to possess for falconry. If a permittee captures a raptor they are not allowed to possess, it shall be released immediately.

(f) A Master Falconer authorized by the Department shall take no more than two (2) golden eagles in any year from the wild and only in a livestock or wildlife depredation area during the time the depredation area is in effect. A livestock depredation area is declared by U.S.D.A. Wildlife Services and permitted under 50 CFR 22.23, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; or upon the request of the governor and authorized by the Service Director pursuant to 50 CFR 22.31, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter, and 50 CFR 22.32, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part

22.23, 50 CFR Part 22.31 and 50 CFR Part 22.32 can be viewed at any Department Regional Office or the Headquarters Office.

(i) The allocation of golden eagles to be taken from a designated depredation area shall be in accordance with the National Flyway Council Golden Eagle Allocation Procedure, revised as of March 2019, and which does not include any later amendments or editions of the incorporated matter. A copy of the National Flyway Council Golden Eagle Allocation Procedure can be viewed at any Department Regional Office or the Headquarters Office.

(g) All traps used for capturing raptors for falconry purposes shall be legibly marked or tagged with the permittee's name and address or current raptor capture license number. All raptor capture devices and setups shall be checked at least once per day while in use, except that all devices and setups used for capturing golden eagles shall be checked every thirty (30) minutes while in use.

(h) A permittee may take no more than two (2) raptors from the wild in any calendar year to use in falconry.

(i) If a permittee transfers a raptor taken from the wild to another permittee in the same year in which he captured it, the raptor shall count as one of the raptors the permittee is allowed to take from the wild that year; it will not count as a capture by the recipient.

(i) General or Master Falconers may remove eyas raptors from a nest or aerie.

(j) At the first opportunity to do so, but no later than ten (10) days after the capture of a wild raptor, the permittee shall report the capture by entering the required information, including band number or microchip information, in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee shall include the legal description to include 1/4 Sec.; Sec.; Twn.; Rng. or UTM coordinates using map datum NAD 83; of the nest site or location of capture.

(k) Other restrictions on taking raptors from the wild for falconry.

(i) An Apprentice Falconer may take any raptor less than one (1) year old from the wild at any time of the year, except eyas raptors and the following: any species listed as a national Species of Conservation Concern in the most recent list of "Birds of Conservation Concern" from the Service, a bald eagle, a white-tailed eagle, a Steller's sea-eagle, a golden eagle, or a federally listed threatened or endangered species. However, American kestrels and great horned owls may be taken from the wild that are over one (1) year of age.

(ii) General or Master Falconers may only take raptors less than one (1) year of age from the wild, at any time of the year, except American kestrels and great horned owls of any age may be taken from the wild.

(iii) Master Falconers authorized to possess golden eagles for use in falconry may capture an immature or subadult golden eagle in a livestock depredation area during the time the depredation area and associated depredation permit or depredation control order are in effect.

(A) A permittee may take an eyas golden eagle from its nest in a livestock depredation area if a biologist representing the agency responsible for declaring the depredation area has determined that the adult golden eagle is preying on livestock.

(B) A permittee may take a nesting adult golden eagle only if a biologist representing the agency responsible for declaring the depredation area has determined that the adult golden eagle is preying on livestock and that any eyas of the adult will be taken by a falconer authorized to possess it or by the biologist and transferred to an individual authorized to possess it.

(C) A permittee shall determine the locations of the livestock depredation areas declared by U.S.D.A. Wildlife Services, or published in the Federal Register by the Service in response to the governor's request.

(D) Before a permittee begins any eagle trapping activities, he shall inform the Regional U.S. Fish and Wildlife Service Law Enforcement office responsible for the area of the permittee's capture plans. The permittee shall notify the office in person, in writing, or via facsimile or email at least three (3) business days before the permittee begins trapping.

(E) A government employee who has trapped a golden eagle under federal, state, or tribal permit authority may transfer the bird to a permittee authorized to possess golden eagles for use in falconry.

(F) All devices and setups used for capturing golden eagles shall be checked every thirty (30) minutes while in use.

(iv) The permittee may recapture a lost raptor at any time. Recapture of a wild raptor is not considered to be taking a raptor from the wild.

(v) The permittee may capture a lost raptor wearing falconry equipment or a captive-bred raptor at any time, even if he is not allowed to possess the species. The raptor will not count against his possession limit, nor will the take from the wild count against his limit. The permittee must report the recapture of the raptor to the Department no more than five (5) working days after the capture. The raptor must be returned to the person who lost it, if that person may legally possess it. Disposition of a raptor whose legal ownership cannot be determined will be at the discretion of the Department.

(vi) A permittee may take any raptor that he is authorized to possess from the wild, even if the raptor is banded with a federal Bird Banding Laboratory aluminum band, except that banded peregrine falcons shall not be taken from the wild.

(A) If a captured raptor, including a peregrine falcon, is marked with a seamless metal band, a transmitter, or any other item identifying it as a falconry raptor, the raptor shall be reported to the Department no more than five (5) business days after the capture. A recaptured falconry raptor shall be returned to the permittee who lost it. If the permittee does not desire to possess the raptor, the permittee capturing the raptor may keep the raptor. Otherwise, disposition of a raptor whose legal ownership cannot be determined shall be at the discretion of the Department. While a permittee keeps a raptor for return to the person who lost the raptor, the raptor shall not count against his possession limit or his limit on take of raptors from the wild if he reported possessing the raptor to the Department.

(B) If a permittee captures a peregrine falcon that has a research band, such as a colored band with alphanumeric codes, or a research marking attached to the peregrine falcon, the peregrine falcon shall be immediately released, except that if the peregrine falcon has a transmitter attached to it, the permittee is authorized to possess the peregrine falcon up to thirty (30) days if he wishes to contact the researcher to determine if the researcher wishes to replace the transmitter or its batteries. If the researcher wishes to do so, or to have the transmitter removed, the researcher or his designee can make the change or allow the permittee to do so before releasing it. If the researcher does not wish to keep the transmitter on the falcon, the permittee may keep the falcon if he captured the falcon in circumstances in which capture of wild peregrines is allowed.

(C) If a captured raptor has any other band, research marking, or transmitter attached to it, the permittee shall promptly report the band numbers and all other relevant information to the federal Bird Banding Laboratory at 1-800-327-2263. The permittee shall contact the researcher and determine if he wishes to replace a transmitter attached to the raptor. If so, the permittee is authorized to possess the raptor up to thirty (30) days until the researcher, his designee, or the permittee can replace the transmitter. Disposition of the raptor will be at the discretion of the researcher and the Department. If the permittee possesses such a raptor temporarily, it will not count against his possession limit for falconry raptors.

(vii) At least one (1) young raptor shall be left in any nest or aerie from which a permittee takes an eyas raptor.

(viii) General or Master Falconers may take no more than one (1) raptor of a threatened species from the wild each year if the regulations in 50 CFR 21.29, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; allows it and if the falconer obtains a federal endangered species permit to do so before taking the raptor. A copy of 50 CFR Part 21.29 can be viewed at any Department Regional Office or the Headquarters Office.

(l) A permittee shall not take a raptor recently removed from the federal List of Endangered and Threatened Wildlife to use in falconry unless a management plan allowing for take of that species has been published. If take is allowed in the management plan, a permittee may do so in accordance with the provisions for take in the plan.

(m) Raptors injured due to falconer trapping efforts. Permittees have two (2) options for dealing with a raptor injured by their trapping efforts. In either case, the permittee is responsible for the costs of care and rehabilitation of the raptor.

(i) A permittee may put the raptor on his falconry permit. He shall report the take by entering the required information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department at the first opportunity to do so, but no more than ten (10) days after capture of the raptor. The permittee shall then have it treated by a veterinarian or a permitted wildlife rehabilitator. The raptor shall count against the permittee's possession limit.

(ii) A permittee may give the raptor directly to a veterinarian or a permitted Wyoming wildlife rehabilitator and report it to the Department within ten (10) business days. If reported properly, the raptor shall not count against capture or possession limits.

(n) If a permittee is present at a capture site, another permittee may capture the raptor for him and immediately give possession of the raptor to him. The permittee taking possession of the raptor shall be required to file Service Form 3-186A and shall have the raptor count against their own possession limit.

Section 8. Acquisition, Transfer, Release, Loss or Rebanding of a Raptor.

(a) If a permittee acquires, transfers, rebands, or microchips a raptor; or if a raptor a permittee possesses is stolen; or if a permittee loses a raptor to the wild and does not recover it within thirty (30) consecutive days; or if a raptor possessed for falconry dies; the permittee must report the change within ten (10) days by entering the required information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee of a stolen raptor shall also report such theft to the Department and to the U.S. Fish and Wildlife Service Law Enforcement special agent in charge for the area.

(b) Permittees shall keep copies of all electronic database submissions documenting take, transfer, loss, rebanding, theft or micro-chipping of each falconry raptor until five (5) years after the raptor is transferred, lost or has died.

(c) Permittees shall adhere to the following regulations prior to permanently releasing a raptor to the wild;

(i) If the species is not native to Wyoming, or is a hybrid of any kind, it shall not be released to the wild.

(ii) If the species to be released is native to Wyoming and is captive-bred, a permittee shall not release the raptor to the wild unless he has written permission from the Department. If permitted to do so, the raptor shall be hacked (allowed to adjust) to the wild at an appropriate time of year and an appropriate location. The permittee shall remove any falconry

band and report release of the raptor by entering the required information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(iii) If the species to be released is native to Wyoming and was taken from the wild, it may be released at an appropriate time of year and an appropriate location. The permittee shall remove any falconry band and report release by entering the required information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(d) There is no limit on the number of wild-caught or captive-bred raptors that may be transferred to a permittee, but a permittee shall not exceed their possession limit.

(e) No person shall enter upon the private property of any person to take a raptor without the written permission of the owner or person in charge of the property.

Section 9. Banding, Tagging or Implanting Micro-chips in Raptors Used in Falconry.

(a) When flown free, a hybrid raptor shall have at least two (2) attached radio transmitters to help locate it.

(b) A captive-bred raptor shall be banded with a seamless metal band in accordance with 50 CFR 21.30, revised as of October 1, 2018, and which does not include any later amendments of the incorporated matter. If a seamless band is removed or lost, within ten (10) days from the day it is removed or noted missing, the permittee shall report it and request a replacement U.S. Fish and Wildlife Service nonreusable band from the Department. The permittee shall submit the required information electronically immediately upon rebanding or micro-chipping the raptor in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee shall replace a band that is removed or lost, or may implant an ISO (International Organization for Standardization) compliant (134.2 kHz) microchip in the raptor and report the microchip information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. A copy of 50 CFR Part 21.30 can be viewed at any Department Regional Office or the Headquarters Office.

(c) A permittee shall not band a raptor removed from the wild with a seamless numbered band.

(d) Any wild caught northern goshawk (*Accipiter gentilis*), Harris's hawk (*Parabuteo unicinctus*), peregrine falcon or gyrfalcon (*Falco rusticolus*) possessed must be banded with a permanent, nonreusable, numbered U.S. Fish and Wildlife Service leg band that the Department will supply. A permittee may purchase and implant an ISO-compliant (134.2 kHz) microchip in the raptor in addition to the band. Contact the Department for information on obtaining and disposing of bands. Permittees may request bands from the Department in advance of any effort to capture a raptor.

(e) If the band must be removed or is lost from a raptor obtained from the wild it shall be reported within five (5) days to the Department and the permittee shall then do at least one of the following:

(i) Request a U.S. Fish and Wildlife Service nonreusable band from the Department. Immediately upon rebanding the raptor, the permittee shall report it by entering the required information (including band number and microchip information) in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(ii) Obtain and implant an ISO-compliant (134.2 kHz) microchip in the raptor and report the microchip information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A form to the Department.

(f) Permittees shall not alter, deface or use counterfeit bands. The rear tab on a band may be removed, and surface imperfections may be smoothed if it does not affect the integrity of the band or the numbering on it.

(g) If a permittee documents health or injury problems for a raptor that are caused by the band, the Department may provide an exemption to the banding requirement for that raptor. In that case, the permittee shall possess a copy of the exemption paperwork when transporting or flying the raptor. If the raptor is a wild northern goshawk (*Accipiter gentilis*), Harris's hawk (*Parabuteo unicinctus*), peregrine falcon (*Falco peregrinus*), or gyrfalcon (*Falco rusticolus*) the band must be replaced with an ISO-compliant (134.2 kHz) microchip that the U.S. Fish and Wildlife Service will supply. The U.S. Fish and Wildlife Service will not provide a microchip for a wild northern goshawk, Harris's hawk, peregrine falcon, or gyrfalcon unless a permittee demonstrates that a band caused an injury or health problem for the raptor.

Section 10. Additional Provisions for the Practice of Falconry.

(a) Raptors removed from the wild for falconry are always considered wild raptors.

(b) General Falconers or Master Falconers may hack falconry raptors.

(i) Any raptor a permittee is hacking counts against his possession limit and shall be a species the permittee is authorized to possess.

(ii) Any hybrid or raptor not native to Wyoming shall have two (2) attached functioning radio transmitters during hacking.

(iii) Permittees shall not hack raptors near nesting areas of a federally threatened or endangered bird species or any other locations where raptors are likely to harm Federally listed, threatened or endangered animal species.

(c) Permittees may use other acceptable falconry practices, such as, but not limited to, the use of creance (tethered) flying, lures, balloons or kites in training or conditioning raptors.

(d) Selling or trading raptors under a falconry permit.

(i) A permittee may sell, purchase, barter or offer to sell, purchase or barter captive-bred raptors marked with seamless bands to other permittees who are authorized to possess raptors.

(ii) Permittees shall not purchase, sell, trade or barter wild raptors. Wild raptors shall only be transferred.

(e) A permittee may transfer a raptor to another permit type.

(i) A permittee shall not transfer a wild-caught raptor to a raptor propagation permit unless the raptor has been used in falconry for at least two (2) years, or at least one (1) year for a sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), merlin (*Falco columbarius*), or an American kestrel (*Falco sparverius*). Within ten (10) days of transferring the raptor, the permittee shall report the transfer by entering the required information in the U.S. Fish and Wildlife Service ePermit System or provide a copy of Service Form 3-186A documenting acquisition of the raptor by the propagator to the Federal migratory bird permit office that administers the propagation permit.

(ii) A permittee may transfer a wild-caught raptor to another permit type at any time, if it has been injured and a licensed veterinarian has determined that the raptor can no longer be flown for falconry. Within ten (10) days of transferring the raptor, the permittee shall provide a copy of Service Form 3-186A documenting acquisition of the raptor and shall also provide a copy of the certification from the veterinarian that the raptor is not useable in falconry, to the federal migratory bird permits office that administers the other permit type.

(f) Permittees may transfer captive-bred raptors if the holder of the other permit type is authorized to possess the raptor(s). Within ten (10) days the permittee must report the transfer by entering the required information in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(g) Permittees may use raptors possessed for falconry in captive propagation if the permittee or the person overseeing the propagation, has the required propagation permit in accordance with 50 CFR 21.30, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter. If a permittee uses a raptor for eight (8) or more months in a year in captive propagation, the raptor shall be transferred for propagation. The raptor shall then be banded as required in 50 CFR 21.30. A copy of 50 CFR Part 21.30 can be viewed at any Department Regional Office or the Headquarters Office.

(h) Apprentice, General or Master Falconers may use raptor(s) they possess under their falconry permit in conservation education programs presented in public venues.

(i) A permittee does not need a Wyoming or federal education permit to conduct conservation education programs using a raptor held under a Wyoming falconry permit.

(ii) A permittee may present conservation education programs as an Apprentice Falconer if he is under the direct supervision of a General or Master Falconer during presentation of the program.

(iii) Permittees shall use their raptors primarily for falconry.

(iv) Permittees may charge a fee for presentation of a conservation education program. The fee may not exceed the amount required to recoup the permittee's costs.

(v) In conservation education programs, permittees shall provide information about the biology, ecological roles and conservation needs of raptors and other migratory birds, although not all of these topics must be addressed in every presentation. Permittees shall not give presentations that do not address falconry and conservation education.

(vi) Permittees shall be responsible for all liability associated with conservation education programs as per 50 CFR 13.50, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part 13.50 can be viewed at any Department Regional Office or the Headquarters Office.

(i) Permittees shall not receive payment for photography, filming or other such uses of raptors to make movies or other sources of information on the practice of falconry or on the biology, ecological roles and conservation needs of raptors and other migratory birds.

(i) Permittees shall not use raptors to make movies, commercials or in other commercial ventures that are not related to falconry.

(ii) Permittees shall not use raptors for entertainment, advertisements, as a representation of any business, company, corporation or other organization, or for promotion or endorsement of any products, merchandise, goods, services, meetings or fairs, with the following exceptions:

(A) Raptors may be used to promote or endorse a nonprofit falconry organization or association.

(B) Raptors may be used to promote or endorse products or endeavors related directly to falconry, such as hoods, telemetry equipment, giant hoods, perches and materials for raptor facilities.

(j) General or Master Falconers may assist permitted Wyoming wildlife rehabilitators to condition raptors in preparation for release to the wild and may keep raptors in their facilities.

(i) The rehabilitator shall provide the permittee with a letter or form that identifies the raptor and explains that the permittee is assisting in rehabilitation.

(ii) Public contact with any raptor being rehabilitated under these provisions shall be minimized.

(iii) A permittee does not have to add any raptor held for this purpose to their falconry permit; the raptor shall remain under the permit of the rehabilitator.

(iv) Permittees shall return all raptors to the rehabilitator for final disposition.

(k) Using a falconry raptor in abatement activities.

(i) A Master Falconer may conduct and receive payment for abatement activities with raptors possessed for falconry if he has a Special Purpose Abatement permit issued by the U.S. Fish and Wildlife Service or is a sub-permittee of an abatement permittee. A General Falconer may conduct and receive payment for abatement activities only as a sub-permittee of the holder of the abatement permit.

(l) Feathers that raptors molt.

(i) A permittee may possess flight feathers for imping for each species of raptor the permittee possesses or previously held, for as long as the permittee has a valid falconry permit. The permittee may receive feathers for imping from other permitted falconers or propagators in the United States, and may give feathers to them. No permittee shall buy, sell or barter such feathers.

(ii) Permittees may donate feathers from a raptor, except golden eagle feathers, to any person or institution with a valid permit to have the feathers, or to anyone exempt from the permit requirement under 50 CFR 21.12, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(iii) Except for primary or secondary flight feathers or retrices from a golden eagle, permittees shall not be required to gather feathers that are molted or otherwise lost by raptors. Permittees may leave the feathers where the feathers fall, store the feathers for imping or destroy the feathers. Permittees shall collect molted flight feathers and retrices from golden eagles for imping, or shall send the feathers to the National Eagle Repository at: U.S. Fish and Wildlife Service, National Eagle Repository, Rocky Mountain Arsenal, Building 128, Commerce City, Colorado 80022. The telephone number at the Repository is 303-287-2110.

(iv) If a permittee's permit expires or is revoked, he shall donate the feathers of any raptor, except a golden eagle, to any person or institution exempt from the permit requirement under 50 CFR 21.12, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; or authorized by permit to acquire and possess the feathers. If the permittee does not donate the feathers, the permittee shall burn, bury, or otherwise destroy the feathers. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(m) Disposition of carcasses of falconry raptors.

(i) A permittee shall send the entire body of a golden eagle held for falconry, including all feathers, talons and other parts, to the National Eagle Repository.

(ii) A permittee may donate the body or feathers of any other raptor they were permitted to possess to any person or institution exempt under 50 CFR 21.12, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; or authorized by permit to acquire and possess such parts or feathers. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(iii) If the raptor was banded or micro-chipped prior to its death, a permittee may keep the body of any raptor, except that of a golden eagle, and the band and microchip shall be left in place. The permittee may keep the body so that the feathers are available for imping or may have the body mounted by a taxidermist. The mount may be used in giving conservation education programs.

(iv) If a permittee does not wish to keep the raptor body or feathers or donate the body or feathers, he shall burn, bury or otherwise destroy the body or feathers within ten (10) consecutive days of the death of the raptor or after final examination by a veterinarian to determine cause of death.

(v) If a permittee does not donate the raptor body or feathers or have the body mounted by a taxidermist, he may possess the flight feathers for as long as he has a valid falconry permit. Permittee's shall not buy, sell, or barter the feathers. Permittee's shall keep the paperwork documenting their acquisition of the raptor.

(n) Permittee's falconry activities shall not cause the take of federally listed, threatened or endangered wildlife.

(o) A permittee may use a raptor to take any species listed in parts 50 CFR 21.43, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; 50 CFR 21.44, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; 50 CFR 21.45, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; or 50 CFR 21.46, revised as of October 1, 2018, and which does not include any later amendments or editions of the incorporated matter; at any time in accordance with the conditions of the applicable depredation order, as long as the permittee is not monetarily compensated. A copy of 50 CFR Part 21.43, 50 CFR Part 21.44, 50 CFR Part 21.45 and 50 CFR Part 21.46 can be viewed at any Department Regional Office or the Headquarters Office.

(p) A surviving spouse, executor, administrator or other legal representative of a deceased falconry permittee shall transfer any raptor held by the permittee to another authorized permittee within ninety (90) consecutive days of the death of the falconry permittee. After

ninety (90) consecutive days, disposition of a raptor held under the permit is at the discretion of the Department.

Section 11. Hunting with Raptors. A person holding a valid Wyoming hunting license for game birds or small game animals and a license to hunt with falcon may take game birds and small game animals in and during any of the established hunting areas and seasons in accordance with existing Wyoming Game and Fish Commission regulations under the following provisions:

- (a) Persons hunting with raptors may take game birds without distinction as to sex.
- (b) A permittee may allow a raptor to feed on a prey animal taken unintentionally, provided that the prey animal is not taken into the falconer's possession.
 - (i) Unintentional take of any federally listed threatened or endangered species shall be reported to the Department and the U.S. Fish and Wildlife Ecological Services Field Office in Cheyenne within five (5) business days of the take event.

Section 12. Most Restrictive State or Federal Regulation. State and federal regulations govern the taking, possession and transportation of all raptors. In all cases, the most restrictive regulation, whether federal or state, shall apply.

Section 13. Raptor Propagation. For the purpose of raptor propagation, the Wyoming Game and Fish Commission hereby adopts Title 50, Code of Federal Regulations (CFR) Part 21.30 entitled Raptor Propagation Permits, revised as of October 1, 2018. These regulations govern the propagation of raptors in captivity, the permitting criteria and regulatory requirements to maintain raptors in captivity for captive propagation, including annual reporting for raptors propagated within the State of Wyoming. Violations of the federal regulation pertaining to raptor propagation shall be considered violations of Commission regulations. Any future amendments, additions or revisions in the federal regulations governing raptor propagation shall be adopted by the Wyoming Game and Fish Commission prior to becoming law in Wyoming. A copy of Title 50 CFR Part 21.30 may be viewed at Department Regional Offices and Headquarters.

Section 14. Violations of Commission Regulations.

- (a) A violation of federal regulations or of Commission regulations pertaining to the maintenance or use of a falconry permit issued to an applicant under Sections 3 and 4 of this Chapter shall not be grounds, in and of itself, for revocation of any raptor propagation permit issued to an applicant under Section 13 of this Chapter.
- (b) A violation of federal regulations or of Commission regulations pertaining to the maintenance and use of a raptor propagation permit issued to an applicant under Section 13 of this Chapter shall not be grounds, in and of itself, for revocation of any falconry permit issued to an applicant under Sections 3 and 4 of this Chapter.

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

~~WYOMING GAME AND FISH COMMISSION~~

CHAPTER 25

FALCONRY AND RAPTOR PROPAGATION REGULATION

Section 1. Authority. This regulation is promulgated by authority of ~~W.S.~~Wyoming Statutes § 23-1-103, § 23-1-302, § 23-2-101 and § 23-2-105.

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

(a) “Abatement Activities” means the use of trained raptors to flush, haze or take birds or other wildlife where allowed to mitigate depredation problems, including threats to human health and safety.

(b) “Adult Golden Eagle” means a golden eagle without any immature or sub-adult feathers in either the wings or the tail.

(c) “Aerie” means the nest of any raptor.

(d) “Captive-bred” means raptors, including eggs, hatched in captivity from parents that mated or otherwise transferred gametes in captivity.

(e) “CFR” means the Code of Federal Regulations.

(f) “Department” means the Wyoming Game and Fish Department whose mailing address is: 5400 Bishop Boulevard, Cheyenne, WY 82006.

(g) “Eyas Raptor” means a young raptor not yet capable of flight.

(h) “Falconry” means taking wild quarry by means of a trained raptor. Falconry includes the taking of raptors from the wild to use in falconry and caring for, training, and possessing raptors held for falconry.

(i) “Falconry Permit” means a permit to possess, transport, sell, purchase, barter, or offer to sell, purchase or barter raptors for falconry purposes.

(j) “General Raptor Capture License” means a license to capture one (1) raptor, except peregrine falcons (*Falco peregrinus*), from the wild in accordance with this regulation.

(k) “Hacking” means the temporary release to the wild of a raptor held for falconry for conditioning or for the preparation of permanent release of a raptor to the wild.

- (l) “Hybrid” means offspring produced by crossing species.
- (m) “Imping” means to graft new feathers to existing feather shafts on a raptor’s wing(s) or tail to repair damage or to increase flying capacity.
- (n) “Imprint” means a raptor that is hand-raised from two weeks of age until it is fully feathered and has identified itself with humans rather than its own species. An imprinted raptor is considered to be so for its entire lifetime.
- (o) “License to Hunt with Falcon” means a license to take game birds and small game animals with raptors.
- (p) “Limited Quota Raptor Capture License” means a license to capture one (1) peregrine falcon (*Falco peregrinus*) from the wild.
- (q) “Livestock Depredation Area” means a specific geographic location in which depredation by golden eagles has been recognized. The boundaries and duration of a livestock depredation area are declared by the United States Department of Agriculture (U.S.D.A.) Wildlife Services or by the governor.
- (r) “Permittee” means a person who has been issued a valid Wyoming falconry permit or a falconry permit from another state, tribe, or territory that complies with federal falconry standards.
- (s) “Raptor” means any bird of the Order Accipitriformes, Falconiformes or Strigiformes listed in 50 CFR 10.13, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; to be used in falconry. A copy of 50 CFR Part 10.13 can be viewed at any Department Regional Office or the Headquarters Office.
- (t) “Service” means the U.S. Fish and Wildlife Service.
- (u) “Wild Raptor” means a non-captive bred raptor taken from its natural environment.

Section 3. Falconry Permit. Persons desiring to take, transport, receive or possess any raptor(s) shall make written application for a falconry permit to the Department in accordance with the following provisions:

- (a) An application for a falconry permit shall include proof of successful completion of a falconry examination administered by the Department or proof of a previously held falconry permit for the class applied for.
- (b) Falconry Permit Conditions.

(i) A Wyoming falconry permit or a falconry permit from another state, tribe, or territory meeting federal falconry standards shall be required before any person may take, transport, receive or possess any raptor for falconry purposes or practice falconry in Wyoming. A falconry permit expires five (5) years from the date of issuance or renewal unless otherwise restricted or revoked in writing by the Department or suspended by court action. The Department may revoke any falconry permit for failure to comply with any condition of the permit or this regulation. A permittee dissatisfied with the Department's decision to revoke a permit may request a hearing before the Wyoming Game and Fish Commission. A request for hearing shall be made in writing to the Chief of the Wildlife Division within ten (10) business days after receipt of the notice from the Department revoking the permit. The hearing shall be conducted in accordance with commission Regulation Chapter 27, Rules of Practice Governing Contested Cases before the Wyoming Game and Fish Commission, revised as of January 22, 2014, and which does not include any later amendments or editions of the incorporated matter. A copy of all Commission regulations can be viewed at any Department Regional Office or the Headquarters Office.

(A) If a falconry permit has lapsed for less than five (5) years, it may be reinstated at the previous class the permittee held if proof of falconry certification for that class is furnished to the Department.

(B) If a falconry permit has lapsed for five (5) years or more, it may be reinstated at the previous class the permittee held if proof of certification at that class is furnished to the Department and the permittee correctly answers at least eighty percent (80%) of the questions on a supervised falconry examination administered by the Department. The permittee's facilities shall pass inspection by the Department prior to possessing any raptor(s).

(C) In cases where a permit has been revoked or suspended by the Department for failing to comply with conditions of the permit or this regulation, the Department shall reissue a permit after the applicant has provided satisfactory documentation that the conditions which resulted in the revocation or suspension have been corrected and the revocation/suspension period has ended.

(ii) No permittee may take, purchase, receive or otherwise acquire, sell, barter, transfer or otherwise dispose of any raptor unless such permittee enters the required information, including band number or microchip information, in the ~~electronic database at~~ <http://permits.fws.gov/186A> U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department within ten (10) calendar days of any such transaction.

(iii) Permittee(s) shall be in immediate possession of their falconry permit(s) or legible copies of their falconry permit(s), if not at the location of their falconry facilities while trapping, transporting, working with, or flying falconry raptor(s).

(iv) Applicants who have experience in falconry and are visiting the United States or are a new resident in the United States shall qualify for a falconry permit appropriate for their experience. To demonstrate knowledge of U.S. falconry laws and regulations, applicants

must correctly answer at least eighty percent (80%) of the questions on the supervised examination for falconers administered by the Department. The Department shall determine which class of falconry permit the applicant is qualified for, consistent with the class requirements in Sections 3 and 4. To do so, the Department shall base its decision on the applicant's documentation of his experience. The applicant's falconry facilities shall meet the standards in Section 6 (a) before keeping any raptors for falconry.

(A) A visitor may use any raptor for falconry that he possesses legally in his country of residence for that purpose, provided import of that species to the United States is not prohibited and provided he has met all permitting requirements of his country of residence.

(B) If a raptor brought into the United States dies or is lost while in Wyoming, the visitor shall report the loss to the Department before leaving Wyoming.

(C) When flown free, any raptor brought to this country temporarily shall have two (2) attached radio transmitters that will allow the falconer to locate it.

(v) A permittee shall notify the Department within thirty (30) days of moving outside of the state of Wyoming with raptors in possession.

(vi) A falconer permitted in another state or jurisdiction who moves to Wyoming with raptors in possession shall notify the Department within thirty (30) days.

Section 4. Classes of Permits to Practice Falconry. The Department shall issue three (3) classes of falconry permits: Apprentice, General and Master, based upon their experience in falconry as follows:

(a) Apprentice Falconer Permit Requirements and Provisions.

(i) Shall be at least twelve (12) years of age and if less than eighteen (18) years of age, shall have a parent or legal guardian who is legally responsible for the apprentice's activities, sign the permittee's application.

(ii) Shall correctly answer at least eighty percent (80%) of the questions on a supervised falconry examination administered by the Department.

(iii) Shall submit a letter from a Master Falconer or a General Falconer with a valid state, tribal, or territorial falconry permit who is at least eighteen (18) years old and has at least two (2) years experience as a General Falconer or equivalent, stating that he shall assist the permittee as necessary, in: learning about husbandry and training of raptors held for falconry; relevant wildlife laws and regulations; and deciding what species of raptor is appropriate for the permittee to possess while an Apprentice.

(iv) Shall possess no more than one (1) raptor for use in falconry in accordance with 50 CFR 21.29, revised as of October 1, ~~2012~~2018, and does not include any later

amendments or editions of the incorporated matter; including wild, captive-bred, or hybrid raptors. A copy of 50 CFR Part 21.29 can be viewed at any Department Regional Office or the Headquarters Office.

- (v) May take any wild raptor less than one (1) year old, except an eyas.

- (vi) Shall not possess a raptor taken from the wild as an eyas.

- (vii) Shall not possess an imprinted raptor.

- (b) General Falconer Permit Requirements and Provisions.

- (i) Shall be at least sixteen (16) years of age and if less than eighteen (18) years of age, shall have a parent or legal guardian who is legally responsible for their activities, sign the permittee's application.

- (ii) Shall submit documentation to the Department from a General Falconer or Master Falconer stating that the permittee has practiced falconry at the Apprentice Falconer class or equivalent for at least two (2) years, including maintaining, training, flying and hunting the raptor(s) for at least four (4) months in each year.

- (iii) Shall have practiced falconry at the apprentice class with his own raptor for at least two (2) years.

- (iv) May take and possess any wild, captive-bred or hybrid raptor, except a golden eagle (*Aquila chrysaetos*), bald eagle (*Haliaeetus leucephalus*), white-tailed eagle (*Haliaeetus albicilla*) or Steller's sea-eagle (*Haliaeetus pelagicus*).

- (v) Shall possess no more than three (3) raptors.

- (vi) Shall not sponsor more than two (2) Apprentice Falconers at one time.

- (c) Master Falconer Permit Requirements and Provisions.

- (i) Shall have practiced falconry at the General Falconer class with his own raptor(s) for at least five (5) years and submit documentation attesting to such experience.

- (ii) May take and possess any wild, captive-bred, or hybrid raptor, except a bald eagle. Shall only take and possess a golden eagle, white-tailed eagle or Steller's sea eagle by meeting the qualifications as set forth in subsection (c)(iv) of this section.

- (iii) Shall possess no more than five (5) wild raptors.

- (iv) May take and possess up to three (3) eagles of the following species: golden eagle, white-tailed eagle or Steller's sea eagle. In order for the Department to approve a

request to possess an eagle for use in falconry, the permittee shall provide the following documentation to the Department:

(A) The permittee's experience in handling large raptors, including information about species handled and the type and duration of the activity in which the experience was gained.

(B) At least two (2) letters of reference from people with experience handling or flying large raptors such as eagles, ferruginous hawks (*Buteo regalis*), northern goshawks (*Accipiter gentilis*) or great horned owls (*Bubo virginianus*). Each letter must contain a concise history of the author's experience with large raptors, which can include, but is not limited to, handling of raptors held by zoos, rehabilitating large raptors or scientific studies involving large raptors. Each letter must also assess the permittee's ability to care for eagles and fly them in falconry.

(v) May possess any number of captive-bred raptors as long as they have been trained in the pursuit of wild game or used in hunting.

Section 5. Falconry Examination.

(a) The examination administered by the Department shall cover care and handling of raptors, federal and state laws and regulations relevant to falconry and other appropriate subject matter.

(b) Any applicant failing to correctly answer at least eighty percent (80%) of the questions on the examination shall be allowed to retake the examination at thirty (30) day intervals.

Section 6. Facilities, Care, and Equipment Requirements. No person may possess a raptor without first providing adequate facilities and equipment to humanely house and care for the raptor under the following provisions:

(a) All raptors held under a falconry permit shall be kept in humane and healthy conditions.

(i) Raptor facilities shall protect raptors from the environment, excessive disturbance, predators, domestic animals and other raptors. The permittee is responsible for the maintenance and security of raptors in his possession.

(A) Raptors may be housed together untethered if they are compatible with each other.

(ii) Raptor facilities shall be inspected and approved by the Department before a permittee may obtain a raptor to use in falconry. The Department shall certify that a permittee's facilities and equipment meet the following standards:

(A) The facility shall have a suitable perch for each raptor, at least one opening for sunlight, and shall provide a healthy environment for raptors inside.

(B) Each raptor shall have an area large enough to allow it to fly if it is untethered, or if tethered, to fully extend its wings or bate (attempt to fly while tethered) without damaging its feathers or contacting other raptors.

(C) Each raptor shall have access to a pan of clean water available unless weather conditions, the perch type or some other factor makes it unsafe for the raptor.

(D) The facility shall be large enough to allow easy access for the care and feeding of raptors.

(E) If raptors are not tethered, all walls that are not solid must be covered in such a manner as to protect the bird from striking or injuring itself against them. Suitable materials may include vertical bars spaced narrower than the width of the body of the smallest raptor housed in the enclosure or heavy-duty netting.

(F) Other innovative housing systems may be acceptable if they provide the enclosed raptors with protection and maintain healthy feathers.

(iii) A permittee may keep raptors outside in the open if they are under constant watch by a designated individual.

(iv) A permittee shall inform the Department within five (5) business days after a permanent change in location of their facilities.

(b) A permittee's falconry facilities may be located on property owned by another individual.

(i) A permittee shall submit to the Department a signed and dated statement showing that the property owner agrees that the falconry facilities, equipment, and raptors may be inspected without advance notice by Department personnel during reasonable hours on any day of the week. Permittees shall be present during inspections.

(c) A permittee shall have jesses or the materials and equipment to make them, leash and swivel, bath container, and appropriate scales or balances for weighing raptor(s) possessed.

(d) When transporting the raptor or using it for hunting, the permittee shall ensure that the raptor has a suitable perch and is protected from the environment and excessive disturbance.

(e) Permittees may house raptors, when not transporting or hunting, in temporary facilities for no more than one-hundred twenty (120) consecutive calendar days provided the raptor has a suitable perch and is protected from the environment, excessive disturbance,

predators, domestic animals, and each other. Temporary facilities utilized in excess of one-hundred twenty (120) days shall be deemed permanent facilities and shall meet the requirements set forth in Section 6 (a).

(f) Another falconry permittee may care for a raptor(s) at the original permittee's facilities or at their own facilities for no more than one-hundred (120) consecutive calendar days. The permittee providing such care must have a signed and dated statement authorizing the temporary possession, plus a copy of Service Form 3-186A that shows the original permittee is the owner of the raptor(s). The statement must include information about the time period for which he will keep the raptor(s) and what he is allowed to do with the raptor(s).

(i) The raptor(s) will remain on the original permittee's falconry permit and will not be counted against the possession limit of the person caring for the raptor(s).

(ii) If the person caring for the raptor(s) holds the appropriate class falconry permit, he may fly the raptor(s) in whatever way authorized by the owner.

(iii) Temporary care of another permittee's raptor(s) may be extended indefinitely in extenuating circumstances such as illness, military service, or for a family emergency. The Department shall consider such instances on a case-by-case basis.

(g) A person who does not have a falconry permit may care for falconry raptor(s) at the permittee's facilities for no more than forty-five (45) consecutive calendar days.

(i) The raptor(s) shall remain on the permittee's falconry permit.

(ii) The raptor(s) shall remain in the permittee's facilities.

(iii) Temporary care of raptors may be extended indefinitely in extenuating circumstances, such as illness, military service, or for a family emergency. The Department shall consider such instances on a case-by-case basis.

(iv) The person(s) caring for the raptor(s) shall not fly them for any reason.

(h) Permittees may keep raptor(s) inside their residence. Facilities shall meet the standards in Section 6 (a) except that permittees are not required to modify windows or other openings of the structure. Raptors kept in the home shall be tethered when they are not being moved into or out of the residence.

(i) Raptor(s), facilities, equipment and records may be inspected in the presence of the permittee during reasonable hours on any day of the week by Department Law Enforcement personnel.

Section 7. Raptor Capture Licenses. Any person with a valid falconry permit desiring to take raptors from the wild shall make written application for a general or limited quota raptor capture license from the Department in accordance with the following provisions:

(a) A permittee shall not receive more than two (2) general raptor capture licenses or one (1) general raptor capture license and one (1) limited quota raptor capture license in any calendar year. No person shall receive more than one (1) limited quota raptor capture license in any calendar year.

(b) For a general raptor capture license, an applicant shall submit a separate application and fee for each license applied for. The general raptor license capture area shall be the entire State of Wyoming. In accordance with the conditions contained in this Chapter, any species of raptor, except peregrine falcons (*Falco peregrinus*), may be taken from the wild under the authority of a general raptor capture license. Golden eagles shall only be taken in accordance with subsection (k)(iii) of this section.

(c) For a limited quota raptor capture license, a completed application and proper fee shall be submitted for limited quota raptor capture licenses for peregrine falcons (*Falco peregrinus*) to Headquarters not later than March 1 during the calendar year in which the licensee intends to take a peregrine falcon. If the deadline date occurs on a day when Headquarters has been closed to mail delivery or for license sales (weekends, holidays, etc.), applications received on the next business day by 5:00 pm mountain standard time shall be accepted as meeting the application deadline. The Department may issue a maximum of five (5) limited quota raptor capture licenses to capture peregrine falcons annually by drawing. In the drawing, four (4) licenses shall be reserved for residents and one (1) license shall be reserved for a nonresident. To establish the number of leftover licenses, the Department may continue to alternately draw from the list of unsuccessful applicants of each the resident and nonresident drawing against the established quota, until there are no unissued licenses for which there are applications. In the event there are more limited quota licenses available than applications received, the licenses shall be issued on a first come, first served basis beginning March 15 at 8:00am. The capture area shall be the entire state of Wyoming, except the lands within the Middle Fork of the Popo Agie River, Baldwin Creek or Sawmill Creek drainages in Fremont County are closed.

(d) Any wild raptor captured in the field shall be counted as one of the raptors the permittee is allowed to take from the wild that calendar year, unless the raptor is immediately released at the capture site.

(e) A permittee may not intentionally capture a raptor species that their classification as a falconer does not allow them to possess for falconry. If a permittee captures a raptor they are not allowed to possess, it shall be released immediately.

(f) A Master Falconer authorized by the Department shall take no more than two (2) golden eagles in any year from the wild and only in a livestock or wildlife depredation area during the time the depredation area is in effect. A livestock depredation area is declared by

U.S.D.A. Wildlife Services and permitted under 50 CFR 22.23, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; or upon the request of the governor and authorized by the Service Director pursuant to 50 CFR 22.31, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter, and 50 CFR 22.32, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part 22.23, 50 CFR Part 22.31 and 50 CFR Part 22.32 can be viewed at any Department Regional Office or the Headquarters Office.

(i) The allocation of golden eagles to be taken from a designated depredation area shall be in accordance with the National Flyway Council Golden Eagle Allocation Procedure, revised as of March 2019, and which does not include any later amendments or editions of the incorporated matter. A copy of the National Flyway Council Golden Eagle Allocation Procedure can be viewed at any Department Regional Office or the Headquarters Office.

(g) All traps used for capturing raptors for falconry purposes shall be legibly marked or tagged with the permittee's name and address or current raptor capture license number. All raptor capture devices and setups shall be checked at least once per day while in use, except that all devices and setups used for capturing golden eagles shall be checked every thirty (30) minutes while in use.

(h) A permittee may take no more than two (2) raptors from the wild in any calendar year to use in falconry.

(i) If a permittee transfers a raptor taken from the wild to another permittee in the same year in which he captured it, the raptor shall count as one of the raptors the permittee is allowed to take from the wild that year; it will not count as a capture by the recipient.

(i) General or Master Falconers may remove eyas raptors from a nest or aerie.

(j) At the first opportunity to do so, but no later than ten (10) days after the capture of a wild raptor, the permittee shall report the capture by entering the required information, including band number or microchip information, in the ~~electronic database at~~ <http://permits.fws.gov/186A> U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee shall include the legal description to include 1/4 Sec.; Sec.; Twn.; Rng. or UTM coordinates using map datum NAD 83; of the nest site or location of capture.

(k) Other restrictions on taking raptors from the wild for falconry.

(i) An Apprentice Falconer may take any raptor less than one (1) year old from the wild at any time of the year, except eyas raptors and the following: any species listed as a national Species of Conservation Concern in the most recent list of "Birds of Conservation Concern" from the Service, a bald eagle, a white-tailed eagle, a Steller's sea-eagle, a golden

eagle, or a federally listed threatened or endangered species. However, American kestrels and great horned owls may be taken from the wild that are over one (1) year of age.

(ii) General or Master Falconers may only take raptors less than one (1) year of age from the wild, at any time of the year, except American kestrels and great horned owls of any age may be taken from the wild.

(iii) Master Falconers authorized to possess golden eagles for use in falconry may capture an immature or subadult golden eagle in a livestock depredation area during the time the depredation area and associated depredation permit or depredation control order are in effect.

(A) A permittee may take an eyas golden eagle from its nest in a livestock depredation area if a biologist representing the agency responsible for declaring the depredation area has determined that the adult golden eagle is preying on livestock.

(B) A permittee may take a nesting adult golden eagle only if a biologist representing the agency responsible for declaring the depredation area has determined that the adult golden eagle is preying on livestock and that any eyas of the adult will be taken by a falconer authorized to possess it or by the biologist and transferred to an individual authorized to possess it.

(C) A permittee shall determine the locations of the livestock depredation areas declared by U.S.D.A. Wildlife Services, or published in the Federal Register by the Service in response to the governor's request.

(D) Before a permittee begins any eagle trapping activities, he shall inform the Regional U.S. Fish and Wildlife Service Law Enforcement office responsible for the area of the permittee's capture plans. The permittee shall notify the office in person, in writing, or via facsimile or email at least three (3) business days before the permittee begins trapping.

(E) A government employee who has trapped a golden eagle under federal, state, or tribal permit authority may transfer the bird to a permittee authorized to possess golden eagles for use in falconry.

(F) All devices and setups used for capturing golden eagles shall be checked every thirty (30) minutes while in use.

(iv) The permittee may recapture a lost raptor at any time. Recapture of a wild raptor is not considered to be taking a raptor from the wild.

(v) The permittee may capture a lost raptor wearing falconry equipment or a captive-bred raptor at any time, even if he is not allowed to possess the species. The raptor will not count against his possession limit, nor will the take from the wild count against his limit. The permittee must report the recapture of the raptor to the Department no more than five (5)

working days after the capture. The raptor must be returned to the person who lost it, if that person may legally possess it. Disposition of a raptor whose legal ownership cannot be determined will be at the discretion of the Department.

(vi) A permittee may take any raptor that he is authorized to possess from the wild, even if the raptor is banded with a federal Bird Banding Laboratory aluminum band, except that banded peregrine falcons shall not be taken from the wild.

(A) If a captured raptor, including a peregrine falcon, is marked with a seamless metal band, a transmitter, or any other item identifying it as a falconry raptor, the raptor shall be reported to the Department no more than five (5) business days after the capture. A recaptured falconry raptor shall be returned to the permittee who lost it. If the permittee does not desire to possess the raptor, the permittee capturing the raptor may keep the raptor. Otherwise, disposition of a raptor whose legal ownership cannot be determined shall be at the discretion of the Department. While a permittee keeps a raptor for return to the person who lost the raptor, the raptor shall not count against his possession limit or his limit on take of raptors from the wild if he reported possessing the raptor to the Department.

(B) If a permittee captures a peregrine falcon that has a research band, such as a colored band with alphanumeric codes, or a research marking attached to the peregrine falcon, the peregrine falcon shall be immediately released, except that if the peregrine falcon has a transmitter attached to it, the permittee is authorized to possess the peregrine falcon up to thirty (30) days if he wishes to contact the researcher to determine if the researcher wishes to replace the transmitter or its batteries. If the researcher wishes to do so, or to have the transmitter removed, the researcher or his designee can make the change or allow the permittee to do so before releasing it. If the researcher does not wish to keep the transmitter on the falcon, the permittee may keep the falcon if he captured the falcon in circumstances in which capture of wild peregrines is allowed.

(C) If a captured raptor has any other band, research marking, or transmitter attached to it, the permittee shall promptly report the band numbers and all other relevant information to the federal Bird Banding Laboratory at 1-800-327-2263. The permittee shall contact the researcher and determine if he wishes to replace a transmitter attached to the raptor. If so, the permittee is authorized to possess the raptor up to thirty (30) days until the researcher, his designee, or the permittee can replace the transmitter. Disposition of the raptor will be at the discretion of the researcher and the Department. If the permittee possesses such a raptor temporarily, it will not count against his possession limit for falconry raptors.

(vii) At least one (1) young raptor shall be left in any nest or aerie from which a permittee takes an eyas raptor.

(viii) General or Master Falconers may take no more than one (1) raptor of a threatened species from the wild each year if the regulations in 50 CFR 21.29, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; allows it and if the falconer obtains a federal endangered species permit to

do so before taking the raptor. A copy of 50 CFR Part 21.29 can be viewed at any Department Regional Office or the Headquarters Office.

(l) A permittee shall not take a raptor recently removed from the federal List of Endangered and Threatened Wildlife to use in falconry unless a management plan allowing for take of that species has been published. If take is allowed in the management plan, a permittee may do so in accordance with the provisions for take in the plan.

(m) Raptors injured due to falconer trapping efforts. Permittees have two (2) options for dealing with a raptor injured by their trapping efforts. In either case, the permittee is responsible for the costs of care and rehabilitation of the raptor.

(i) A permittee may put the raptor on his falconry permit. He shall report the take by entering the required information in the ~~electronic database at~~ <http://permits.fws.gov/186A> U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department at the first opportunity to do so, but no more than ten (10) days after capture of the raptor. The permittee shall then have it treated by a veterinarian or a permitted wildlife rehabilitator. The raptor shall count against the permittee's possession limit.

(ii) A permittee may give the raptor directly to a veterinarian or a permitted Wyoming wildlife rehabilitator and report it to the Department within ten (10) business days. If reported properly, the raptor shall not count against capture or possession limits.

(n) If a permittee is present at a capture site, another permittee may capture the raptor for him and immediately give possession of the raptor to him. The permittee taking possession of the raptor shall be required to file Service Form 3-186A and shall have the raptor count against their own possession limit.

Section 8. Acquisition, Transfer, Release, Loss or Rebanding of a Raptor.

(a) If a permittee acquires, transfers, rebands, or microchips a raptor; or if a raptor a permittee possesses is stolen; or if a permittee loses a raptor to the wild and does not recover it within thirty (30) consecutive days; or if a raptor possessed for falconry dies; the permittee must report the change within ten (10) days by entering the required information in the ~~electronic database at~~ <http://permits.fws.gov/186A> U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee of a stolen raptor shall also report such theft to the Department and to the U.S. Fish and Wildlife Service Law Enforcement special agent in charge for the area.

(b) Permittees shall keep copies of all electronic database submissions documenting take, transfer, loss, rebanding, theft or micro-chipping of each falconry raptor until five (5) years after the raptor is transferred, lost or has died.

(c) Permittees shall adhere to the following regulations prior to permanently releasing a raptor to the wild;

(i) If the species is not native to Wyoming, or is a hybrid of any kind, it shall not be released to the wild.

(ii) If the species to be released is native to Wyoming and is captive-bred, a permittee shall not release the raptor to the wild unless he has written permission from the Department. If permitted to do so, the raptor shall be hacked (allowed to adjust) to the wild at an appropriate time of year and an appropriate location. The permittee shall remove any falconry band and report release of the raptor by entering the required information in the ~~electronic database at <http://permits.fws.gov/186A>~~ U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(iii) If the species to be released is native to Wyoming and was taken from the wild, it may be released at an appropriate time of year and an appropriate location. The permittee shall remove any falconry band and report release by entering the required information in the ~~electronic database at <http://permits.fws.gov/186A>~~ U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(d) There is no limit on the number of wild-caught or captive-bred raptors that may be transferred to a permittee, but a permittee shall not exceed their possession limit.

(e) No person shall enter upon the private property of any person to take a raptor without the written permission of the owner or person in charge of the property.

Section 9. Banding, Tagging or Implanting Micro-chips in Raptors Used in Falconry.

(a) When flown free, a hybrid raptor shall have at least two (2) attached radio transmitters to help locate it.

(b) A captive-bred raptor shall be banded with a seamless metal band in accordance with 50 CFR 21.30, revised as of October 1, ~~2012~~2018, and which does not include any later amendments of the incorporated matter. If a seamless band is removed or lost, within ten (10) days from the day it is removed or noted missing, the permittee shall report it and request a replacement U.S. Fish and Wildlife Service nonreusable band from the Department. The permittee shall submit the required information electronically immediately upon rebanding or micro-chipping the raptor ~~at <http://permits.fws.gov/186A>~~, in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. The permittee shall replace a band that is removed or lost, or may implant an ISO (International Organization for Standardization) compliant (134.2 kHz) microchip in the raptor and report the microchip information ~~at <http://permits.fws.gov/186A>~~ in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department. A copy of 50 CFR Part 21.30 can be viewed at any Department Regional Office or the Headquarters Office.

(c) A permittee shall not band a raptor removed from the wild with a seamless numbered band.

(d) Any wild caught northern goshawk (*Accipiter gentilis*), Harris's hawk (*Parabuteo unicinctus*), peregrine falcon or gyrfalcon (*Falco rusticolus*) possessed must be banded with a permanent, nonreusable, numbered U.S. Fish and Wildlife Service leg band that the Department will supply. A permittee may purchase and implant an ISO-compliant (134.2 kHz) microchip in the raptor in addition to the band. Contact the Department for information on obtaining and disposing of bands. Permittees may request bands from the Department in advance of any effort to capture a raptor.

(e) If the band must be removed or is lost from a raptor obtained from the wild it shall be reported within five (5) days to the Department and the permittee shall then do at least one of the following:

(i) Request a U.S. Fish and Wildlife Service nonreusable band from the Department. Immediately upon rebanding the raptor, the permittee shall report it by entering the required information (including band number and microchip information) in the ~~electronic database at <http://permits.fws.gov/186A>~~ U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(ii) Obtain and implant an ISO-compliant (134.2 kHz) microchip in the raptor and report the microchip information at ~~<http://permits.fws.gov/186A>~~ in the U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A form to the Department.

(f) Permittees shall not alter, deface or use counterfeit bands. The rear tab on a band may be removed, and surface imperfections may be smoothed if it does not affect the integrity of the band or the numbering on it.

(g) If a permittee documents health or injury problems for a raptor that are caused by the band, the Department may provide an exemption to the banding requirement for that raptor. In that case, the permittee shall possess a copy of the exemption paperwork when transporting or flying the raptor. If the raptor is a wild northern goshawk (*Accipiter gentilis*), Harris's hawk (*Parabuteo unicinctus*), peregrine falcon (*Falco peregrinus*), or gyrfalcon (*Falco rusticolus*) the band must be replaced with an ISO-compliant (134.2 kHz) microchip that the U.S. Fish and Wildlife Service will supply. The U.S. Fish and Wildlife Service will not provide a microchip for a wild northern goshawk, Harris's hawk, peregrine falcon, or gyrfalcon unless a permittee demonstrates that a band caused an injury or health problem for the raptor.

Section 10. Additional Provisions for the Practice of Falconry.

(a) Raptors removed from the wild for falconry are always considered wild raptors.

(b) General Falconers or Master Falconers may hack falconry raptors.

(i) Any raptor a permittee is hacking counts against his possession limit and shall be a species the permittee is authorized to possess.

(ii) Any hybrid or raptor not native to Wyoming shall have two (2) attached functioning radio transmitters during hacking.

(iii) Permittees shall not hack raptors near nesting areas of a federally threatened or endangered bird species or any other locations where raptors are likely to harm Federally listed, threatened or endangered animal species.

(c) Permittees may use other acceptable falconry practices, such as, but not limited to, the use of creance (tethered) flying, lures, balloons or kites in training or conditioning raptors.

(d) Selling or trading raptors under a falconry permit.

(i) A permittee may sell, purchase, barter or offer to sell, purchase or barter captive-bred raptors marked with seamless bands to other permittees who are authorized to possess raptors.

(ii) Permittees shall not purchase, sell, trade or barter wild raptors. Wild raptors shall only be transferred.

(e) A permittee may transfer a raptor to another permit type.

(i) A permittee shall not transfer a wild-caught raptor to a raptor propagation permit unless the raptor has been used in falconry for at least two (2) years, or at least one (1) year for a sharp-shinned hawk (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), merlin (*Falco columbarius*), or an American kestrel (*Falco sparverius*). Within ten (10) days of transferring the raptor, the permittee shall report the transfer by entering the required information in the ~~electronic database at <http://permits.fws.gov/186A>~~ U.S. Fish and Wildlife Service ePermit System or provide a copy of Service Form 3-186A documenting acquisition of the raptor by the propagator to the Federal migratory bird permit office that administers the propagation permit.

(ii) A permittee may transfer a wild-caught raptor to another permit type at any time, if it has been injured and a licensed veterinarian has determined that the raptor can no longer be flown for falconry. Within ten (10) days of transferring the raptor, the permittee shall provide a copy of Service Form 3-186A documenting acquisition of the raptor and shall also provide a copy of the certification from the veterinarian that the raptor is not useable in falconry, to the federal migratory bird permits office that administers the other permit type.

(f) Permittees may transfer captive-bred raptors if the holder of the other permit type is authorized to possess the raptor(s). Within ten (10) days the permittee must report the transfer by entering the required information in the ~~electronic database at <http://permits.fws.gov/186A>~~ U.S. Fish and Wildlife Service ePermit System or by submitting Service Form 3-186A to the Department.

(g) Permittees may use raptors possessed for falconry in captive propagation if the permittee or the person overseeing the propagation, has the required propagation permit in

accordance with 50 CFR 21.30, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter. If a permittee uses a raptor for eight (8) or more months in a year in captive propagation, the raptor shall be transferred for propagation. The raptor shall then be banded as required in 50 CFR 21.30. A copy of 50 CFR Part 21.30 can be viewed at any Department Regional Office or the Headquarters Office.

(h) Apprentice, General or Master Falconers may use raptor(s) they possess under their falconry permit in conservation education programs presented in public venues.

(i) A permittee does not need a Wyoming or federal education permit to conduct conservation education programs using a raptor held under a Wyoming falconry permit.

(ii) A permittee may present conservation education programs as an Apprentice Falconer if he is under the direct supervision of a General or Master Falconer during presentation of the program.

(iii) Permittees shall use their raptors primarily for falconry.

(iv) Permittees may charge a fee for presentation of a conservation education program. The fee may not exceed the amount required to recoup the permittee's costs.

(v) In conservation education programs, permittees shall provide information about the biology, ecological roles and conservation needs of raptors and other migratory birds, although not all of these topics must be addressed in every presentation. Permittees shall not give presentations that do not address falconry and conservation education.

(vi) Permittees shall be responsible for all liability associated with conservation education programs as per 50 CFR 13.50, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part 13.50 can be viewed at any Department Regional Office or the Headquarters Office.

(i) Permittees shall not receive payment for photography, filming or other such uses of raptors to make movies or other sources of information on the practice of falconry or on the biology, ecological roles and conservation needs of raptors and other migratory birds.

(i) Permittees shall not use raptors to make movies, commercials or in other commercial ventures that are not related to falconry.

(ii) Permittees shall not use raptors for entertainment, advertisements, as a representation of any business, company, corporation or other organization, or for promotion or endorsement of any products, merchandise, goods, services, meetings or fairs, with the following exceptions:

(A) Raptors may be used to promote or endorse a nonprofit falconry organization or association.

(B) Raptors may be used to promote or endorse products or endeavors related directly to falconry, such as hoods, telemetry equipment, giant hoods, perches and materials for raptor facilities.

(j) General or Master Falconers may assist permitted Wyoming wildlife rehabilitators to condition raptors in preparation for release to the wild and may keep raptors in their facilities.

(i) The rehabilitator shall provide the permittee with a letter or form that identifies the raptor and explains that the permittee is assisting in rehabilitation.

(ii) Public contact with any raptor being rehabilitated under these provisions shall be minimized.

(iii) A permittee does not have to add any raptor held for this purpose to their falconry permit; the raptor shall remain under the permit of the rehabilitator.

(iv) Permittees shall return all raptors to the rehabilitator for final disposition.

(k) Using a falconry raptor in abatement activities.

(i) A Master Falconer may conduct and receive payment for abatement activities with raptors possessed for falconry if he has a Special Purpose Abatement permit issued by the U.S. Fish and Wildlife Service or is a sub-permittee of an abatement permittee. A General Falconer may conduct and receive payment for abatement activities only as a sub-permittee of the holder of the abatement permit.

(l) Feathers that raptors molt.

(i) A permittee may possess flight feathers for imping for each species of raptor the permittee possesses or previously held, for as long as the permittee has a valid falconry permit. The permittee may receive feathers for imping from other permitted falconers or propagators in the United States, and may give feathers to them. No permittee shall buy, sell or barter such feathers.

(ii) Permittees may donate feathers from a raptor, except golden eagle feathers, to any person or institution with a valid permit to have the feathers, or to anyone exempt from the permit requirement under 50 CFR 21.12, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(iii) Except for primary or secondary flight feathers or retrices from a golden eagle, permittees shall not be required to gather feathers that are molted or otherwise lost by raptors. Permittees may leave the feathers where the feathers fall, store the feathers for imping

or destroy the feathers. Permittees shall collect molted flight feathers and retrices from golden eagles for imping, or shall send the feathers to the National Eagle Repository at: U.S. Fish and Wildlife Service, National Eagle Repository, Rocky Mountain Arsenal, Building 128, Commerce City, Colorado 80022. The telephone number at the Repository is 303-287-2110.

(iv) If a permittee's permit expires or is revoked, he shall donate the feathers of any raptor, except a golden eagle, to any person or institution exempt from the permit requirement under 50 CFR 21.12, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; or authorized by permit to acquire and possess the feathers. If the permittee does not donate the feathers, the permittee shall burn, bury, or otherwise destroy the feathers. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(m) Disposition of carcasses of falconry raptors.

(i) A permittee shall send the entire body of a golden eagle held for falconry, including all feathers, talons and other parts, to the National Eagle Repository.

(ii) A permittee may donate the body or feathers of any other raptor they were permitted to possess to any person or institution exempt under 50 CFR 21.12, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; or authorized by permit to acquire and possess such parts or feathers. A copy of 50 CFR Part 21.12 can be viewed at any Department Regional Office or the Headquarters Office.

(iii) If the raptor was banded or micro-chipped prior to its death, a permittee may keep the body of any raptor, except that of a golden eagle, and the band and microchip shall be left in place. The permittee may keep the body so that the feathers are available for imping or may have the body mounted by a taxidermist. The mount may be used in giving conservation education programs.

(iv) If a permittee does not wish to keep the raptor body or feathers or donate the body or feathers, he shall burn, bury or otherwise destroy the body or feathers within ten (10) consecutive days of the death of the raptor or after final examination by a veterinarian to determine cause of death.

(v) If a permittee does not donate the raptor body or feathers or have the body mounted by a taxidermist, he may possess the flight feathers for as long as he has a valid falconry permit. Permittee's shall not buy, sell, or barter the feathers. Permittee's shall keep the paperwork documenting their acquisition of the raptor.

(n) Permittee's falconry activities shall not cause the take of federally listed, threatened or endangered wildlife.

(o) A permittee may use a raptor to take any species listed in parts 50 CFR 21.43, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; 50 CFR 21.44, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; 50 CFR 21.45, revised as of October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; or 50 CFR 21.46, revised as of ~~August~~ October 1, ~~2012~~2018, and which does not include any later amendments or editions of the incorporated matter; at any time in accordance with the conditions of the applicable depredation order, as long as the permittee is not monetarily compensated. A copy of 50 CFR Part 21.43, 50 CFR Part 21.44, 50 CFR Part 21.45 and 50 CFR Part 21.46 can be viewed at any Department Regional Office or the Headquarters Office.

(p) A surviving spouse, executor, administrator or other legal representative of a deceased falconry permittee shall transfer any raptor held by the permittee to another authorized permittee within ninety (90) consecutive days of the death of the falconry permittee. After ninety (90) consecutive days, disposition of a raptor held under the permit is at the discretion of the Department.

Section 11. Hunting with Raptors. A person holding a valid Wyoming hunting license for game birds or small game animals and a license to hunt with falcon may take game birds and small game animals in and during any of the established hunting areas and seasons in accordance with existing Wyoming Game and Fish Commission regulations under the following provisions:

(a) Persons hunting with raptors may take game birds without distinction as to sex.

(b) A permittee may allow a raptor to feed on a prey animal taken unintentionally, provided that the prey animal is not taken into the falconer's possession.

(i) Unintentional take of any federally listed threatened or endangered species shall be reported to the Department and the U.S. Fish and Wildlife Ecological Services Field Office in Cheyenne within five (5) business days of the take event.

Section 12. Most Restrictive State or Federal Regulation. State and federal regulations govern the taking, possession and transportation of all raptors. In all cases, the most restrictive regulation, whether federal or state, shall apply.

Section 13. Raptor Propagation. For the purpose of raptor propagation, the Wyoming Game and Fish Commission hereby adopts Title 50, Code of Federal Regulations (CFR) Part 21.30 entitled Raptor Propagation Permits, revised as of October 1, ~~2012~~2018. These regulations govern the propagation of raptors in captivity, the permitting criteria and regulatory requirements to maintain raptors in captivity for captive propagation, including annual reporting for raptors propagated within the State of Wyoming. Violations of the federal regulation pertaining to raptor propagation shall be considered violations of Commission regulations. Any future amendments, additions or revisions in the federal regulations governing raptor propagation shall be adopted by the Wyoming Game and Fish Commission prior to becoming law in Wyoming. A

copy of Title 50 CFR Part 21.30 may be viewed at Department Regional Offices and Headquarters.

Section 14. Violations of Commission Regulations.

(a) A violation of federal regulations or of Commission regulations pertaining to the maintenance or use of a falconry permit issued to an applicant under Sections 3 and 4 of this Chapter shall not be grounds, in and of itself, for revocation of any raptor propagation permit issued to an applicant under Section 13 of this Chapter.

(b) A violation of federal regulations or of Commission regulations pertaining to the maintenance and use of a raptor propagation permit issued to an applicant under Section 13 of this Chapter shall not be grounds, in and of itself, for revocation of any falconry permit issued to an applicant under Sections 3 and 4 of this Chapter.

WYOMING GAME AND FISH COMMISSION

~~Mike Healy~~David Rael, President

Dated: ~~January 22, 2014~~July 18, 2019

STATEMENT OF REASONS

CHAPTER 32

REGULATION GOVERNING FIREARM CARTRIDGES

AND ARCHERY EQUIPMENT

W.S. § 23-1-302 directs and empowers the Commission to promulgate such orders as the Commission deems necessary to carry out the intent of this regulation.

W.S. § 23-2-104 empowers the Commission to establish rules and regulation specifications for archery equipment used for taking big or trophy game animals.

W.S. § 23-3-110 empowers the Commission to establish rules and regulations governing firearms and ammunition specifications for taking game birds and wild turkeys.

W.S. § 23-3-111 empowers the Commission to establish rules and regulations governing firearms and ammunition specifications for taking big or trophy game animals.

Section 3, Definitions. New definitions are being provided for the terms “Smart Firearm” and “Trackable Arrow Technology”.

Section 6, Archery equipment that is legal for the taking of big or trophy game animals. New language is provided in subsections (d) and (e) to clarify the permissible use of trackable arrow technology, magnifying sights, holographic sights and range finding sights while archery hunting.

Other grammatical and formatting edits have been incorporated to provide additional clarity but do not change the intent of the regulation.



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

GOVERNOR
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEI – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 32, Regulation Governing Firearm Cartridges and Archery Equipment

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission Regulation Chapter 32, Regulation Governing Firearm Cartridges and Archery Equipment. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received 19 total comments for Chapter 32.

Three comments did not address this proposed regulation and were meant for consideration with other regulations.

Five comments were in support of the draft regulation as proposed.

Six comments were not in support of trackable arrows and other technology for use during special archery seasons. The Department previously conducted a public survey regarding use of high tech equipment for hunting purposes. Our survey results indicate that a majority of hunters find the types of technology referenced in the draft regulation acceptable and in keeping with the spirit of “fair chase” for hunting. The Wyoming Game and Fish Commission (Commission) has discussed the use of these specific types of technology during several open public meetings, and requested the Department to clarify in regulation the specific types of hunting technology that was permissible for use. After consideration of these public comments, and considering public comments received at their July 2019 Commission meeting, the Commission elected to not make additional changes to this draft regulation.

Five comments addressed concern with this regulations current language regarding the use of expanding point bullets. Department personnel are in ongoing conversations and discussions with bullet manufacturers to address these concerns and will be making recommended edits to this regulation prior to the 2020 big game hunting seasons.

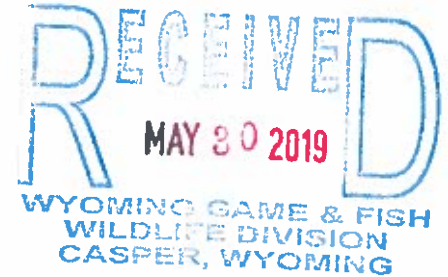
ul

Wyoming Game and Fish Department Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☒ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Ch 32 Sec 4 (d)

(e) "Prohibit" should be the 1st
Word - None of this stuff

(d) No tracking technology

And No Crossbows

It is primitive, Keep it primitive

green river

MARK Anselmi
Printed Name

(Please use reverse for additional comments)

5-29-19
Date

4/2019

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☒ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

The department needs to limit/regulate advanced technology in hunting. Therefore, I recommend the following changes to the proposed regulations.

- 1) eliminate section b c) completely. This would not allow crossbow usage during archery season
- 2) change section b d) to only allow lighted nocks and prohibit the use of Bluetooth and GPS technology
- 3) change section e) to prohibit the use of magnified sight, holographic sights, Range finding sights and any electronic device attached to a bow that aids in the harvest of big or trophy game in archery season.

(Please use reverse for additional comments.)

Shelby Martin
greenriver

Shelby Martin
Printed Name

5/29/19
Date

4/2019



Fluid Transfer Monolithic® FTM

Xtreme Defense®



We Will Never Stop Innovating®

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☒ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

The department needs to limit/regulate advanced technology in hunting. Therefore, I recommend the following changes to the proposed regulations:

- 1) eliminate section b c) completely. This would not allow crossbow usage during archery season.
- 2) change section b d) to only allow lighted arrow nocks and prohibit the use of bluetooth & gps technology.
- 3) change section e) to prohibit the use of magnified sights, holographic sights, range finding sights and any electronic device attached to a bow that aids in the harvest of big or trophy game in archery seasons.

greenriver

Steve Martin

Printed Name

Steve Martin

(Please use reverse for additional comments)

5/29/19

Date

4/2019

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☒ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

I AGREE WITH THE PROPOSED ARCHERY
REGULATIONS

greenriver

CLAIR KENNELL (Please use reverse for additional comments)
5/29/19
Printed Name Date 4/2019

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☒ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

See Attached Sheet

(Please use reverse for additional comments.)

Sundance

Chris Rhodes
Printed Name

5/29/19
Date

4/2019



(307) 746-9740

bcgunworks@gmail.com

www.baysidecustomgunworks.net

To: Wyoming Game and Fish

2019 Chapter 32 Regulations Governing Firearms Cartridges and Archery Equipment.

Section 4 part a(i)

Any center-fire firearm of at least .24 caliber and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half inches (1.5) in overall length, and using an expanding point bullet; or,

The bullet regulation, “and using an expanding point bullet”, eliminates about 1/3 of commonly used projectiles and many of which are factory loaded by various ammunition manufacturers and sold as “hunting ammunition”.

The bullet regulation “and using an expanding point bullet” eliminates the use of hard cast lead which is tried and proven in many calibers and cartridges for big game hunting for well over 100 years. It also eliminates the use of new lead free designs that are tried and proven which are manufactured by Lehigh Defense and Cutting Edge Bullets as well as some others. The lead free designs and the hard cast bullets are sold as loaded ammunition by many companies large and small and marketed to hunters.

We are addressing the letter of the law and not the color of the law. We can make the reasonable assumption that no one would be charged for using one of these non-expanding well proven bullet designs. But it is important for laws to be transparent and have the color (implied meaning) match the letter (exactly what it says is to be enforced).

Bullet technology especially in the lead free bullet market is developing rapidly. We know that in the long run more than likely we will all be forced to hunt with lead free bullets. It's important that we get ahead of the curb and embrace this technology as well.

I have two ideas on how the Wyoming Game and Fish can address this issue with the Firearms Cartridge Regulations.

Wyoming Game and Fish Department Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Chapter 32

See attached.

Sundance

Justin Evans
Printed Name

(Please use reverse for additional comments.)

29 May 19
Date

4/2019



23 May 2019

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

To whom it may concern,

I am writing this letter in reference to the Wyoming Game and Fish Department Chapter 32 concerning the Regulations Governing Firearm Cartridges and Archery Equipment. Currently, WGFD Chapter 32 is illegalizing many phenomenal choices for hunting bullets and ammunition due to the way the regulations written in section 4, subsections a-c, written as "and using an expanding point bullet".

My name is Justin Evans and I am a Ballistics Engineer working for Lehigh Defense in Rapid City, SD. I did most of my growing up in Cheyenne, WY and graduated from the University of Wyoming with a degree in Mechanical Engineering. I tell you this for full transparency, that my goals are to aid WGFD, and not just to benefit the company as to which I work for and design projectiles for. The reality is that hunting bullets are becoming more and more advanced each year, and companies such as ours are constantly striving to create bullets that hunters can rely on for harvesting game animals. I understand and agree with the desire to protect wildlife from improper bullet use during big game hunting seasons. However, I believe there is a better way to write this clause to both protect wildlife and avoid outlawing many great and readily available bullets for hunters. I would like to participate in helping WGFD in the writing of Chapter 32 for this reason.

A few people from our company will be attending the Sundance meeting on May 29, 2019. We look forward to meeting and greatly look forward to being a part of valuable discussion. If we can ever help in any way possible please do not hesitate to ask.

Thank you,

Justin Evans
Ballistics/Engineering
650-431-8140



Fluid Transfer Monolithic® FTM

Xtreme Defense® – Xtreme Penetrator

The FTM projectile is unlike anything else on the market today. Instead of utilizing high pressure to initiate expansion like a traditional deforming hollow point, the same high pressure fluid is directed radially away from the projectile's path through "fluted" sections. The massive pressure difference created by the flutes concentrates the fluid, as well as bone and tissue fragments and rapidly accelerates them through the fluted path and into its surroundings. This action creates violent tearing, cutting, and stretching of vital organs, tissues, and other fluid based systems. FTM technology is quickly becoming the top choice for military, law enforcement, and civilian use, as it is virtually blind to barriers. Made from solid copper bar stock, the FTM projectile is able to get through the hardest of barriers such as sheet metal and auto glass with minor deformation, unlike its lead counterparts. This solid machined projectile, in combination with carefully engineered geometries creates a product that is unrivaled in terminal performance.



The technology started with the Xtreme Penetrator (XP) design, a projectile that achieves great straight-line penetration, without greatly sacrificing terminal performance. This is an excellent woodsman's bullet, or it can be used for personal defense in calibers that often times achieve inadequate penetration without the use of an FMJ. The Xtreme Defense (XD) design is a much more aggressive version, creating massive amounts of drag within soft targets, and it was designed from the ground up to meet the FBI's specifications for bullet performance. The XD is the optimum choice when uncompromised terminal performance is required and is utilized by military and law enforcement agencies around the world.

We Will Never Stop Innovating®

Gel Test Worksheet

Date tested: 24 January 2013

Weapon type: GA Precision
Barrel length: 22"

BB velocity: 595 fps

BB depth: 3.63"

Shot velocity: 2,569 fps

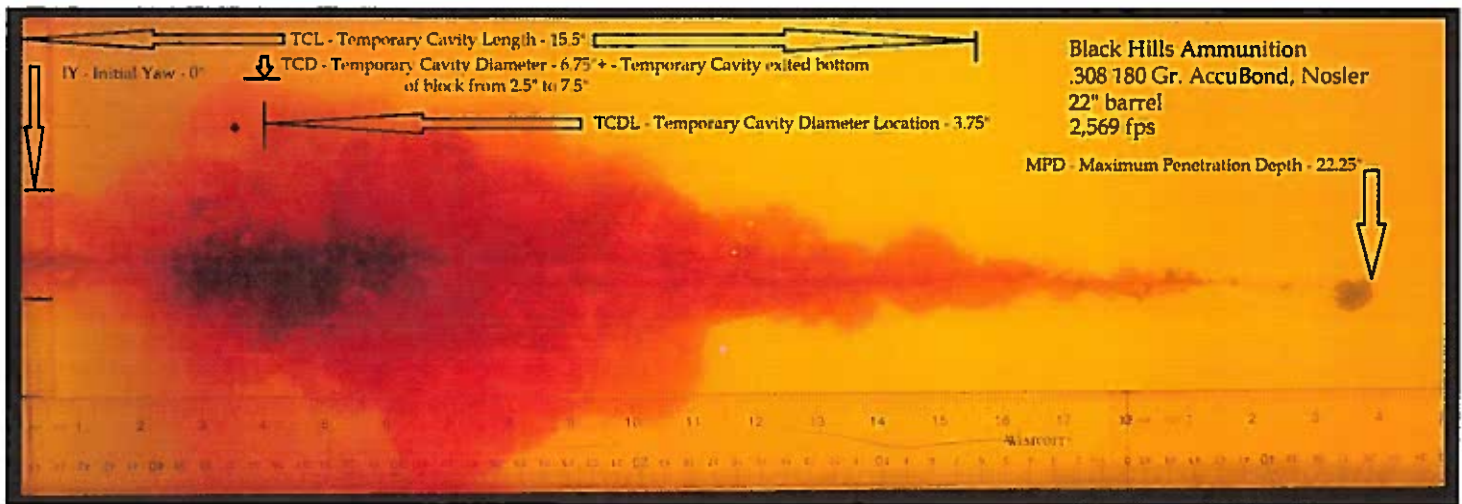
Ammunition type & Lot #: Black Hills Ammunition .308 180 Gr. AccuBond, Nosler
Black Hills Gold

D.P.: N/A

Distance To Block: 12 feet

Notes: TC exited bottom of gelatin block from 2.5" to 7.5".

Temporary cavity (TC) data (inches)				Fragment info		
IY	TCL	TCD	TCDL	#> 1gr	%> 7"	MPD
0"	15.5"	6.75"+	3.75"	N/A	N/A	22"



Bullet Retained Weight	Percentage Retained	Average Expansion Diameter	Largest Diameter
122.4 Gr.	68%	.631"	.653"

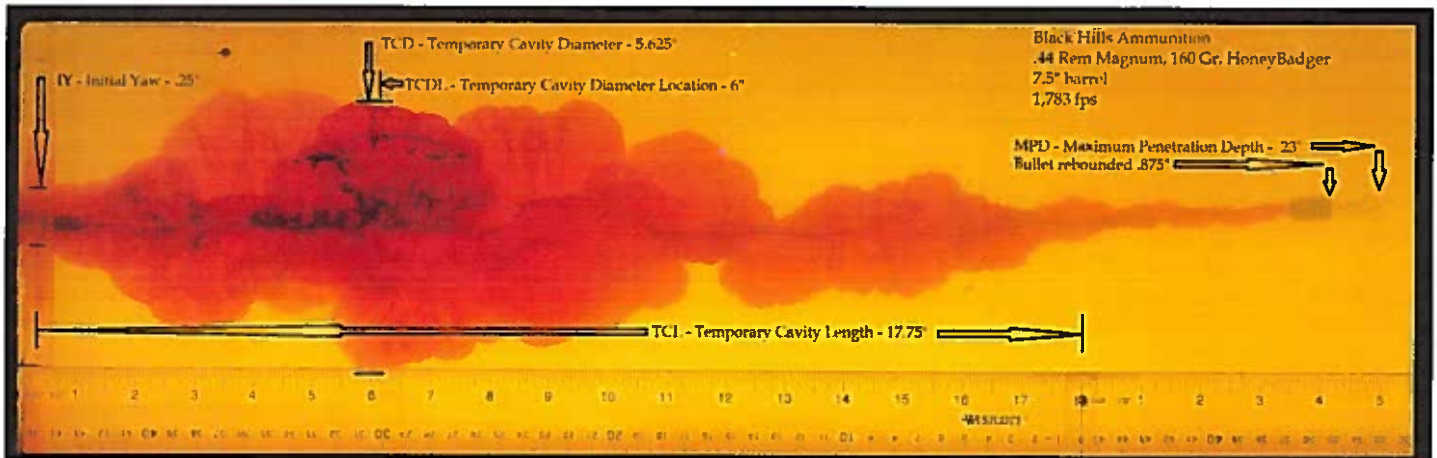
Gel Test Worksheet

Date tested: 8 December, 2016	Weapon type: Ruger Redhawk Barrel Length: 7.5"	Tested by: Doug
-------------------------------	---	-----------------

BB velocity: 596 fps	BB depth: 3.46"	Shot velocity: 1,783 fps
Ammunition type & Lot #: Black Hills Ammunition .44 Rem Magnum 160 Gr. HoneyBadger		

D.P.: N/A	Distance To Block: 12 feet
Notes: Bullet rebounded .875"	

Temporary cavity (TC) data (inches)				Fragment info		
IY	TCL	TCD	TCDL	#> 1gr	%> 7"	MPD
.25"	17.75"	5.625"	6"	N/A	N/A	23"



Bullet Retained Weight	Percentage Retained	Average Expansion Diameter	Largest Diameter
160 Gr.	100%	.426"	.431"

Gel Test Worksheet

Date tested: 7 December, 2010	Weapon type: Smith & Wesson Model 29-2 Barrel length: 6.5"
-------------------------------	---

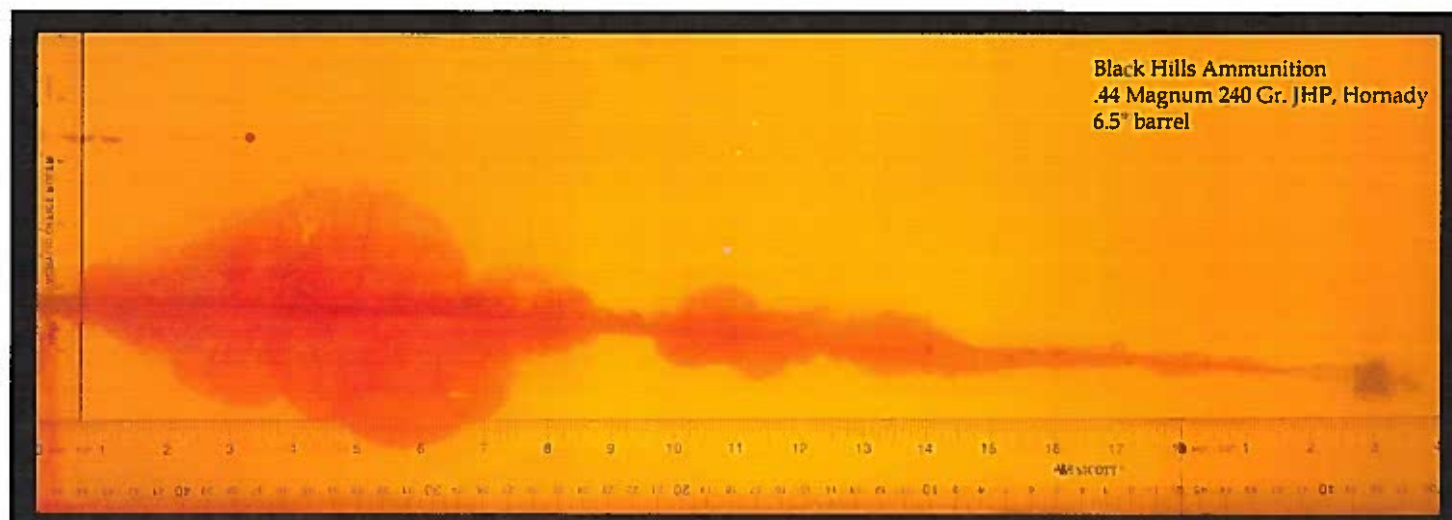
BB velocity: 575 fps	BB depth: 3.11"	Shot velocity: 1,250 fps
----------------------	-----------------	--------------------------

Ammunition type & Lot #: Black Hills Ammunition .44 Magnum 240 Gr. JHP, Hornady

D.P.: N/A	Distance To Block: 12 feet
-----------	----------------------------

Notes:

Temporary cavity (TC) data (inches)				Fragment info		
IY	TCL	TCD	TCDL	#> 1gr	%> 7"	MPD
.5"	13"	3.75"	4.5"	7	100%	21.25"



Bullet Retained Weight	Percentage Retained	Average Expansion Diameter	Largest Diameter
224.8 Gr.	94%	.610"	.625"

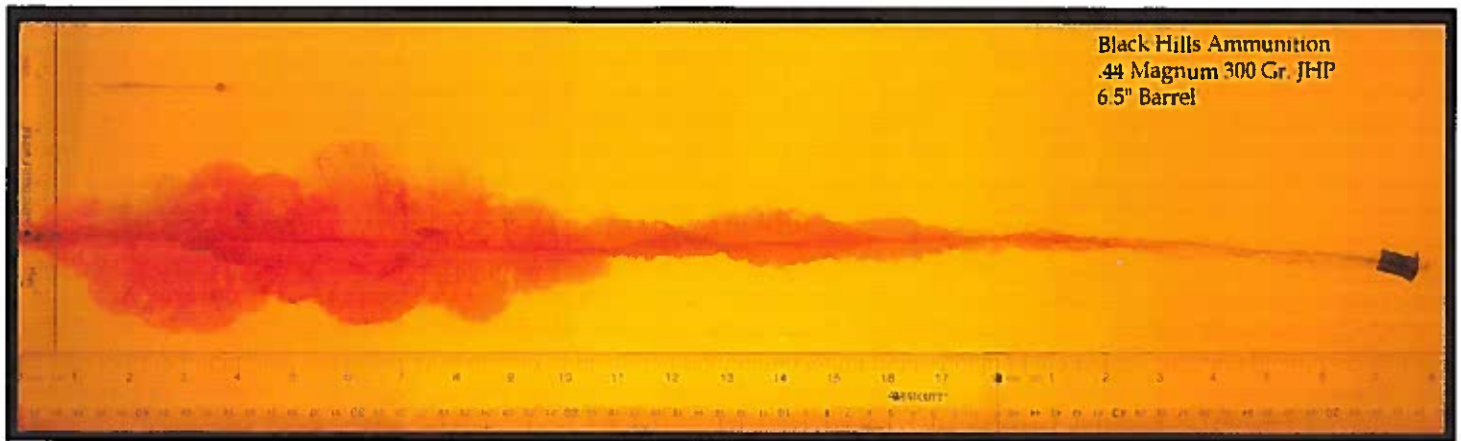
Gel Test Worksheet

Date tested: 7 December, 2010	Weapon type: Smith & Wesson Model 29-2 Barrel length: 6.5"
-------------------------------	---

BB velocity: 598 fps	BB depth: 3.49"	Shot velocity: 1,044 fps
Ammunition type & Lot #: Black Hills Ammunition .44 Magnum 300 Gr. JHP, Hornady		

D.P.: N/A	Distance To Block: 12 feet
Notes:	

Temporary cavity (TC) data (inches)				Fragment info		
IY	TCL	TCD	TCDL	#> 1gr	%> 7"	MPD
.5"	14.25"	3.25"	6.25"	3	100%	25.75"



Bullet Retained Weight	Percentage Retained	Average Expansion Diameter	Largest Diameter
296.8 Gr.	99%	.601"	.644"



(307) 746-9740

bcbgunworks@gmail.com

www.baysidecustomgunworks.net



To: Wyoming Game and Fish

2019 Chapter 32 Regulations Governing Firearms Cartridges and Archery Equipment.

Section 4 part a(i)

Any center-fire firearm of at least .24 caliber and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half inches (1.5) in overall length, and using an expanding point bullet; or,

The bullet regulation, "and using an expanding point bullet", eliminates about 1/3 of commonly used projectiles and many of which are factory loaded by various ammunition manufacturers and sold as "hunting ammunition".

The bullet regulation "and using an expanding point bullet" eliminates the use of hard cast lead which is tried and proven in many calibers and cartridges for big game hunting for well over 100 years. It also eliminates the use of new lead free designs that are tried and proven which are manufactured by Lehigh Defense and Cutting Edge Bullets as well as some others. The lead free designs and the hard cast bullets are sold as loaded ammunition by many companies large and small and marketed to hunters.

We are addressing the letter of the law and not the color of the law. We can make the reasonable assumption that no one would be charged for using one of these non-expanding well proven bullet designs. But it is important for laws to be transparent and have the color (implied meaning) match the letter (exactly what it says is to be enforced).

Bullet technology especially in the lead free bullet market is developing rapidly. We know that in the long run more than likely we will all be forced to hunt with lead free bullets. It's important that we get ahead of the curb and embrace this technology as well.

I have two ideas on how the Wyoming Game and Fish can address this issue with the Firearms Cartridge Regulations.

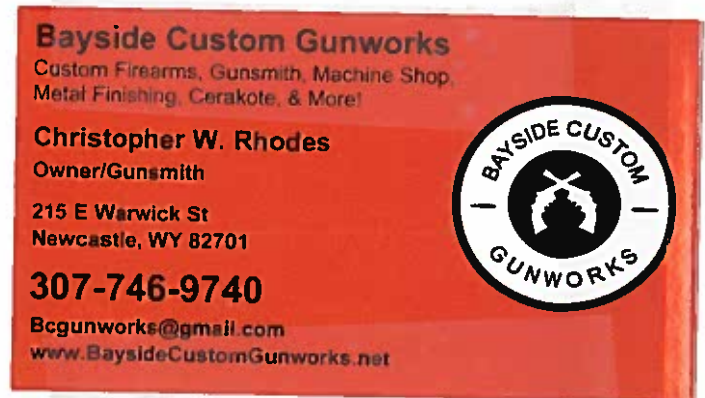
mail

- One option being to just eliminate the statement “and using an expanding point bullet” from the regulation.
- Or add a definition of “expanding point bullet” to the regulation. To stay ahead of the rapidly advancing technology, not have to revisit this law year after year, and to aid in simplicity I would recommend the following definition:
 - Expanding Point Bullet: A bullet designed by its manufacturer to create a wound channel larger than bore diameter.

Thank you for taking your time to read my letter. I hope the information provided will help us make all of these well proven bullet designs available to the Wyoming hunters. If you have any questions, please don't hesitate to contact me.



Christopher W. Rhodes
Owner Bayside Custom Gunworks
Personal Cell (804) 832-9545



May 31, 2019

To: Wyoming Game and Fish

2019 Chapter 32 Regulations Governing Firearms Cartridges and Archery Equipment.

Section 4 part a(i)

Any center-fire firearm of at least .24 caliber and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half inches (1.5) in overall length, and using an expanding point bullet; or,

The bullet regulation, "and using an expanding point bullet", eliminates about 1/3 of commonly used projectiles and many of which are factory loaded by various ammunition manufacturers and sold as "hunting ammunition".

The bullet regulation "and using an expanding point bullet" eliminates the use of hard cast lead which is tried and proven in many calibers and cartridges for big game hunting for well over 100 years. It also eliminates the use of new lead-free designs that are tried and proven which are manufactured by Lehigh Defense and Cutting Edge Bullets as well as some others. The lead-free designs and the hard cast bullets are sold as loaded ammunition by many companies large and small and marketed to hunters.

We are addressing the letter of the law and not the color of the law. We can make the reasonable assumption that no one would be charged for using one of these non-expanding well proven bullet designs. But it is important for laws to be transparent and have the color (implied meaning) match the letter (exactly what it says is to be enforced).

Bullet technology especially in the lead-free bullet market is developing rapidly. We know that in the long run more than likely we will all be forced to hunt with lead free bullets. It's important that we get ahead of the curb and embrace this technology as well.

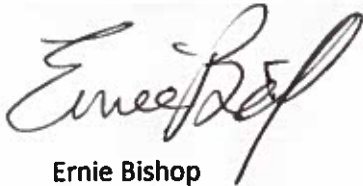
I have two ideas on how the Wyoming Game and Fish can address this issue with the Firearms Cartridge Regulations.

One option being to just eliminate the statement "and using an expanding point bullet" from the regulation.

Or add a definition of "expanding point bullet" to the regulation. To stay ahead of the rapidly advancing technology, not have to revisit this law year after year, and to aid in simplicity I would recommend the following definition:

Expanding Point Bullet: A bullet designed by its manufacturer to create a wound channel larger than bore diameter.

Thank you for taking your time to read my letter. I hope the information provided will help us make all of these well proven bullet designs available to the Wyoming hunters. If you have any questions, please don't hesitate to contact me.



Ernie Bishop
306 West Flying Circle Drive
Gillette, WY 82716
ernieemily@yahoo.com
307-257-0379

mail



WGFD Web Comment Report

Chapter 32, Regulation Governing Firearm Cartridges and Archery Equipment

- 1** Chapter 32 Section 4 A-C states "and using an expanding point bullet" and this outlaws many great choices for hunters in terms of bullet selection. The phrase needs re-written to accommodate a wider variety of tried and true hunting projectiles while still protecting game animals from the use of non-viable bullets.

Final Comment	Evans, Justin	Rapid City, SD	5/23/2019 8:48:00 AM
----------------------	----------------------	-----------------------	----------------------

- 2** I support the proposed changes. I have seen and used the rangefinding sights and can see the advantages of their use for hunting. Thank you

Final Comment	Bomar, Randy	Sheridan, WY	5/27/2019 12:11:00 PM
----------------------	---------------------	---------------------	-----------------------

- 3** I like the new changes and support them.

Final Comment	Bomar, Brock	Sheridan, WY	5/27/2019 12:13:00 PM
----------------------	---------------------	---------------------	-----------------------

- 4** I strongly approve of the changes you're proposing to the archery regulations. Thank you Rob Hium

Final Comment	Hium, Rob	Dayton , WY	5/27/2019 10:02:00 PM
----------------------	------------------	--------------------	-----------------------

- 5** Dear Commissioners,I strongly urge you to prohibit the use of magnifying,holographic,range finding,sights on bowhunting equipment.I further ask that you not allow any tracking devises to the hunting arrow.Remembering the primitive nature that allowed for bowhunting seasons,please refrain from archery eqiptment that was never intended when archery seasons were first incorporated.Aldo Leapold would be proud of you.Dave Baer,Uinta county

Final Comment	M.Baer, David	Mountain View, WY	5/29/2019 9:52:00 AM
----------------------	----------------------	--------------------------	----------------------

- 6** You should prohibit trackable arrow technology, not promote it. This will lead to people taking questionable shots. Keep bow hunting primitive, no sights, no trackable arrows. The trackable arrows will come back to haunt you. Thank you, Mark Anselmi

Final Comment	Anselmi, Mark	Ropck Springs, WY	5/30/2019 10:47:00 AM
----------------------	----------------------	--------------------------	-----------------------

- 7** You should not outlaw non expanding bullets such as hard cast that has been used for years and the best choice for big bore pistols for big game and with some of the new solid copper bullets that are coming out that don't expand still make more shock to the animal and get more penetration then expanding bullets. You have to be able to get the bullet to the Vidal organs over an animal and the hard cast bullets is what most of us big bore handgunners use and that is what we use in the sharps rifles that have cleanly killed game for years. Thank you for your time

Final Comment	Horn, Kory	Carthage, IL	5/30/2019 9:01:00 PM
----------------------	-------------------	---------------------	----------------------

- 8** Your regulation to use a expanding bullets to hunt game animals is woefully out dated. With the advancement of bullet technology being what it is, you're preventing hunters from using some very amazing bullet choices. Please revisit this rule. Thank you Steve Brown

Final Comment	Brown, Steve	Charlotte, MI	5/30/2019 10:06:00 PM
----------------------	---------------------	----------------------	-----------------------

- 9** You have banned non expanding bullets, hard cast with a large melplat is a good and effective killer. It provides good penetration and hydrostatic shock. Buy banning these bullets you have taken a viable and very useful bullet away from hunters who use large caliber rifles and handguns. Please reconsider this, I understand that most non expanding bullets do not preform well, but you could make an exception for hard cast flat point bullets in your regulations. Thank you for your time.

Final Comment	Hartrampf, Schnell	Troy, MT	5/31/2019 12:46:00 PM
----------------------	---------------------------	-----------------	-----------------------

WGFD Web Comment Report

Chapter 32, Regulation Governing Firearm Cartridges and Archery Equipment

- 10** As far as magnifying sights, holographic sights and range finding sights, SHOULD NOT be able to be used while archery hunting. The use of these sights is intended to be able to shoot farther and farther which is the exact opposite of what we should be doing. Bowhunters need to get CLOSER and take better shots instead of relying on technology to get further and further from big game animals. These devices are basically what wannabe bowhunters think they need since they are not willing to pass marginal shots. It is a bad idea to be able to use trackable arrow technology in bowhunting. This is just another crutch that wannabe bowhunters think they need to make up for poor hunting skills. It is shame that sportsmen are relying more and more on technology instead of learning how to stalk and to wait for good shot opportunities. The entire idea of bowhunters hunting first is because we have limited success. Some bowhunters now believe that almost anything that will help them get a big game animal should be allowed. We are coming to sad state of affairs when technology replaces sportsmanship and fair chase. Mike Barrett, Dayton, WY

Final Comment	Barrett, Mike	Dayton, WY	6/16/2019 10:28:00 AM
----------------------	----------------------	-------------------	-----------------------

- 11** Trackable arrow technology SHOULD NOT include anything that emits a signal from an arrow that can be followed once an arrow is shot in the field. This technology will only let bowhunters think they can take longer and longer shots as they will feel that if they can hit the animal they will be able to find it - a bad situation. Magnifying sights, holographic sights and range finding sights attached to the bow will only make bowhunters also take longer and longer shots. Bowhunting is supposed to be a limiting sport and all this technology is just making it easier and easier. There is no need to for these types of items (and they will only get more and more advanced) in bowhunting which is supposed to be a more limited sport. Any electronic device attached to a bow makes an animal taken with that bow ineligible to be entered into the Pope & Young records program. There is one thing that can be done that will improve the sportsmanship and ethics of bowhunters and make technology less needed and that is mandatory Bowhunter Education for All Bowhunters. Susan Barrett, Dayton, WY

Final Comment	Barrett, Susan	Dayton, WY	6/16/2019 10:42:00 AM
----------------------	-----------------------	-------------------	-----------------------

- 12** ADDITIONAL COMMENT If you legalize trackable arrow technology it will be very difficult to undo this and by this I mean when the technology gets good enough to be able to keep track of an animal in a major drainage that has a superficial hit (neck, shoulder, high back) then anyone who gets the code to put into his phone from the original hunter will be able to harass that animal as long as the batteries or energy source last. In the case of a very large trophy animal there could be many hunters able to constantly pursue this critter. Is that what bowhunting is coming to? In my humble opinion, there should be a law/regulation that if you draw blood from a big game animal, that is the only animal you can attach your tag to. While this is basically unenforceable, it sends a crystal clear message to sportsmen to take only high percentage shots. It is amazing the way things get around in the hunting community about things like this. It is my understanding that many places in Africa and outfitters in the US use this policy. This is the way it should be. Mike Barrett, Dayton, WY

Final Comment	Barrett, Mike	Dayton, WY	6/16/2019 11:00:00 AM
----------------------	----------------------	-------------------	-----------------------

- 13** Technology that helps hunters make clean shots like a rangefinder and magnification mounted on archery equipment is a good idea. Kids like new technology this will help get them out in the field.

Final Comment	Adams, Wyatt	Gillette, WY	6/16/2019 3:22:00 PM
----------------------	---------------------	---------------------	----------------------

- 14** I spoke with a Game and Fish employee and he explained that they were looking into making bow sights with laser rangefinders built in and also lighted arrow knocks illegal. I read the proposed and did not get that same feeling. So my opinion is both range finding scopes or sights along with lighted arrow knocks should remain LEGAL. I have used both on previous hunts. They aid in making the hunt and kill more ethical with less game loss due to bad shot placement. I have harvested 15 Bull and 3 cow elk in the last 21 years of archery hunting in Wyoming with only 1 animal not found. My success is far above average and though it is extremely challenging, I accredit many of these hunting items to my success.

Final Comment	Schall, John	casper, WY	6/16/2019 6:08:00 PM
----------------------	---------------------	-------------------	----------------------

WGFD Web Comment Report

Chapter 32, Regulation Governing Firearm Cartridges and Archery Equipment

- 15** To whom it may concern, Technology has its place, but there comes a point when you have too much technology on your side to be considered a fair chase hunter. When people can go hide cameras on the mountain and sit at home and check them from their computer or phone, that becomes not only an invasion of privacy, but it is not considered hunting and it should be outlawed. Cameras off the type that you don't have to check in person should be outlawed completely except for biologist's use. Archery hunting has become so high tech that it should be considered its own class (not "primitive weapon ")unless you are truly shooting a traditional long bow or recurve with no fancy sights or lighted nocks, etc. Muzzleloaders these days shoot ballistic tipped bullets, use high power scopes, and have the same effective distance as a .30-06 rifle. Those are no longer primitive in my book. Primitive muzzleloaders should have to use iron sights and shoot a patched round ball or sabot. 4 wheelers are a great tool, but they are greatly abused, especially during hunting seasons. I know there aren't a lot of people that would back me up, but I truly think the best thing for our wildlife would be if 4 wheelers were outlawed on public lands during hunting season. There would be so much less harassment of wildlife without 4 wheelers. Thank you for your time, please feel free to call me at any time. Bart Kolacny 307-578-6009

Final Comment	Kolacny, Bart	Powell, WY	6/16/2019 7:55:00 PM
----------------------	----------------------	-------------------	----------------------

- 16** Reference: Ch. 32, Sec 4(b)(i): firearm calibers for antelope, deer, etc. Gentlemen: I have been a WY resident for 73 years, including my military service. Having had experience with the M16 rifle, I believe the 5.56/.223 caliber to be completely unsuitable for any big game or trophy game animal. I have seen many carcasses having multiple wounds during my hunting trips since that reg was adopted, and the majority of them were not killing wounds. I would greatly appreciate your reconsidering and reversing that caliber as legal. It does not provide a quick, clean kill without much practice in shot placement. Please note this is my opinion and is not voiced during any of our HE classes. Thank you, Jim Ainsworth Rawlins

Final Comment	Ainsworth, James	Rawlins, WY	6/17/2019 9:54:00 AM
----------------------	-------------------------	--------------------	----------------------

- 17** Through ignorance, it would seem the Bobcats have been exterminated! Please relent, trapping is the cruelest death. These beautiful animals deserve better

Final Comment	Cameron, Linda	Southampton,	6/17/2019 4:09:00 PM
----------------------	-----------------------	---------------------	----------------------

- 18** Through ignorance, it would seem the Bobcats have been exterminated! Please relent, trapping is the cruelest death. These beautiful animals deserve better

Final Comment	Cameron, Linda	Southampton,	6/17/2019 4:09:00 PM
----------------------	-----------------------	---------------------	----------------------

- 19** I feel ALL lead shot should be banned and fishing lures should not contain lead. Lead should not be used in nature because it is a deadly poison to wildlife and birds!

Final Comment	Hipp, Jane	Jackson, WY	6/17/2019 4:59:00 PM
----------------------	-------------------	--------------------	----------------------

CHAPTER 32
REGULATION GOVERNING FIREARM CARTRIDGES
AND ARCHERY EQUIPMENT

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 23-1-302, § 23-2-104, § 23-3-110 and § 23-3-111.

Section 2. Regulation. The Commission hereby adopts the following regulation governing firearm cartridges and archery equipment for the taking of big or trophy game animals and game birds. This regulation shall remain in effect until modified or repealed by the Commission.

Section 3. Definition. For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes, and the Commission also adopts the following definition:

(a) “Archery Equipment” means crossbows, longbows, recurve bows, compound bows, arrows and bolts.

(b) “Smart Firearm” means any firearm equipped with a computerized targeting system that marks a target, calculates a firing solution and automatically discharges the firearm at a point calculated to most likely hit the marked target.

(c) “Trackable Arrow Technology” means any technology or device that allows for a hunting arrow to be tracked or more readily located while in the field. This includes, but is not necessarily limited to, lighted arrow nocks, GPS devices inserted into an arrow shaft or Bluetooth arrow nocks, which facilitate locating a hunting arrow once it is shot from a bow.

Section 4. Firearms, muzzle-loaders and cartridges that are legal for the taking of big or trophy game animals.

(a) For the taking of bighorn sheep, elk, moose, mountain goat or black bear by the use of a firearm, a hunter shall use:

(i) Any center-fire firearm of at least .24 caliber and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half inches (1.5) in overall length, and using an expanding point bullet; or,

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .40 caliber and firing an expanding point bullet or lead ball and using a charge of at least fifty (50) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

(b) For the taking of antelope, deer, mountain lion, or gray wolf where designated as a trophy game animal, a hunter shall use:

(i) Any center-fire firearm of at least .22 caliber (excluding .22 Hornet) and having a bullet weight of at least sixty (60) grains and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half (1.5) inches in overall length, and using an expanding point bullet; or,

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .40 caliber and firing an expanding point bullet or lead ball and using a charge of at least fifty (50) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

(c) For the taking of a grizzly bear by the use of a firearm, a hunter shall use:

(i) Any center-fire firearm of at least .27 caliber and firing a cartridge of at least two (2) inches in overall length and using an expanding point bullet of at least one hundred fifty (150) grains.

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .50 caliber and firing an expanding point bullet or lead ball and using a charge of at least one hundred (100) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

Section 5. Firearms, cartridges and archery equipment that are legal for the taking of game birds and small game.

(a) For the taking of game birds, excluding wild turkey, blue grouse and ruffed grouse, a hunter shall use:

(i) Any center-fire or muzzle-loading shotgun not larger than a ten (10) gauge plugged to admit no more than one (1) shell in the chamber and two (2) shells in the magazine; or,

(ii) Any archery equipment.

(b) For the taking of wild turkey, a hunter shall use any shotgun, center-fire firearm, .17 HMR or larger rimfire firearm with an overall cartridge length greater than one (1) inch, any muzzle-loading firearm, or any archery equipment.

(c) Blue grouse, ruffed grouse and small game may be taken in any manner except as prohibited by Wyoming Statute.

Section 6. Archery equipment that is legal for the taking of big or trophy game animals.

(a) For the taking of antelope, bighorn sheep, black bear, deer, mountain goat, mountain lion, or gray wolf where designated as a trophy game animal, a hunter shall use a longbow, recurve bow or compound bow of not less than forty (40) pounds draw weight and an arrow equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(b) For the taking of elk, grizzly bear or moose, a hunter shall use a longbow, recurve bow or compound bow of not less than fifty (50) pounds draw weight and an arrow equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(c) For the taking of any big or trophy game animal with a crossbow, a hunter shall use a crossbow having a peak draw weight of at least ninety (90) pounds and a bolt of at least sixteen (16) inches in length equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(d) For the taking of any big or trophy game animal by the use of any archery equipment, a hunter may use trackable arrow technology to assist in following up their shot, retrieving a hunting arrow or locating a legally harvested big or trophy game animal. Any electronic tracking device that is capable of transferring from a hunting arrow to a big or trophy game animal shall not be considered trackable arrow technology and shall not be permitted for hunting big or trophy game animals.

(e) Magnifying sights, holographic sights and range finding sights attached to legal archery equipment are permissible to use while archery hunting any big or trophy game animal.

Section 7. Smart Firearm. No person shall use a smart firearm to take any game bird, big game or trophy game animal.

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

CHAPTER 32
REGULATION GOVERNING FIREARM CARTRIDGES
AND ARCHERY EQUIPMENT

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 23-1-302, § 23-2-104, § 23-3-110 and § 23-3-111.

Section 2. Regulation. The Commission hereby adopts the following regulation governing firearm cartridges and archery equipment for the taking of big or trophy game animals and game birds. This regulation shall remain in effect until modified or repealed by the Commission.

Section 3. Definition. For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes, and the Commission also adopts the following definition:

(a) “Archery Equipment” means crossbows, longbows, recurve bows, compound bows, arrows and bolts.

(b) “Smart Firearm” means any firearm equipped with a computerized targeting system that marks a target, calculates a firing solution and automatically discharges the firearm at a point calculated to most likely hit the marked target.

(c) “Trackable Arrow Technology” means any technology or device that allows for a hunting arrow to be tracked or more readily located while in the field. This includes, but is not necessarily limited to, lighted arrow nocks, GPS devices inserted into an arrow shaft or Bluetooth arrow nocks, which facilitate locating a hunting arrow once it is shot from a bow.

Section 4. Firearms, muzzle-loaders and cartridges that are legal for the taking of big or trophy game animals.

(a) For the taking of bighorn sheep, elk, moose, mountain goat or black bear by the use of a firearm, a hunter shall use:

(i) Any center-fire firearm of at least .24 caliber and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half inches (1.5) in overall length, and using an expanding point bullet; or,

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .40 caliber and firing an expanding point bullet or lead ball and using a charge of at least fifty (50) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

(b) For the taking of antelope, deer, mountain lion, or gray wolf where designated as a trophy game animal, a hunter shall use:

(i) Any center-fire firearm of at least .22 caliber (excluding .22 Hornet) and having a bullet weight of at least sixty (60) grains and firing a cartridge of at least two (2) inches in overall length, or any other cartridge of at least .35 caliber and at least one and one-half (1.5) inches in overall length, and using an expanding point bullet; or,

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .40 caliber and firing an expanding point bullet or lead ball and using a charge of at least fifty (50) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

(c) For the taking of a grizzly bear by the use of a firearm, a hunter shall use:

(i) Any center-fire firearm of at least .27 caliber and firing a cartridge of at least two (2) inches in overall length and using an expanding point bullet of at least one hundred fifty (150) grains.

(ii) Any muzzle-loading rifle or any muzzle-loading handgun of at least .50 caliber and firing an expanding point bullet or lead ball and using a charge of at least one hundred (100) grains of black powder or its equivalent; or,

(iii) Any shotgun firing “00” or larger buckshot, or a slug.

Section 5. Firearms, cartridges and archery equipment that are legal for the taking of game birds and small game.

(a) For the taking of game birds, excluding wild turkey, blue grouse and ruffed grouse, a hunter shall use:

(i) Any center-fire or muzzle-loading shotgun not larger than a ten (10) gauge plugged to admit no more than one (1) shell in the chamber and two (2) shells in the magazine; or,

(ii) Any archery equipment.

(b) For the taking of wild turkey, a hunter shall use any shotgun, center-fire firearm, .17 HMR or larger rimfire firearm with an overall cartridge length greater than one (1) inch, any muzzle-loading firearm, or any archery equipment.

(c) Blue grouse, ruffed grouse and small game may be taken in any manner except as prohibited by Wyoming Statute.

Section 6. Archery equipment that is legal for the taking of big or trophy game animals.

(a) For the taking of antelope, bighorn sheep, black bear, deer, mountain goat, mountain lion, or gray wolf where designated as a trophy game animal, a hunter shall use a longbow, recurve

bow or compound bow of not less than forty (40) pounds draw weight and an arrow equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(b) For the taking of elk, grizzly bear or moose, a hunter shall use a longbow, recurve bow or compound bow of not less than fifty (50) pounds draw weight and an arrow equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(c) For the taking of any big or trophy game animal with a crossbow, a hunter shall use a crossbow having a peak draw weight of at least ninety (90) pounds and a bolt of at least sixteen (16) inches in length equipped with a fixed or expanding point broadhead that when fully expanded cannot pass through a seven-eighths (7/8) inch solid ring.

(d) For the taking of any big or trophy game animal by the use of any archery equipment, a hunter may use trackable arrow technology to assist in following up their shot, retrieving a hunting arrow or locating a legally harvested big or trophy game animal. Any electronic tracking device that is capable of transferring from a hunting arrow to a big or trophy game animal shall not be considered trackable arrow technology and shall not be permitted for hunting big or trophy game animals.

(e) Magnifying sights, holographic sights and range finding sights attached to legal archery equipment are permissible to use while archery hunting any big or trophy game animal.

Section 7. Smart Firearm. No person shall use a smart firearm to take any game bird, big game or trophy game animal.

WYOMING GAME AND FISH COMMISSION

~~Mark Anselmi~~David Rael, President

Dated: ~~May 23, 2018~~July 18, 2019

STATEMENT OF REASONS

CHAPTER 42

MOUNTAIN LION HUNTING SEASONS

W.S. § 23-1-302 directs and empowers the Commission to fix seasons and bag limits, open, shorten or close seasons on any species or sex of wildlife except predatory animals, predacious birds, protected animals and protected birds.

W.S. § 23-1-703 (e) empowers the Commission to determine the allocation of resident and nonresident mountain lion harvest.

The Commission proposes to amend this regulation to establish annual hunting seasons, mortality limits and limitations for mountain lion hunting seasons. At the time of this filing, the 2018 mountain lion harvest information is not yet available to the Department. Individual hunt area season dates, limitations and mortality limits may be modified as a result of harvest data currently being evaluated. Any additional proposed changes to hunting season dates, specific hunt area limitations, mortality limits, hunt area boundaries or other hunting provisions will be made available for public comment during all public meetings held around the state.

Section 3, Hunting Regulations. New language is being added to address the harvest of a mountain lion that has been caught in a trap or snare.

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



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

GOVERNOR
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEI – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer, Dan Thompson and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 42, Mountain Lion Hunting Seasons

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission (Commission) Regulation Chapter 42, Mountain Lion Hunting Seasons. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received 16 total comments for Chapter 42.

The public comments received for this regulation covered a myriad of topics and did not have many common themes. Some comment topics include: abolish mountain lion hunting seasons, opposition to any mortality limit increases, support for mortality limit decreases, a lack of support for the use of hounds to pursue mountain lions, support for later season start dates, and support for Department management of mountain lions.

The Department recommended continuing to utilize hunting seasons (including hunting with hounds) as part of ongoing management efforts of mountain lions in the state. Department harvest and management data is also supportive of the mortality limits and season dates as proposed.

After consideration of all the public comments received, the Department made no additional changes to this draft regulation. The Commission also considered all the public comments they received and made no additional changes to the proposed regulation.

Wyoming Game and Fish Department Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☒ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Keep area 19 the same.

(Please use reverse for additional comments.)

Cody

Cody Donner

Printed Name

Date

4/2019

Wyoming Game and Fish Department Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☒ Mountain Lion Hunting Seasons
- ☐ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Based on the data presented classifying Area 19 as a non-harvest area. It does
seem that taking more from a source area will overall change the overall
State population. Therefore I believe that we should keep the harvest at 20

Cody

Samuel Gopham

Printed Name

(Please use reverse for additional comments)

05/28/19

Date

4/2019



**THE HUMANE SOCIETY
OF THE UNITED STATES**

1255 23rd Street, NW
Suite 450
Washington, DC 20037
P 202-452-1100
F 202-778-6132
humanesociety.org

Susan Atherton
Co-Chair

Thomas J. Sabatino
Co-Chair

Kitty Block
President and CEO and
Chief International Officer

G. Thomas Waite III
Treasurer
Chief Financial Officer and
Acting Chief Operating Officer

Katherine L. Karl
General Counsel and
Chief Legal Officer

Michaelen Barsness
Controller and
Deputy Treasurer

Johanie V. Parra
Secretary

DIRECTORS

Jeffrey J. Arciniaco
Susan Atherton
Eric L. Bernthal, Esq.
Georgina Bloomberg
J. Elizabeth Bradham
Jerry Cesak
Neil B. Fang, Esq., CPA
Caren M. Fleit
Spencer B. Haber
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
Mary I. Max
C. Thomas McMillen
Judy Ney
Sharon Lee Patrick
Marsha R. Perelman
Jonathan M. Ratner
Thomas J. Sabatino, Jr.
Walter J. Stewart, Esq.
Jason Weiss
David O. Wiebers, M.D.

June 17, 2019

David Rael, President
Wyoming Game and Fish Commissioner
P.O. Box 628
Cowley, WY 82420
david.rael@wyo.gov

Brian Nesvik, Director
Wyoming Game and Fish Department
5400 Bishop Boulevard
Cheyenne, Wyoming 82006
brian.nesvik@wyo.gov



#15

RE: Updates to Wyoming Hunting Regulations, Chapter 42, Mountain Lion Hunting Seasons

Dear President Rael, Director Nesvik and Members of the Commission:

On behalf of the Humane Society of the United States and our Wyoming supporters, we thank you for the opportunity to submit the following comments regarding the Wyoming Game and Fish Department's (WGFD) proposed updates to Wyoming Hunting Regulations, Chapter 42, Mountain Lion Hunting Seasons. We support the proposed additional language to prohibit the killing of trapped mountain lions (*Puma concolor*). However, we are strongly opposed to the trophy hunting of mountain lions because of the consequences to mountain lions, other wildlife and entire ecosystems.

Trophy hunting of mountain lions is unsustainable and cruel, particularly upon dependent kittens and their mothers. Research shows that mountain lions are far more social than previously believed and trophy hunting them causes social chaos resulting in additional mortalities apart from the individual killed by the hunter, which are never counted by the agency. Additionally, studies show that killing mountain lions increases conflicts with humans and livestock while hindering the ecological benefits they provide, such as helping reduce the spread of disease in cervid populations.

For the reasons that follow, we request that the Commission not approve the proposed quota increases and protect mountain lions from trophy hunting now and into perpetuity. If the Commission does allow the trophy hunting of mountain lions to continue, it must first conduct a thorough study to estimate Wyoming's mountain lion population and establish quotas that do not exceed sustainable limits. While we do not support a trophy hunt on mountain lions, WGFD must ensure that any limits ("quotas") not exceed 12% to 14% of the adult and subadult populations if the agency is determined to authorize a hunt.

I. Trophy hunting is harmful to mountain lions and increases conflicts

Trophy hunting is the greatest source of mortality for Wyoming's mountain lions.¹ The practice is harmful to more than just the wild cats who are killed. Conservation biologists have derided this practice as unnecessary and wasteful. Batavia et al. (2018) write: Compelling evidence shows that the animals hunted as trophies have sophisticated levels of "intelligence, emotion and sociality" which is "profoundly disrupted" by trophy hunting.² For these reasons, WGFD must not allow trophy hunting of mountain lions in Wyoming:

1) *Mountain lions remove deer infected with disease:* Mountain lions can help maintain the health and viability of ungulate populations by preying on sick individuals, reducing the spread of disease such as chronic wasting disease (CWD) and brucellosis. For example, during a study in Rocky Mountain National Park, researchers found lions preyed on mule deer infected with CWD.ⁱⁱⁱ The study concluded that adult deer preyed upon by lions were more likely to have CWD than deer shot by hunters. According to the study, “The subtle behaviour changes in prion-infected deer may be better signals of vulnerability than body condition, and these cues may occur well before body condition noticeably declines.”^{iv} This suggests that mountain lions select for infected prey and may be more effective at culling animals with CWD than hunters who rely on more obvious signs of emaciation that occur in later stages of the disease. Moreover, the lions consumed over 85 percent of carcasses, including brains, thereby removing a significant amount of contamination from the environment.^v

This ecosystem benefit is increasingly important as CWD infection continues to increase in prevalence and distribution in Wyoming^{vi} and neighboring states. A reduction in the lion population could eliminate one of the best defenses against the spread of this deadly disease. Mountain lions also reduce vehicle collisions with deer, saving drivers \$1.1 million in collision costs annually in South Dakota alone.^{vii}

2) *Mountain lions provide economic benefits through tourism:* Killing mountain lions deprives citizens of their ability to view or photograph wild mountain lions.^{viii} Nonconsumptive users are a rapidly growing stakeholder group who provide immense economic contributions to the communities in which they visit.^{ix} The public values mountain lions and views them as an indicator of healthy environments while posing little risk to people living near them.^x A new study indicates that Americans highly value wildlife and are concerned about their welfare and conservation.^{xi} Surveys also show that the majority of Americans do not support trophy hunting.^{xii} A 2018 study co-sponsored by the Western Association of Fish and Wildlife Agencies, Manfredo et al. (2018), found that more Wyomingites value and appreciate wildlife than ever.^{xiii} Fewer of us want wildlife, such as grizzly bears, wolves and mountain lions killed for utilitarian purposes.^{xiv}

The U.S. Fish and Wildlife Service’s 2016 wildlife-recreation report indicates that wildlife watchers nationwide have increased 20% from 2011, numbering 86 million and spending \$75.9 billion, while all hunters declined by 16%, with the biggest decline in big game hunter numbers, from 11.6 million in 2011 to 9.2 million in 2016.^{xv} Altogether, hunters spent \$25.6 billion in 2016, about one-third that spent by wildlife watchers.^{xvi} In Wyoming, tourism drew in nearly nine million people in 2018 alone, resulting in almost \$4 billion in direct spending and nearly \$200 million in state and local tax revenues.^{xvii}

3) *Trophy hunting of mountain lions will not boost deer populations:* The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results. Numerous recent studies demonstrate that predator removal actions “generally had no effect” in the long term on ungulate populations.^{xviii} If predators had been absent, the deer would have died from some other cause of mortality.^{xix}

Because ecological systems are complex, heavily persecuting mountain lions will fail to address the underlying malnutrition problems that deer face. Research also shows that disruption by oil and gas drilling greatly harms mule deer populations. A new study in Wyoming confirms oil and gas harms to mule deer.^{xx} The key to mule deer survival is access to adequate nutrition and protecting breeding females, not predation.^{xxi}

In their review article that surveyed 48 predation studies involving mule deer, Forrester and Wittmer determined that, while predation was the “primary proximate cause of mortality for all age classes” of deer, predator removal studies indicate that “predation is compensatory, particularly at high deer densities, and that nutrition and weather shape population dynamics.”^{xxii} In other words, each year, some deer are “doomed surplus”; that is, they die will no matter what.^{xxiii} In their study, Monteith et al. (2014) found that both additive and compensatory mortality can occur in a single year and “should be viewed as

a continuum rather than as a dichotomy.^{xxxiv} If Wyoming wants to grow its ungulate populations, then WGFD must foster survival of adult female mule deer to stem declines and increase nutritional conditions for mule deer as these factors are the most important for mule deer survival.

4) *Trophy hunting increases complaints and livestock depredations:* Data show that mountain lions kill very few cattle and sheep across the country.^{xxxv} In Wyoming, mountain lions only cause around 1% of all cattle and sheep mortalities.^{xxxvi} Moreover, only 14% of Wyoming cattle operations reportedly used non-lethal methods to protect their animals from predation.^{xxxvii}

In regions with increasing mountain lion complaints, wildlife officials throughout western states often lengthen seasons and increase bag limits to respond to what they believe may be a growing lion population. However, research has shown that the public's perception of an increasing population and greater numbers of livestock losses may actually be a result of a declining female and increasing male demographic in the population.^{xxxviii} Heavy hunting of lions can skew the ratio of young males in the population by causing compensatory immigration and emigration by young male lions.^{xxix}

In fact, hunting of mountain lions to reduce complaints and livestock depredations can have the opposite effect. Killing lions disrupts their social structure and increases both complaints and livestock depredations.^{xxx} Peebles et al. (2013) write:

... each additional cougar on the landscape increased the odds of a complaint of livestock depredation by about 5%. However, contrary to expectations, each additional cougar killed on the landscape increased the odds by about 50%, or an order of magnitude higher. By far, hunting of cougars had the greatest effects, but not as expected. Very heavy hunting (100% removal of resident adults in 1 year) increased the odds of complaints and depredations in year 2 by 150% to 340%.^{xxxi}

Hunting disrupts mountain lions' sex-age structure and tilts a population to one that is comprised of younger males, the demographic which is most likely to engage in livestock losses than animals in stable, older population.^{xxxii}

5) *Killing large numbers of mountain lions halts their ability to create trophic cascades in their ecosystems, which benefits a wide range of flora, fauna and people:* Mountain lions serve important ecological roles, including providing a variety of ecosystem services.^{xxxiii} As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs.^{xxxiv} Their protection and conservation has ripple effects throughout their natural communities. Researchers have found that by modulating deer populations, mountain lions prevented overgrazing near fragile riparian systems, resulting in greater biodiversity.^{xxxv} Additionally, carrion left from lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity.^{xxxvi}

6) *Trophy hunting is unsustainable and cruel:* Mountain lions are sparsely populated across vast areas, invest in few offspring, provide extended parental care to their young, have a tendency towards infanticide, females limit reproduction and social stability promotes their resiliency.^{xxxvii} Human persecution affects their social structure^{xxxviii} and harms their persistence.^{xxix}

Research shows that trophy hunting and predator control results in additive mortalities, causing total mortalities to far exceed what would occur in nature.^{xl} In fact, the effect of human persecution is "super additive," meaning that kill rates on large carnivores has a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss, social disruption and its indirect effects including increased infanticide and decreased recruitment of their young.^{xli} When trophy hunters and predator-control agents remove the stable adult mountain lions from a population, it encourages subadult males to immigrate, leading to greater aggression between cats and mortalities to adult females and subsequent infanticide.^{xlii}

7) *Trophy hunting and predator control is particularly harmful to mountain lion kittens and their mothers:* Biologists maintain that females are the most important demographic of a lion population; they ensure the continuation of the species.^{xliii} Unfortunately, female mountain lions are frequent victims of trophy hunting, both directly from the trophy hunter, and indirectly from social chaos.^{xliv} In heavily hunted populations, female mountain lions experience higher levels of intraspecific aggression (fights with other cats) resulting in predation on themselves and their kittens.^{xlv} Over-hunting harms a population's ability to recruit new members, especially if too many adult females are removed.^{xvi} The loss of adult females ensures the death of orphaned kittens by starvation, dehydration, predation or exposure.^{xlvii} Kittens up to 12 months of age are likely incapable of dispatching prey animals on their own.^{xlviii} Thus, a trophy hunter or trapper kills more than just the animal in the crosshairs: trophy hunting causes a sudden disruption in mountain lion social structures that leads to additional mortalities that are never counted in states' hunting quotas.^{xlix}

8) *Trophy hunting harms entire mountain lion communities:* A study on mountain lions in the Teton region of Wyoming shows that mountain lions are quite social and live in "communities," with females sharing kills with other females and territorial males, while males may protect their females and kittens from incoming, competing males.ⁱ Disrupting these communities can cause negative effects and increases conflicts by causing social chaos within their populations.ⁱⁱ Trophy hunting and predator control easily destabilizes mountain lion populations, causing increased conflicts with humans, pets and livestock.ⁱⁱⁱ

9) *Trophy hunting is unnecessary as mountain lions are a self-regulating species:* Mountain lions occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences.ⁱⁱⁱⁱ In order to survive, their populations must stay at a smaller size relative to their prey's biomass or risk starvation.^{lv} They do this by regulating their own numbers.^{lv} When prey populations decline, so do mountain lion populations.^{lvi} Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another.^{lvii}

Mountain lions, as with most large carnivores, are also considered a keystone species because they help drive the ecosystems from the top down resulting in greater biological diversity.^{lviii} Mountain lions regulate many of the other species in their communities, including herbivores, who then regulate the plant community.^{lix} Wildlife managers and biologists also consider mountain lions to be an 'umbrella' species – by protecting lions and their large habitat, a wide array of additional plants and animals in this habitat will also be protected.^{lx}

10) *Hounding harms cougar kittens, non-target wildlife and the hounds themselves:* Trophy hunting with hounds is cruel and causes harm to more than just the mountain lions being chased. Hounds kill kittens, and lions often injure or kill hounds.^{lxi} The practice is stressful and energetically taxing to lions.^{lxii} Hounding is not considered "fair chase" hunting by most.^{lxiii} Additionally, hounds chase non-target wildlife and trespass onto private lands.^{lxiv}

If WGFD is to continue allowing trophy hunting of mountain lions, it must at the very least ensure that mortality from human persecution not exceed the species sustainable rate of growth, thought to be approximately 12% to 14% of the population.^{lxv} WGFD currently allows practically unlimited trophy hunting of mountain lions, despite lacking a statewide population estimate.

II. WGFD must significantly reduce its already excessive trophy hunting quota to maintain healthy mountain lion populations in Wyoming.

WGFD currently allows the killing of mountain lions without understanding how this level of killing is affecting the Wyoming's lion populations. In 2017 alone, trophy hunters killed 282 mountain lions in

Wyoming. If WGFD is to continue allowing trophy hunting of mountain lions, the agency must set sustainable quotas based on reliable research and population estimates in order to prevent over-persecution:

- A ten-year study of hunting mountain lions on the Uncompahgre Plateau by Colorado Parks and Wildlife found that a sustainable offtake rate amounted to 11% to 12% of the population.^{lxvi}
- A Montana mountain lion study concludes that sustainable offtake should be no more than 12%.^{lxvii}
- Washington Department of Fish and Wildlife biologists conclude a harvest of no more than 14% of the resident adults to avoid overkill of mountain lions.^{lxviii}

As we detailed above, trophy hunting of mountain lions, especially at unsustainable and excessive rates, can harm the long-term survival of the species and increase conflicts with humans, pets and livestock. Moreover, this high rate of killing is damaging to other wildlife, including Wyoming's ungulate populations that benefit from mountain lion predation on diseased individuals. While the Humane Society of the United States does not support a trophy hunt on mountain lions, we believe WGFD must ensure that any quotas not exceed 12% to 14% of the adult and subadult populations, based on a reliable population estimate, if the agency is determined to continue allowing the trophy hunting of mountain lions. Such a limit will prevent the hunting of mountain lions above sustainable levels.

III. Conclusion.

WGFD continues to allow significantly trophy hunting mortality for mountain lions despite having no population estimate to ensure the species is not being overhunted. WGFD must not increase the mountain lion trophy hunting quota as doing so would only provide further trophy hunting of this iconic and ecologically significant species without considering the biological and social repercussions.

Wyoming's mountain lions are an important component of our natural wild heritage, and deserve reasoned management so that their populations are conserved for all Wyoming stakeholders, including for future generations, and to safeguard their intrinsic and ecological value. We urge the Commission to not approve the proposed updates and prohibit the trophy hunting of mountain lions in 2019 as well as future years. Thank you for your consideration.

Sincerely,

Lisa Kauffman
Senior State Director, Idaho and Wyoming
The Humane Society of the United States

ⁱ See e.g., The Humane Society of the United States, "State of the Mountain Lion: A Call to End Trophy Hunting of America's Lion," (Washington, DC2017); Cougar Management Guidelines, *Cougar Management Guidelines* (Bainbridge Island, WA: WildFutures, 2005).

ⁱⁱ Batavia et al. (2018) write: "...nonhuman animals are not only physically, socially, and emotionally disrupted [by trophy hunters], but also debased by the act of trophy hunting. Commoditized, killed, and dismembered, these individuals are relegated to the sphere of mere things when they are turned into souvenirs, oddities, and collectibles. We argue this is morally indefensible. Nonhuman animals are not mere objects but living beings with interests of their own, to whom we owe at least some basic modicum of respect (Regan, 1983). To transform them into trophies of human conquest is a violation of duty and common decency; and to accept, affirm, and even institutionalize trophy hunting, as the international conservation community seems to have done, is to aid and abet an immoral practice." Authors then argue that trophy hunting cannot be "presumed [to be] integral to conservation success."

ⁱⁱⁱ C. E. Krumm et al., "Mountain Lions Prey Selectively on Prion-Infected Mule Deer," *Biology Letters* 6, no. 2 (2009).

^{iv} *Ibid.*, p. 210

^v Ibid.

^{vi} Nebraska Game and Parks. 2017. Chronic Wasting Disease (CWD). Retrieved from <http://outdoornebraska.gov/cwd/>.

^{vii} Gilbert et al., "Socioeconomic Benefits of Large Carnivore Recolonization through Reduced Wildlife-Vehicle Collisions."

^{viii} While rarely seen in the wild by the general public, wildlife photographers have brought mountain lions closer to us than ever before. Photographers such as Steve Winter (<https://www.stevewinterphoto.com/>) and Tom Mangelsen (<http://mangelsen.com/>) are helping people understand just how magnificent these iconic wild cats truly are.

^{ix} M. L. Elbroch et al., "Contrasting Bobcat Values," *Biodiversity and Conservation* (2017); U.S. Fish and Wildlife Service, "2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation: National Overview," ed. U.S. Fish and Wildlife Service (2017).

^x Harry C. Zinn et al., "Societal Preferences for Mountain Lion Management Along Colorado's Front Range. Colorado State University, Human Dimensions in Natural Resources Unit," *5th Mountain Lion Workshop Proceedings* (1996).

^{xi} Kelly A. George et al., "Changes in Attitudes toward Animals in the United States from 1978 to 2014," *Biological Conservation* 201 (2016).

^{xii} Remington Research Group, "Trophy Hunting: U.S. National Survey," (2015); The Humane Society of the United States, "State of the Mountain Lion: A Call to End Trophy Hunting of America's Lion," "New Poll Reveals Majority of Americans Oppose Trophy Hunting Following Death of Cecil the Lion," news release, 2015,

http://www.humanesociety.org/news/press_releases/2015/10/poll-americans-oppose-trophy-hunting-100715.html?referrer=https://www.google.com/; The Economist/YouGov, "Moral Acceptability of Various Behaviors - Hunting Animals for Sport," ed. The Economist (2018).

^{xiii} M. J. Manfredo et al., "America's Wildlife Values: The Social Context of Wildlife Management in the U.S.," ed. National Report from the research project entitled "America's Wildlife Values" (Fort Collins, Colorado: Colorado State University, Department of Natural Resources, 2018).

^{xiv} Ibid.

^{xv} U.S. Fish and Wildlife Service, "2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation," ed. U.S. Department of the Interior (2016); "2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation," ed. U.S. Department of the Interior (2011).

^{xvi} Ibid

^{xvii} Wyoming Office of Tourism. 2018. That's WY: 2018 Year in Review. Retrieved from https://www.travelwyoming.com/sites/default/files/uploads/2018_YIR.pdf

^{xviii} T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus hemionus* in North America," *Mammal Review* 43, no. 4 (2013), p. 300; R. J. Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World," *Biological Conservation* 224 (2018).

^{xix} K. L. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (2014).

^{xx} Hall Sawyer et al., "Mule Deer and Energy Development—Long-Term Trends of Habituation and Abundance," *Global Change Biology* (2017).

^{xxi} e.g. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment.," Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus hemionus* in North America.," K. F. Robinson et al., "Can Managers Compensate for Coyote Predation of White-Tailed Deer?," *Journal of Wildlife Management* 78, no. 4 (2014).

^{xxii} T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus hemionus* in North America," *Mammal Review* 43, no. 4 (2013), p. 292.

^{xxiii} K. L. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (2014).

^{xxiv} P. 41

^{xxv} The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019).

^{xxvi} Ibid.

^{xxvii} Ibid.

^{xxviii} Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.," citing Lambert et al. 2006 and Robinson et al. 2008, citing Lambert et al. 2006 and Robinson et al. 2008

^{xxix} Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting," *BMC Ecology* 16, no. 1 (2016).

^{xxx} Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

^{xxxi} Ibid., p.6.

^{xxxii} Ibid.

^{xxxiii} e.g., Weaver, Paquet, and Ruggiero, "Resilience and Conservation of Large Carnivores in the Rocky Mountains.," W.J. Ripple and R.L. Beschta, "Linking a Cougar Decline, Trophic Cascade, and Catastrophic Regime Shift in Zion National Park," *Biological Conservation* 133 (2006); J. A. Estes et al., "Trophic Downgrading of Planet Earth," *Science* 333, no. 6040 (2011); L. Mark Elbroch and Heiko U. Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas," *Biology letters* 8, no. 5 (2012); L. Mark Elbroch et al., "Nowhere to Hide: Pumas, Black Bears, and Competition Refuges," *Behavioral Ecology* 26, no. 1 (2015); L. M. Elbroch et al., "Vertebrate Diversity Benefiting from Carrion Provided by Pumas and Other Subordinate Apex Felids," *Biological Conservation* 215 (2017); Christopher J. O'Bryan et al., "The Contribution of Predators and Scavengers to Human Well-Being," *Nature Ecology & Evolution* 2, no. 2 (2018).

^{xxxiv} Sophie L. Gilbert et al., "Socioeconomic Benefits of Large Carnivore Recolonization through Reduced Wildlife-Vehicle Collisions," *Conservation Letters* (2016); O'Bryan et al., "The Contribution of Predators and Scavengers to Human Well-Being."

^{xxxv} Ripple and Beschta, "Linking a Cougar Decline, Trophic Cascade, and Catastrophic Regime Shift in Zion National Park.," Elbroch and Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas."

^{xxxvi} Elbroch et al., "Vertebrate Diversity Benefiting from Carrion Provided by Pumas and Other Subordinate Apex Felids." Connor O'Malley et al., "Motion-Triggered Video Cameras Reveal Spatial and Temporal Patterns of Red Fox Foraging on Carrion Provided by Mountain Lions," *PeerJ* 6 (2018); Elbroch and Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas."

^{xxxvii} A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167 (2013); D. Stoner, M. , M.L. Wolfe, and D. Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics," *Journal of Wildlife Management* 70 (2006); S. Creel et al., "Questionable Policy for Large Carnivore Hunting," *Science* 350, no. 6267 (2015); J. L. Weaver, P. C. Paquet, and L. F. Ruggiero, "Resilience and Conservation of Large Carnivores in the Rocky Mountains," *Conservation Biology* 10, no. 4 (1996).

^{xxxviii} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics.," Kaylie A. Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations," *Plos One* 8, no. 11 (2013); Wallach et al., "What Is an Apex Predator?," Heather M. Bryan et al., "Heavily Hunted Wolves Have Higher Stress and Reproductive Steroids Than Wolves with Lower Hunting Pressure," *Functional Ecology* (2014); C. T. Darimont et al., "Human Predators Outpace Other Agents of Trait Change in the Wild," *Proceedings of the National Academy of Sciences of the United States of America* 106, no. 3 (2009); Sterling D. Miller et al., "Trends in Intensive Management of Alaska's Grizzly Bears, 1980-2010," *Journal of Wildlife Management* 75, no. 6 (2011).

^{xxxix} Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015).

^{xl} J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (2005); G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (2006); L. L. Eberhardt et al., "A Seventy-Year History of Trends in Yellowstone's Northern Elk Herd," *ibid.* 71, no. 2 (2007); Darimont et al., "The Unique Ecology of Human Predators."

^{xli} Scott Creel and Jay Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)," *PLoS ONE* 5, no. 9 (2010); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest," *Animal Conservation* 18, no. 5 (2015); Darimont et al., "The Unique Ecology of Human Predators."

^{xlii} H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence.," C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006).

^{xliii} Kenneth A. Logan and Linda L. Sweeney, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore* (Washington, DC: Island Press, 2001); D. Barnhurst and F. G. Lindzey, "Detecting Female Mountain Lions with Kittens," *Northwest Science* 63, no. 1 (1989); T. Ruth, K. Murphy, and P. Bulotte, "Presence and Movements of Lactating and Maternal Female Cougars: Implications for State Hunting Regulations" (paper presented at the Seventh Mountain Lion Workshop, Jackson, Wyoming, 2003); T. P. Hemker, F. G. Lindzey, and B. B. Ackerman, "Population Characteristics and Movement Patterns of Cougars in Southern Utah," *Journal of Wildlife Management* 48, no. 4 (1984).

^{xliv} e.g., Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

^{xlv} D. C. Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?," *Wildlife Biology* 19, no. 3 (2013); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence.," Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?."

^{xlvi} C. R. Anderson and F. G. Lindzey, "Experimental Evaluation of Population Trend and Harvest Composition in a Wyoming Cougar Population," *Wildlife Society Bulletin* 33, no. 1 (2005).

^{xlvii} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics.," Logan and Sweeney, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore*, Connor O'Malley et al., "Aligning Mountain Lion Hunting Seasons to Mitigate Orphaning Dependent Kittens," *Wildlife Society Bulletin* 0, no. 0 (2018).

^{xlviii} L. M. Elbroch and H. Quigley, "Observations of Wild Cougar (*Puma Concolor*) Kittens with Live Prey: Implications for Learning and Survival," *Canadian Field-Naturalist* 126, no. 4 (2012); L. Mark Elbroch and Howard Quigley, "Age-Specific Foraging Strategies among Pumas, and Its Implications for Aiding Ungulate Populations through Carnivore Control," 1, no. 4 (2019).

^{xlix} Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest.," H. S. Cooley et al., "Source Populations in Carnivore Management: Cougar Demography and Emigration in a Lightly Hunted Population," *Animal Conservation* 12, no. 4 (2009); Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis.," Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report.," Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana.," H. S. Robinson et al., "Sink Populations in Carnivore Management: Cougar Demography and Immigration in a Hunted Population," *Ecological Applications* 18, no. 4 (2008); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence.," R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as

a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013); Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

ⁱ L. Mark Elbroch et al., "Adaptive Social Strategies in a Solitary Carnivore," *Science Advances* 3, no. 10 (2017).

ⁱⁱ Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."; Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest."; Creel et al., "Questionable Policy for Large Carnivore Hunting."; Ausband et al., "Recruitment in a Social Carnivore before and after Harvest."; Darimont et al., "The Unique Ecology of Human Predators."

ⁱⁱⁱ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

^{iv} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."

^v I. A. Hatton et al., "The Predator-Prey Power Law: Biomass Scaling across Terrestrial and Aquatic Biomes," *Science* 349, no. 6252 (2015).

^{vi} Wallach et al., "What Is an Apex Predator?."

^{vii} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."

^{viii} K. Hansen, *Cougar: The American Lion* (Flagstaff, AZ: Northland Publishing, 1992); A. Kitchener, *The Natural History of the Wild Cats* (Ithaca, New York: Cornell University Press, 1991).

^{ix} M. E. Soule et al., "Ecological Effectiveness: Conservation Goals for Interactive Species," *Conservation Biology* 17, no. 5 (2003).

^x Maximilian L. Allen et al., "Trophic Facilitation or Limitation? Comparative Effects of Pumas and Black Bears on the Scavenger Community," *PLoS One* 9, no. 7 (2014); M. L. Elbroch, H. B. Quigley, and A. Caragiulo, "Spatial Associations in a Solitary Predator: Using Genetic Tools and Gps Technology to Assess Cougar Social Organization in the Southern Yellowstone Ecosystem," *acta ethologica* 18, no. 2 (2014).

^{xi} Logan and Sweanor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore*.

^{xii} Logan and Sweanor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore*; F. G. Lindzey et al., "Cougar Population Response to Manipulation in Southern Utah," *Wildlife Society Bulletin* 20, no. 2 (1992); L. M. Elbroch et al., "Trailing Hounds Vs Foot Snares: Comparing Injuries to Pumas Puma Concolor Captured in Chilean Patagonia," *Wildlife Biology* 19, no. 2 (2013).

^{xiii} H. J. Harlow et al., "Stress Response of Cougars to Nonlethal Pursuit by Hunters," *Canadian Journal of Zoology* 70, no. 1 (1992); C. M. Bryce, C. C. Wilmers, and T. M. Williams, "Energetics and Evasion Dynamics of Large Predators and Prey: Pumas Vs. Hounds," *PeerJ* e3701 (2017).

^{xiv} J. Posewitz, *Beyond Fair Chase: The Ethic and Tradition of Hunting* (Helena, Montana: Falcon Press, 1994); T. L. Teel, R. S. Krannich, and R. H. Schmidt, "Utah Stakeholders' Attitudes toward Selected Cougar and Black Bear Management Practices," *Wildlife Society Bulletin* 30, no. 1 (2002).

^{xv} e.g., Hank Hristienko and Jr. McDonald, John E., "Going into the 21st Century: A Perspective on Trends and Controversies in the Management of the Black Bear," *Ursus* 18, no. 1 (2007); E. Mori, "Porcupines in the Landscape of Fear: Effect of Hunting with Dogs on the Behaviour of a Non-Target Species," *Mammal Research* 62, no. 3 (2017); S. Grignolio et al., "Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area," *Biological Conservation* 144, no. 1 (2011).

^{xvi} K.A. Logan, "Puma Population Responses to Sport Hunting on the Uncompahgre Plateau, Colorado," ed. Colorado Parks and Wildlife (Unpublished letter of 12/10/142014); Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

^{xvii} Logan, "Puma Population Responses to Sport Hunting on the Uncompahgre Plateau, Colorado."

^{xviii} Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

^{xix} Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management."



MOUNTAIN LION FOUNDATION

Saving America's Lion

June 5, 2019

Executive Director
Lynn Cullens

Board of Directors
Toby Cooper
Chair

Elizabeth Sullivan
Vice Chair

Ann Hamilton
Treasurer

Donald Molde, M.D.
Secretary

Rabbi Joseph Hurwitz
Bob McCoy
Jonathan Naimon
Chris Tromborg, Ph.D.

Honorary Board

Robert Bateman
Mr. & Mrs. Gordon P. Getty
Sandy Lerner
Barry Lopez
Robert Redford
Dr. George Schaller
Robert Wagner

30
YEARS OF
Saving America's Lion
1986 ~ 2016

Post Office Box 1896
Sacramento CA 95812
www.mountainlion.org
info@mountainlion.org
(916) 442-2666

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

Submitted electronically via online portal

RE: Chapter 42, Mountain Lion Hunting Seasons

Dear Game and Fish Commission members,

The Mountain Lion Foundation asks that you consider the following concerns raised by the proposed Chapter 42, Mountain Lion Hunting Seasons put forth by Wyoming Game and Fish Department for mountain lion (*Puma concolor*) hunting in Wyoming.

The views expressed are the official position of the Mountain Lion Foundation and the 7000 supporters of the organization.

Trophy hunting is the greatest source of mortality for mountain lions throughout the majority of their range in the United States.ⁱ Conservation biologists have established that the practice of trophy hunting is destructive and unnecessary, as it profoundly disrupts a population's social structure.ⁱⁱ Hunting mountain lions results in additive mortality – rates that far exceed what would happen in natureⁱⁱⁱ – and can lead to population instability and decline, as well as an increase in conflicts with humans and domestic animals.^{iv}

Additionally, one of the established rationales behind hunting mountain lions is to increase populations of prey animals like deer. While researchers have known for decades that mountain lions have minimal influence on deer populations, a recent study suggests that heavily hunted mountain lion populations may inadvertently put more pressure on deer populations than anticipated.^v For these reasons, we would politely request that the Commission consider ending hunting of mountain lions entirely.

The Foundation, which is strongly opposed to the hunting of mountain lions, respectfully requests that the Commission, at the minimum, reduce the current unsustainable quotas to below the sustainable limit established by researchers: 12-14% of the adult population. The Foundation asks that the limit be reduced to 10% or less than that of the known population to account for additional human-caused mortality including vehicle strike, incidental snaring or trapping, poaching, public safety removal and so on. Additionally, we request that the use of hounds to pursue mountain lions no longer be permitted as this practice is unethical and is not considered to be fair chase. We are also asking that the start of all of the mountain lion hunting seasons be



mail

delayed until December 1 to protect dependent young from being orphaned by hunters. Lastly, we want to emphasize that over-hunting mountain lions may not have the desired impact of increasing mule deer populations. In fact, hunting of these apex predators may have the opposite effect.

The Foundation respectfully requests these actions for the reasons outlined below:

The quota should be reduced to 10% of the known population to account for any additional human-caused mortality.

While the Wyoming Game and Fish Department conducts research on lion populations in the state, they have never released a population estimate. Instead, they manage mountain lions based on population trend estimates, which raises serious concerns that quotas in some parts of Wyoming are far too high, leading to localized population declines. The combined lack of information and intense harvest is a significant threat to the mountain lion's long-term viability in many parts of the state.

For the upcoming 2019-2020 season, we are appreciative that the WGFD has recommended decreasing quotas in Hunt Areas 17 and 23. However, Game and Fish is seeking to increase the quota in Hunt Area 19. We would ask that the Commission reject any quota increases in the state and instead reduce quotas to limits that have been established as sustainable by researchers.

In order to sustain viable populations of mountain lions, prevent human-wildlife conflict and avoid compromising the long-term viability by failing to account for all human-caused sources of mortality, hunting of adult lion populations should not exceed the intrinsic growth rate of the population of interest.^{vi} The intrinsic growth rate for mountain lion populations is established by researchers to be between 15-17%.^{vii} Setting human-caused mortality limits at 10% or less of the adult population facilitates the maintenance of home ranges and social stability, reducing the likelihood of increased conflict with humans and population decline.^{viii}

Additionally, trophy hunting of mountain lions leads to an increase in kitten mortality in heavily hunted populations.^{ix} Killing an adult female with kittens results in the death of her dependent young by dehydration, malnutrition, predation and exposure; even those who are at least six months to a year old^x. This impacts a population's ability to recruit new members if too many adult females are removed, making the population less resilient to hunting and other causes of mortality^{xi}; both human-caused and natural.

As such, we ask that, when making quota decisions in the future, the Commission votes to reduce the number of mountain lions that can be killed by hunters to 10% or less of the total adult population to account for additional human-caused mortality to maintain healthy, stable lion populations.

Killing mountain lions is unnecessary and results in an increase in conflicts with humans and domestic animals.

However, studies have shown that mountain lion populations are self-regulating and that killing established adult lions may actually lead to increased conflict with humans as a result of the disruption of mountain lion social structure and increased immigration of dispersing individuals.^{xii}

Mountain lions occur at low densities relative to their primary prey.^{xiii} In order to survive, they regulate their own numbers by staying at a smaller population size relative to their prey's biomass or they risk starvation.^{xiv} In other words, when prey populations decline, so do mountain lion populations. Because of these predator-prey dynamics, mountain lion populations do not need to be managed by humans.

In general, hunters target older and larger mountain lions. However, doing so results in a younger overall age structure, which increases the likelihood of conflict with humans.^{xv} As it stands, conflicts

with mountain lions are exceedingly rare. Overhunting will disrupt resident populations, eventually leading to an increase in conflicts with people, pets and livestock.

A study in Washington state showed that, as wildlife officials increased quotas and lengthened hunting season, mountain lion complaints increased rather than decreased. The heavy hunting pressure resulted in a higher ratio of younger males in the population as a result of immigration and emigration.^{xvi} Contrary to popular belief, killing mountain lions results in an increase in complaints and livestock depredation due to disruption of their social structure.^{xvii}

To ensure healthy social structures and territorial behavior, mountain lion populations should not be hunted for trophies or recreation. This will also help to reduce conflicts with people, pets, and livestock.

Using hounds to pursue mountain lions is unethical and is not considered to be fair chase.

Hounding is an inhumane and outdated sport that has been banned in two-thirds of the United States. Hounding poses significant risk to the hounds as well as to young wildlife, including dependent kittens and cubs, who may be attacked and killed by hounds.^{xviii} Hounds also disturb or kill non-target wildlife and trespass onto private lands.^{xix} This practice is not fair chase and is highly controversial, even among hunters.^{xx}

Fair chase hunting is based upon the premise of giving the animal an equal opportunity to escape from the hunter.^{xxi} Using hounds, especially those equipped with GPS collars, provides an unfair advantage to hunters.

Many proponents of hound hunting claim that hunters can be more selective using this technique. Since hunters can get so close to a treed animal, hound hunting advocates assert that hunters can determine the sex, size, and general age of an animal before determining whether or not they are permitted to harvest that individual. Knowing the sex and other demographic status of the individual being hunted could be helpful in maintaining a viable population. However, a review of 30 years of records from game managers throughout the western United States found that, although technically feasible, most hunters could not tell the size and sex of an animal up a tree. Hunters had roughly 50% accuracy when determining sex; the same as if they had determined the sex with a coin toss.

For the reasons outlined above, we ask that the use of hounds to pursue mountain lions be no longer permitted. If the Commission decides to continue to allow the use of dogs then, at the very least, GPS collars should be prohibited as the practice does not align with fair chase values.

Delay the start of the mountain lion hunting seasons until December 1 to protect dependent young.

While it is not permitted in Wyoming to kill any females accompanied by spotted kittens, dependent young may not always be in the presence of their mother. Without kittens in her presence, a hunter may not be aware that a female has offspring and may kill her. As mountain lions offspring are dependent on their mothers for survival up to around 18 months of age, the loss of their mother prior to reaching adulthood would likely result in the death of her young, even if they are around a year old.

A recent study has shown that delaying the start of hunting seasons until December 1 would protect about 91 percent of kittens from perishing as a result of being orphaned by hunters.^{xxii} By better aligning hunting seasons with denning periods, hunters will have the best opportunity to identify females with kittens. This, ultimately, will benefit both mountain lions and hunters that want to ensure that their populations remain healthy into the future.

Targeting mountain lions to boost mule deer may have the opposite effect.

Hunting mountain lions has long been thought to bolster populations of game species like mule deer, while reducing competition for this shared resource. However, a recent study evaluated the impacts that

heavy hunting of mountain lion has on mule deer and elk. The study found that heavy hunting pressure on these apex predators had the opposite effect on mule deer.^{xxiii} As trophy hunters often target the large, dominant male, they inadvertently reduce the age structure of mountain lions in the area, leaving younger, less experienced lions on the landscape. According to the study, these younger predators typically selected for mule deer instead of larger prey species like elk. As a result, the researchers noted that, despite increased survival of fawns and females, the removal of mountain lions did not yield a growth in the mule deer population. Instead, they suggested that hunting may actually be increasing the number of mountain lions that specialize in targeting deer.

To summarize, we are asking the Commission to establish quotas in the future that are more in line with the best available science. Specifically, we request that the limit be reduced to 10% or less of the total adult and sub-adult population. We are also asking that hounds are not permitted at any time to aid trophy hunters in their pursuit of mountain lions. The use of hounds is inhumane, does not constitute as fair chase and offers hunters an unfair advantage. If hounds are permitted, we ask that GPS collars to track their movements are prohibited to better align with fair chase principals. We are also asking that the start of the mountain lion season in Wyoming be delayed until December 1. Doing so could prevent the death of a female with dependent young and could ultimately prevent the orphaning and deaths of approximately 91 percent of kittens. Lastly, we politely ask that the Commission factor in the recent findings about the impacts of high hunting quotas on both mountain lion and deer populations and include this information when setting limits now and in the future.

Thank you for your consideration. Please make this comment letter a part of the official record regarding this decision.

Respectfully,



Lynn Cullens

EXECUTIVE DIRECTOR

(916) 606-1610

LCullens@MountainLion.org

Questions or requests regarding this comment letter may be directed to:

Denise Peterson

Visibility Specialist

(801) 628-1211

visibility@mountainlion.org

REFERENCES

- Anderson, C. R., and F. G. Lindzey. 2005. **Experimental evaluation of population trend and harvest composition in a Wyoming cougar population.** *Wildlife Society Bulletin* 33:179–188.
- Ausband, D. E., C. R. Stansbury, J. L. Stenglein, J. L. Struthers, and L. P. Waits. 2015. **Recruitment in a social carnivore before and after harvest.** *Animal Conservation* 18:415–423.
- Batavia, C., M. P. Nelson, C. T. Darimont, P. C. Paquet, W. J. Ripple, and A. D. Wallach. 2018. **The elephant (head) in the room: A critical look at trophy hunting.** *Conservation Letters*.
- Beausoleil, R. A., G. M. Koehler, B. T. Maletzke, B. N. Kertson, and R. B. Wielgus. 2013. **Research to regulation: Cougar social behavior as a guide for management.** *Wildlife Society Bulletin*.
- Cooley, H. S., R. B. Wielgus, G. M. Koehler, H. S. Robinson, and B. T. Maletzke. 2009. **Does hunting regulate cougar populations? A test of the compensatory mortality hypothesis.** *Ecology* 90:2913–2921.
- Cougar Management Guidelines. 2005. **Cougar Management Guidelines.** WildFutures, Bainbridge Island, WA.
- 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.
- Darimont, C. T., C. H. Fox, H. M. Bryan, and T. E. Reimchen. 2015. **The unique ecology of human predators.** *Science*. 349:858-860.
- Eberhardt, L. L., P. J. White, R. A. Garrott, and D. B. Houston. 2007. **A Seventy-Year History of Trends in Yellowstones Northern Elk Herd.** *Journal of Wildlife Management* 71:594–602.
- Elbroch, L. M., and H. Quigley. 2019. **Age-specific foraging strategies among pumas, and its implications for aiding ungulate populations through carnivore control.** *Conservation Science and Practice* 1.
- Elbroch, L. M., B. D. Jansen, M. M. Grigione, R. J. Sarno, and H. U. Wittmer. 2013. **Trailing hounds vs foot snares: comparing injuries to pumas *Puma concolor* captured in Chilean Patagonia.** *Wildlife Biology* 19:210-216.
- Hristienko, H., and J. McDonald, John E. 2007. **Going in the 21st century: a perspective on trends and controversies in the management of the black bear *Ursus*.** 18:72-88.
- Lindzey, F. G., W. D. Vansickle, S. P. Laing, and C. S. Mecham. 1992. **Cougar Population Response to Manipulation in Southern Utah.** *Wildlife Society Bulletin* 20:224-227.
- Logan, K. A., and L. L. Sweanor. 2001. **Desert puma: evolutionary ecology and conservation of an enduring carnivore.** Island Press, Washington, DC.
- Maletzke, B. T., R. Wielgus, G. M. Koehler, M. Swanson, H. Cooley, and J. R. Alldredge. 2014. **Effects of hunting on cougar spatial organization.** *Ecology and Evolution*.
- O'Malley, C., L. M. Elbroch, A. Kusler, M. Peziol, and H. Quigley. 2018. **Aligning mountain lion hunting seasons to mitigate orphaning dependent kittens.** *Wildlife Society Bulletin* 42:438–443.
- Peebles, K. A., R. B. Wielgus, B. T. Maletzke, and M. E. Swanson. 2013. **Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.** *PLoS ONE* 8.
- Posewitz, J. 1994. **Beyond Fair Chase: The Ethic and Tradition of Hunting.** Falcon Press, Helena, Montana.
- Robinson, H.S. DeSimone, R. 2011. **The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana.** Final Report. Montana Fish, Wildlife & Parks. Helena, MT.
- Stoner, D. C., M. L. Wolfe, and D. M. Choate. 2006. **Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics.** *Journal of Wildlife Management* 70:1588–1600.
- Teel, T. L., R. S. Krannich, and R. H. Schmidt. 2002. **Utah stakeholders' attitudes toward selected cougar and black bear management practices.** *Wildlife Society Bulletin* 30:2-15.

- Teichman, K. J., B. Cristescu, and C. T. Darimont. 2016. Hunting as a management tool? **Cougar-human conflict is positively related to trophy hunting**. *BMC Ecology* 16.
- Vucetich, J. A., D. W. Smith, and D. R. Stahler. 2005. **Influence of harvest, climate and wolf predation on Yellowstone elk, 1961-2004**. *Oikos* 111:259–270.
- Wallach, A. D., I. Izhaki, J. D. Toms, W. J. Ripple, and U. Shanas. 2015. **What is an apex predator?** *Oikos* 124:1453–1461.
- Wielgus, R. B., D. E. Morrison, H. S. Cooley, and B. Maletzke. 2013. **Effects of male trophy hunting on female carnivore population growth and persistence**. *Biological Conservation* 167:69–75.

-
- ⁱ Cougar Management Guidelines (2005)
- ⁱⁱ Batavia et al. (2018)
- ⁱⁱⁱ Vucetich et al. (2005), Eberhardt et al. (2007), Darimont et al. (2015)
- ^{iv} Creel and Rotella (2010), Ausband et al. (2015), Darimont et al. (2015)
- ^v Elbroch and Quigley (2019)
- ^{vi} Beausoleil et al. (2013)
- ^{vii} Robinson and DeSimone (2011)
- ^{viii} Maletzke et al. (2014)
- ^{ix} Stoner et al. (2006), Wielgus et al. (2013)
- ^x Stoner et al. (2006)
- ^{xi} Anderson and Lindzey (2005)
- ^{xii} Tiechman et al. (2016)
- ^{xiii} Stoner et al. (2006)
- ^{xiv} Wallach et al. (2015)
- ^{xv} Cooley et al. (2009)
- ^{xvi} Tiechman et al. (2016)
- ^{xvii} Peeble et al. (2013)
- ^{xviii} Lindzey et al. (1992), Logan and Sweanor (2001), Elbroch et al. (2013)
- ^{xix} Hristienko and McDonald (2007)
- ^{xx} Posewitz (1994), Teel et al. (2002), Cougar Management Guidelines (2005)
- ^{xxi} Posewitz (1994)
- ^{xxii} O'Malley et al. (2018)
- ^{xxiii} Elbroch and Quigley (2019)

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

- 1** Mountain lions are abundant in Wyoming. It is important to manage both predator and prey. Harvesting cats helps other game animal populations.

Final Comment **Wayment, Lane** **Croydon , UT** 5/3/2019 1:06:00 PM

- 2** I would also like to propose a boundary change of hunt area 5, I would like to see the portion of area 5 south of interstate 80 added to area 25, similar to what hunt area 35 is for black bear. I would also propose that area 25 would then be a extended season of September 1-August 31. Reasons for the change are that the deer herds south of the interstate migrate south to Colorado during the winter months and the mountain lions seem to follow, almost all of the lion pressure in this area is after the now march season closure and I don't believe that it's an option the extend the season in area 5 because of the summer use of vedauwoo and curt gowdy

Final Comment **Stinson, Bryon** **Laramie, WY** 5/23/2019 10:16:00 AM

- 3** "Man is rich in proportion to the number of things he can afford to let alone." - Henry David Thoreau I trapped as a kid and that is now my biggest regret as a nature lover and photographer. To trap you have to not have empathy for other living things. To trap, you have to practice cruelty to innocent living beings. To trap, you have to not think beyond yourself. If Wyoming stil has more hunters and trappers than wildlife observers, photographers, and nature lovers, then that's sad. In WA, we're welcoming the return of grizzlies and wolves to our state.

Final Comment **SCHUSTER, MIKE** **DEMING, WA** 5/26/2019 1:45:00 PM

- 4** Chapter 42 Mountain lion regulation for Area 1, Bearlodge. I would like to propose that the season stay the same, but the use of dogs to trail mountain lions be restricted to latter in the season. Maybe a good start date for the use of dogs be December 26th. The activity of running dogs through the Bearlodge starting September 1st tends to chase the elk herd to private land or into South Dakota. Having dogs run in front of someone bowhunting for elk is very agravating.

Final Comment **Hartman, Lyle** **Hulett, WY** 5/27/2019 5:25:00 AM

- 5** Correction to a previous comment I made on lions: "that kittens don't travel with their mother until they are six years old" should say "six months old" Thank you

Final Comment **Patten, Leslie** **Cody, WY** 5/27/2019 11:49:00 AM

- 6** Dear Game and Fish Commission members, The Mountain Lion Foundation asks that you consider the following concerns raised by the proposed Chapter 42, Mountain Lion Hunting Seasons put forth by Wyoming Game and Fish Department for mountain lion (Puma concolor) hunting in Wyoming. The views expressed are the official position of the Mountain Lion Foundation and the 7000 supporters of the organization. Trophy hunting is the greatest source of mortality for mountain lions throughout the majority of their range in the United States. Conservation biologists have established that the practice of trophy hunting is destructive and unnecessary, as it profoundly disrupts a population's social structure. Hunting mountain lions results in additive mortality – rates that far exceed what would happen in nature – and can lead to population instability and decline, as well as an increase in conflicts with humans and domestic animals. Additionally, one of the established rationales behind hunting mountain lions is to increase populations of prey animals like deer. While researchers have known for decades that mountain lions have minimal influence on deer populations, a recent study suggests that heavily hunted mountain lion populations may inadvertently put more pressure on deer populations than anticipated. For these reasons, we would politely request that the Commission consider ending hunting of mountain lions entirely. The Foundation, which is strongly opposed to the hunting of mountain lions, respectfully requests that the Commission, at the minimum, reduce the current unsustainable quotas to below the sustainable limit established by researchers: 12-14% of the adult population. The Foundation asks that the limit be reduced to 10% or less than that of the known population to account for additional human-caused mortality including vehicle strike, incidental snaring or trapping, poaching, public safety removal and so on. Additionally, we request that the use of hounds to pursue mountain lions no longer be permitted as this practice is unethical and is not considered to be fair chase. We are also asking that the start of all of the mountain lion hunting seasons be

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

delayed until December 1 to protect dependent young from being orphaned by hunters. Lastly, we want to emphasize that over-hunting mountain lions may not have the desired impact of increasing mule deer populations. In fact, hunting of these apex predators may have the opposite effect. The Foundation respectfully requests these actions for the reasons outlined below: The quota should be reduced to 10% of the known population to account for any additional human-caused mortality. While the Wyoming Game and Fish Department conducts research on lion populations in the state, they have never released a population estimate. Instead, they manage mountain lions based on population trend estimates, which raises serious concerns that quotas in some parts of Wyoming are far too high, leading to localized population declines. The combined lack of information and intense harvest is a significant threat to the mountain lion's long-term viability in many parts of the state. For the upcoming 2019-2020 season, we are appreciative that the WGFD has recommended decreasing quotas in Hunt Areas 17 and 23. However, Game and Fish is seeking to increase the quota in Hunt Area 19. We would ask that the Commission reject any quota increases in the state and instead reduce quotas to limits that have been established as sustainable by researchers. In order to sustain viable populations of mountain lions, prevent human-wildlife conflict and avoid compromising the long-term viability by failing to account for all human-caused sources of mortality, hunting of adult lion populations should not exceed the intrinsic growth rate of the population of interest. The intrinsic growth rate for mountain lion populations is established by researchers to be between 15-17%. Setting human-caused mortality limits at 10% or less of the adult population facilitates the maintenance of home ranges and social stability, reducing the likelihood of increased conflict with humans and population decline. Additionally, trophy hunting of mountain lions leads to an increase in kitten mortality in heavily hunted populations. Killing an adult female with kittens results in the death of her dependent young by dehydration, malnutrition, predation and exposure; even those who are at least six months to a year old. This impacts a population's ability to recruit new members if too many adult females are removed, making the population less resilient to hunting and other causes of mortality; both human-caused and natural. As such, we ask that, when making quota decisions in the future, the Commission votes to reduce the number of mountain lions that can be killed by hunters to 10% or less of the total adult population to account for additional human-caused mortality to maintain healthy, stable lion populations. Killing mountain lions is unnecessary and results in an increase in conflicts with humans and domestic animals. However, studies have shown that mountain lion populations are self-regulating and that killing established adult lions may actually lead to increased conflict with humans as a result of the disruption of mountain lion social structure and increased immigration of dispersing individuals. Mountain lions occur at low densities relative to their primary prey. In order to survive, they regulate their own numbers by staying at a smaller population size relative to their prey's biomass or they risk starvation. In other words, when prey populations decline, so do mountain lion populations. Because of these predator-prey dynamics, mountain lion populations do not need to be managed by humans. In general, hunters target older and larger mountain lions. However, doing so results in a younger overall age structure, which increases the likelihood of conflict with humans. As it stands, conflicts with mountain lions are exceedingly rare. Overhunting will disrupt resident populations, eventually leading to an increase in conflicts with people, pets and livestock. A study in Washington state showed that, as wildlife officials increased quotas and lengthened hunting season, mountain lion complaints increased rather than decreased. The heavy hunting pressure resulted in a higher ratio of younger males in the population as a result of immigration and emigration. Contrary to popular belief, killing mountain lions results in an increase in complaints and livestock depredation due to disruption of their social structure. To ensure healthy social structures and territorial behavior, mountain lion populations should not be hunted for trophies or recreation. This will also help to reduce conflicts with people, pets, and livestock. Using hounds to pursue mountain lions is unethical and is not considered to be fair chase. Hounding is an inhumane and outdated sport that has been banned in two-thirds of the United States. Hounding poses significant risk to the hounds as well as to young wildlife, including dependent kittens and cubs, who may be attacked and killed by hounds. Hounds also disturb or kill non-target wildlife and trespass onto private lands. This practice is not fair chase and is highly controversial, even among hunters. Fair chase hunting is based upon the premise of giving the animal an equal opportunity to escape from the hunter. Using hounds, especially those equipped with GPS collars, provides an unfair advantage to hunters. Many proponents of hound hunting claim that hunters can be more selective using this technique. Since hunters can get so close to a treed animal, hound hunting advocates assert that hunters can determine the sex, size, and general age of an animal before determining whether or not they are permitted to harvest that individual. Knowing the sex and other demographic status of the individual being hunted could be helpful in maintaining a viable population. However, a review of 30 years of records from game managers throughout the western United States found that, although technically feasible, most hunters could not tell the size and sex of an animal up a tree. Hunters had roughly 50% accuracy when determining sex; the same as if they had determined the sex with a coin toss. For the reasons outlined above, we ask that the use of hounds to pursue mountain lions be no longer permitted. If the Commission decides to continue to allow the use of dogs then, at the very least, GPS collars should be prohibited as the practice does not align with fair chase values. Delay the start of the mountain lion hunting

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

seasons until December 1 to protect dependent young. While it is not permitted in Wyoming to kill any females accompanied by spotted kittens, dependent young may not always be in the presence of their mother. Without kittens in her presence, a hunter may not be aware that a female has offspring and may kill her. As mountain lions offspring are dependent on their mothers for survival up to around 18 months of age, the loss of their mother prior to reaching adulthood would likely result in the death of her young, even if they are around a year old. A recent study has shown that delaying the start of hunting seasons until December 1 would protect about 91 percent of kittens from perishing as a result of being orphaned by hunters. By better aligning hunting seasons with denning periods, hunters will have the best opportunity to identify females with kittens. This, ultimately, will benefit both mountain lions and hunters that want to ensure that their populations remain healthy into the future. Targeting mountain lions to boost mule deer may have the opposite effect. Hunting mountain lions has long been thought to bolster populations of game species like mule deer, while reducing competition for this shared resource. However, a recent study evaluated the impacts that heavy hunting of mountain lion has on mule deer and elk. The study found that heavy hunting pressure on these apex predators had the opposite effect on mule deer. As trophy hunters often target the large, dominant male, they inadvertently reduce the age structure of mountain lions in the area, leaving younger, less experienced lions on the landscape. According to the study, these younger predators typically selected for mule deer instead of larger prey species like elk. As a result, the researchers noted that, despite increased survival of fawns and females, the removal of mountain lions did not yield a growth in the mule deer population. Instead, they suggested that hunting may actually be increasing the number of mountain lions that specialize in targeting deer. To summarize, we are asking the Commission to establish quotas in the future that are more in line with the best available science. Specifically, we request that the limit be reduced to 10% or less of the total adult and sub-adult population. We are also asking that hounds are not permitted at any time to aid trophy hunters in their pursuit of mountain lions. The use of hounds is inhumane, does not constitute as fair chase and offers hunters an unfair advantage. If hounds are permitted, we ask that GPS collars to track their movements are prohibited to better align with fair chase principals. We are also asking that the start of the mountain lion season in Wyoming be delayed until December 1. Doing so could prevent the death of a female with dependent young and could ultimately prevent the orphaning and deaths of approximately 91 percent of kittens. Lastly, we politely ask that the Commission factor in the recent findings about the impacts of high hunting quotas on both mountain lion and deer populations and include this information when setting limits now and in the future. Thank you for your consideration. Please make this comment letter a part of the official record regarding this decision. Respectfully, Lynn Cullens
EXECUTIVE DIRECTOR (916) 606-1610 LCullens@MountainLion.org Questions or requests regarding this comment letter may be directed to: Denise Peterson Visibility Specialist (801) 628-1211
visibility@mountainlion.org

REFERENCES Anderson, C. R., and F. G. Lindzey. 2005. Experimental evaluation of population trend and harvest composition in a Wyoming cougar population. *Wildlife Society Bulletin* 33:179–188. Ausband, D. E., C. R. Stansbury, J. L. Stenglein, J. L. Struthers, and L. P. Waits. 2015. Recruitment in a social carnivore before and after harvest. *Animal Conservation* 18:415–423. Batavia, C., M. P. Nelson, C. T. Darimont, P. C. Paquet, W. J. Ripple, and A. D. Wallach. 2018. The elephant (head) in the room: A critical look at trophy hunting. *Conservation Letters*. Beausoleil, R. A., G. M. Koehler, B. T. Maletzke, B. N. Kertson, and R. B. Wielgus. 2013. Research to regulation: Cougar social behavior as a guide for management. *Wildlife Society Bulletin*. Cooley, H. S., R. B. Wielgus, G. M. Koehler, H. S. Robinson, and B. T. Maletzke. 2009. Does hunting regulate cougar populations? A test of the compensatory mortality hypothesis. *Ecology* 90:2913–2921. Cougar Management Guidelines. 2005. Cougar Management Guidelines. WildFutures, Bainbridge Island, WA. 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. Darimont, C. T., C. H. Fox, H. M. Bryan, and T. E. Reimchen. 2015. The unique ecology of human predators. *Science*. 349:858-860. Eberhardt, L. L., P. J. White, R. A. Garrott, and D. B. Houston. 2007. A Seventy-Year History of Trends in Yellowstone's Northern Elk Herd. *Journal of Wildlife Management* 71:594–602. Elbroch, L. M., and H. Quigley. 2019. Age-specific foraging strategies among pumas, and its implications for aiding ungulate populations through carnivore control. *Conservation Science and Practice* 1. Elbroch, L. M., B. D. Jansen, M. M. Grigione, R. J. Sarno, and H. U. Wittmer. 2013. Trailing hounds vs foot snares: comparing injuries to pumas *Puma concolor* captured in Chilean Patagonia. *Wildlife Biology* 19:210-216. Hristienko, H., and J. McDonald, John E. 2007. Going in the 21st century: a perspective on trends and controversies in the management of the black bear *Ursus*. 18:72-88. Lindzey, F. G., W. D. Vansickle, S. P. Laing, and C. S. Mecham. 1992. Cougar Population Response to Manipulation in Southern Utah. *Wildlife Society Bulletin* 20:224-227. Logan, K. A., and L. L. Sweanor. 2001. Desert puma: evolutionary ecology and conservation of an enduring carnivore. Island Press, Washington, DC. Maletzke, B. T., R. Wielgus, G. M. Koehler, M. Swanson, H. Cooley, and J. R. Alldredge. 2014. Effects of hunting on cougar spatial organization. *Ecology and Evolution*. O'Malley, C., L. M. Elbroch, A. Kusler, M. Peziol, and H. Quigley. 2018. Aligning mountain lion hunting seasons to mitigate orphaning dependent kittens. *Wildlife Society Bulletin* 42:438–443. Peebles, K. A., R. B. Wielgus, B. T. Maletzke, and M. E. Swanson. 2013.

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations. PLoS ONE 8. Posewitz, J. 1994. Beyond Fair Chase: The Ethic and Tradition of Hunting. Falcon Press, Helena, Montana. Robinson, H.S. DeSimone, R. 2011. The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana. Final Report. Montana Fish, Wildlife & Parks. Helena, MT. Stoner, D. C., M. L. Wolfe, and D. M. Choate. 2006. Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics. Journal of Wildlife Management 70:1588–1600. Teel, T. L., R. S. Krannich, and R. H. Schmidt. 2002. Utah stakeholders' attitudes toward selected cougar and black bear management practices. Wildlife Society Bulletin 30:2-15. Teichman, K. J., B. Cristescu, and C. T. Darimont. 2016. Hunting as a management tool? Cougar-human conflict is positively related to trophy hunting. BMC Ecology 16. Vucetich, J. A., D. W. Smith, and D. R. Stahler. 2005. Influence of harvest, climate and wolf predation on Yellowstone elk, 1961-2004. Oikos 111:259–270. Wallach, A. D., I. Izhaki, J. D. Toms, W. J. Ripple, and U. Shanas. 2015. What is an apex predator? Oikos 124:1453–1461. Wielgus, R. B., D. E. Morrison, H. S. Cooley, and B. Maletzke. 2013. Effects of male trophy hunting on female carnivore population growth and persistence. Biological Conservation 167:69–75.

Final Comment	Peterson, Denise	Sacramento, CA	6/5/2019 8:45:00 AM
----------------------	-------------------------	-----------------------	---------------------

7 I am against the proposed changes to the mountain lion boundary change between unit 23 and 15. The change will only accomplish one thing, close the season earlier in unit 23. It will not move hunting pressure to unit 15 as Dan Theile told me was one of the reasons for the change. The area will continue to have high hunting pressure until the season closes. I am also against the quota reduction in unit 23. Contrary to what your flawed data suggests, unit 23 has more lions currently than it has in the past decade. Houndsmen are passing females and outfitters are being more selective with clients which has resulted in some clients not killing lions while on their hunts. This is the main reason you are not reaching your quota in unit 23, it is not a reduced number of lions. I spent 60 plus days pursuing lions in unit 23 this winter and saw more lions this year than I have in a long time. This change will accomplish one more thing, houndsman's wives will be happy for the simple fact that their husbands will be home more! I have been guiding and outfitting in this unit for 17 years and would hope my opinion would be valued and not ignored.

Final Comment	Adney, Robert	Dayton, WY	6/7/2019 7:01:00 AM
----------------------	----------------------	-------------------	---------------------

8 I don't believe that combining area 23 with part of the Buffalo side to fill the quota is a terrible idea. The problem isn't a lack of mountain lion it's more a problem of opportunity. Most of the available land to hunt when the snow gets deep is private property thus less houndsmen pursuing lions. Right now myself and the majority of lion hunters are interested in harvesting mature toms and that takes a lot of time to find one that fits that bill. If you add buffalo into area 23 it will be just like bears where people know the quota is going to close so they'd rather shoot a female or small juvenile lion rather than holding out for a mature Tom for fear that the season will close.

Final Comment	Petty, Matthew	Ranchester , WY	6/8/2019 1:12:00 PM
----------------------	-----------------------	------------------------	---------------------

9 Killing mountain lions for SPORT is disgusting, not to mention the value an apex predator has on the environment. While I may not live in WY, I am part of this country and what happens in WY does affect the rest of the world. Hunting a predator is not a game and trapping them is even worse. Please, quit this barbaric practice.

Final Comment	Young, Lahna	West Bloomfield, MI	6/9/2019 8:34:00 PM
----------------------	---------------------	----------------------------	---------------------

10 There are not enough wolves to justify having any sort of hunting season for them, much less extending the one you already have.

Final Comment	Lehmberg, Judy	Dayton, TX	6/14/2019 10:25:00 PM
----------------------	-----------------------	-------------------	-----------------------

11 It continues to be shown that the very small and shrinking mountain lion population is under enormous stress. Why do we encourage people to kill them? What harm are they causing? As always, mountain lions (and other animals like bears) are killed each year without tags under the "had to defend myself" category and yet none of those numbers get included in your quotas. Why is that? I have offered to buy every available mountain lion tag in order to stop this killing. Is it about needed money? Otherwise, I think we will

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

succeed in killing off another species. People visit WY to see wildlife ALIVE NOT DEAD. Tourism is the number two income generator in our state. They come to see animals in nature. Period.

Final Comment	Osnos, Annette	Jackson, WY	6/15/2019 5:20:00 AM
----------------------	-----------------------	--------------------	-----------------------------

- 12** I oppose any Mountain Lion quota or hunt at this time. I refer to the study of Mark Elbroch. As we have lost 48% of our Mountain Lion and counting to man and wolves we must pull back on the hunting of mountain lions. Call a time out and assess the damage. The mountain lion cannot compete with the wolves for food in the winter and the food is on a drastic decline and due in large part to your elk reduction and your political move to shut the feed grounds. As you continue to wipe out the elk herd and in particular the park elk herd in the hunt of GTNP and area 78 and in August when the few calf elk that survive are suckling, take a breath, stop killing our elk inappropriately, leave some food for the apex predators, mountain lion, grizzly bear and wof. And allow the Mountain Lion Population a chance to recover. No mountain lion hunting in 2019/2020. Please. Deidre J. Bainbridge

Final Comment	bainbridge, deidre	Jackson, WY	6/15/2019 9:24:00 PM
----------------------	---------------------------	--------------------	-----------------------------

- 13** The Center for Biological Diversity ("Center") provides the following comments concerning Wyoming's Chapter 42 Draft Regulations on Mountain Lion Hunting Seasons ("Regulations"). The Center supports Wyoming Game and Fish Department's ("WGFD") decision to decrease hunting quotas in certain areas, and further encourages the Commission to decrease quotas throughout Wyoming. Mountain lions are essential to Wyoming's landscape and have always been present in the tradition and culture of the United States. Mountain lions are a native species Wyoming should protect, instead of exploit. I. End hunting for mountain lions or lower quotas throughout Wyoming. A. Mountain lions are essential to maintain biodiversity and ecological health. Mountain lions are an umbrella species (conserving them and their habitat conserves surrounding fauna and flora, Thorne et al. 2006), a keystone species, and ecosystem engineers. As a keystone species, mountain lions benefit their environment at a level disproportionate to their biomass (Barry et al. 2018). As an ecosystem engineer, mountain lions improve the health of their surrounding ecosystems because they create, modify, and maintain their surrounding habitat, which "subsequently increases heterogeneity" (Barry et al. 2019; Jones et al. 1997). For instance, researchers proved the carrion from mountain lion predation provides micro-habitats and resources for smaller animals and insects that enable them to perform a variety of ecological benefits throughout their lifecycle (Barry et al. 2019). And, mountain lions' predation on deer prevent deer from overgrazing in ecologically sensitive regions, including riparian wetlands, which increases the wetlands' biodiversity (HSUS 2017). One study shows mountain lions' predation on ungulates preserved ungulate destruction of cottonwood trees and other vegetation, which in turn prevented riverbanks from eroding, which prevented water temperatures from increasing. The cool water temperatures enabled multiple fish species to thrive (Ripple & Beschta 2006). Wyoming mountain lions create the same ecological cycle from ungulates to riverbank preservation to plentiful fish species, which benefits Wyoming and WGFD. Preserved riparian wetlands and thriving fish in Wyoming increase the number and frequency of wildlife enthusiasts who chose to visit Wyoming to recreate and fish. Mountain lion predation benefits hunters. Chronic wasting disease (CWD) affects elk and deer in Wyoming (WGFD), and researchers consider its prevalence a threat throughout the state (MacKay 2018). In a study testing CWD in mule deer, more than 38% of the deer tested positive for CWD, which guarantees death for those animals and spreads the disease (Mackay 2018). Researchers found mountain lions prey selectively on ungulates infected with CWD (Wild et al. 2011, referencing Krumm et al. 2005). This inherent trait not only helps minimize the spread of CWD, it helps ungulate hunters because it increases the hunters' probability of choosing an animal that is not infected. Hunters then have a greater likelihood of being able to use the meat from the ungulates they harvest. B. Give mountain lions the opportunity to rehabilitate their populations to a healthy level. Wyoming is one of the few states with a mountain lion population that is beginning to rebound from dangerously low levels during the mid-20th century. Mountain lions self-regulate their populations based on resource availability and do not overpopulate their habitats. Excluding hunting, mountain lions currently face threats of "habitat loss, high mortality from vehicle strikes, and loss of migration corridors" (Ernest et al. 2002). These unnatural deaths prevent the species from reaching a sustainable and genetically diverse population (HSUS 2017), and hunting exacerbates its population decline. WGFD needs accurate data on mountain lion populations before continuing to allow hunting seasons. Of the sixteen states that are home to distinct mountain lion populations, Wyoming is one of three states that do not maintain accurate estimates of its lions (HSUS 2017). Researchers estimate Wyoming's territory could support up to 3,312 mountain lions, but WGFD does not annually measure the states' population to determine whether Wyoming has reached its population limit (HSUS 2017). Biologists from Colorado, Montana, and Washington recommend states do not allow hunting mountain lions beyond 12-

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

14% of their entire populations (HSUS 2017). Because of the multiple threats to mountain lions' survival and because WGFD does not have an estimate of Wyoming's current population, the Center urges WGFD to pause all hunting and incorporate scientific research methods to estimate its mountain lion population. Only then can WGFD determine whether Wyoming has a population sufficient to withstand human intervention through hunting and ensure that the quotas do not exceed harvesting beyond 12-14%. Hunting seasons promise Wyoming depleted mountain lion populations because one dead lion forecasts the death of multiple other lions through infanticide or kitten abandonment. Mountain lion societies are built on complex social structures, which hunters destroy when they kill key group members. Male and female mountain lions maintain territory for their group, which makes them the resident male and female of that area (HSUS 2017). When hunters kill resident males, sub-adult male lions try to dominate the pack and become the new resident males. In this struggle, sub-adult males frequently kill the previous resident males' kittens for complete dominance of the group (Keehner et al. 2015; Wielgus 2013). Mother mountain lions often die in these confrontations because they protect their young from the attack by sub-adult males (HSUS 2017). The Center is concerned about WGFD's policy regarding dependent young. The Center supports WGFD's prohibition of killing female lions that have dependent young by their side. However, hunters still risk killing mother mountain lions whose kittens are protected in their den. Female mountain lions spend 44-88% of their lives rearing kittens, and each female has up to four kittens per pregnancy (HSUS 2017, referencing Ruth et al. 2003). But, WGFD does not require hunters to take courses distinguishing female, nursing mountain lions from non-nursing female or male mountain lions (WGFD). This means that hunters have a 50% chance of encountering and killing a female mountain lion. Allowing hunting seasons, especially without requiring identification courses, ensures denning kittens will lose their mothers and die from "starvation, predation, dehydration, or exposure" each season (HSUS 2017). For every one mountain lion a hunter kills, the hunter collaterally kills up to four more mountain lions. These ongoing deaths will prevent all of Wyoming's wildlife enthusiasts, hunters and observers alike, from observing mountain lions in the near future. II. If WGFD continues hunting seasons, only permit "fair chase" hunting. A. Ban any use of hounds from hunting mountain lions. The Center supports WGFD's decision to ban all traps to catch mountain lions. The Center further urges WGFD to ban use of any hunting dog to pursue mountain lions because of the immediate and long-term detrimental effects "hounding" has on Wyoming's wildlife. Hunting enthusiasts developed ethics regulations in the sport known as "fair chase." These ethics require hunters use humane methods of taking animals and gives animals a genuine opportunity to escape their pursuers (HSUS 2017). Several states have banned hounding and many hunters criticize the practice because it does not align with honorable hunting practices. One 2012 survey – comprised of individuals in categories based on location of residence, gender, education, and wildlife enthusiast consumption or non-consumption – showed that up to 74% of individuals in some categories disapproved of hunting mountain lions with hounds. Even 31% of hunters disapproved of hounding because it was unethical (Teel et al. 2002). Hounds corner mountain lions up trees or cliff edges until hunters arrive who then shoot mountain lions within point-blank range (Nat'l Geo. 2017). Hunters outfit their hounds with radio collars, which provide unfair advantages to the hunters: the radios notify hunters of the location of their hounds and, therefore, the mountain lions. These unethical tracking techniques prevent mountain lions from being able to escape their pursuers. Hounding not only hurts mountain lions and other big game, it also injures the hounds who are involved in the chase, non-target animals (Grignolio et al. 2011), and damages private land (Hristienko & McDonald 2007). Hounding also changes the behavior of other species hunters pursue because the non-target species during mountain lion season learn to avoid hunters and hounds. When the hunting seasons commence for these species, hunters experience lower success rates because the animals have learned to avoid detection (Lone et al. 2015). B. Prohibit mountain lion hunting in summer months and only sell licenses at full price. The Center urges WGFD to stop all hunting seasons during months with snowfall because the weather creates severe disadvantages for mountain lions to escape pursuit. Hounds can track scent better on snow than on dry ground, increasing the unethical status of hounding, and hunters can follow footprints that lead hunters to mountain lions (HSUS 2017). Also, female mountain lions give birth to kittens throughout the year (HSUS 2017). The scheduled hunting seasons ensure hunters will easily find mother mountain lions in snowy months who are rearing kittens, and those kittens will die if the hunters harvest their mothers. WGFD's proposed chapter on "Mountain Lion Hunting Seasons" states a "person may receive a maximum of one (1) full price mountain lion license and a maximum of one (1) reduced price mountain lion license during any one (1) calendar year" (WGFD 2019). WGFD should require hunters to purchase licenses at full price to hunt mountain lions. This decision will increase WGFD's annual revenue from hunting licenses and will model a respect for mountain lions all hunters should embody. The expense indicates mountain lions are precious resources that people should take sparingly. Increased license prices will better protect Wyoming's mountain lion population from threat of extinction and help WGFD maintain the critical balance between responsible hunting and species conservation. III. Conclusion The Public Trust Doctrine is a vital aspect of North American wildlife culture and law, and ensures access and enjoyment of wilderness resources for every American generation (Wildlife Society 2010). Mountain lions belong to the American tradition, and

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

therefore, the Public Trust Doctrine, and deserve WGFD's protection through effective conservation measures. Because of mountain lions' self-regulation of their population, and the populations' sensitivity to human intervention, hunting is not an effective method of conservation. Furthermore, hunting's popularity decreases every year, especially for big game. In a 2011 survey, only 3% of hunters said they would pursue big game that included mountain lions (HSUS 2017, referencing DOI 2011). In 2019, attitudes to leave hunting practices and embrace non-consumptive wildlife recreation have grown to incredible numbers and supply millions of dollars in revenue to Wyoming annually. WGFD should heavily weigh the input of Wyoming's residents and visitors who provide the majority of WGFD's revenue for conservation efforts. The Center urges WGFD to prohibit mountain lion hunting in order to align the Department with the perspective of Wyoming's residents and visitors who want to preserve large fauna for generations to come. Respectfully yours, Jessica Chapman Law Clerk Center for Biological Diversity P.O. Box 11374 Portland, OR 97211-0374 Tel: (503) 283-5474 Email: jchapman@biologicaldiversity.org Andrea Santarsiere Senior Attorney Center for Biological Diversity P.O. Box 469 Victor, ID 83455 Tel: (303) 854-7748 Email: asantarsiere@biologicaldiversity.org

References* J. Barry et al. 2018. Pumas as ecosystem engineers: ungulate carcasses support beetle assemblages in the Greater Yellowstone Ecosystem. *Oecologia*. 189(3): pp. 577-586. doi: <https://doi.org/10.1007/s00442-018-4315-z>. U.S. Dept. of Interior – Fish and Wildlife Serv., and U.S. Dept. of Commerce – U.S. Census Bureau. 2011. Ernest et al. 2002. Fecal DNA Analysis and Risk Assessment of Mountain Lion Predation of Bighorn Sheep. *J. Wildl Manag.* 66(1): pp. 75-85. doi: 10.2307/3802873. S. Grignolio et al. 2011. Effects of hunting with hounds on a non-target species living on the edge of a protected area. *Biol. Conserv.* 144(1): pp. 641-649. doi: <https://doi.org/10.1016/j.biocon.2010.10.022>. H. Hristienko & J. McDonald Jr. 2007. Going into the 21st century: a perspective on trends and controversies in the management of the American black bear. *Ursus*. 18(1): pp. 72-88. Available at: <https://pdfs.semanticscholar.org/16d5/f4295551be0eb595f9232f9e6b999d1cba31.pdf>. Humane Society of the U.S. 2017. State of the Mountain Lion. Washington, DC. Available at: <http://nvwildlifealliance.org/wp-content/uploads/2015/10/HSUS-Mountain-Lion-report-2017.pdf>. C. Jones et al. 1997. Positive and Negative Effects of Organisms as Physical Ecosystem Engineers. *ESA*. 78(7): pp. 1946-1957. doi: [https://doi.org/10.1890/0012-9658\(1997\)078\[1946:PANEOO\]2.0.CO;2](https://doi.org/10.1890/0012-9658(1997)078[1946:PANEOO]2.0.CO;2). J. Keehner et al. 2015. Effects of male targeted harvest regime on sexual segregation in mountain lion. *Biol. Conserv.* 192: pp. 42-47. doi: <https://doi.org/10.1016/j.biocon.2015.09.005>. C. Krumm et al. 2005. Relative Vulnerability of Chronic Wasting Disease Infected Mule Deer to Vehicle Collisions. *J. Wildl Dis.* 41(3): pp. 503-511. doi: <https://doi.org/10.7589/0090-3558-41.3.503>. K. Logan et al. 1999. Capturing Pumas with Foot-Hold Snares. *Wild. Soc. Bull.* 27(1): pp. 201-208. Available at: <http://mountainlion.org/us/nm/LIBRARY/NM-R-Logan-et-al-1999-Capturing-Pumas-with-foot-hold-snares-1985-1995.pdf>. K. Lone et al. 2015. An adaptive behavioral response to hunting: surviving male red deer shift habitat at the onset of the hunting season. *Anim Behav.* 102: pp. 127-138. doi: <https://doi.org/10.1016/j.anbehav.2015.01.012>. R. MacKay. 2018. New research has again made chronic wasting disease a kitchen table conversation, and this time it's considered a threat to Wyoming's deer. *Wyo. Wildlife*. Available at: <https://wgfd.wyo.gov/WGFD/media/content/PDF/Vet%20Services/April-2018-CWD-article-WWN.pdf>. M. Paterniti. 2017. Trophy Hunting: Should We Kill Animals to Save Them? *Nat'l Geo*. Available at: <https://www.nationalgeographic.com/magazine/2017/10/trophy-hunting-killing-saving-animals/>. W. Ripple & R. Beschta. 2006. Linking a cougar decline, trophic cascade, and catastrophic regime shift in Zion National Park. *Biol Conserv.* 133(4): pp. 397-408. doi: <https://doi.org/10.1016/j.biocon.2006.07.002>. T. Ruth et al. 2003a. Presence and Movements of Lactating and Maternal Female Cougars: Implications for State Hunting Regulations in Seventh Mountain Lion Workshop, Jackson, WY. H. Suminski. 1982. Mountain Lion Predation on Domestic Livestock in Nevada. *Proceedings of the Tenth Vertebrate Pest Conf.* 43: pp. 62-66. Available at: <https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1042&context=vpc10>. T. Teel et al. 2002. Utah stakeholders' attitudes toward selected cougar and black bear management practices. *Wildl Soc Bull.* 30(1): 2-15. doi: <https://www.jstor-org.proxy2.cl.msu.edu/stable/3784630>. J. Thorne et al. 2006. A Conservation Design for the Central Coast of California and the Evaluation of Mountain Lion as an Umbrella Species. *Natural Areas J.* 26(2): pp. 137-148. doi: [https://doi.org/10.3375/0885-8608\(2006\)26\[137:ACDFTC\]2.0.CO;2](https://doi.org/10.3375/0885-8608(2006)26[137:ACDFTC]2.0.CO;2). R. Wielgos et al. 2013. Effects of male trophy hunting on female carnivore population growth and persistence. *Biol. Conserv.* 167: pp. 69-75. doi: <https://doi.org/10.1016/j.biocon.2013.07.008>. M. Wild et al. 2011. The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal on Prion Disease Dynamics in Deer. *J. Wildl Dis.* 47(1): pp. 78-93. doi: <https://doi.org/10.7589/0090-3558-47.1.78>. Wildlife Society. 2010. The Public Trust Doctrine: Implications for Wildlife Management and Conservation in the United States and Canada. *Worthy Shorts, Inc.* New York, NY. Available at: https://wildlife.org/wp-content/uploads/2014/05/ptd_10-1.pdf. Wyo. Game & Fish Dept. Last visited June 13, 2019. Chronic Wasting Disease (CWD) in Wyoming Wildlife. Available at: <https://wgfd.wyo.gov/Wildlife-in-Wyoming/More-Wildlife/Wildlife-Disease/Chronic-Wasting-Disease>. Wyo. Game & Fish Dept. Last visited June 13, 2019. Mountain Lion Education and Identification.

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

Last visited June 13, 2019. Available at: <https://wgfd.wyo.gov/Education/Wildlife-ID/Mountain-Lion-Education>. Wyo. Game & Fish Dept. 2019. May 20, 2019 Draft: Chapter 42, Mountain Lion Hunting Seasons. Available at: https://wgfd.wyo.gov/WGFD/media/content/July_CH-42_Draft-5-20-19-4.pdf.
*References may be provided upon request.

Final Comment	Santarsiere, Andrea	Victor, ID	6/17/2019 11:59:00 AM
---------------	---------------------	------------	-----------------------

- 14** Please protect the wolves do not increase the killings of wolves in any way shape or form !!! We must save them from being slaughter

Final Comment	Smith, Maria	Lafayette , IN	6/17/2019 3:02:00 PM
---------------	--------------	----------------	----------------------

- 15** Dear President Rael, Director Nesvik and Members of the Commission: On behalf of the Humane Society of the United States and our Wyoming supporters, we thank you for the opportunity to submit the following comments regarding the Wyoming Game and Fish Department's (WGFD) proposed updates to Wyoming Hunting Regulations, Chapter 42, Mountain Lion Hunting Seasons. We would be happy to provide references and/or supporting materials at your request. This information was omitted due to the word limit within the online commenting form. The Humane Society of the United States supports the proposed additional language to prohibit the killing of trapped mountain lions (*Puma concolor*). However, we are strongly opposed to the trophy hunting of mountain lions because of the consequences to mountain lions, other wildlife and entire ecosystems. Trophy hunting of mountain lions is unsustainable and cruel, particularly upon dependent kittens and their mothers. Research shows that mountain lions are far more social than previously believed and trophy hunting them causes social chaos resulting in additional mortalities apart from the individual killed by the hunter, which are never counted by the agency. Additionally, studies show that killing mountain lions increases conflicts with humans and livestock while hindering the ecological benefits they provide, such as helping reduce the spread of disease in cervid populations. For the reasons that follow, we request that the Commission not approve the proposed quota increases and protect mountain lions from trophy hunting now and into perpetuity. If the Commission does allow the trophy hunting of mountain lions to continue, it must first conduct a thorough study to estimate Wyoming's mountain lion population and establish quotas that do not exceed sustainable limits. While we do not support a trophy hunt on mountain lions, WGFD must ensure that any limits ("quotas") not exceed 12% to 14% of the adult and subadult populations if the agency is determined to authorize a hunt. I. Trophy hunting is harmful to mountain lions and increases conflicts Trophy hunting is the greatest source of mortality for Wyoming's mountain lions. The practice is harmful to more than just the wild cats who are killed. Conservation biologists have derided this practice as unnecessary and wasteful. Batavia et al. (2018) write: Compelling evidence shows that the animals hunted as trophies have sophisticated levels of "intelligence, emotion and sociality" which is "profoundly disrupted" by trophy hunting. For these reasons, WGFD must not allow trophy hunting of mountain lions in Wyoming: 1) Mountain lions remove deer infected with disease: Mountain lions can help maintain the health and viability of ungulate populations by preying on sick individuals, reducing the spread of disease such as chronic wasting disease (CWD) and brucellosis. For example, during a study in Rocky Mountain National Park, researchers found lions preyed on mule deer infected with CWD. The study concluded that adult deer preyed upon by lions were more likely to have CWD than deer shot by hunters. According to the study, "The subtle behaviour changes in prion-infected deer may be better signals of vulnerability than body condition, and these cues may occur well before body condition noticeably declines." This suggests that mountain lions select for infected prey and may be more effective at culling animals with CWD than hunters who rely on more obvious signs of emaciation that occur in later stages of the disease. Moreover, the lions consumed over 85 percent of carcasses, including brains, thereby removing a significant amount of contamination from the environment. This ecosystem benefit is increasingly important as CWD infection continues to increase in prevalence and distribution in Wyoming and neighboring states. A reduction in the lion population could eliminate one of the best defenses against the spread of this deadly disease. Mountain lions also reduce vehicle collisions with deer, saving drivers \$1.1 million in collision costs annually in South Dakota alone. 2) Mountain lions provide economic benefits through tourism: Killing mountain lions deprives citizens of their ability to view or photograph wild mountain lions. Nonconsumptive users are a rapidly growing stakeholder group who provide immense economic contributions to the communities in which they visit. The public values mountain lions and views them as an indicator of healthy environments while posing little risk to people living near them. A new study indicates that Americans highly value wildlife and are concerned about their welfare and conservation. Surveys also show that the majority of Americans do not support trophy hunting. A 2018 study co-sponsored by the Western Association of Fish and Wildlife Agencies, Manfredo et al. (2018), found that more Wyomingites value and appreciate wildlife than ever. Fewer of us want wildlife,

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

such as grizzly bears, wolves and mountain lions killed for utilitarian purposes. The U.S. Fish and Wildlife Service's 2016 wildlife-recreation report indicates that wildlife watchers nationwide have increased 20% from 2011, numbering 86 million and spending \$75.9 billion, while all hunters declined by 16%, with the biggest decline in big game hunter numbers, from 11.6 million in 2011 to 9.2 million in 2016. Altogether, hunters spent \$25.6 billion in 2016, about one-third that spent by wildlife watchers. In Wyoming, tourism drew in nearly nine million people in 2018 alone, resulting in almost \$4 billion in direct spending and nearly \$200 million in state and local tax revenues. 3) Trophy hunting of mountain lions will not boost deer populations: The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results. Numerous recent studies demonstrate that predator removal actions "generally had no effect" in the long term on ungulate populations. If predators had been absent, the deer would have died from some other cause of mortality. Because ecological systems are complex, heavily persecuting mountain lions will fail to address the underlying malnutrition problems that deer face. Research also shows that disruption by oil and gas drilling greatly harms mule deer populations. A new study in Wyoming confirms oil and gas harms to mule deer. The key to mule deer survival is access to adequate nutrition and protecting breeding females, not predation. In their review article that surveyed 48 predation studies involving mule deer, Forrester and Wittmer determined that, while predation was the "primary proximate cause of mortality for all age classes" of deer, predator removal studies indicate that "predation is compensatory, particularly at high deer densities, and that nutrition and weather shape population dynamics." In other words, each year, some deer are "doomed surplus"; that is, they die will no matter what. In their study, Monteith et al. (2014) found that both additive and compensatory mortality can occur in a single year and "should be viewed as a continuum rather than as a dichotomy." If Wyoming wants to grow its ungulate populations, then WGFD must foster survival of adult female mule deer to stem declines and increase nutritional conditions for mule deer as these factors are the most important for mule deer survival. 4) Trophy hunting increases complaints and livestock depredations: Data show that mountain lions kill very few cattle and sheep across the country. In Wyoming, mountain lions only cause around 1% of all cattle and sheep mortalities. Moreover, only 14% of Wyoming cattle operations reportedly used non-lethal methods to protect their animals from predation. In regions with increasing mountain lion complaints, wildlife officials throughout western states often lengthen seasons and increase bag limits to respond to what they believe may be a growing lion population. However, research has shown that the public's perception of an increasing population and greater numbers of livestock losses may actually be a result of a declining female and increasing male demographic in the population. Heavy hunting of lions can skew the ratio of young males in the population by causing compensatory immigration and emigration by young male lions. In fact, hunting of mountain lions to reduce complaints and livestock depredations can have the opposite effect. Killing lions disrupts their social structure and increases both complaints and livestock depredations. Peebles et al. (2013) write: . . . each additional cougar on the landscape increased the odds of a complaint of livestock depredation by about 5%. However, contrary to expectations, each additional cougar killed on the landscape increased the odds by about 50%, or an order of magnitude higher. By far, hunting of cougars had the greatest effects, but not as expected. Very heavy hunting (100% removal of resident adults in 1 year) increased the odds of complaints and depredations in year 2 by 150% to 340%. Hunting disrupts mountain lions' sex-age structure and tilts a population to one that is comprised of younger males, the demographic which is most likely to engage in livestock losses than animals in stable, older population. 5) Killing large numbers of mountain lions halts their ability to create trophic cascades in their ecosystems, which benefits a wide range of flora, fauna and people: Mountain lions serve important ecological roles, including providing a variety of ecosystem services. As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs. Their protection and conservation has ripple effects throughout their natural communities. Researchers have found that by modulating deer populations, mountain lions prevented overgrazing near fragile riparian systems, resulting in greater biodiversity. Additionally, carrion left from lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity. 6) Trophy hunting is unsustainable and cruel: Mountain lions are sparsely populated across vast areas, invest in few offspring, provide extended parental care to their young, have a tendency towards infanticide, females limit reproduction and social stability promotes their resiliency. Human persecution affects their social structure and harms their persistence. Research shows that trophy hunting and predator control results in additive mortalities, causing total mortalities to far exceed what would occur in nature. In fact, the effect of human persecution is "super additive," meaning that kill rates on large carnivores has a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss, social disruption and its indirect effects including increased infanticide and decreased recruitment of their young. When trophy hunters and predator-control agents remove the stable adult mountain lions from a population, it encourages subadult males to immigrate, leading to greater aggression between cats and mortalities to adult females and subsequent infanticide. 7) Trophy hunting and predator control is particularly harmful to mountain lion kittens and their mothers: Biologists maintain that females are the most important

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

demographic of a lion population; they ensure the continuation of the species. Unfortunately, female mountain lions are frequent victims of trophy hunting, both directly from the trophy hunter, and indirectly from social chaos. In heavily hunted populations, female mountain lions experience higher levels of intraspecific aggression (fights with other cats) resulting in predation on themselves and their kittens. Over-hunting harms a population's ability to recruit new members, especially if too many adult females are removed. The loss of adult females ensures the death of orphaned kittens by starvation, dehydration, predation or exposure. Kittens up to 12 months of age are likely incapable of dispatching prey animals on their own. Thus, a trophy hunter or trapper kills more than just the animal in the crosshairs: trophy hunting causes a sudden disruption in mountain lion social structures that leads to additional mortalities that are never counted in states' hunting quotas. 8) Trophy hunting harms entire mountain lion communities: A study on mountain lions in the Teton region of Wyoming shows that mountain lions are quite social and live in "communities," with females sharing kills with other females and territorial males, while males may protect their females and kittens from incoming, competing males. Disrupting these communities can cause negative effects and increases conflicts by causing social chaos within their populations. Trophy hunting and predator control easily destabilizes mountain lion populations, causing increased conflicts with humans, pets and livestock. 9) Trophy hunting is unnecessary as mountain lions are a self-regulating species: Mountain lions occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences. In order to survive, their populations must stay at a smaller size relative to their prey's biomass or risk starvation. They do this by regulating their own numbers. When prey populations decline, so do mountain lion populations. Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another. Mountain lions, as with most large carnivores, are also considered a keystone species because they help drive the ecosystems from the top down resulting in greater biological diversity. Mountain lions regulate many of the other species in their communities, including herbivores, who then regulate the plant community. Wildlife managers and biologists also consider mountain lions to be an 'umbrella' species – by protecting lions and their large habitat, a wide array of additional plants and animals in this habitat will also be protected. 10) Hounding harms cougar kittens, non-target wildlife and the hounds themselves: Trophy hunting with hounds is cruel and causes harm to more than just the mountain lions being chased. Hounds kill kittens, and lions often injure or kill hounds. The practice is stressful and energetically taxing to lions. Hounding is not considered "fair chase" hunting by most. Additionally, hounds chase non-target wildlife and trespass onto private lands. If WGFD is to continue allowing trophy hunting of mountain lions, it must at the very least ensure that mortality from human persecution not exceed the species sustainable rate of growth, thought to be approximately 12% to 14% of the population. WGFD currently allows practically unlimited trophy hunting of mountain lions, despite lacking a statewide population estimate. II. WGFD must significantly reduce its already excessive trophy hunting quota to maintain healthy mountain lion populations in Wyoming. WGFD currently allows the killing of mountain lions without understanding how this level of killing is affecting the Wyoming's lion populations. In 2017 alone, trophy hunters killed 282 mountain lions in Wyoming. If WGFD is to continue allowing trophy hunting of mountain lions, the agency must set sustainable quotas based on reliable research and population estimates in order to prevent over-persecution: • A ten-year study of hunting mountain lions on the Uncompahgre Plateau by Colorado Parks and Wildlife found that a sustainable offtake rate amounted to 11% to 12% of the population. • A Montana mountain lion study concludes that sustainable offtake should be no more than 12%. • Washington Department of Fish and Wildlife biologists conclude a harvest of no more than 14% of the resident adults to avoid overkill of mountain lions. As we detailed above, trophy hunting of mountain lions, especially at unsustainable and excessive rates, can harm the long-term survival of the species and increase conflicts with humans, pets and livestock. Moreover, this high rate of killing is damaging to other wildlife, including Wyoming's ungulate populations that benefit from mountain lion predation on diseased individuals. While the Humane Society of the United States does not support a trophy hunt on mountain lions, we believe WGFD must ensure that any quotas not exceed 12% to 14% of the adult and subadult populations, based on a reliable population estimate, if the agency is determined to continue allowing the trophy hunting of mountain lions. Such a limit will prevent the hunting of mountain lions above sustainable levels. III. Conclusion. WGFD continues to allow significantly trophy hunting mortality for mountain lions despite having no population estimate to ensure the species is not being overhunted. WGFD must not increase the mountain lion trophy hunting quota as doing so would only provide further trophy hunting of this iconic and ecologically significant species without considering the biological and social repercussions. Wyoming's mountain lions are an important component of our natural wild heritage, and deserve reasoned management so that their populations are conserved for all Wyoming stakeholders, including for future generations, and to safeguard their intrinsic and ecological value. We urge the Commission to not approve the proposed updates and prohibit the trophy hunting of mountain lions in 2019 as well as future years. Thank you for your consideration. Sincerely, Lisa Kauffman Senior State Director, Idaho and Wyoming The Humane Society of the United States

WGFD Web Comment Report

Chapter 42, Mountain Lion Hunting Seasons

Final Comment	Kauffman, Lisa	Boise, ID	6/17/2019 3:49:00 PM
---------------	----------------	-----------	----------------------

- 16** We agree with no changes (quota number) in Southwest Wyoming lion units. It is declining in older class lion and more lion hunters are killing more young lion. Need to take into consideration of having no take on collared lion. There is a lot of time, personnel, and money put into these research projects then you have some lion hunter put an end to it. If they are a true conservationist having no take on collared lion won't be a problem, this would give a chance of younger collared lion to get bigger. Also if they are collared female with kittens, this no take would benefit them in giving the kittens a better chance to survive. One occurrence this last winter a guy killed a collared female with 3 kittens, so most likely all 3 kittens also died. This impacts the future. This no take strategy has been done in Utah. Research has shown they don't only prey on deer, but many other species like elk, beaver, coyotes, badgers, etc.. which lions are helping control populations of these other species. Another regulation to consider is to put a 3 day wait period once lion season starts to prevent people poaching. There would be less chance of them thinking about killing a lion, then going back to town to get one and going back to get it. Utah uses the 3 day wait period, we would be fine with having minimum of 1 day. Wait period we think would also increase number of lion licenses purchased prior to hunting lion and would reduce the temptation of taking a lion illegally.

Final Comment	Bonomo, Shane	Rock Springs, WY	6/17/2019 4:39:00 PM
---------------	---------------	------------------	----------------------

CHAPTER 42

MOUNTAIN LION HUNTING SEASONS

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 23-1-302, § 23-2-101 (d), § 23-1-703 (e) and § 23-3-109 (a).

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) “Bayed” means impeding the movement of a mountain lion such that while a person is present (with or without dogs) the animal is unable to flee the area where it is being held.
- (b) “Biological year” means twelve (12) consecutive months from September 1 to August 31.
- (c) “Dependent Young” means any mountain lion with visible spots other than those occurring on the inside of its front legs or any mountain lion still traveling with an adult female mountain lion.
- (d) “Mortality” means any legal mountain lion harvest or illegal human caused mountain lion death, excluding mountain lions taken by the Department, mountain lions taken under the authority of W.S. § 23-3-115 (a), and all other mountain lion deaths.
- (e) “Reduced price mountain lion license” means a license which may be authorized in specific hunt areas allowing a person to take a mountain lion in addition to what may be taken on a full price mountain lion license.

Section 3. Hunting Regulations.

- (a) Mountain lions shall only be taken during open seasons by the use of legal firearms or archery equipment, except as otherwise provided by State statute and Commission regulations.
- (b) Use of Dogs. Dogs may be used to pursue mountain lions during the open season. However, dogs shall only be used to pursue mountain lions during open hours for the taking of mountain lions.
- (c) After a mountain lion has been pursued or bayed, a properly licensed person shall promptly harvest or release the mountain lion. No person shall in any manner restrict or hinder the mountain lions ability to escape for the purpose of allowing a person who was not present at the time the mountain lion was bayed to arrive and take the mountain lion.

(d) Bag and Possession Limits. The bag and possession limit for any person with a proper license shall be one (1) mountain lion during any one (1) calendar year (January 1 - December 31), except as otherwise provided in this Section. Hunters may take any mountain lion, except dependent young and female mountain lions with dependent young at side.

(e) Reduced price mountain lion licenses. A person may receive a maximum of one (1) full price mountain lion license and a maximum of one (1) reduced price mountain lion license during any one (1) calendar year. A person shall possess and exhibit a full price mountain lion license for the current calendar year in order to receive a reduced price mountain lion license for the same calendar year.

(f) Reduced price mountain lion licenses are valid only in hunt areas 5, 7, 8, 9, 15, 16, 19, 24, 25, 27 and 31.

(g) Reporting and Registering Kills. Hunters harvesting mountain lions shall retain the pelt and skull from each mountain lion harvested for registration purposes. Even if the skull is damaged, it shall accompany the pelt. Visible external evidence of sex shall remain naturally attached to the pelt.

(i) Within three (3) days (seventy-two (72) hours) after harvesting a mountain lion, the licensee shall present the pelt and skull to a district game warden, district wildlife biologist, or Department personnel at a Department Regional Office during business hours for registration. The entire pelt and skull shall be presented in an unfrozen condition in order to allow collection of two (2) premolar teeth to be utilized to determine the age of the mountain lion and to allow examination of the pelt to determine the sex of the mountain lion and lactation status of females. At the time of registration, the licensee shall furnish the Department with their license, the date of kill, the location of the site of kill to include hunt area, section, township and range, or UTM coordinates.

(ii) A licensee taking a mountain lion in a designated wilderness area shall report their harvest by telephone or in person within three (3) days, (seventy-two (72) hours) and shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Regional Office during business hours for registration within ten (10) days from the date of harvest or within three (3) days after returning from a designated wilderness area. The licensee making the telephone report shall contact a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office and provide their name, license number, date of kill, sex of mountain lion, hunt area and the location of the kill site (drainage). At the time of registration, the licensee shall furnish the Department their license, the date of kill, the location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iii) Within twenty-four (24) hours after taking a mountain lion in Hunt Area 1, the licensee shall report the taking of a mountain lion 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, residency status of the licensee, date of the kill and location of the site of kill to include hunt area.

(h) Any person who makes a false statement reporting a mountain lion kill or 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.

(i) Hunt Areas, Season Dates and Limitations.

Hunt Area	Dates of Seasons	Hunt Area Mortality Limit	Limitations
1	Sep. 1 - Mar. 31	Resident Limit - 20 Nonresident Limit - 4	See Section 3 (k)
2	Sep. 1 - Mar. 31	3	
3	Sep. 1 - Mar. 31	8	
4	Sep. 1 - Mar. 31	10	
5	Sep. 1 - Mar. 31	12	See Section 3 (e) and (f)
	Apr. 1 - Apr. 30*		Valid off national forest*
6	Sep. 1 - Apr. 30	15	
7	Sep. 1 - Aug. 31	14	See Section 3 (e) and (f)
8	Sep. 1 - Aug. 31	10	See Section 3 (e) and (f)
9	Sep. 1 - Aug. 31	12	See Section 3 (e) and (f)
10	Sep. 1 - Mar. 31	7	
11	Sep. 1 - Mar. 31	4	
12	Sep. 1 - Mar. 31	6	
13	Sep. 1 - Mar. 31	5	
14	Sep. 1 - Mar. 31	15	
15	Sep. 1 - Aug. 31	Unlimited	See Section 3 (e) and (f)
16	Sep. 1 - Mar. 31	6	See Section 3 (e) and (f)
17	Sep. 1 - Mar. 31	5	
18	Sep. 1 - Mar. 31	12	
19	Sep. 1 - Mar. 31	25	See Section 3 (e) and (f)
20	Sep. 1 - Aug. 31	18	
21	Sep. 1 - Mar. 31	20	
22	Sep. 1 - Aug. 31	25	
23	Sep. 1 - Mar. 31	15	
24	Sep. 1 - May 31	Unlimited	See Section 3 (e) and (f)
25	Sep. 1 - Mar. 31	12	See Section 3 (e) and (f)
26	Sep. 1 - Mar. 31	15	
27	Sep. 1 - Aug. 31	Unlimited	See Section 3 (e) and (f)
28	Sep. 1 - Mar. 31	3	
29	Sep. 1 - Mar. 31	6	
30	Sep. 1 - Mar. 31	12	
31	Sep. 1 - Aug. 31	11	See Section 3 (e) and (f)
32	Sep. 1 - Mar. 31	25	

(j) Hunt Area Mortality Limit. The mountain lion season in a hunt area shall close when the hunt area mortality limit is reached. If the hunt area mortality limit is not reached, the

season shall close upon the date specified in subsection (i) of this Section. Hunt area mortality limits shall be for the biological year. It is the hunter's responsibility to confirm that the hunt area they intend to hunt is open. The status of hunt area closures is available by calling toll free 1-800-264-1280 twenty-four (24) hours a day.

(k) **Resident and Nonresident Mortality Limits.** A separate resident and nonresident mortality limit shall apply in designated hunt areas as set forth in this Section, and shall represent the maximum allowable harvest of mountain lions for either resident or nonresident licensed hunters within a specified hunt area.

(i) A hunt area with a resident mortality limit shall close to resident mountain lion hunters when the resident mortality limit is reached or on the date specified in subsection (i) of this Section, whichever comes first.

(ii) A hunt area with a nonresident mortality limit shall close to nonresident mountain lion hunters when the nonresident mortality limit is reached or on the date specified in subsection (i) of this Section, whichever comes first.

(l) No person shall knowingly take a mountain lion caught in a trap or snare or within twenty-four (24) hours after the mountain lion is released from a trap or snare.

Section 4. Archery Regulations. Mountain lions may be taken with legal archery equipment in all areas as set forth in Section 3 of this Chapter.

Section 5. Hunt Area Descriptions.

(a) **Area and Number**

Area 1. Bearlodge. Beginning where Wyoming State Highway 24 crosses the Wyoming-South Dakota state line; southerly along said line to U.S. Highway 85; southwesterly along said highway to Wyoming Highway 585; northwesterly along said highway to Interstate Highway 90; westerly along said highway to U.S. Highway 14 at the town of Sundance; northwesterly along said highway to Wyoming State Highway 24; northerly and easterly along said highway to the Wyoming-South Dakota state line.

Area 2. Teton. Beginning where the Continental Divide crosses the southern boundary of Yellowstone National Park; southerly along said divide to the Union Pass Road (U.S.F.S. Road 600); westerly and southerly along said road to the Darwin Ranch Road (U.S.F.S. Road 620); westerly along said road to the divide between the Green River and the Gros Ventre River; southwesterly along said divide to the divide between the Gros Ventre River and the Hoback River at Hodges Peak; westerly along said divide to the divide between Flat Creek and the Granite Creek; southwesterly along said divide to Cache Peak; northerly along the divide between Flat Creek and Cache Creek at Jackson Peak; westerly along the ridge between Cache Creek and Twin Creeks to the Bridger-Teton National Forest/National Elk Refuge Boundary; southwesterly along the National Elk Refuge boundary to where Flat Creek crosses U. S. Highway 26-89-191 at the north edge of the town of Jackson; southwesterly along said highway

to Wyoming Highway 22; westerly along said highway to the Wyoming-Idaho state line; northerly along said line to the south boundary of Yellowstone National Park; easterly along said boundary to the Continental Divide, excluding Grand Teton National Park and the National Elk Refuge.

Area 3. Bridger. Beginning where the Union Pass Road (U.S.F.S. Road 600) crosses the Continental Divide; southeasterly along said divide to Mt. Nystrom; easterly from Mt. Nystrom to Sweetwater Gap and the headwaters of the Sweetwater River; southerly down said river to U.S. Highway 28; southwesterly along said highway to U.S. Highway 191; northerly along said highway to the divide between the Green River and the Hoback 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 and easterly along said road to the Continental Divide.

Area 4. Popo Agie. Beginning where Wyoming Highway 135 crosses the southern boundary of the Wind River Reservation; southerly along said highway to U.S. Highway 287; easterly along said highway to the Sweetwater River; southwesterly and then northerly up said river to Sweetwater Gap and the headwaters of the Sweetwater River; westerly from Sweetwater Gap to Mt. Nystrom and the Continental Divide; northwesterly along said divide to the south boundary of the Wind River Reservation; easterly along said boundary to Wyoming Highway 135.

Area 5. Iron Mountain. Beginning where Interstate Highway 25 crosses the Wyoming-Colorado state line; westerly along said line to U.S. Highway 287; northerly along said highway to Wyoming Highway 34; northerly and easterly along said highway to Interstate Highway 25; southerly along said highway to the Wyoming-Colorado state line.

Area 6. Laramie Peak. Beginning where Interstate Highway 25 crosses the North Platte River at the city of Douglas; southerly along said highway to Wyoming Highway 34; westerly along said highway to U.S. Highway 30; northerly and westerly along said highway to Wyoming Highway 487; northerly and westerly along said highway to the Lone Tree Road (B.L.M. Road 3141); northerly along said road to the Spring Creek Road; easterly to the Bates Creek Road (Natrona County Road 402); northeasterly along said road to the Squaw Springs Trail Road; northeasterly along said road to U.S.F.S. Road 660; southeasterly along said road to Curry Creek; northwesterly down said creek to Deer Creek; northeasterly down said creek to the North Platte River; easterly down said river to Interstate Highway 25.

Area 7. South Snowy Range. Beginning at the city of Laramie and U.S. Highway 287; southerly along said highway to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 230 (west of the North Platte River); northerly along said highway to Wyoming Highway 130; easterly along said highway to the city of Laramie.

Area 8. Seminoe. Beginning at the junction of Wyoming Highway 220 and Wyoming Highway 487; southerly along Wyoming Highway 487 to U.S. Highway 30; westerly along said highway to Interstate Highway 80; westerly along said highway to U.S. Highway 287 in the city

of Rawlins; northerly along said highway to Wyoming Highway 220; northeasterly along said highway to Wyoming Highway 487.

Area 9. Sierra Madre. Beginning at the junction of Interstate Highway 80 and Wyoming Highway 130; southerly along Wyoming Highway 130 to Wyoming Highway 230; southeasterly along said highway to the Wyoming-Colorado state line; westerly along said line to the Continental Divide; northerly along said divide to the Sage Creek Road (Carbon County Road 401); northerly along said road to Wyoming Highway 71; northerly along said highway to Interstate Highway 80; easterly along said highway to Wyoming Highway 130.

Area 10. Haystacks. Beginning at the junction of Interstate Highway 80 and Wyoming Highway 789; easterly along Interstate Highway 80 to the junction of Wyoming Highway 71; southerly along said highway to the Sage Creek Road (Carbon County Road 401); southerly along said road to the Continental Divide at Middlewood Hill; southerly along said divide to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 789; northerly along said highway to Interstate Highway 80.

Area 11. Red Desert. Beginning at the junction of Wyoming Highway 73 and U.S. Highway 287; southerly along U.S. Highway 287 to Interstate Highway 80; westerly along said highway to Creston Junction and U.S. Highway 789; southerly along said highway to the Wyoming-Colorado state line; westerly along said line to the Cow Creek-Powder Wash Road north of Powder Wash, Colorado; northwesterly along said road to the Bitter Creek Road (Sweetwater County Road 19); northwesterly along said road to Interstate Highway 80; westerly along said highway to the Green River; northerly up said river to Big Sandy River; northeasterly up said river to U.S. Highway 191; southerly along said highway to Wyoming Highway 28; northeasterly along said highway to the Sweetwater River; northeasterly down said river to U.S. Highway 287; easterly along said highway to the Bison Basin Road; southerly along said road to the Three Forks-Atlantic City Road (B.L.M. Road 2317); easterly along said road to the Wamsutter-Crooks Gap Road (Sweetwater County Road 23N and Fremont County Road 318); southerly along said road to the Bairoil Road (Sweetwater County Road 22); easterly along said road to Wyoming Highway 73; easterly along said highway to U.S. Highway 287.

Area 12. Flaming Gorge. Beginning at the junction of Interstate Highway 80 and the Bitter Creek Road (Sweetwater County Road 19); southeasterly along said road to the Cow Creek-Powder Wash Road; southeasterly along said road to the Wyoming-Colorado state line; westerly along said line to the Wyoming-Utah state line; westerly along said line to Flaming Gorge Reservoir and the Green River; northerly up said river to Interstate Highway 80; easterly along said highway to the junction of the Bitter Creek Road (Sweetwater County Road 19).

Area 13. Wasatch. Beginning where Interstate Highway 80 crosses the Green River; southerly down said river to the Wyoming-Utah state line; westerly and northerly along said line to Interstate Highway 80; easterly along said highway to the Green River.

Area 14. Lincoln. Beginning where the Green River crosses Interstate Highway 80; westerly along said highway to the Wyoming-Utah state line; northerly along said line to the Wyoming-Idaho state line; northerly along said line to the divide between the Salt River and

Bear River; easterly along said divide to the divide between the Salt River and the Smiths Fork River; northeasterly along said divide to Commissary Ridge; southeasterly along said ridge to the head of LaBarge Creek; southeasterly down said creek to the Green River; southeasterly down said river to Interstate Highway 80.

Area 15. Kaycee. Beginning at the junction of Interstate Highway 25 and Middle Fork Crazy Woman Creek; southerly along Interstate Highway 25 to U.S. Highway 20-26 at the city of Casper; westerly along said highway to the town of Waltman and the Waltman-Arminto Road (Natrona County Road 104); northerly along said road to the Buffalo Creek Road (Natrona County Road 105); northerly along said road to the Big Horn Mountain Divide Road/Hazelton Road (Natrona County Road 109-Washakie County Road 81-Johnson County Road 3); northerly along said road to the Gold Mine Road (U.S.F.S. Road 452); northerly along said road to the Canyon Creek Road (U.S.F.S. Road 25); northerly along said road to U.S. Highway 16; easterly along said highway to the Hazelton Road (Johnson County Road 3); southerly along said road to Middle Fork Crazy Woman Creek; easterly down said creek to Interstate Highway 25.

Area 16. Gas Hills. Beginning at the city of Casper and Wyoming Highway 220; southwesterly along said highway to U.S. Highway 287; southerly along said highway to Wyoming Highway 73; westerly along said highway to the Bairoil Road (Sweetwater County Road 22); westerly along said road to the Wamsutter-Crooks Gap Road (Sweetwater County Road 23N and Fremont County Road 318); northerly along said road to the Three Forks-Atlantic City Road (B.L.M. Road 2317); westerly along said road to the Bison Basin Road (Fremont County Road 281 and B.L.M. Road 3221); northerly along said road to U.S. Highway 287; westerly along said highway to Wyoming Highway 135; northerly along said highway to the boundary of the Wind River Reservation; easterly and northerly along said boundary to U.S. Highway 20-26; easterly along said highway to Wyoming Highway 220 in the city of Casper.

Area 17. Piney. Beginning where U.S. Highway 191 crosses the Green River; southeasterly along said highway to the Big Sandy River; southwesterly down said river to the Green River; northerly up said river to LaBarge Creek; northwesterly up said creek to the Greys River Road at Tri Basin Divide; northerly along said road to the divide between the Green River and the Greys River; easterly and northerly along said divide to the divide between the Green River and the Hoback River (Hoback Rim); easterly along said divide to U.S. Highway 191; southerly along said highway to the Green River.

Area 18. Wind River. All of the drainage of the Wind River, which lies west of the west boundary of the Wind River Reservation.

Area 19. Northwest. All of the Clark's Fork River drainage, Soda Butte Creek drainage, Shoshone River drainage, Greybull River drainage, Gooseberry Creek drainage and Yellowstone River drainage, outside Yellowstone National Park and west of Wyoming Highway 120.

Area 20. Owl Creek/Bighorn Basin. Beginning where the Big Horn River crosses the Wyoming-Montana state line; southerly up said river to the north boundary of the Wind River Reservation; westerly along said boundary to the divide between Owl Creek and the South Fork

Wood River; northeasterly along said divide to the divide between Cottonwood Creek and Gooseberry Creek; northeasterly along said divide to the divide between Gooseberry Creek and Grass Creek; easterly along said divide to Wyoming Highway 120; northerly along said highway to the Wyoming-Montana state line; easterly along said state line to the Bighorn River; in addition, all non-Indian fee title lands in that portion of Hot Springs County within the exterior boundaries of the Wind River Reservation.

Area 21. Shell. Beginning where the Big Horn Mountain Divide crosses the Wyoming-Montana state line; southerly along said divide to U.S. Highway 16; westerly along said highway to the Big Horn River; northerly down said river to the Wyoming-Montana state line; easterly along said line to the Big Horn Mountain Divide.

Area 22. Ten Sleep. Beginning at the junction of U.S. Highway 16 and the Canyon Creek Road (U.S.F.S. Road 25); southerly along said road to the Gold Mine Road (U.S.F.S. Road 452); southerly along said road to the Big Horn Mountain Divide Road-Hazelton Road (Johnson County Road 3-Washakie County Road 81-Natrona County Road 109); southerly along said road to the Buffalo Creek Road (Natrona county Road 105); southwesterly along said road to the Waltman-Arminto Road (Natrona County Road 104); southerly along said road to the town of Waltman and U.S. Highway 20-26; westerly along said highway to the east boundary of the Wind River Reservation; northerly then westerly along said boundary to the Big Horn River; northerly down said river to U.S. Highway 16; easterly along said highway to the Canyon Creek Road (U.S.F.S. Road 25). Also included are all lands of the Wind River Reservation within the Bureau of Reclamation Riverton and Boysen Unit boundaries and Boysen State Park, excluding Indian sole occupancy lands north of Cottonwood Creek.

Area 23. Sheridan. Beginning where Interstate Highway 90 crosses the Wyoming-Montana state line; southerly along said highway to Interstate Highway 25; southerly along said highway to Middle Fork Crazy Woman Creek; westerly up said creek to the Hazelton Road (Johnson County Road 3); northerly along said road to U.S. Highway 16; southwesterly along said highway to the Big Horn Mountain Divide at Powder River Pass; northerly along said divide to the Wyoming-Montana state line; easterly along said line to Interstate Highway 90.

Area 24. Rochelle. Beginning where the Rocky Point Road (Crook County Road 145) crosses the Wyoming-Montana state line; southerly along said road to the "D" Road (Crook County Road 68); southerly along said road to Interstate Highway 90; easterly along said highway to U.S. Highway 16; southeasterly along said highway to the Wyoming-South Dakota state line; southerly along said line to the Wyoming-Nebraska state line; southerly along said line to U.S. Highway 20; westerly along said highway to Interstate Highway 25; northwesterly along said highway to the North Platte River at the town of Douglas; westerly along said river to the city of Casper and Interstate Highway 25; northerly along said highway to Interstate Highway 90; northerly along said highway to the Wyoming-Montana state line; easterly along said line to the Rocky Point Road (Crook County Road 145).

Area 25. Hartville. Beginning where U.S. Highway 20 crosses the Wyoming-Nebraska state line; southerly along said line to the Wyoming-Colorado state line; westerly along said line

to Interstate Highway 25; northerly along said highway to U.S. Highway 20; easterly along said highway to the Wyoming-Nebraska state line.

Area 26. Greys River. Beginning at the Wyoming-Idaho state line on the Snake River; easterly up said river to Bailey Creek; southeasterly up said creek to Dry Wash Draw; easterly up said draw to the divide between Bailey Creek and Willow Creek (Greyback Ridge); southerly along said divide to the divide between the Greys River and Willow Creek; southerly along said divide to the divide between the Greys River and the Hoback River; southerly along said divide to the divide between the Greys River and the Green River; southerly and westerly along said divide to the Greys River Road at the Tri Basin Divide; southerly along said road to La Barge Creek; northwesterly up said creek to Commissary Ridge; northwesterly along said ridge to the divide between the Salt River and the Smiths Fork River; southwestly along said divide to the divide between the Salt river and the Bear River; westerly along said divide to the Wyoming-Idaho state line; northerly along said line to the Snake River.

Area 27. Casper Mountain. Beginning at the confluence of the North Platte River and Deer Creek at the town of Glenrock; southerly up said creek to Curry Creek; southeasterly up said creek to U.S.F.S. Road 660; northwesterly along said road to its termination at the Squaw Springs Trail Road; southwestly along said road to the Bates Creek Road (Natrona County Road 402); southwestly along said road to the Spring Creek Road; westerly along said road to the Lone Tree Road (B.L.M. Road 3141); southerly along said road to Wyoming Highway 487; northerly and westerly along said highway to Wyoming Highway 220; northerly and easterly along said highway to the Casper city limits; northerly along said city limits to the North Platte River; easterly along said river to Deer Creek.

Area 28. Crowheart Butte. All non-Indian owned fee title land within the exterior boundaries of the Wind River Reservation excluding Mountain Lion Hunt Area 22, those areas of the Spence and Moriarity Wildlife Management Area that lie east of the East Fork of the Wind River, and those lands within Hot Springs County.

Area 29. Hoback. Beginning where U.S. Highway 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; easterly along said ridge to Jackson Peak; southerly along the divide between Flat Creek and Cache Creek to Cache Peak; easterly along the divide between Flat Creek and Granite Creek to Pyramid Peak; southerly 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; southeasterly along the divide between the Hoback River and Green River; southwestly along said divide to the divide between the Greys River and Hoback River; northeasterly and westerly along said divide to the divide between the Greys River and Willow Creek; northerly along said divide to the divide between the Bailey Creek and Willow Creek (Greyback Ridge); northerly along said divide to Dry Wash Draw; westerly down said draw to Baily Creek; northwesterly down said creek to the Snake River; southerly and westerly down the Snake River to the Wyoming-Idaho state line; northerly along said line to Wyoming Highway 22; easterly along said highway to U.S. Highway 191; northeasterly along said highway to Flat Creek.

Area 30. Newcastle. Beginning where U.S. Highway 85 crosses the Wyoming-South Dakota state line; southerly along said line to U.S. Highway 16; northwesterly along said highway to the town of Moorcroft and Interstate Highway 90; easterly along said highway to the town of Sundance and Wyoming State Highway 585; southeasterly along said highway to U.S. Highway 85; northerly along said highway to the Wyoming-South Dakota state line.

Area 31. Elk Mountain. Beginning at the city of Laramie and Wyoming Highway 130; westerly then northerly along said highway to U.S. Highway 30; easterly and southerly along said highway to the city of Laramie.

Area 32. Hulett. Beginning where the Montana-Wyoming state lines crosses the Rocky Point Road (Crook County Road 145); easterly along said line to where the Montana, Wyoming and South Dakota state lines meet; southerly along the Wyoming-South Dakota state line to Wyoming State Highway 24; westerly and southerly along said highway to U.S. Highway 14; southeasterly along said highway to the town of Sundance and Interstate Highway 90; westerly along said highway to the town of Moorcroft and the D-Road (Crook County Road 68); northerly along said road to the Rocky Point Road in Campbell County; northerly along said road to the Wyoming-Montana state line.

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

CHAPTER 42

MOUNTAIN LION HUNTING SEASONS

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 23-1-302, § 23-2-101 (d), § 23-1-703 (e) and § 23-3-109 (a).

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) “Bayed” means impeding the movement of a mountain lion such that while a person is present (with or without dogs) the animal is unable to flee the area where it is being held.
- (b) “Biological year” means twelve (12) consecutive months from September 1 to August 31.
- (c) “Dependent Young” means any mountain lion with visible spots other than those occurring on the inside of its front legs or any mountain lion still traveling with an adult female mountain lion.
- (d) “Mortality” means any legal mountain lion harvest or illegal human caused mountain lion death, excluding mountain lions taken by the Department, mountain lions taken under the authority of W.S. § 23-3-115 (a), and all other mountain lion deaths.
- (e) “Reduced price mountain lion license” means a license which may be authorized in specific hunt areas allowing a person to take a mountain lion in addition to what may be taken on a full price mountain lion license.

Section 3. Hunting Regulations.

- (a) Mountain lions shall only be taken during open seasons by the use of legal firearms or archery equipment, except as otherwise provided by State statute and Commission regulations.
- (b) Use of Dogs. Dogs may be used to pursue mountain lions during the open season. However, dogs shall only be used to pursue mountain lions during open hours for the taking of mountain lions.
- (c) After a mountain lion has been pursued or bayed, a properly licensed person shall promptly harvest or release the mountain lion. No person shall in any manner restrict or hinder the mountain lions ability to escape for the purpose of allowing a person who was not present at the time the mountain lion was bayed to arrive and take the mountain lion.
- (d) Bag and Possession Limits. The bag and possession limit for any person with a proper license shall be one (1) mountain lion during any one (1) calendar year (January 1 -

December 31), except as otherwise provided in this Section. Hunters may take any mountain lion, except dependent young and female mountain lions with dependent young at side.

(e) Reduced price mountain lion licenses. A person may receive a maximum of one (1) full price mountain lion license and a maximum of one (1) reduced price mountain lion license during any one (1) calendar year. A person shall possess and exhibit a full price mountain lion license for the current calendar year in order to receive a reduced price mountain lion license for the same calendar year.

(f) Reduced price mountain lion licenses are valid only in hunt areas 5, 7, 8, 9, 15, 16, 19, 24, 25, 27 and 31.

(g) Reporting and Registering Kills. Hunters harvesting mountain lions shall retain the pelt and skull from each mountain lion harvested for registration purposes. Even if the skull is damaged, it shall accompany the pelt. Visible external evidence of sex shall remain naturally attached to the pelt.

(i) Within three (3) days (seventy-two (72) hours) after harvesting a mountain lion, the licensee shall present the pelt and skull to a district game warden, district wildlife biologist, or Department personnel at a Department Regional Office during business hours for registration. The entire pelt and skull shall be presented in an unfrozen condition in order to allow collection of two (2) premolar teeth to be utilized to determine the age of the mountain lion and to allow examination of the pelt to determine the sex of the mountain lion and lactation status of females. At the time of registration, the licensee shall furnish the Department with their license, the date of kill, the location of the site of kill to include hunt area, section, township and range, or UTM coordinates.

(ii) A licensee taking a mountain lion in a designated wilderness area shall report their harvest by telephone or in person within three (3) days, (seventy-two (72) hours) and shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Game and Fish Regional Office during business hours for registration within ten (10) days from the date of harvest or within three (3) days after returning from a designated wilderness area. The licensee making the telephone report shall contact a district game warden, district wildlife biologist or Department personnel at a Game and Fish Department Regional Office and provide their name, license number, date of kill, sex of mountain lion, hunt area and the location of the kill site (drainage). At the time of registration, the licensee shall furnish the Department their license, the date of kill, the location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iii) Within twenty-four (24) hours after taking a mountain lion in Hunt Area 1, the licensee shall report the taking of a mountain lion 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, residency status of the licensee, date of the kill and location of the site of kill to include hunt area.

(h) Any person who makes a false statement reporting a mountain lion kill or 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.

(i) Hunt Areas, Season Dates and Limitations.

Hunt Area	Dates of Seasons	Hunt Area Mortality Limit	Limitations
1	Sep. 1 - Mar. 31	Resident Limit - 20 Nonresident Limit - 4	See Section 3 (k)
2	Sep. 1 - Mar. 31	3	
3	Sep. 1 - Mar. 31	8	
4	Sep. 1 - Mar. 31	10	
5	Sep. 1 - Mar. 31	12	See Section 3 (e) and (f)
	Apr. 1 - Apr. 30*		Valid off national forest*
6	Sep. 1 - Apr. 30	15	
7	Sep. 1 - Aug. 31	14	See Section 3 (e) and (f)
8	Sep. 1 - Aug. 31	10	See Section 3 (e) and (f)
9	Sep. 1 - Aug. 31	12	See Section 3 (e) and (f)
10	Sep. 1 - Mar. 31	7	
11	Sep. 1 - Mar. 31	4	
12	Sep. 1 - Mar. 31	6	
13	Sep. 1 - Mar. 31	5	
14	Sep. 1 - Mar. 31	15	
15	Sep. 1 - Aug. 31	Unlimited	See Section 3 (e) and (f)
16	Sep. 1 - Mar. 31	6	See Section 3 (e) and (f)
17	Sep. 1 - Mar. 31	<u>95</u>	
18	Sep. 1 - Mar. 31	12	
19	Sep. 1 - Mar. 31	<u>2025</u>	See Section 3 (e) and (f)
20	Sep. 1 - Aug. 31	18	
21	Sep. 1 - Mar. 31	20	
22	Sep. 1 - Aug. 31	25	
23	Sep. 1 - Mar. 31	<u>2015</u>	
24	Sep. 1 - May 31	Unlimited	See Section 3 (e) and (f)
25	Sep. 1 - Mar. 31	12	See Section 3 (e) and (f)
26	Sep. 1 - Mar. 31	15	
27	Sep. 1 - Aug. 31	Unlimited	See Section 3 (e) and (f)
28	Sep. 1 - Mar. 31	3	
29	Sep. 1 - Mar. 31	6	
30	Sep. 1 - Mar. 31	12	
31	Sep. 1 - Aug. 31	11	See Section 3 (e) and (f)
32	Sep. 1 - Mar. 31	25	

(j) Hunt Area Mortality Limit. The mountain lion season in a hunt area shall close when the hunt area mortality limit is reached. If the hunt area mortality limit is not reached, the season shall close upon the date specified in subsection (i) of this Section. Hunt area mortality

limits shall be for the biological year. It is the hunter's responsibility to confirm that the hunt area they intend to hunt is open. The status of hunt area closures is available by calling toll free 1-800-264-1280 twenty-four (24) hours a day.

(k) **Resident and Nonresident Mortality Limits.** A separate resident and nonresident mortality limit shall apply in designated hunt areas as set forth in this Section, and shall represent the maximum allowable harvest of mountain lions for either resident or nonresident licensed hunters within a specified hunt area.

(i) A hunt area with a resident mortality limit shall close to resident mountain lion hunters when the resident mortality limit is reached or on the date specified in subsection (i) of this Section, whichever comes first.

(ii) A hunt area with a nonresident mortality limit shall close to nonresident mountain lion hunters when the nonresident mortality limit is reached or on the date specified in subsection (i) of this Section, whichever comes first.

(l) No person shall knowingly take a mountain lion caught in a trap or snare or within twenty-four (24) hours after the mountain lion is released from a trap or snare.

Section 4. Archery Regulations. Mountain lions may be taken with legal archery equipment in all areas as set forth in Section 3 of this Chapter.

Section 5. Hunt Area Descriptions.

(a) **Area and Number**

Area 1. Bearlodge. Beginning where Wyoming State Highway 24 crosses the Wyoming-South Dakota state line; southerly along said line to U.S. Highway 85; southwesterly along said highway to Wyoming Highway 585; northwesterly along said highway to Interstate Highway 90; westerly along said highway to U.S. Highway 14 at the town of Sundance; northwesterly along said highway to Wyoming State Highway 24; northerly and easterly along said highway to the Wyoming-South Dakota state line.

Area 2. Teton. Beginning where the Continental Divide crosses the southern boundary of Yellowstone National Park; southerly along said divide to the Union Pass Road (U.S.F.S. Road 600); westerly and southerly along said road to the Darwin Ranch Road (U.S.F.S. Road 620); westerly along said road to the divide between the Green River and the Gros Ventre River; southwesterly along said divide to the divide between the Gros Ventre River and the Hoback River at Hodges Peak; westerly along said divide to the divide between Flat Creek and the Granite Creek; southwesterly along said divide to Cache Peak; northerly along the divide between Flat Creek and Cache Creek at Jackson Peak; westerly along the ridge between Cache Creek and Twin Creeks to the Bridger-Teton National Forest/National Elk Refuge Boundary; southwesterly along the National Elk Refuge boundary to where Flat Creek crosses U. S. Highway 26-89-191 at the north edge of the town of Jackson; southwesterly along said highway to Wyoming Highway 22; westerly along said highway to the Wyoming-Idaho state line;

northerly along said line to the south boundary of Yellowstone National Park; easterly along said boundary to the Continental Divide, excluding Grand Teton National Park and the National Elk Refuge.

Area 3. Bridger. Beginning where the Union Pass Road (U.S.F.S. Road 600) crosses the Continental Divide; southeasterly along said divide to Mt. Nystrom; easterly from Mt. Nystrom to Sweetwater Gap and the headwaters of the Sweetwater River; southerly down said river to U.S. Highway 28; southwesterly along said highway to U.S. Highway 191; northerly along said highway to the divide between the Green River and the Hoback 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 and easterly along said road to the Continental Divide.

Area 4. Popo Agie. Beginning where Wyoming Highway 135 crosses the southern boundary of the Wind River Reservation; southerly along said highway to U.S. Highway 287; easterly along said highway to the Sweetwater River; southwesterly and then northerly up said river to Sweetwater Gap and the headwaters of the Sweetwater River; westerly from Sweetwater Gap to Mt. Nystrom and the Continental Divide; northwesterly along said divide to the south boundary of the Wind River Reservation; easterly along said boundary to Wyoming Highway 135.

Area 5. Iron Mountain. Beginning where Interstate Highway 25 crosses the Wyoming-Colorado state line; westerly along said line to U.S. Highway 287; northerly along said highway to Wyoming Highway 34; northerly and easterly along said highway to Interstate Highway 25; southerly along said highway to the Wyoming-Colorado state line.

Area 6. Laramie Peak. Beginning where Interstate Highway 25 crosses the North Platte River at the city of Douglas; southerly along said highway to Wyoming Highway 34; westerly along said highway to U.S. Highway 30; northerly and westerly along said highway to Wyoming Highway 487; northerly and westerly along said highway to the Lone Tree Road (B.L.M. Road 3141); northerly along said road to the Spring Creek Road; easterly to the Bates Creek Road (Natrona County Road 402); northeasterly along said road to the Squaw Springs Trail Road; northeasterly along said road to U.S.F.S. Road 660; southeasterly along said road to Curry Creek; northwesterly down said creek to Deer Creek; northeasterly down said creek to the North Platte River; easterly down said river to Interstate Highway 25.

Area 7. South Snowy Range. Beginning at the city of Laramie and U.S. Highway 287; southerly along said highway to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 230 (west of the North Platte River); northerly along said highway to Wyoming Highway 130; easterly along said highway to the city of Laramie.

Area 8. Seminoe. Beginning at the junction of Wyoming Highway 220 and Wyoming Highway 487; southerly along Wyoming Highway 487 to U.S. Highway 30; westerly along said highway to Interstate Highway 80; westerly along said highway to U.S. Highway 287 in the city

of Rawlins; northerly along said highway to Wyoming Highway 220; northeasterly along said highway to Wyoming Highway 487.

Area 9. Sierra Madre. Beginning at the junction of Interstate Highway 80 and Wyoming Highway 130; southerly along Wyoming Highway 130 to Wyoming Highway 230; southeasterly along said highway to the Wyoming-Colorado state line; westerly along said line to the Continental Divide; northerly along said divide to the Sage Creek Road (Carbon County Road 401); northerly along said road to Wyoming Highway 71; northerly along said highway to Interstate Highway 80; easterly along said highway to Wyoming Highway 130.

Area 10. Haystacks. Beginning at the junction of Interstate Highway 80 and Wyoming Highway 789; easterly along Interstate Highway 80 to the junction of Wyoming Highway 71; southerly along said highway to the Sage Creek Road (Carbon County Road 401); southerly along said road to the Continental Divide at Middlewood Hill; southerly along said divide to the Wyoming-Colorado state line; westerly along said line to Wyoming Highway 789; northerly along said highway to Interstate Highway 80.

Area 11. Red Desert. Beginning at the junction of Wyoming Highway 73 and U.S. Highway 287; southerly along U.S. Highway 287 to Interstate Highway 80; westerly along said highway to Creston Junction and U.S. Highway 789; southerly along said highway to the Wyoming-Colorado state line; westerly along said line to the Cow Creek-Powder Wash Road north of Powder Wash, Colorado; northwesterly along said road to the Bitter Creek Road (Sweetwater County Road 19); northwesterly along said road to Interstate Highway 80; westerly along said highway to the Green River; northerly up said river to Big Sandy River; northeasterly up said river to U.S. Highway 191; southerly along said highway to Wyoming Highway 28; northeasterly along said highway to the Sweetwater River; northeasterly down said river to U.S. Highway 287; easterly along said highway to the Bison Basin Road; southerly along said road to the Three Forks-Atlantic City Road (B.L.M. Road 2317); easterly along said road to the Wamsutter-Crooks Gap Road (Sweetwater County Road 23N and Fremont County Road 318); southerly along said road to the Bairoil Road (Sweetwater County Road 22); easterly along said road to Wyoming Highway 73; easterly along said highway to U.S. Highway 287.

Area 12. Flaming Gorge. Beginning at the junction of Interstate Highway 80 and the Bitter Creek Road (Sweetwater County Road 19); southeasterly along said road to the Cow Creek-Powder Wash Road; southeasterly along said road to the Wyoming-Colorado state line; westerly along said line to the Wyoming-Utah state line; westerly along said line to Flaming Gorge Reservoir and the Green River; northerly up said river to Interstate Highway 80; easterly along said highway to the junction of the Bitter Creek Road (Sweetwater County Road 19).

Area 13. Wasatch. Beginning where Interstate Highway 80 crosses the Green River; southerly down said river to the Wyoming-Utah state line; westerly and northerly along said line to Interstate Highway 80; easterly along said highway to the Green River.

Area 14. Lincoln. Beginning where the Green River crosses Interstate Highway 80; westerly along said highway to the Wyoming-Utah state line; northerly along said line to the Wyoming-Idaho state line; northerly along said line to the divide between the Salt River and

Bear River; easterly along said divide to the divide between the Salt River and the Smiths Fork River; northeasterly along said divide to Commissary Ridge; southeasterly along said ridge to the head of LaBarge Creek; southeasterly down said creek to the Green River; southeasterly down said river to Interstate Highway 80.

Area 15. Kaycee. Beginning at the junction of ~~U.S. Highway 16 and~~ Interstate Highway 25 ~~at the town of Buffalo and Middle Fork Crazy Woman Creek~~; southerly along Interstate Highway 25 to U.S. Highway 20-26 at the city of Casper; westerly along said highway to the town of Waltman and the Waltman-Arminto Road (Natrona County Road 104); northerly along said road to the Buffalo Creek Road (Natrona County Road 105); ~~northeasterly northerly~~ along said road to the Big Horn Mountain Divide Road/Hazelton Road (Natrona County Road 109-Washakie County Road 81-Johnson County Road 3); northerly along said road to the Gold Mine Road (U.S.F.S. Road 452); northerly along said road to the Canyon Creek Road (U.S.F.S. Road 25); northerly along said road to U.S. Highway 16; ~~northeasterly along said highway~~ easterly along said highway to the Hazelton Road (Johnson County Road 3); southerly along said road to Middle Fork Crazy Woman Creek; easterly down said creek to Interstate Highway 25.

Area 16. Gas Hills. Beginning at the city of Casper and Wyoming Highway 220; southwesterly along said highway to U.S. Highway 287; southerly along said highway to Wyoming Highway 73; westerly along said highway to the Bairoil Road (Sweetwater County Road 22); westerly along said road to the Wamsutter-Crooks Gap Road (Sweetwater County Road 23N and Fremont County Road 318); northerly along said road to the Three Forks-Atlantic City Road (B.L.M. Road 2317); westerly along said road to the Bison Basin Road (Fremont County Road 281 and B.L.M. Road 3221); northerly along said road to U.S. Highway 287; westerly along said highway to Wyoming Highway 135; northerly along said highway to the boundary of the Wind River Reservation; easterly and northerly along said boundary to U.S. Highway 20-26; easterly along said highway to Wyoming Highway 220 in the city of Casper.

Area 17. Piney. Beginning where U.S. Highway 191 crosses the Green River; southeasterly along said highway to the Big Sandy River; southwesterly down said river to the Green River; northerly up said river to LaBarge Creek; northwesterly up said creek to the Greys River Road at Tri Basin Divide; northerly along said road to the divide between the Green River and the Greys River; easterly and northerly along said divide to the divide between the Green River and the Hoback River (Hoback Rim); easterly along said divide to U.S. Highway 191; southerly along said highway to the Green River.

Area 18. Wind River. All of the drainage of the Wind River, which lies west of the west boundary of the Wind River Reservation.

Area 19. Northwest. All of the Clark's Fork River drainage, Soda Butte Creek drainage, Shoshone River drainage, Greybull River drainage, Gooseberry Creek drainage and Yellowstone River drainage, outside Yellowstone National Park and west of Wyoming Highway 120.

Area 20. Owl Creek/Bighorn Basin. Beginning where the Big Horn River crosses the Wyoming-Montana state line; southerly up said river to the north boundary of the Wind River

Reservation; westerly along said boundary to the divide between Owl Creek and the South Fork Wood River; northeasterly along said divide to the divide between Cottonwood Creek and Gooseberry Creek; northeasterly along said divide to the divide between Gooseberry Creek and Grass Creek; easterly along said divide to Wyoming Highway 120; northerly along said highway to the Wyoming-Montana state line; easterly along said state line to the Bighorn River; in addition, all non-Indian fee title lands in that portion of Hot Springs County within the exterior boundaries of the Wind River Reservation.

Area 21. Shell. Beginning where the Big Horn Mountain Divide crosses the Wyoming-Montana state line; southerly along said divide to U.S. Highway 16; westerly along said highway to the Big Horn River; northerly down said river to the Wyoming-Montana state line; easterly along said line to the Big Horn Mountain Divide.

Area 22. Ten Sleep. Beginning at the junction of U.S. Highway 16 and the Canyon Creek Road (U.S.F.S. Road 25); southerly along said road to the Gold Mine Road (U.S.F.S. Road 452); southerly along said road to the Big Horn Mountain Divide Road-Hazelton Road (Johnson County Road 3-Washakie County Road 81-Natrona County Road 109); southerly along said road to the Buffalo Creek Road (Natrona county Road 105); southwestly along said road to the Waltman-Arminto Road (Natrona County Road 104); southerly along said road to the town of Waltman and U.S. Highway 20-26; westerly along said highway to the east boundary of the Wind River Reservation; northerly then westerly along said boundary to the Big Horn River; northerly down said river to U.S. Highway 16; easterly along said highway to the Canyon Creek Road (U.S.F.S. Road 25). Also included are all lands of the Wind River Reservation within the Bureau of Reclamation Riverton and Boysen Unit boundaries and Boysen State Park, excluding Indian sole occupancy lands north of Cottonwood Creek.

Area 23. Sheridan. Beginning where Interstate Highway 90 crosses the Wyoming-Montana state line; southerly along said highway to Interstate Highway 25; southerly along said highway to Middle Fork Crazy Woman Creek; westerly up said creek to the Hazelton Road (Johnson County Road 3); northerly along said road to U.S. Highway 16; southwestly along said highway to the Big Horn Mountain Divide at Powder River Pass; northerly along said divide to the Wyoming-Montana state line; easterly along said line to Interstate Highway 90.

Area 24. Rochelle. Beginning where the Rocky Point Road (Crook County Road 145) crosses the Wyoming-Montana state line; southerly along said road to the "D" Road (Crook County Road 68); southerly along said road to Interstate Highway 90; easterly along said highway to U.S. Highway 16; southeasterly along said highway to the Wyoming-South Dakota state line; southerly along said line to the Wyoming-Nebraska state line; southerly along said line to U.S. Highway 20; westerly along said highway to Interstate Highway 25; northwesterly along said highway to the North Platte River at the town of Douglas; westerly along said river to the city of Casper and Interstate Highway 25; northerly along said highway to Interstate Highway 90; northerly along said highway to the Wyoming-Montana state line; easterly along said line to the Rocky Point Road (Crook County Road 145).

Area 25. Hartville. Beginning where U.S. Highway 20 crosses the Wyoming-Nebraska state line; southerly along said line to the Wyoming-Colorado state line; westerly along said line

to Interstate Highway 25; northerly along said highway to U.S. Highway 20; easterly along said highway to the Wyoming-Nebraska state line.

Area 26. Greys River. Beginning at the Wyoming-Idaho state line on the Snake River; easterly up said river to Bailey Creek; southeasterly up said creek to Dry Wash Draw; easterly up said draw to the divide between Bailey Creek and Willow Creek (Greyback Ridge); southerly along said divide to the divide between the Greys River and Willow Creek; southerly along said divide to the divide between the Greys River and the Hoback River; southerly along said divide to the divide between the Greys River and the Green River; southerly and westerly along said divide to the Greys River Road at the Tri Basin Divide; southerly along said road to La Barge Creek; northwesterly up said creek to Commissary Ridge; northwesterly along said ridge to the divide between the Salt River and the Smiths Fork River; southwestly along said divide to the divide between the Salt river and the Bear River; westerly along said divide to the Wyoming-Idaho state line; northerly along said line to the Snake River.

Area 27. Casper Mountain. Beginning at the confluence of the North Platte River and Deer Creek at the town of Glenrock; southerly up said creek to Curry Creek; southeasterly up said creek to U.S.F.S. Road 660; northwesterly along said road to its termination at the Squaw Springs Trail Road; southwestly along said road to the Bates Creek Road (Natrona County Road 402); southwestly along said road to the Spring Creek Road; westerly along said road to the Lone Tree Road (B.L.M. Road 3141); southerly along said road to Wyoming Highway 487; northerly and westerly along said highway to Wyoming Highway 220; northerly and easterly along said highway to the Casper city limits; northerly along said city limits to the North Platte River; easterly along said river to Deer Creek.

Area 28. Crowheart Butte. All non-Indian owned fee title land within the exterior boundaries of the Wind River Reservation excluding Mountain Lion Hunt Area 22, those areas of the Spence and Moriarity Wildlife Management Area that lie east of the East Fork of the Wind River, and those lands within Hot Springs County.

Area 29. Hoback. Beginning where U.S. Highway 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; easterly along said ridge to Jackson Peak; southerly along the divide between Flat Creek and Cache Creek to Cache Peak; easterly along the divide between Flat Creek and Granite Creek to Pyramid Peak; southerly 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; southeasterly along the divide between the Hoback River and Green River; southwestly along said divide to the divide between the Greys River and Hoback River; northeasterly and westerly along said divide to the divide between the Greys River and Willow Creek; northerly along said divide to the divide between the Bailey Creek and Willow Creek (Greyback Ridge); northerly along said divide to Dry Wash Draw; westerly down said draw to Baily Creek; northwesterly down said creek to the Snake River; southerly and westerly down the Snake River to the Wyoming-Idaho state line; northerly along said line to Wyoming Highway 22; easterly along said highway to U.S. Highway 191; northeasterly along said highway to Flat Creek.

Area 30. Newcastle. Beginning where U.S. Highway 85 crosses the Wyoming-South Dakota state line; southerly along said line to U.S. Highway 16; northwesterly along said highway to the town of Moorcroft and Interstate Highway 90; easterly along said highway to the town of Sundance and Wyoming State Highway 585; southeasterly along said highway to U.S. Highway 85; northerly along said highway to the Wyoming-South Dakota state line.

Area 31. Elk Mountain. Beginning at the city of Laramie and Wyoming Highway 130; westerly then northerly along said highway to U.S. Highway 30; easterly and southerly along said highway to the city of Laramie.

Area 32. Hulett. Beginning where the Montana-Wyoming state lines crosses the Rocky Point Road (Crook County Road 145); easterly along said line to where the Montana, Wyoming and South Dakota state lines meet; southerly along the Wyoming-South Dakota state line to Wyoming State Highway 24; westerly and southerly along said highway to U.S. Highway 14; southeasterly along said highway to the town of Sundance and Interstate Highway 90; westerly along said highway to the town of Moorcroft and the D-Road (Crook County Road 68); northerly along said road to the Rocky Point Road in Campbell County; northerly along said road to the Wyoming-Montana state line.

WYOMING GAME AND FISH COMMISSION

~~Keith Culver~~ David Rael, President

Dated: ~~July 19, 2017~~ July 18, 2019

STATEMENT OF REASONS

CHAPTER 44

REGULATION FOR ISSUANCE OF LICENSES, PERMITS, STAMPS, TAGS,

PREFERENCE POINTS AND COMPETITIVE RAFFLE CHANCES

W.S. § 23-1-302 empowers the Wyoming Game and Fish Commission (Commission) to prescribe the requirements and form, including electronic licensing format, for the licenses, stamps and tags provided in the Game and Fish Act.

W.S. § 23-1-705 empowers the Commission to issue licenses each year for the exclusive use of not more than two (2) antelope hunt events.

House Enrolled Act No. 081 (HEA 081) of the Sixty-Fifth Legislature of the State of Wyoming 2019 General Session empowers the Commission to set rules for issuing a resident lifetime fishing license and conservation stamp to any resident who is permanently and totally disabled.

In Section 3, the definitions of “Duplicate License” and “Electronic Signature” have been modified for clarity.

In Section 5, edits and additions have been made in subsection (e)(i)(A) which outlines the process for organizations to apply for exclusive antelope hunt event licenses. Current regulations allow for antelope hunt event licenses to be issued to the One-Shot Antelope Club and the Wyoming Women’s Foundation. Beginning for the 2020 antelope hunting season, the Commission shall accept applications from any organization interested in receiving these antelope hunt event licenses. Edits in subsection (e)(vi)(A) clarifies the issuance of mountain goat licenses. Edits in subsection (g)(iii) clarify an applicants’ eligibility to apply for and receive wild bison hunting licenses. Edits in subsections (n) and (o) clarify the validity of licenses for which a duplicate license or replacement license is issued.

In Section 9, edits have been made to allow for electronic submission of landowner license applications.

In Section 10, the process for issuing a resident lifetime fishing license and conservation stamp to any resident who is permanently and totally disabled has been outlined.

In Section 19, clarification has been provided regarding proof of residency for resident permits and preference points.

In Section 20, numerous application dates have been modified and the deletion of the “Method of Submission” row will allow for electronic submission of landowner applications. More specifically, the application period and last date to modify or withdraw an application for nonresident elk licenses has been modified.

In Section 23, edits have been made to streamline the process to apply for a license reservation.

In Section 28, edits have been made for clarification of license and conservation stamp expiration dates.

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
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEL – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer, Greg Phipps and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission (Commission) Regulation Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received 56 total comments for Chapter 44. Six comments did not address this proposed regulation and were meant for consideration with other regulations.

The majority of comments received (38) were not in favor of the proposed nonresident elk application deadline change, and favored a variety of other options for this application period. Six comments asked for the nonresident elk application dates to match the resident application dates. Three comments asked the Department to consider instituting resident elk preference points which was not a draft consideration within this proposed regulation. Two comments supported the draft regulation as presented and one comment asked for a simpler application process. There was also concern voiced about the Department holding nonresident elk application fees for a few months between the end of the application period and completion of the drawing.

After consideration of all the public comments received, the Department made no additional changes to this draft regulation. The Commission also considered all the public comments they received and made no additional changes to the proposed regulation.

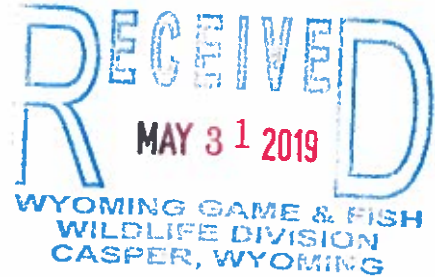
The Commission has previously discussed resident preference points for elk and decided against instituting them. The Department will monitor the new nonresident elk application period and make adjustments in the future if any are warranted.

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☒ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Please implement a preference point
system for residents in the Elk License
draw

The fact that you have a point system
for non-residents creates the impression
that you are favoring the outgitters
who profit from non residents as
compared to your resident hunters.

workend

Shelley Spence
Printed Name

(Please use reverse for additional comments)

Date 5/30/19 4/2019

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☒ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

Please implement a preference point system for Residents in the Elk license draw. I have applied in Elk area 603 for 15-20 years. Never drew a Bull tag. My partners draw every 3-4 years. I may never live to draw a Bull unless you put in a preference point system for Residents.

Woodard

LYLE SPENCE

Printed Name

(Please use reverse for additional comments.)

5-30-19

Date

4/2019

RECEIVED
JUN 17 2019

WYOMING GAME & FISH
WILDLIFE DIVISION
CASPER, WYOMING

Dear WG&F:

My name is Colten Chambers and I am a nonresident to your state. I have been building ~~points~~ ^{preference} points for Elk for your state and this year (2019) I applied and was unsuccessful. I have enough points accumulated now I plan to put in for the draw every spring until I draw, and will then try to draw the general tag in following years. Your draw system and balance of trophy management vs. hunter opportunity is a great system compared to other states in letting the nonresident hunter get into the field in a reasonable amount of time. I love how a lot of your Type 1 tags when drawn can be used for Archery as well as Rifle if a Archery stamp is purchased as well as a lot of units where Archery seasons ending on Sept. 31 and Rifle starting the very next day. The management you are doing for overall elk herd densities, quality bulls, as well as opportunity again is very well thought out and balanced.

However, when I heard of the nonresident elk ~~application~~ ^{deadline} deadline and drawing date regulation proposal change I was very upset. The recent deadline date of Jan. 31 and draw results ~~available~~ ^{available} in mid February, then refunds issued in short order worked out perfect for my overall →



elk hunting plan. I build points and apply in several other western states to give myself the opportunity to hunt elk somewhere every year. With the new proposed regulation change of the ~~drawing~~^{application deadline} still being Jan. 31 and myself being charged the full amount of nearly \$1400 for the special drawing (which I do to increase my odds and shave a few points off of most hunts), and then not holding the drawing until May, ~~that~~ puts me in a jam for trying to apply for other states in the same year. Obviously I now cannot apply for hunts in New Mexico, Colorado, or Montana now because my money used for applying in one of these states will be in limbo and by the time I find out if I was successful in the draw for Wyoming those other states' ~~drawings~~^{application} deadlines will be over as they happen in March-April. I think the current system should be left alone and kept as it has been. If I was to come up with more money to apply in another state and then apply for both hoping to get drawn in only one, then come to find out I draw in both it would greatly influence my budget as well as trying to scramble to find time to make both hunts happen given that the dates for each hunt were not in the same timeframe. My analysis of this current change is it is not going to

benefit the on your own nonresident on a budget loyally applying year after year willing to put up a large tag sum for the special drawing to be able to have a plan B on another state to fall back on other than Colorado OTC or Idaho, after the Wyoming drawing.

I can see making the application deadline to sometime in April but not keeping our hard earned money for 4-5 months before refunding if unsuccessful or just as importantly keeping us from applying in these other states because of this Feb-May ^{period} waiting to see if we drew. ~~draw~~ If at all possible please keep the nonresident Elk drawing dates the same (Mid February) as has been for so long.

Again thank you for giving us nonresidents the opportunity to hunt Elk in your great state as well as give input on regulations. This new change will greatly burden us nonresidents and will in no way benefit us for our goals as hunters and conservationists.

Sincerely,

Colten Chambers

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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



Please use a separate form for each of the categories below:

- ☐ Furbearing Animal Hunting or Trapping Seasons
- ☐ Falconry and Raptor Propagation Regulation
- ☐ Regulation Governing Firearms Cartridges and Archery Equipment
- ☐ Mountain Lion Hunting Seasons
- ☒ Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances
- ☐ Gray Wolf Hunting Seasons

Comments:

The Nonresident is allowed to cumulate preference points for elk hunting. As a resident of the state for 46 years and paying taxes to support the WY Game & Fish, a resident should have the same privilege to accumulate preference points for Bull Elk.

In our party of four or five hunters, it is very rare when we have one hunter with a bull license. As we get older, it is much harder to determine when we'll have an opportunity to get a bull license.

I would like to see the commission adopt a preference point system for bull elk.

mail

Rick Six
Printed Name

(Please use reverse for additional comments.)

6/12/19
Date

4/2019

WGFD Web Comment Report
Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

- 1** My personal preference would be that the application period for NR Elk remain the same however I understand that may need to move 'back' further into the year for other reasons. If that is indeed the case, please also look at moving the draw deadline back as well. Drawing a tag is often about luck and statistics and it's hard to put in an informed application when the numbers aren't even finalized. In my opinion, moving the draw date back without also moving the application deadlines doesn't make any sense at all. I also think it's unfair to have multiple months in-between the deadline and the actual draw - that puts many hunters into an unfair position as the majority of NR's are also applying for other hunts and tags.

Final Comment	Olson, Jason	Sioux Falls, SD	4/30/2019 9:53:00 AM
----------------------	---------------------	------------------------	-----------------------------

- 2** I really think that having the same application deadline in January when you aren't even going to begin the draw process until May is crazy. It is so frustrating to have to apply and then wait MONTHS to find out if you draw or not. I also think it is crazy to require using a credit card to apply and then charging a fee to use the credit card. On some applications like Bison it is over \$100 for a nonresident just for the credit card fee. And 99% of the time you get it refunded anyway. Either allow people to send in money via check or money order or don't take the money until they draw the tag like most other states do now. While I'm on a rant, I think preference points for Sheep and Moose should be optional. I will never live long enough to get to actually use them, but I'm required to buy them.

Final Comment	Paden, Nathan	Slaton, TX	4/30/2019 10:02:00 AM
----------------------	----------------------	-------------------	------------------------------

- 3** Maybe I misunderstand the proposal, but Collecting money in January from non residents and holding it until may is abusive. There is only so much juice you can squeeze out of us before we go elsewhere. If the draw date moves back, so should the entry and payment deadline. No reason that process should be so delayed. Thank you

Final Comment	Buerkle, Gus	Austin, TX	4/30/2019 10:26:00 AM
----------------------	---------------------	-------------------	------------------------------

- 4** I represent non-resident hunters who can only afford one trip per year due to family, job leave, and budget. I exclusively hunt Wyoming and the beauty has been knowing results of the elk draw prior to application due dates for deer and antelope. If I am not successful on the elk draw, I can parlay tag cost into a deer or antelope application with hopes of still having a Wyoming hunting trip every Fall. I also pay three app fee's in the process now. With moving the draws as prescribed above I will now only be able to afford one application. It will reduce my hunter opportunity.

Final Comment	Whitten, Matt	Central, SC	4/30/2019 12:27:00 PM
----------------------	----------------------	--------------------	------------------------------

- 5** I love elk hunting WY. Despite price increases and credit card fees I still feel the quality of the hunt is worth the cost. I think you do a great job with the draw setup and nonresident opportunity. But the new ap/draw date restructure is just dumb. You should be embarrassed that is the best you could do. If you wanted and were required to move the NR elk draw later, than the ap period should have been moved later as well. Taking 4+ months between applying and finding out results is simply not right. No reason to treat the hunters that way. Well there is 1 reason. I'm sure the WYOGA is pleased. Hate to see WY sell out that way to special interest. I'll still apply, most will. You'll sell your 7250 NR tags and make your money but that doesn't make what you've done right.

Final Comment	Lipics, Jeff	Canadensis, PA	4/30/2019 1:57:00 PM
----------------------	---------------------	-----------------------	-----------------------------

- 6** Moving the elk application deadline will result in many people, including my group of 7 who have been applying every year for a long time, choosing to not apply in WY. No way will we wait until June to find out if we MAYBE draw an elk tag. This would result in us having no backup plan other than OTC licenses in ID or CO if we are unsuccessful. Instead, we will go to other states. I know a lot of people who feel the same way and there are many people on hunting forums expressing this exact same sentiment. Please keep the drawing/results in January!

Final Comment	Krebs, Dean	Alexandria, MN	4/30/2019 2:19:00 PM
----------------------	--------------------	-----------------------	-----------------------------

WGFD Web Comment Report
Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

- 7** If I understand one possible change would require non-resident hunters to apply prior to January 31st each year but we would not know the results of the drawing until June! Plus we would have that money on our credit cards for a very long time and possibly not draw. This would be a substantially worse system for me as a non-resident hunter - please do not do this. I would request you simply align the non-resident application period with the resident application period. I do not like the January 31st deadline at all anyway. You all do a great job but this would be a step in the wrong direction in my opinion. Thank You.

Final Comment	Behrens, Russ	Grinnell, IA	4/30/2019 2:43:00 PM
----------------------	----------------------	---------------------	----------------------

- 8** I have been applying for 7 years in the WY elk NR draw. I finally started applying for the draw since it fit my other draw schedules. This change would force me out of the system. I would wait till I have the guaranteed points to draw and then not enter again. These types of changes are detrimental to the long term application strategy and reduce confidence in your other species as well. Please do not make this change!

Final Comment	Prickett, Adam	willows, CA	4/30/2019 3:50:00 PM
----------------------	-----------------------	--------------------	----------------------

- 9** As a non resident one of the big benefits of the current draw system is the early results. Then if not drawing a Wyoming tag you can apply for other states. I understand there are valid reasons to consider the change but this could result in fewer nonresidents applying for Wyoming tags since dates will be on even ground with other states like Colorado, etc... At the very least move the application deadline back from Jan 31st to match the residents dates. Five months to hold people's money is a long time. Thank You

Final Comment	Danielson, Brian	Rushford, MN	4/30/2019 4:48:00 PM
----------------------	-------------------------	---------------------	----------------------

- 10** Please move the elk general and limited quota non-resident and limited quota reduced price non-resident cow/calf application dates to coincide with the resident application due dates of May 31.

Final Comment	Woolever, Tyler	Montoursville, PA	4/30/2019 7:00:00 PM
----------------------	------------------------	--------------------------	----------------------

- 11** As a NR Wyoming is a great place to hunt and it is my first choice. I normally make 1-2 trips a year there for vacation and hunting. I am in favor of moving the NR big game draw to match the Resident draw. However, with the Credit Card processing fees and the possibility of still having to have our application in by Jan 31 to not be drawn until Possibly June is not acceptable. Even if we are allowed to change our draw choices up to May 8th you are tying up our money for at a minimum of 4 months without the guaranteed tag. This does not allow us on a budget to apply in different states. If we do there is no provisions to be able to withdraw our app for a full refund. I understand the demand and what NR pay. But this is too much and too complicated when the draw for R and NR can be the same. Please don't make us pay in January to wait until June! Sincerely Tony Shumaker

Final Comment	Shumaker , Anthony	Paw Paw, MI	4/30/2019 8:22:00 PM
----------------------	---------------------------	--------------------	----------------------

- 12** The proposed date changes for nonresident elk applications are a total sellout to Wyoming outfitters at the expense of all others. I understand the reason for pushing back the app to allow harvest goals to be set. While I like the early app, I would accept later since there was a legitimate issue to resolve. Keeping the app in Jan then holding our money for 5 months is total crap. You should be embarrassed to even propose it.

Final Comment	JULIANA, JASON	HURRICANE, UT	4/30/2019 8:28:00 PM
----------------------	-----------------------	----------------------	----------------------

- 13** I don't like the proposal to have nonresident elk applicants wait 4 months for elk draw results. The longer a state keeps my application in limbo (and my hard-earned fees), the less likely I am to plan hunts there. I would be fine with keeping the early application and draw dates as were present in 2019, or moving the application deadline to align with the resident deadline at the end of May. I would prefer moving the nonresident deadline to the end of May. Thank you for your consideration!

Final Comment	Morris, Andrew	Thornton, CO	5/1/2019 12:39:00 AM
----------------------	-----------------------	---------------------	----------------------

WGFD Web Comment Report

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

- 14** Good day. As a non-resident, I am adamantly opposed to the proposal to keep a January application period for elk...but move the draw date 3-4 months. The February draw date is very advantageous for those non residents which apply in multiple states. I would like to see that continue. If a February draw is no longer feasible and the draw must be moved....there is absolutely no reason to keep the January application period. There is no reason for Wyoming to start keeping my money for four months. I currently have elk points and will stay in the game regardless until I draw....but if you adopt this proposal as written, my next Wyoming elk tag will be my last. Thank you for your time. Sincerely, Paul Vice

Final Comment	Vice, Paul	Seymour, IN	5/1/2019 4:07:00 AM
----------------------	-------------------	--------------------	---------------------

- 15** I have no problem with moving the NR draw to match R dates. My only issue lies in the Jan deadline. I assume they will still have to mail out the "packet" for NRs to apply; it just doesn't really mean anything since you will have to stay on top of the approved numbers in the April meetings and modify your app accordingly in a short period of time. Why not save the confusion and just move the application deadline to match deer and antelope.

Final Comment	Taylor , McKinsey	Chilhowie , VA	5/1/2019 4:24:00 AM
----------------------	--------------------------	-----------------------	---------------------

- 16** The proposal to keep the non-resident application period LIMITED to January but not post results until the deer/antelope results is the worst possible scenario! This proposal punishes the NR's that want an early result AND those wishing for the dates to coincide with deer/antelope. Extending the date for modifying the application is of little benefit when you're holding our money in escrow for that long (and now charging us a non-refundable credit card fee). Make the application dates the exact same as deer/antelope for non-residents and keep it simple.

Final Comment	Wagner, Jason	North Ogden, UT	5/1/2019 7:23:00 AM
----------------------	----------------------	------------------------	---------------------

- 17** Congratulations Wyoming, you just lost another NR hunter. So glad I got to hunt there last year and burned my PP's. I won't be starting over now with this ridiculous new rule. Does anybody have a brain there???

Final Comment	Castro, Dave	Chico, CA	5/1/2019 7:41:00 AM
----------------------	---------------------	------------------	---------------------

- 18** I am totally opposed to moving the draw date for elk licenses. The biggest issue you will face when moving the date is customers requesting a refund. The current system allows you to apply in Wyoming and know if you are drawn before applying to other states. Not sure who or why this was thought to be a good idea... but it is not. Wyoming is my first choice to hunt but if you move the draw dates then it makes it more difficult to navigate the drawings for all.

Final Comment	Matheis, Greg	Huntingburg, IN	5/1/2019 8:23:00 AM
----------------------	----------------------	------------------------	---------------------

- 19** It is ridiculous if the commission is going to take our NR money at the end of January and not release results until June. If u want to move the results deadline till after the quotas etc have passed then the app deadline needs to moved as well to reflect that. Is there any logical reason to keep the NR app deadline at Jan other than to appease the WYOGA? It is irresponsible on your part to cater to them at the sake of all NR

Final Comment	ott, thomas	jackson, AL	5/1/2019 9:23:00 AM
----------------------	--------------------	--------------------	---------------------

- 20** Why would Wyoming extend the application deadline and drawing dates for elk? The current dates and drawing allow hunters ample time to plan prepare for the hunt, including locating reviewing and selecting a guide. Moving the drawing date to May/June reduces the time to prepare for a hunt. In addition, if drawn in another state there is little to no time to cancel the application to Wyoming. The early drawing period in Wyoming allows hunters to apply with other states is not selected to Wyoming. The only reason to move the date to the right is to reduce the number of hunters who apply. Is Wyoming driving to reduce the number of applications received for elk hunting?

Final Comment	Matheis, Chris	South Bend, IN	5/1/2019 10:25:00 AM
----------------------	-----------------------	-----------------------	----------------------

WGFD Web Comment Report
Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

- 21** I would like to say that I am opposed to the proposed change to non-resident notification of application for elk from February to June. This proposed change puts too much burden on the Wyoming non-resident to either submit a Wyoming application and put all of their "eggs" on the one application or to not submit a Wyoming application and put in for another state. The beauty of Wyoming in the past has been that non-residents knew in February whether or not they had draw in Wyoming and if they had not drawn then they were able to put in an application in other states. Please do not change the current process of applying in January and knowing the result in February. Thanks.

Final Comment	Bothwell, William	Fort Collins, CO	5/1/2019 12:28:00 PM
----------------------	--------------------------	-------------------------	----------------------

- 22** Please consider moving the elk application date to match Wyoming residents application date. Leaving it in January just sucks. Thanks for all your hard work in making Wyoming such a great hunting destination. Mike....

Final Comment	Malandruccolo , Mike	Newcastle , DE	5/1/2019 4:00:00 PM
----------------------	-----------------------------	-----------------------	---------------------

- 23** It is ridiculous to have non-resident application period ending in January when draw results are not available until June. If NR drawing is moved to the same time as the resident drawing, the application period should move as well. People shouldn't have to give up thousands of dollars for 4 months to wait for results.

Final Comment	Chapman, Brody	Brooklyn Center, MN	5/2/2019 4:04:00 PM
----------------------	-----------------------	----------------------------	---------------------

- 24** I was disappointed to see the proposal to require non-resident elk application be submitted in January, but results not released until June. Holding these funds for so many months is a hardship to working families. Yes, Non-resident elk tags are expensive, but budgeting that expense can be done for those who want it bad enough. I currently apply for myself and three family members. The interest cost to float these fees for nearly 6 months adds up, and doesn't benefit WGFD. While I prefer the early February results date, if we can't see results until June, the application period for non-residents should conform to the resident application dates. It is offensive to hold the money for so long, without any assurance of drawing a tag. Please either retain the February results for non-resident elk tags, or move the application period to May to coincide with the resident application period.

Final Comment	Phifer, Bill	West Point, UT	5/2/2019 5:01:00 PM
----------------------	---------------------	-----------------------	---------------------

- 25** Your proposal to chapter 44 will have a negative impact on my future of hunting in Wyoming. i need to know if I obtained a tag prior to April 15 as it impacts what I apply for in Nevada including deer, antelope and elk tags here in Nevada. Your statement of reason does not give an adequate explanation of why you proposing this change. here is what your explanation is In Section 20, numerous application dates have been modified and the deletion of the "Method of Submission" row will allow for electronic submission of landowner applications. More specifically, the application period and last date to modify or withdraw an application for nonresident elk licenses has been modified. A why this date has been modified would have been appreciated.

Final Comment	Martin, Doug	Carson City, NV	5/3/2019 11:18:00 AM
----------------------	---------------------	------------------------	----------------------

- 26** The change to the nonresident elk draw period and results concerns me. Having the January draw deadline and early results has allowed me to apply to WY and depending on the results plan out the rest of my out of state applications. I understand the reasons to move the draw dates to may to better allow for tag number setting to be completed. I am okay with making a change to better manage the resource even if it is at the expense of my convenience. Where I have concern is that the application deadline would still be in January. It would be quite unreasonable to hold my money for that extended period of time. This would also further limit my fall hunt planning with WY requiring me to apply before any other state while also not giving me results until after all of the other deadlines are past. I feel the reasonable option would be to have the elk draw process early or late and not the worst parts of each. Pick one. Thank you for your consideration.

WGFD Web Comment Report
Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

Final Comment	Morel, Greg	Dickinson, ND	5/5/2019 9:24:00 AM
----------------------	--------------------	----------------------	----------------------------

- 27** I've just drawn my 2nd general elk tag and look forward to hunting in Wyoming again this fall. One of the advantages of hunting in Wyoming over other states is that nonresident draw results are available earlier than any other state. I'm a busy person with family and work obligations so knowing draw results as early as possible is important to me. I've never applied in Idaho because their draw results are in June, which is too late for me to plan for a couple of weeks off in September. If Wyoming moves back their draw results to June I'll go with outfitters in other states so I can plan better. Note that Alaska finishes their draw in mid February and Arizona finishes theirs in early March.

Final Comment	Lytle, Curtis	Zuni, VA	5/6/2019 12:11:00 PM
----------------------	----------------------	-----------------	-----------------------------

- 28** I'm somewhat new to out of state public land hunting. This is my fourth year applying for tags and points. I currently apply on AZ, UT and NM and use CO and ID as a part of my back-up plan. I had intended to branch out to another state and add WY. The addition of the 2.5% credit card fee left me weighing the value of paying \$32.50(\$15 application fee and \$17.50 CC processing fee) to go into the draw with zero points vs simply purchasing a point later in the year. I opted to purchase the point only. Now, the new plans seem to be to have me apply in January, and hold on to my application money until all of the other states I apply in have had their application periods come and go, then update the available hunts and quotas, possibly leaving my application in desperate need of changing, not to mention being in limbo with regard to double booking hunts. When all the dust settles, if I manage to pay for other applications without all of my hunting budget funds in hand, I can then pay another \$5 to cancel my application just before the draw if I need to. I must say that I am no longer certain that I will purchase an elk point this year. I definitely hope that whenever you choose to hold the drawing, you place the non-resident application date very near it. I'm completely in favor of moving the non-resident drawing date to the new, later, date, but I'm not at all in favor of leaving the non-resident application deadline in Jan if the new drawing date is adopted. The application deadline and drawing date should be much closer together.

Final Comment	Templeton, Darek	Ropesville, TX	5/7/2019 9:31:00 PM
----------------------	-------------------------	-----------------------	----------------------------

- 29** suggestion regarding elk tag application proposed process is if the date of award is to be the same as deer and antelope then please keep the application period open for the same time frame, in other words keep it open until the end of May. Thank you

Final Comment	Martin, Doug	Carson City, NV	5/21/2019 8:57:00 AM
----------------------	---------------------	------------------------	-----------------------------

- 30** Yesterday we learned of the plan to expand trapping permits in and around the area of Grand Teton NP and the Teton Science Center. Trapping is a practice that should be curtailed, not expanded. Its a cruel and barbaric practice that has been outlawed in many countries, some of which are considered "less advanced" than ours. It way past time for us to put this awful means of wildlife exploitation to rest. The expansion of permits should be rejected. The Cruel realities of Trapping should be phased out entirely.

Final Comment	Podell, Paul	Jackson, WY	5/24/2019 10:58:00 AM
----------------------	---------------------	--------------------	------------------------------

- 31** Chapter 32 bans a lot of commonly used and well proven projectiles. Many loaded by major manufactures.

Final Comment	Rhodes, Jessica	Newcastle, WY	5/30/2019 4:13:00 PM
----------------------	------------------------	----------------------	-----------------------------

- 32** The membership of WYOGA support the proposal of maintaining a January deadline for non resident Elk applications. We also support the proposal for a May 8th withdrawal / modify date. It's important that the draw for non resident Elk applications be conducted as close as possible to May 15th. The mid May draw will help the non resident sportsman make alternate plans if he/she fails to draw the Elk license. This is important and can help with Wyoming antelope / deer applications. Thank you. Sy Gilliland President WYOGA

Final Comment	Gilliland, Sy	Casper, WY	6/9/2019 7:41:00 AM
----------------------	----------------------	-------------------	----------------------------

WGFD Web Comment Report

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

33 I have reviewed the nonresident application period proposal for deer, elk and antelope and disagree with any changes proposed. Wyoming has always had the BEST application dates and process of ANY Western state. The nonresident draw odds reflect this management. I believe the benefits of application date changes will be minimal considering the negatives for non residents. Please don't change a great process! Thanks

Final Comment **Dawson, Perry** **Leesburg, GA** 6/9/2019 8:08:00 AM

34 I'm in favor of delaying the nonresident elk revision deadline until after elk seasons and units revisions are available to the public in any given year. With the current system it is impossible to know if season or unit changes have taken place until after the nonresident elk deadlines.

Final Comment **Sebastian, Jim** **Loveland, CO** 6/9/2019 9:50:00 AM

35 Chapter 44, Section 10 (c). Please make the application process as simple as possible, preferably one page. Some applicants will need assistance to complete and submit an application, so be flexible. Clients are at the mercy of the Social Security Administration when it comes to the content of benefit letters, so don't require what the feds don't provide. Please make this section effective immediately upon being signed by the Commission President as the statute providing the authority for this regulation was effective when it was signed by the governor. The WGFD should not need 6 months to develop and application process.

Final Comment **Gilbert, Joe** **Sheridan , WY** 6/10/2019 5:38:00 AM

36 I am against having different application periods for residents and nonresidents, specifically, I would like the elk application deadline to be May 31st for nonresidents, like it is for residents. I am against the department keeping nonresident tag fees for elk for 4 months. I am in favor of changing the bison application dates to March as long as the draw and results dates are not pushed back. I would prefer that the sheep and mountain goat application period be moved similarly if draw dates were maintained. With online only applications, I see no reason to delay those drawings as they are currently, 2 months and change. I would also like to put all nonresidents in the same drawing pool, and not give preference to non-resident landowners who may or may not be contributing anything to Wyoming wildlife.

Final Comment **Morris, Andrew** **Thornton, CO** 6/11/2019 4:57:00 PM

37 The proposed change to the nonresident elk application deadlines introduces an unnecessary and frankly unwelcome financial hardship on applicants. While I am supportive of moving the draw to a later date so that herd assessments and quotas may be developed accurately, there appears to be no similarly defensible reason to subject applicants to a hold on their funds for what is likely to be 4 to 5 months. Keep in mind that the majority of applicants for quota licences will be unsuccessful, so this is not a trivial or theoretical hardship affecting only a few persons. The outlay of monies for applications represents a significant investment for most people, and it is not reasonable to require payment so far in advance of the draw. It serves no biological purpose to do so and gives the unfortunate appearance of questionable motives that could easily be avoided by moving the application deadline closer to the draw date. 2 to 5 weeks seems more on par with other western states conducting similar licence drawings. Thank you, Scott McDonnell

Final Comment **McDonnell, Scott** **Long Valley, NJ** 6/11/2019 8:11:00 PM

38 I think the proposed change to the elk draw date is great! I believe this will improve some draw odds and benefit those of us that place a priority on hunting Wyoming.

Final Comment **Donohoe, David** **UTICA, NE** 6/12/2019 8:08:00 AM

39 Please consider making both resident and non-resident elk draws the same date.

Final Comment **Rowland, Colton** **Woodland Park, CO** 6/12/2019 3:49:00 PM

WGFD Web Comment Report

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

- 40** I am commenting on changing the nonresident elk "withdraw & modify" date from February 3rd to May 8th which will obviously push back the drawing date as well. I don't have a problem with this change however I would recommend a corresponding change to the "accepted application" date from January 31st to sometime in April. Deer and Antelope applications are accepted through the end of May and then the drawing is held three weeks later, I don't see why the elk draw should work any different as currently you accept applications through the end of January and then three weeks or so later the drawing is held. Under the new proposal, why do you need to collect the applications and corresponding license fees that far in advance of the actual drawing? Thanks.

Final Comment	Kogelmann, Michael	PIERRE, SD	6/14/2019 1:34:00 PM
----------------------	---------------------------	-------------------	----------------------

- 41** haveing the elk deadline in january, and the results posted in june is ridulious. This will make alot harder to plan an elk hunt or to have a plan b.

Final Comment	irvine, brian	clarkfield, MN	6/15/2019 9:51:00 AM
----------------------	----------------------	-----------------------	----------------------

- 42** WU believes that the value of wolves to the health of our public landscapes outweighs the recreational opportunity to trap and kill with cruel and inhumane steel devices year-round without any scientific foundation. We request that the Wyoming Game and Fish Department and the Wyoming Game and Fish Commission permanently end hunting of wolves in the Trophy Zone. The sport hunting of wolves by the general public serves no purpose other than as an expression of "blood lust" and a catalyst for "bragging rights." There is no derived food value, only ego gratification. Many members of WU were brought up in hunting families and were taught that you only kill what you will eat. WU still subscribes to that value. A trophy hunt of wolves feeds nothing more than the personal ego, and as it all too often occurs within the Predator Zone, is a disgrace to the ethical hunting community. Again, Wyoming's wolves should have big game status with a year-round closed hunting season. Wyoming Untrapped opposes sport hunting of wolves for several reasons, including the significant role wolves play as an apex predator within the Greater Yellowstone Ecosystem and how the indiscriminate killing of wolves can have a significant impact on the natural functioning of ecosystems. The indiscriminate hunting of wolves can have significant impacts that will reverberate throughout the ecological systems. Wolves are apex species and exist not as individuals but as social units-as packs. Leave them alone and they will flat out control their own numbers (Ordiz, A. et al. 2013.). Witness the Yellowstone wolf population: after 20-plus years, this sub-population has stabilized around 100 individuals—without human intervention, control or hunting. And the Northern elk herd, a primary food source for a large portion of Yellowstone's wolves, is on a steady increase. Wyoming Untrapped also opposes the hunting of wolves because it violates several principles of the North American Model of Wildlife Conservation (NAMWC). First, wildlife is held as a Public Trust Resource by state or federal agencies and is not owned by anyone. This, in conjunction with wildlife being Allocated by Wildlife Law wherein the public – all the public has input into law-making causes us to ask: why, after years of the Commission "taking public comment," we who have alternate views regarding wolf management have yet to see any significant changes made from any of the original Wyoming Gray Wolf Management Plan? This can hardly be viewed as respecting, let alone incorporating the public's input. How can the State of Wyoming and the Game and Fish Commission support, let alone justify a Predator Zone for wolves? Even if the abhorrent killing practices are technically legal within the Predator Zone, they are by every reasonable standard amoral and demonstrate a complete disregard for the principle of "Fair Chase" and the ethical treatment of wildlife. If the Commission remains silent and does nothing to eliminate the Predator Zone, does not call-out the inhumane killing practices employed therein, and does nothing to remove the wolf's Predator Status within 85% of the State, the Commission, and the State are tacitly condoning and remain complicit in this unethical killing activity. Disproportionally high wolf killings near the parks and refuge have undoubtedly impacted the ability of visitors to view wild wolves in the heart of their current range. We strongly urge the Commission to reconfigure the HA's and adjust hunting quotas to better protect wolves and wolf packs that utilize the parks and refuge for significant portions of their life cycle. Doing so will better serve the desires of tens-of-thousands of visitors who come to the region each year for a chance to view wolves in the wild- a critical part of the state's tourist economy. Wolf management decisions need to be founded on more than hunting quotas, the protection of livestock and for the benefit of "high dollar" game species. Responsible wolf management needs to consider all mortality regardless of cause. It needs to consider ecosystem function- it needs to represent a consensus of the majority of the public, and should not include sport hunting. It is WU's conclusion that the Wyoming Game and Fish Commission, with its proposed 2019 hunting season- a plan structured to maintain just the

WGFD Web Comment Report

Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference Points and Competitive Raffle Chances

minimum population necessary to prevent re-listing under the Endangered Species Act, is not doing enough to ensure the wolf's long-term survival. We feel that the Commission is putting politics over best science. We believe that the Commission is simply not living up to the public's expectations to manage all wildlife, including wolves for the benefit of all citizens. And we feel the Commission's proposed Chapter 47, Gray Wolf Hunting Season continues to jeopardize the well being of the wolves residing within our two premier National Parks and it greatly hinders Wyoming's wolves from fulfilling their critical ecological niche. Wyoming Untrapped considers it morally and philosophically indefensible to have a sanctioned gray wolf hunting season, or to allow wolves to be indiscriminately killed as predatory animals throughout 85 percent of the state. And, although we firmly believe that the Commission's Draft Chapter 47 Gray Wolf Hunting Season proposal ignores many of the fundamentals of both the North American Model of Wildlife Conservation and the Public Trust Doctrine, and that it largely ignores best available science, we submit these comments for your collective consideration because we regrettably acknowledge that this is the environment we are now having to work within WU wants to make clear that while we respectfully submit these comments for your consideration, in no way should this be construed as support for sport hunting of wolves, whether as trophy game or as predators. Wolves are essential to the environment, including clean water, and healthy ecosystems, as proven at Yellowstone National Park!

Final Comment	Scrima, Lawrence	Aurora, CO	6/16/2019 9:34:00 AM
----------------------	-------------------------	-------------------	----------------------

43 To whom it may concern, I was at one of your public comment meetings in Cody last year and was shocked to hear everybody on board with killing lots of does in order to ensure buck survival. Well I'm not sure who failed their anatomy class, but bucks don't grow on trees and does are needed in order to increase buck populations. You absolutely cannot maintain a healthy herd when you kill off the females. In moderation, you can and should use female tags to help control population, but upping the numbers of doe/fawn/cow/calf tags in every species and area is not the answer. Whitetail doe/fawn tags on the National Forest should be kept as is or even increased as they are invasive and do not belong in prime Mule Deer habitat. I'm not suggesting to kill egg all whitetails, either, just help out the mule deer populations by moderating their competition. If you have any questions please call Bart Kolacny 307-578-6009

Final Comment	Kolacny, Bart	Powell, WY	6/16/2019 8:11:00 PM
----------------------	----------------------	-------------------	----------------------

44 The May drawing for non-resident elk hunters needs to remain the same. You will loose applicants if you change these dates. They apply for Wyoming first, if they are unsuccessful, they have time to apply in other states.

Final Comment	POWERS, RHONDA	PARKMAN, WY	6/17/2019 10:15:00 AM
----------------------	-----------------------	--------------------	-----------------------

45 As a citizen of Wyoming for 34 years, I would like to express my concern about trapping in Wyoming. It is inhumane to animals!! There is no way to target a certain type of animal, and ones that do get caught can be there suffering for days! As far as trapping in public lands, it is also dangerous for citizens and their animals that frequent these areas. Please consider changing the laws concerning the number of days between checking traps, the fact that no posting of traps in the area is required, and the types of traps used. Our wildlife deserves more!! Thank you, Kelly Mayor

Final Comment	Mayor, Kelly	Jackson, WY	6/17/2019 10:42:00 AM
----------------------	---------------------	--------------------	-----------------------

46 Humans are quickly driving many species to the brink of extinction ...with the government killing and allowing the killing of millions of animals to make room for cows with cars killing a million animals Every year with destroying their homes and killing babies when a wooded area is destroyed for another strip mall humans will continue to drive our wild life populations to a point of no return...allowing the uncontrolled murder of any animal is wrong we don't need that fur there is no real need to hunt and torture these creatures with inhumane trapsthe only need here is a need to continue a life style of hunting torture trapping any animal for fur is someone's need to kill there IS NO OTHER NEED BEING FULLFILLED FOR FURS THAN THE NEED TO MURDER A BEAUTIFUL CREATURE

Final Comment	Hill, KIM	Memphis, TN	6/17/2019 12:39:00 PM
----------------------	------------------	--------------------	-----------------------

WGFD Web Comment Report

**Chapter 44, Regulation for Issuance of Licenses, Permits, Stamps, Tags, Preference
Points and Competitive Raffle Chances**

CHAPTER 44

REGULATION FOR ISSUANCE OF LICENSES, PERMITS, STAMPS, TAGS, PREFERENCE POINTS AND COMPETITIVE RAFFLE CHANCES

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 6-7-101, § 9-4-217(h), § 20-6-112, § 23-1-102, § 23-1-107, § 23-1-302, § 23-1-702, § 23-1-703, § 23-1-704, § 23-1-705, § 23-2-101, § 23-2-102, § 23-2-107, § 23-2-109, § 23-2-201, § 23-2-207, § 23-2-301, § 23-2-306, § 23-2-307, § 23-2-401 and § 23-3-403, § 23-6-301 through § 23-6-303.

Section 2. Regulation. The Commission authorizes the Department to issue licenses, permits, stamps, tags, preference points and competitive raffle chances, and to develop and maintain policies, processes and procedures necessary to carry out the provisions of this Chapter. The Commission hereby adopts the following regulation governing the issuance of licenses. This regulation shall remain in effect until modified or repealed by the Commission.

Section 3. Definitions. For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes, Commission regulations and the Commission also adopts the following definitions:

(a) “Application Fee” means a fee authorized by the Legislature enabling the Department to recover a portion of its costs associated with compensating owners or lessees of property damaged by game animals and game birds. In addition, the application fee is used by the Department to recover costs associated with license issuance. This fee is nonrefundable.

(b) “Charitable Purpose” means motivated by sympathy and understanding and generosity and done without any remuneration.

(c) “Commissioner Complimentary License” means an antelope, deer or elk license issued at the existing statutory price at the request of a Commissioner.

(d) “Completed Application” means all required portions of the application have been properly completed with correct applicant information, submitted within the proper time period and accompanied by the proper fee. A completed application includes the applicant’s name, physical address, mailing address if different than the physical address, date of birth, physical description (height, weight, eyes, hair and sex), telephone number or email address, years of residency and proof of residency for resident fee types, Social Security Number (SSN), Individual Tax Identification Number (ITIN) or Passport Number from non-U.S. citizens, desired valid hunting license specifications, and an original signature for residents submitting paper applications. Completed application specifications refer to licenses sold through the Electronic Licensing Service (ELS) and manually issued licenses and permits.

(e) “Disabilities” as used in this Chapter means permanent anatomical, physiological or mental deficiencies that prevent or restrict normal achievement.

(f) “Document” means an instrument on which information has been recorded by means of letters, figures, or marks and which may be used as evidence.

(g) “Documentary Evidence” means evidence furnished by written instruments, inscriptions, or documents of all kinds.

(h) “Duplicate License” means a license issued by the Department to replace an original license that is valid and has not expired and has been lost or destroyed. If the original license was issued through the Electronic Licensing Service (ELS), a duplicate license shall only be required if the original license contained a carcass coupon.

(i) “Electronic Application” means the license or permit application form submitted through the Electronic Licensing Service (ELS).

(j) “Electronic Licensing Service (ELS)” means the Department’s Electronic Draw Application System, Internet Point of Sale System and Online Internet Sales System used by the Department, license selling agents and the public to apply for or purchase licenses, permits, stamps, tags and preference points.

(k) “Electronic Signature” means an electronic process attached to or logically associated with any electronic transaction including the license, preference point or permit application submitted to the Wyoming Game and Fish Department that requires substantiation of the identity of the person initiating the electronic transaction. This process includes, but may not be limited to, use of personal credentials to gain access to the system, entering a keystroke at a specified prompt that indicates the submitter’s acceptance of an assertive statement, or the use of any other technology that is in compliance with the state of Wyoming’s Electronic Signature Rules as promulgated by the Office of the Chief Information Officer. This process can be used to indicate the applicant’s acceptance of an assertion such as a residency requirement or veracity of the application at a specified prompt. Ref: W.S. § 40-21-102 (a) (viii).

(l) “Full Price License” means a deer, antelope, elk, mountain lion or ram bighorn sheep license issued that is not a reduced price doe/fawn, cow/calf, ewe/lamb or mountain lion license.

(m) “Full Time” means performing duties and responsibilities at the request or direction of an established charitable, humanitarian, or religious organization for more than thirty (30) hours per calendar week every week the person is absent from the state.

(n) “General Licenses” means big or trophy game or wild turkey licenses valid in any hunt area in which licenses have not been totally limited in number. General licenses shall be valid only under species, sex, age class and harvest limitations that are in effect for each hunt area.

(o) “Governor Complimentary License” means hunting or fishing license issued for no fee at the request of the Governor.

(p) “Gunpowder or Buckskin Hunt” means the annual Gunpowder and Buckskin Hunt conducted by the Sheridan, Wyoming Rotary Club.

(q) “Headquarters” means the Cheyenne Office of the Wyoming Game and Fish Department located at 5400 Bishop Blvd., Cheyenne, WY 82006.

(r) “Humanitarian Purpose” means for the promotion of human welfare and the advancement of social reforms and done without remuneration.

(s) “Immediate Family Member of the Decedent” means spouse, parent, grandparent, sibling or lineal descendants and their spouses.

(t) “Initial Drawing” means a computer processed drawing held for initial offering of resident and nonresident licenses and permits.

(u) “Issue-After License” means licenses that are limited in number and that were not issued in the initial or leftover drawings; these licenses shall be issued on an as processed basis through the ELS.

(v) “Landowner” means an individual, partnership, corporation, trust, limited liability company or combination of these, which either owns real property in fee simple title or is acquiring equitable interest by written contract.

(w) “Landowner Applicant” means an individual who either owns real property solely or jointly with other individuals or who holds an interest in a corporation, partnership, trust or limited liability company, which owns real property or is a member of the “immediate family” of the individual.

(x) “Landowner Applicant’s Immediate Family” means the landowner applicant’s spouse, landowner applicant’s parents, landowner applicant’s grandparents, landowner applicant’s lineal descendants and their spouses, or landowner applicant’s siblings.

(y) “Leftover Drawing” means a computer processed random drawing to issue licenses remaining after the initial drawings.

(z) “Leftover Licenses” means limited quota licenses and nonresident region general deer licenses issued in the leftover drawing.

(aa) “Leftover Permits” means permits that are limited in number and were not issued in the initial drawing and shall be issued on an as processed basis through the ELS.

(bb) “License” means a document issued by the Department, through the authority of the Commission, to a qualified individual that grants certain privileges to take fish or wildlife in accordance with statutory or regulatory provisions.

(cc) “License Authorization” means a document approved by the Governor or by a member of the Commission that empowers the Department to issue a Governor complimentary or Commissioner complimentary license in the name of the applicant designated on the document.

(dd) “License Review Board” means a three (3) member board of Department employees consisting of the Deputy Director of Internal Operations, the Fiscal Division Chief and the Chief Game Warden, or their designee, that review and determine all license reservation requests, license refund requests, preference point issues and other license or permit issuance matters.

(ee) “Limited Quota Drawing” means the processing of an application for limited quota or general big game licenses, trophy game licenses, wild turkey licenses, permits, wild bison licenses or Super Tag and Super Tag Trifecta competitive raffles through a drawing.

(ff) “Limited Quota Licenses” means licenses that are limited in number and valid only in a hunt area(s) or portion(s) of a hunt area. Limited quota licenses shall be valid only under species, sex, age class, harvest, and weapon type limitations that are in effect for each hunt area.

(gg) “Limited Quota Reduced Price Cow or Calf (cow/calf) License” means a license which may be authorized in specific hunt areas allowing a person to take cow or calf elk independent of what may be taken on a general license or full priced limited quota license.

(hh) “Limited Quota Reduced Price Doe or Fawn (doe/fawn) License” means a license which may be authorized in specific hunt areas allowing a person to take doe or fawn animals independent of what may be taken on a general license or full priced limited quota license.

(ii) “Limited Quota Reduced Price Ewe or Lamb (ewe/lamb) License” means a license which may be authorized in specific hunt areas allowing a person to take a ewe or lamb bighorn sheep independent of what may be taken on a full priced limited quota license.

(jj) “Minor Dependent” means an individual less than eighteen (18) years of age who is domiciled with parent(s) or legal guardian.

(kk) “National Bow Hunt” means an archery-only hunt that is sponsored and administered by the Wyoming National Bowhunt, Inc.

(ll) “Nonprofit Charitable Organization” means an organization which engages in activities providing the general public with benefits designed to aid in educational, moral, physical, conservation, or social improvement and which is not established for profit.

(mm) “Nonprofit Organization Dedicated to Providing Hunting Opportunities to Individuals with Disabilities” means an organization certifying they are nonprofit and that their primary purpose or mission as stated in their charter is to provide hunting opportunities to individuals with disabilities defined in this regulation.

(nn) “Nonresident” means any person who is not domiciled in Wyoming for at least one (1) year immediately preceding making application for a license and who is not a resident as defined by W.S. § 23-1-102 (a) (ix), § 23-1-107 and § 23-2-101 (a).

(oo) “One-Shot Antelope Hunt” means the One-Shot Antelope Hunt sponsored by the One-Shot Antelope Club in Lander, Wyoming.

(pp) “Party” means a group of individuals with the same residency status who apply together in the initial drawing for hunting licenses for the same species, area and type, and who have expectations of receiving the same treatment in processing of their applications and receiving the same drawing results. For purposes of this regulation, a Party does not include anyone else, regardless of whether or not they may accompany the party of hunters during the hunt.

(qq) “Party Application” means a group of applications in which all applicants with the same residency status specify the same species, hunt area and type in the same order of preference, and all applicants expect the same processing and draw results in the initial drawing.

(rr) “Permit” means a document that authorizes a license holder to carry out activities not authorized by the license itself.

(ss) “Person’s Privilege to Obtain a License Has Been Revoked or Suspended by a Court or the Wildlife Violator Compact” means revocation or suspension of the person’s license or preference point(s).

(tt) “Pioneer Heritage Licenses” means antelope, deer, elk or wild turkey licenses issued to Wyoming residents who are at least seventy (70) years of age prior to the issuance of the license and have continuously resided in Wyoming for at least fifty (50) years immediately preceding application for the license. The fee for the Heritage License shall be established by the Department by multiplying the fee for resident licenses for the same species and license type by sixty-five percent (65%) and rounding down to the next whole dollar amount.

(uu) “Pioneer Licenses” means antelope, deer, elk or wild turkey licenses issued to Wyoming residents who are at least seventy-five (75) years of age prior to the issuance of the license, and who have continuously resided in Wyoming for at least fifty (50) years immediately preceding the application for a license.

(vv) “Potential to Use License” means the license shall be considered to be in possession of the person in whose name it was issued on or after the earliest opening date for which the license is valid if the license is not in the possession of an authorized Department employee.

(ww) “Proper Application Form” means the document prescribed by the Department, a photocopy of the document, or facsimile of the document. These documents shall be the only documents accepted by the Department.

(xx) “Properly Completed Duplicate License Affidavit” means a Department affidavit document signed by the person applying for a duplicate license.

(yy) “Proper Fee” means cash or a negotiable instrument as set forth by W.S. § 34.1-3-104 which results in full payment to the Department, in U.S. dollars for the amount specified by law or regulation for the respective licenses, permits, stamps, tags, preference points or certificates.

(zz) “Qualified Person” means an individual who meets the statutory and regulatory requirements to apply for or receive a license or a preference point. A person shall not be qualified if their privilege to apply for or receive a license or a preference point has been revoked, suspended, or restricted by a court in Wyoming or has been revoked or suspended in Wyoming through the Wildlife Violator Compact.

(aaa) “Quota” means the maximum specified number of licenses to be issued for a given hunt area and species as provided by Commission regulation; in the case of nonresident elk hunt area quotas, the maximum number of specified licenses to be issued by hunt area as provided in writing by the Wildlife Division to the Fiscal Division.

(bbb) “Reduced Price Mountain Lion License” means a license which may be authorized in specific hunt areas allowing a person to take a mountain lion in addition to what may be taken on a full price mountain lion license.

(ccc) “Region General Deer Licenses” means general nonresident deer licenses that shall be limited in number and valid for a specified group of hunt areas in accordance with Commission regulations. A license issued for a region shall only be valid in hunt areas within the region where limitations in Commission regulations specify general licenses. A license issued for a region shall not be valid in any hunt area within that region in which licenses are totally limited in quota, unless specified by Commission regulations.

(ddd) “Religious Purpose” means actions taken to advance sacred matters, religion or a church and done without remuneration.

(eee) “Replacement License” means the reprint of a license, permit, or stamp that does not contain a carcass coupon and the license was originally issued by the Department or license selling agent through the ELS, is currently valid and has not expired.

(fff) “Resident” means a United States citizen or legal alien who is domiciled in Wyoming for at least one (1) full year immediately preceding making application for any resident game and fish license, preference point, permit or tag, shall not have claimed residency in any other state, territory, or country for any other purpose during that one (1) year period, and meets the requirements specified in W.S. § 23-1-102, § 23-1-107 and § 23-2-101 (a).

(ggg) “Special Nonresident Antelope, Deer or Elk Licenses” means those licenses having a fee greater than that of a regular nonresident antelope, deer or elk license as defined in Wyoming Statute and which the statutes provide for a separate nonresident drawing with specific percentages of nonresident quotas designated for only those applicants paying the higher license fees.

(hhh) “Sportsperson Identification Number” means the unique number assigned by the Department to each individual license applicant on the ELS.

(iii) “Super Tag License” means a species specific big game, trophy game or wild bison license issued to the winner of the competitive raffle and upon submission of the proper fee for the appropriate species license set forth by statute.

(jjj) “Super Tag Trifecta Licenses” means a combination of big game, trophy game and wild bison licenses, not to exceed three (3) different species of big game, trophy game and wild bison licenses, issued to the winner of the competitive raffle and upon submission of the proper fee for the appropriate species license set forth by statute.

(kkk) “Transfer” means to convey a license authorization, (from one (1) person to another) as set forth in Section 27 of this regulation.

(lll) “Type” means a limitation on a license in a particular hunt area for the sex of animal, the species of animal, the length of the season, the type of weapon, or a portion of the hunt area in which the license shall be valid.

(mmm) “Unable to Use the License For Good Cause” means an individual is unable to use a limited quota, full price big or trophy game license due to disabling injury or illness, military personnel who receive permanent change of station (PCS) orders or are assigned away from their home duty station on temporary orders (TDY) for the majority of the regular season, or when the Department has determined a majority of, or the entire hunting opportunity has been lost in a specific limited quota hunt area for a full price big or trophy game animal due to the administrative actions of the state or federal government in closing the majority of or all public access to a hunt area, or due to a natural disaster, including, but not necessarily limited to, wildland fires.

(nnn) “Under the Care and Supervision of the Residing Facility” means the person is an employee of the appropriate institution or facility that issued the special limited fishing permit.

(ooo) “Unlimited Reduced Price Cow or Calf (cow/calf) License” means a license which may be authorized in specific hunt areas allowing a person to take cow or calf elk independent of what may be taken on a general license or full price limited quota license.

(ppp) “Unlimited Reduced Price Doe or Fawn (doe/fawn) License” means a license which may be authorized in specific areas allowing a person to take doe or fawn animals independent of what may be taken on a general license or full price limited quota license.

(qqq) “Wyoming Women’s Antelope Hunt” means a women’s antelope hunt sponsored by the Wyoming Women’s Foundation.

(rrr) “Youth License” means a big game license that may be issued to a resident or nonresident individual who is at least eleven (11) years of age and who has not attained eighteen (18) years of age at the time of application. The license shall not be valid until the licensee reaches their twelfth (12th) birthday. For all other species, excluding furbearing animals, requiring a license to take, youth license means a license that may be issued to a resident or nonresident individual who has not attained eighteen (18) years of age. For a resident youth trapping license, youth license means a license that may be issued only to residents under the age of seventeen (17).

Section 4. Method of License Issuance and Accounting. The Fiscal Division shall maintain inventory control and account for the issuance and sale of all licenses, permits, stamps and tags issued under the authority of the Commission. All licenses, permits and tags shall be issued on the basis of a completed application. Applications may be in the form of a separate document or may be incorporated into and considered as part of the license document.

(a) Licenses issued over-the-counter. All licenses that are not limited in number shall be issued by the Department through the ELS and designated Department personnel and facilities or designated license selling agents.

(b) Licenses issued through competitive drawings. Except as provided in this Chapter, all licenses and permits that are limited in number shall be issued through competitive drawings conducted by the Department’s License Section. Entry into the drawing for a limited quota license or permit shall be upon submission of a completed application.

(c) Commercial license issuance. All commercial licenses shall be issued through the ELS by the Department’s License Section at Headquarters, by designated Department personnel or at facilities in accordance with applicable statutes and regulations.

(d) Licenses issued after initial or leftover drawings. Licenses remaining after the initial or leftover drawings shall be sold through the ELS and on a first-come, first-served basis.

(e) Depredation license issuance. Depredation licenses may be issued through the ELS at designated Department locations when additional harvest is needed as determined by the Wildlife Division.

(f) The Department shall charge an applicant a two point five percent (2.5%) credit card processing fee of the cost of any license, permit, stamp, tag, preference point or competitive raffle chance applied for or purchased by the use of a credit card.

Section 5. License Issuance.

(a) In circumstances where the demand for a particular type of license exceeds the supply, a competitive drawing shall be held when feasible to determine successful applicants.

(b) The Department shall only issue licenses in excess of established quotas in the following circumstances:

(i) To accommodate a successful party application in a limited quota drawing;

(ii) To process a Commissioner or Governor license authorization;

(iii) Upon authorization by the License Review Board to resolve a Department license issuance error; or,

(iv) As provided by Commission regulation.

(c) To establish the number of licenses available for the leftover drawing, the Department may continue alternately running the unsuccessful applicants of each resident and nonresident drawing until there are no unissued licenses or permits for which there are unsuccessful applications.

(d) License selling agents shall comply with the following procedures for the sale of limited quota full and reduced price issue-after licenses.

(i) License selling agents shall not sell or allocate licenses prior to the date and time established annually by the Fiscal Division Chief.

(ii) All applications for resident licenses, preference points and permits shall contain the resident applicant's original or electronic signature and when applicable, the parent or legal guardian's signature in accordance with Wyoming statute. Applications for youth licenses and permits may contain a signature from the youth's parent or legal guardian in lieu of the youth applicant's signature. All applications for nonresident licenses and permits shall contain either the nonresident applicant's signature or the signature of the person submitting the application on behalf of the nonresident applicant; and,

(A) In the event the license is issued through the ELS, the resident applicant shall be present at the license selling agent location to purchase the license. The parent or legal guardian of a resident youth applicant shall be present at the license selling agent location to purchase a license for the resident youth applicant.

(iii) License selling agents and the ELS shall only issue licenses to one customer at a time, first-come, first-served in the order the individuals are present in line. The agent may issue up to the maximum number of licenses specified by Chapter 2, General Hunting Regulation to a single individual who provides the required information for license issuance.

(e) Big Game Licenses. No individual shall apply for or receive more than one (1) license for each big game species during any one (1) calendar year, except as otherwise provided in Commission regulation(s).

(i) Antelope. Eighty percent (80%) of the total available limited quota antelope licenses shall initially be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of full price antelope licenses as specified in Chapter 2, General Hunting Regulation. The order of the resident antelope initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(A) Statutes provide for up to one hundred sixty (160) licenses to be available for up to two (2) antelope hunt events each year. These licenses shall be issued above quotas established for the hunt area(s) and shall be allocated to residents and nonresidents, taking into consideration resource management requirements as designated by the Wildlife Division. These licenses are exempt from the provisions in this Chapter limiting the number of big game licenses an individual can obtain in one (1) calendar year. For the 2019 antelope hunting season:

(I) Up to eighty (80) antelope licenses shall be available for the One-Shot Antelope Hunt sponsored by the One-Shot Antelope Club.

(II) Up to eighty (80) antelope licenses shall be available for the Wyoming Women's Antelope Hunt sponsored by the Wyoming Women's Foundation.

(III) For the 2020 antelope hunting season, the Department shall accept applications from organizations who desire to receive antelope hunt event licenses. The application period to conduct an antelope hunt event for the 2020 antelope hunting season shall be August 1, 2019 through August 30, 2019. Applications shall be reviewed by the Department and brought before the Commission for final approval and selection. The Commission may designate an organization to receive antelope hunt event licenses for up to three (3) consecutive hunting seasons before requiring the organization to reapply. Applications for any future antelope hunt event licenses shall be accepted as advertised by the Department.

(IV) An application for an antelope hunt event shall be submitted on a form provided by the Department and shall specify:

- (1.) The name of the organization; and,
- (2.) The organization's history, background and mission; and,

(3.) The number of antelope licenses requested by individual hunt area and type; and,

(4.) The number of consecutive years antelope hunt event licenses are being requested; and,

(5.) The organization's financial plan to benefit wildlife, conservation and the community with funds raised from the antelope hunt event.

(V) The Commission may revoke an organization's opportunity to receive antelope hunt event licenses if any information provided on their application is incorrect or is no longer valid.

(B) The Commission may, upon receipt of payment of antelope license fees as specified in W. S. § 23-1-705, issue up to a total of fifty (50) antelope licenses each year for the exclusive distribution by nonprofit organizations dedicated to providing hunting opportunities to individuals with disabilities.

(I) Qualifying organizations shall make application to the License Section of the Department on or before January 31 for these antelope licenses. The application shall specify:

(1.) The total number of licenses requested; and,

(2.) The Hunt Area and Type designation of the licenses requested; and,

(3.) Certification that shows the organization qualifies under the definition of a "Nonprofit Organization Dedicated to Providing Hunting Opportunities to Individuals with Disabilities".

(II) In the event that more than one (1) qualifying organization requests licenses under this subsection, the Department shall allocate the licenses through a random drawing to the specific qualifying organization(s).

(III) The antelope licenses issued shall be issued through the Department above quotas established for the hunt area(s) and shall be allocated to residents or nonresidents as designated by the nonprofit organization(s).

(C) The order of the nonresident antelope initial drawing set forth in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, then Nonresident Regular Licenses. The allocation of remaining licenses after the Landowner License Drawing shall be forty percent (40%) to the Nonresident Special License Drawing and sixty percent (60%) to the Nonresident Regular License Drawing.

(D) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident antelope licenses to a preference point drawing in the initial drawing. The order of the nonresident antelope preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate up to twenty-five percent (25%) of the available nonresident antelope licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. All unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with a differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(E) Antelope licenses that have not been applied for and issued through initial drawings or leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(F) Eighty percent (80%) of the total available limited quota reduced price doe/fawn antelope licenses shall be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of reduced price doe/fawn antelope licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer doe/fawn antelope licenses shall be made available through the ELS. In addition to the statutorily prescribed application fees, the price of reduced price doe/fawn antelope licenses shall be twenty-two dollars (\$22) for residents, fourteen dollars (\$14) for resident youth, two dollars (\$2) for resident pioneers, eighteen dollars (\$18) for pioneer heritage, thirty-four dollars (\$34) for nonresidents and nineteen dollars (\$19) for nonresident youth.

(ii) Bighorn Sheep. Seventy-five percent (75%) of the total available limited quota full price bighorn sheep licenses shall initially be offered to residents in the initial drawings. The Department shall allocate not less than seventy-five percent (75%) of the available resident full price bighorn sheep licenses and not less than seventy-five percent (75%) of the available nonresident full price bighorn sheep licenses to a preference point drawing in the initial drawing. The order of the resident and nonresident full price bighorn sheep preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled. The Department shall allocate up to twenty-five percent (25%) of the available resident full price bighorn sheep licenses and shall allocate up to twenty-five percent (25%) of the available nonresident full price bighorn sheep

licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed.

(A) Seventy-five percent (75%) of the total available limited quota reduced price ewe/lamb licenses shall be offered to residents in the initial drawing, except as otherwise provided by Commission regulations. An applicant may only apply for and receive the maximum number of reduced price ewe/lamb licenses as specified in Chapter 2, General Hunting Regulation. In addition to the statutorily prescribed application fees, the price of reduced price ewe/lamb licenses shall be thirty-six dollars (\$36) for residents, twenty dollars (\$20) for resident youth, two hundred forty dollars (\$240) for nonresidents and one hundred dollars (\$100) for nonresident youth.

(iii) Deer. Eighty percent (80%) of the total available limited quota deer licenses shall initially be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of full price deer licenses as specified in Chapter 2, General Hunting Regulation. The order of the resident deer initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(A) The Commission shall annually establish the nonresident region general deer license quotas in addition to license quotas for limited quota hunt areas. Nonresident region general deer license quotas shall not include hunt areas with limited quota licenses issued to nonresidents.

(B) Statutes provide for up to seventy-five (75) nonresident special deer licenses to be available for a national bow hunt. This quota shall be deducted from the nonresident special deer quota for the nonresident deer region in which the national bow hunt is held. National bow hunt deer licenses shall only be valid during the hunt dates established by Wyoming National Bowhunt, Inc. and the Department. These dates shall be within the existing special archery season dates as set forth in the most current Commission Regulation Chapter 6 Deer Hunting Seasons of the Commission regulations for the specific deer hunt area(s) in which the hunt will occur.

(C) Statutes provide for up to twenty-five (25) licenses, which may be issued for a gunpowder or buckskin hunt(s). These licenses shall be issued above quotas and allocated to residents and nonresidents as designated by the Wildlife Division. These licenses are exempt from the provisions in this Chapter limiting the number of big game licenses an individual can obtain in one (1) calendar year.

(D) The order of the nonresident deer initial drawings described in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, and then Nonresident Regular Licenses. The allocation of remaining licenses after the nonresident landowner drawing shall be forty percent (40%) to the Nonresident Special License Drawing and sixty percent (60%) to the Nonresident Regular License Drawing.

(E) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident deer licenses to a preference point drawing in the initial drawing. The order of the nonresident deer preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate up to twenty-five percent (25%) of the available nonresident deer licenses to a random drawing in the initial drawing which unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. Unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(F) Nonresident Region General deer licenses that have not been applied for and issued through the initial drawing and leftover drawing shall be offered to nonresidents as issue-after licenses.

(G) Limited quota deer licenses that have not been applied for and issued through the initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(H) Eighty percent (80%) of the total available limited quota reduced price doe/fawn deer licenses shall be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of reduced price doe/fawn deer licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer doe/fawn deer licenses shall be made available for sale through the ELS. In addition to the statutorily prescribed application fees, the price of reduced price doe/fawn deer licenses shall be twenty-two dollars (\$22) for residents, fourteen dollars (\$14) for resident youth, two dollars (\$2) for resident pioneers, eighteen dollars (\$18) for pioneer heritage, thirty-four dollars (\$34) for nonresidents and nineteen dollars (\$19) for nonresident youth.

(I) Resident general deer licenses shall not be limited in number and shall be issued through the ELS. Resident general deer licenses may also be applied for and issued through the initial drawings by submission of a completed application.

(iv) Elk. A total license limit of seven thousand two hundred-fifty (7,250) nonresident elk licenses shall be made available to nonresident applicants in the initial drawing each year. Reduced price cow/calf elk licenses and limited quota elk licenses remaining after the initial drawing may be made available to nonresidents in addition to the limit of seven thousand two hundred fifty (7,250). Sixteen percent (16%) of the total available limited quota full price

and reduced price cow/calf elk licenses shall initially be offered to nonresidents in the nonresident elk initial drawing. The order of the nonresident elk initial drawings described in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, and then Nonresident Regular Licenses. Following the Nonresident Landowner License Drawing, licenses available in the initial drawing from the seven thousand two hundred-fifty (7,250) limit shall be allocated as follows: The allocation of remaining licenses after the nonresident landowner drawing shall be forty percent (40%) to the Nonresident Special License Drawing and sixty percent (60%) to the Nonresident Regular License Drawing. If the seven thousand two hundred-fifty (7,250) license quota is not issued in the initial nonresident drawings, the Department may achieve the seven thousand two hundred-fifty (7,250) license quota by issuing nonresident general elk licenses. Licenses remaining for limited quota areas resulting from this procedure may be made available in the resident elk initial drawing.

(A) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident elk licenses to a preference point drawing in the initial drawing. The order of the nonresident elk preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate up to twenty-five percent (25%) of the available nonresident elk licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. All unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(B) Following the nonresident elk initial drawing, quotas for resident limited quota full priced and reduced price cow/calf elk licenses shall be the greater of the elk quotas established by Commission regulation less any elk licenses currently issued to nonresidents or eighty-four (84%) percent of the quota established by Commission regulation in the initial drawing. The order of the resident elk initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(C) Elk licenses that have not been applied for and issued through the initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(D) An applicant may only apply for and receive the maximum number of full price antlerless and reduced price cow/calf elk licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer cow/calf elk licenses shall be made available for sale through the ELS. In addition to the statutorily prescribed application fees, the price of

reduced price cow/calf elk licenses shall be forty-three dollars (\$43) for residents, twenty dollars (\$20) for resident youth, five dollars (\$5) for resident pioneers, twenty-seven dollars (\$27) for pioneer heritage, two hundred eighty-eight dollars (\$288) for nonresidents and one hundred dollars (\$100) for nonresident youth.

(E) Resident general elk licenses shall not be limited in number and shall be issued through the ELS. General elk licenses may also be applied for and issued through the initial drawings by submitting a completed application.

(v) Moose. Eighty percent (80%) of the total available limited quota moose licenses shall be offered to residents in the initial drawing. The Department shall allocate not less than seventy-five percent (75%) of the available resident moose licenses and not less than seventy-five percent (75%) of the available nonresident moose licenses to a preference point drawing in the initial drawing. The order of the resident and nonresident moose preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this Section; then, the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled. The Department shall allocate up to twenty-five percent (25%) of the available resident moose licenses and shall allocate up to twenty-five percent (25%) of the available nonresident moose licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed.

(vi) Mountain Goat. Seventy-five percent (75%) of the total available limited quota mountain goat licenses shall be offered to residents in the initial drawing.

(A) Any person who has been issued a mountain goat type one (1) or a type two (2) license shall not be eligible to apply for or receive a mountain goat type one (1) or a type two (2) license in any subsequent year.

(B) Any person who has been issued a mountain goat type one (1) or type two (2) license in a previous year may apply for and receive a mountain goat Type A license in any subsequent year.

(C) Any person who applies for and receives a mountain goat Type A license shall be eligible to apply for or receive a mountain goat Type A license in any future year.

(f) Trophy Game. No individual shall apply for or receive more than one (1) license for a specific trophy game species during any one (1) calendar year, except as otherwise provided in Commission regulation.

(i) Black Bear. Black bear licenses shall not be limited in number and shall be issued through the ELS.

(ii) Gray Wolf. Gray wolf licenses shall not be limited in number and shall be issued through the ELS.

(iii) Grizzly Bear. No licenses shall be issued for this species until such time as the Commission may establish an open grizzly bear hunting season.

(iv) Mountain Lion. Full price mountain lion licenses and reduced price mountain lion licenses shall not be limited in number. They shall be issued through the ELS. A person may apply for and receive a maximum of one (1) full price mountain lion license and one (1) reduced price mountain lion license during any one (1) calendar year. Reduced price mountain lion licenses are only valid in specified hunt areas. A person shall possess and exhibit a full price mountain lion license for the current calendar year in order to receive a reduced price mountain lion license for the same calendar year. The price of a reduced price mountain lion license shall be twenty dollars (\$20) for residents and ninety-two dollars (\$92) for nonresidents.

(g) Wild Bison. Eighty (80%) percent of the wild bison recreational hunting season licenses shall be initially offered to residents in the initial drawing. If the number of resident applicants for wild bison licenses does not meet or exceed the resident wild bison license allocation, the remaining resident allocation may be issued to nonresidents. If the number of nonresident applicants for wild bison does not meet or exceed the nonresident wild bison allocation, the remaining license allocation may be issued to residents.

(i) Completed applications for resident and nonresident wild bison recreational hunting season licenses shall only be accepted through the ELS. Applicants shall have the choice of applying for any wild bison or any female or calf wild bison. A computer random drawing shall be utilized to determine successful applicants.

(ii) Wild bison licenses that have not been applied for and issued through initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(iii) Any person who is issued an any wild bison license and harvests; a wild bison is subject to eligibility and waiting periods outlined in W. S. § 23-2-107(f) prior to applying for any future wild bison hunting license.

(h) Bird.

(i) Falconry.

(A) Hunt with Falcon licenses shall be issued as over-the-counter licenses through the ELS.

(B) General Raptor Capture licenses shall be issued as over-the-counter licenses through the ELS at Headquarters. Limited Quota Raptor Capture licenses shall be issued in accordance with Commission Regulation Chapter 25 Falconry Regulation.

(ii) Game Bird. Game Bird licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(iii) Wild Turkey. Eighty percent (80%) of the total available spring and fall limited quota wild turkey licenses shall be offered to residents in the initial drawing. The order of the initial drawings shall be resident landowner licenses, resident regular licenses, nonresident landowner licenses, and then nonresident regular licenses.

(A) Limited quota wild turkey licenses that have not been applied for and issued through the initial drawing shall be offered to residents and nonresidents as issue-after licenses.

(B) The Commission may authorize general wild turkey licenses, which shall not be limited in number. Those licenses shall be issued as over-the-counter licenses through the ELS. These licenses may also be applied for and issued through the initial drawing process.

(i) Small Game. Small Game licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(j) Furbearing Animals.

(i) Trapping. Resident furbearing animal trapping licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS. Nonresident furbearing animal trapping licenses shall not be limited in number and shall be issued in accordance with W.S. § 23-2-303 at Headquarters.

(ii) Capture Furbearing Animal for Domestication. Capture Furbearing Animal for Domestication licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(k) Archery. Archery licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(l) Commercial Licenses. Commercial licenses require written approval by Department personnel prior to issuance.

(i) Commercial Fish Hatchery. Commercial Fish Hatchery licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(ii) Deal in Live Bait. Deal in Live Bait licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters.

(iii) Fishing Preserve. Fishing Preserve licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(iv) Fur Dealer. Fur Dealer licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(v) Game Bird Farm. Game Bird Farm licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(vi) Taxidermist. Taxidermist licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(m) Fishing. Fishing licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(i) Seine or Trap Fish. Seine or Trap Fish licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters. No person shall apply for or receive more than one (1) seine or trap fish license during a calendar year.

(n) Duplicate Licenses.

(i) In order for a duplicate license to be issued, a duplicate license affidavit shall be properly completed by the licensee.

(A) For a license, permit, stamp or tag that was originally issued through a manual process, the customer shall be required to purchase another license, permit, stamp or tag, rather than a duplicate license, as authorized by Commission regulation.

(B) For a license that was originally issued through the ELS, the license selling agent or sub-agent shall not be required to complete a duplicate license affidavit form prior to issuing a duplicate license as the affidavit is incorporated into the duplicate license document being issued through the ELS.

(ii) Duplicate licenses shall be issued through the ELS.

(iii) The Department and license selling agents shall charge a fee of seven dollars (\$7) for issuance of a duplicate license.

(iv) Once a duplicate license is issued, any previous license issued for the same species, hunt area and license type is no longer valid.

(o) Replacement Licenses.

(i) Once a replacement license is issued, any previous license issued for the same license type is no longer valid.

(ii) The Department and license selling agents shall charge a fee of seven dollars (\$7) for the issuance of a replacement license issued through the ELS.

(p) Resident Guide Licenses shall be issued for no charge through the ELS at Department Regional Offices and Headquarters, and shall be issued manually through designated Department personnel.

Section 6. Permits.

(a) Sandhill Crane.

(i) Limited Quota Sandhill Crane. Applicants shall be selected by random computer selection. Twenty percent (20%) of the total available limited quota sandhill crane permits shall initially be offered to nonresidents in the initial drawing. Limited quota sandhill crane permits that have not been applied for and issued through the initial drawing shall be issued through the ELS on an as processed basis until quotas have been reached or the permit is no longer valid.

(ii) General Sandhill Crane. Permits shall not be limited in number and shall only be available through the Department's website beginning August 1.

(b) Disabled Hunter and Disabled Hunter Companion Permits. Any person qualified to obtain a disabled hunter permit or purchase a disabled hunter companion permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(c) Hunters with a Shoot from a Vehicle Permit. Any person qualified to obtain a Shoot from a Vehicle Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(d) Hunting Season Extension Permit. Any person qualified to obtain a Hunting Season Extension Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(e) Migratory Game Bird.

(i) Harvest Information Permit. Harvest Information Permits shall not be limited in number and shall only be available through the Department's website.

(f) Furbearing Animal, Limited Quota Beaver and Marten.

(i) Applicants shall be selected by random computer drawing. Both residents and nonresidents shall draw against the same quota. Leftover permits may be issued to the first eligible applicant as authorized by the Fiscal Division Chief.

(g) Pheasant.

(i) Glendo Permit. Eighty percent (80%) of the total available limited quota Glendo pheasant permits shall be offered to residents in the initial drawing. Glendo pheasant permits that have not been applied for and issued through the initial drawing shall be issued as authorized by the Fiscal Division Chief on an as processed basis until quotas have been reached or the permit is no longer valid. No person shall apply for or receive more than one (1) Glendo Permit in the initial drawing.

(ii) Springer Permit. Eighty percent (80%) of the total available limited quota Springer pheasant permits shall be offered to residents in the initial drawing. Springer pheasant permits that are not applied for and issued through the initial drawing shall be issued at the Springer Check Station or as authorized by the Fiscal Division Chief until the quotas have been reached or the permit is no longer valid. No person shall apply for or receive more than one (1) Springer Permit in the initial drawing.

(h) Special Management Permit. Any individual participating in a special management program shall be required to purchase a Special Management Permit. Special Management Permits shall not be limited in number and shall be issued through the ELS.

(i) Special Limited Fishing Permit.

(i) Any institution, facility or school designated by the Department to issue Special Limited Fishing Permits to any person under the care and supervision of the institution, residing facility, or school as authorized in W.S. § 23-2-207 may issue such permits to fish in accordance with Commission Regulation Chapter 46, Fishing Regulations.

(ii) Special Limited Fishing Permits shall specify the following information:

(A) Name and date of birth of individual to whom the permit is issued;

(B) Calendar year for which the permit is valid;

(C) Name of institution, facility, or school issuing the permit; and,

(D) Name of the person employed by institution, facility, or school who issued the permit.

(iii) No person shall apply for or receive any permit under this section by false swearing, fraud or false statement of any kind or in any form.

(iv) Employees of institutions, facilities or schools as authorized in W.S. § 23-2-207 are not eligible to receive special limited fishing permits.

(v) Any institution, facility or school designated by the Department to issue special limited fishing permits shall submit an annual report to the Department's License Section. The report shall include the number of special limited fishing permits issued, the name of the institution, facility or school and any other required information as provided by the Department. Reports shall be due on or before January 31 following the reporting period year.

(j) Hunters with a Central Visual Acuity Disability Permit. Any person qualified to obtain a Central Visual Acuity Disability Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

Section 7. Tags. Wyoming Interstate Game Tag. Wyoming Interstate Game Tags shall not be limited in number and shall be sold through Department Regional Offices, Headquarters, designated Department personnel, game tag distributors or their designees.

Section 8. Stamps.

(a) Conservation Stamp. Conservation Stamps shall not be limited in number and shall be sold through the ELS as a Conservation Stamp Authorization and manually as an actual stamp.

(i) Hunters or anglers acquiring a manually issued conservation stamp for the purpose set forth in W.S. § 23-2-306 shall validate the stamp by signing their name in ink in the space provided on the face of the stamp. Hunters or anglers who acquire a lifetime conservation stamp or a conservation stamp authorization through the ELS shall not be required to meet the signature provisions of this subsection.

(ii) The validated stamp, or the document exhibiting the stamp privilege, shall be in possession of any person required by W.S. § 23-2-306 to obtain a stamp if the person is engaged in the act of hunting or fishing and shall be immediately produced for inspection upon request from any Department personnel.

(b) Wildlife Damage Management Stamp. Wildlife Damage Management Stamps shall not be limited in number and shall be sold through the ELS. The price for the stamp shall be established by the Wyoming Animal Damage Management Board.

(c) Reciprocity Stamp. Reciprocal agreements provide for licensing for fishing of residents of Wyoming and adjoining states upon artificial impoundment of water forming the boundary between Wyoming and adjoining states. Reciprocity stamps shall not be limited in number and shall be sold through the ELS.

Section 9. Landowner Licenses. Landowner licenses shall only be issued to those landowners who own land which provides habitat for antelope, deer, elk or wild turkeys and meets the requirements as set forth in this section. Any lands purchased or subdivided for the primary purpose of obtaining landowner licenses shall not be eligible for landowner licenses. The Wyoming Game and Fish Commission authorizes the issuance of landowner licenses in

order to provide the opportunity for a landowner applicant or member of the landowner applicant's immediate family to hunt antelope, deer, elk or wild turkey on the landowner's property in the case where licenses for a hunt area have been limited in number and only available through a competitive drawing.

(a) In order to qualify for a license issued under this section, the deeded land qualifying the landowner applicant shall be located in the hunt area for which applied, shall consist of a minimum of one hundred sixty (160) contiguous acres and shall be utilized by the type of big game or wild turkeys for which the applicant applied to the extent the land provides food, cover and water. The landowner applicant shall demonstrate that the species of wildlife for which the license application has been made utilized the described land for a minimum of two thousand (2,000) days of use during the twelve (12) month period immediately preceding the date of application. In no case shall more than two (2) big game licenses per species or more than two (2) spring wild turkey or no more than two (2) fall wild turkey licenses be issued for a parcel of deeded land meeting the above qualifications in a calendar year.

(b) Resident or nonresident landowner applicants that own land in Wyoming or members of the landowner applicant's immediate family may be issued licenses upon application and payment of the specified fee. Licenses shall be issued to landowners without participating in a competitive drawing unless the number of landowner license applications exceeds the number of licenses authorized for the hunt area by the Commission. In such cases, a competitive drawing shall be utilized to determine successful landowner license applicants. Landowner license applications shall be drawn first in each respective resident and nonresident initial drawing and shall be drawn against the total quota available in each respective hunt area.

(c) As a condition of eligibility for licenses issued to landowners, landowner applicants shall provide on and with the application for a license issued to landowners, documentation that substantiates in which capacity the individual qualifies as a landowner applicant under the definition of a landowner applicant or landowner's immediate family in this Chapter. Documentation shall include the completion of the landowner license application form provided by the Department, and any attachments required by the Department to determine eligibility of the applicant. The Department shall consider the eligibility of the applicant based on the requirements in this regulation and documentation provided by the landowner.

(d) In the case of resident license availability, no full price landowner licenses shall be authorized if hunting with a general license is allowed at any time during the hunting season, unless the general license is valid for antlerless deer or antlerless elk hunting only.

(e) In the case where a nonresident landowner qualifies for a landowner license in a hunt area where the current hunting season provides for both limited quota and general license hunting during the established hunting season for the species applied for, the nonresident landowner may apply as a nonresident applicant for either the limited quota license for the area in which the applicant is qualified, or a general license in the initial drawing. If the nonresident landowner is unsuccessful in obtaining a limited quota license in the nonresident drawing, the

nonresident landowner may subsequently apply to the Department for the issuance of a general license.

(f) Landowner licenses shall be designated by the landowner and applied for by a landowner applicant, or a member of the landowner applicant's immediate family.

(i) An individual landowner applicant may apply for or receive:

(A) No more than one (1) full price elk and one (1) limited quota reduced price elk landowner license in a calendar year.

(B) No more than one (1) full price antelope or up to two (2) limited quota reduced price antelope landowner licenses in a calendar year.

(C) No more than one (1) full price deer or up to two (2) limited quota reduced price deer landowner licenses in a calendar year.

(D) No more than one (1) spring wild turkey landowner license and one (1) fall wild turkey landowner license in a calendar year.

(ii) A maximum of two (2) licenses for antelope, deer and elk may be allowed to a landowner applicant regardless of the number of landholdings in which the landowner applicant holds an interest.

(iii) Regardless of a change in ownership of a particular parcel of land, no more than two (2) landowner licenses for each big game species (antelope, deer, and elk) shall be issued in any calendar year on the basis of the qualification of the particular parcel.

(iv) Regardless of a change in ownership of a particular parcel of land, no more than two (2) spring wild turkey and two (2) fall wild turkey landowner licenses shall be issued in any calendar year on the basis of the qualification of the particular parcel.

(g) Landowners shall submit applications for landowner licenses as listed in Section 20 of this regulation.

Section 10. Lifetime Licenses and Conservation Stamp. Any resident qualified to purchase a lifetime fishing, lifetime archery or lifetime combination license pursuant to Wyoming statute may obtain a lifetime license from the Department's License Section at Headquarters or license selling locations as designated by the Fiscal Division Chief.

(a) Any person may purchase a lifetime conservation stamp from the Department's License Section at Headquarters or license selling locations as designated by the Fiscal Division Chief.

(b) Receiving a lifetime license grants the recipient the privilege of utilizing the license for his lifetime; however, the license shall not be construed as exercising resident hunting or fishing privileges in Wyoming when and if the person leaves the state of Wyoming.

(c) A resident lifetime fishing license and conservation stamp may be issued to any resident who is permanently and totally disabled and is unable to engage in any substantial gainful activity. For purposes of this subsection, substantial gainful activity shall be as determined by the U.S. Social Security Administration for the purpose of determining eligibility for Supplemental Security Income or Social Security Disability Insurance benefits.

(i) Any person applying for a resident lifetime fishing license and conservation stamp under this subsection shall apply on a form provided by the Department and shall provide a copy of their Social Security Disability Benefit letter issued from the U.S. Social Security Administration indicating the applicant's inability to engage in any substantial gainful activity.

(ii) A resident lifetime fishing license and conservation stamp issued under this subsection shall remain valid as long as the recipient remains a resident as defined by W.S. § 23-1-102, § 23-1-107 and § 23-2-101.

Section 11. Governor Complimentary Licenses. Wyoming statutes provide for the issuance of complimentary licenses to be issued at the request of the Governor. Big game licenses authorized under this section shall be valid for the species for which the license has been issued.

(a) These licenses shall be valid in any hunt area in accordance with Commission regulations, except for the following:

(i) Complimentary moose licenses shall not be valid in any moose hunt area, which has a total quota of ten (10) or less antlered or any moose licenses.

(ii) Complimentary full price bighorn sheep licenses shall not be valid in any bighorn sheep hunt area that has a total quota of eight (8) or less full price bighorn sheep licenses.

(iii) Complimentary wild bison licenses shall not be valid in any wild bison hunt area which has a total quota of ten (10) or less any wild bison licenses.

(iv) Governor's Complimentary licenses shall not be valid within Grand Teton National Park.

(b) Holders of Governor Complimentary licenses shall be exempt from the provisions in this Chapter limiting the number of big game or wild bison licenses an individual can possess in any one (1) calendar year or during an individual's lifetime. An individual is eligible to receive a Governor Complimentary moose license, Governor Complimentary full price bighorn

sheep license, and a Governor Complimentary wild bison license annually. Recipients shall be exempt from the five (5) year waiting period and preference points shall not be lost if an individual receives a Governor Complimentary moose or full price bighorn sheep license. Nonresident preference points shall not be lost if an individual receives a Governor Complimentary antelope, deer or elk license.

Section 12. Commissioner Complimentary Licenses.

(a) Wyoming statutes provide that each appointed Commissioner may cause, through the issuance of license authorizations to nonprofit charitable organizations, to be issued at full price, complimentary antelope, deer or elk licenses.

(i) Once the commissioner complimentary license authorization has been auctioned or otherwise bid to the highest bidder or raffled to members of the public by the nonprofit charitable organization, the recipient of the license authorization may only transfer the license authorization to another person if no additional consideration above the bid or raffle price is paid by the transferee.

(ii) The recipient of the license authorization may donate the license authorization back to the nonprofit charitable organization that originally bid the license authorization to be rebid to a new highest bidder.

(iii) The Department shall issue the license in the name of the person who submits the authorization for license issuance.

(iv) All big game licenses authorized under this section are valid for a specific region or hunt area as designated by the applicant at the time of application. Commissioner Complimentary licenses shall not be valid within Grand Teton National Park.

(v) The specific region, or hunt area, or type shall not be changed following the issuance of the license by the Department.

(vi) As a condition to issuance of a Commissioner Complimentary license, the Department shall require an authorized officer of the recipient organization to certify under penalty of law that the respective organization is a nonprofit charitable organization as defined in this regulation and eligible to receive the Commissioner Complimentary license authorization.

(b) Holders of Commissioner Complimentary licenses shall be exempt from the provisions in this Chapter limiting the number of licenses an individual can possess in any one (1) calendar year. Nonresident recipients shall not lose preference points for receiving a Commissioner Complimentary antelope, deer or elk license.

Section 13. Commissioner Complimentary Licenses for Persons with Life Threatening Illnesses.

(a) The Commission may, upon receipt of payment of the proper fee issue up to twenty-five (25) antelope licenses, twenty-five (25) deer licenses, twenty-five (25) elk licenses and twenty-five (25) turkey licenses to persons twenty (20) years of age or younger with a life-threatening illness and who is sponsored by a nonprofit charitable organization whose mission it is to provide opportunities and experiences to persons with life-threatening or serious illnesses. Licenses issued under this subsection shall be issued above quotas established for the hunt area(s) by Commission regulation. However, no more than ten (10) limited quota antelope, ten (10) limited quota deer, ten (10) limited quota elk or ten (10) limited quota turkey licenses shall be issued for any one hunt area during the same calendar year.

(i) The sponsoring organization shall submit a request for the number of licenses and species requested on or before January 31 for antelope, deer, elk, spring and fall turkey.

(ii) After notification that a sponsoring organization's request has been granted, the sponsoring organization shall submit a completed application and appropriate license fee for the person with a life-threatening or serious illness to the Department's License Section for license issuance.

(iii) As a condition to issuance of a license in this subsection, the Department shall require an authorized officer of the sponsoring organization to certify under penalty of law that the respective organization is a nonprofit, charitable organization as defined in this regulation.

(iv) The sponsoring organization shall provide a statement from a licensed physician stating the license recipient is clinically diagnosed with a life-threatening or serious illness.

(v) The Department shall issue licenses to individuals sponsored by qualifying organizations meeting the provisions under this subsection to residents and nonresidents in accordance with Section 5(e) (i), 5 (e) (iii), 5(e) (iv), and Section 5(h) (iii) of this Chapter. In the event the number of applications exceeds the number of licenses available under this subsection, the Department shall allocate the licenses through a random drawing on or before February 10. Licenses remaining after the initial issuance shall be available on a first come, first served basis until the quotas for licenses in this subsection have been allocated.

Section 14. Pioneer Licenses, Pioneer Heritage Licenses, Honorably Discharged Pioneer Veterans Licenses, One Hundred Percent (100%) Disabled Resident Veterans Licenses, Resident Disabled Veterans Lifetime Fishing Licenses and Purple Heart Medal Recipients.

(a) Pioneer lifetime combination game bird/small game/fishing licenses may be issued to qualified individuals. The Pioneer game bird/small game/fishing licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters.

(b) Pioneer heritage antelope, deer, elk or wild turkey licenses shall be issued through the ELS to any qualified resident. The fee for such licenses shall be: pioneer heritage antelope license, twenty-two dollars (\$22); pioneer heritage deer license, twenty-six dollars (\$26); pioneer heritage elk license, thirty-five dollars (\$35); and, pioneer heritage wild turkey license, ten dollars (\$10). Reduced price pioneer heritage doe/fawn antelope, doe/fawn deer and cow/calf elk licenses shall be issued through the ELS system.

(c) Honorably discharged pioneer veteran combination game bird/small game/fishing licenses may be issued to qualified individuals. Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as honorably discharged pioneer veterans. The honorably discharged pioneer veteran game bird/small game/fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence that he qualifies as an honorably discharged pioneer veteran.

(d) One hundred percent (100%) disabled resident veteran combination game bird/small game/fishing license may be issued to qualified individuals. Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as one hundred percent (100%) disabled resident veterans. The one hundred percent (100%) disabled resident veteran game bird/small game/fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Department of Veterans Affairs that the resident veteran qualifies as one hundred percent (100%) disabled. For the purpose of this subsection, one hundred percent (100%) disabled does not refer to disability compensation.

(e) Wyoming statutes provide for the issuance of antelope, deer, elk or wild turkey pioneer licenses to individuals qualified at the time of license issuance. For purposes of drawings for which the submission of a completed application shall be required, license applicants shall qualify by June 20 of the current calendar year. Any resident person qualified to receive a limited quota pioneer big game or wild turkey license shall make application through the ELS. Limited quota pioneer licenses for antelope, deer, elk and wild turkey shall be applied for in accordance with Section 20 of this Chapter. Pioneer general deer, general elk and general wild turkey licenses shall be issued through the ELS. Limited quota reduced price pioneer doe/fawn antelope, doe/fawn deer and cow/calf elk licenses shall be issued through the ELS system.

(f) Resident disabled veteran's lifetime fishing license. Any resident disabled veteran who receives fifty percent (50%) or more service connected disability compensation from the United States Department of Veterans Affairs may apply on the proper application form for a resident disabled veteran's lifetime fishing license. The disabled veteran's resident lifetime fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Department of Veterans Affairs that the applicant receives fifty

percent (50%) or more service connected disability compensation. The license shall remain valid for the lifetime of the person in whose name it is issued.

(g) Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as a United States Military Purple Heart Medal recipient. These combination licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Military Department that the resident qualifies as a purple heart recipient.

Section 15. Donation of Big Game Licenses to a Disabled Veteran or to a Permanently Disabled Person Who Uses a Wheelchair.

(a) The holder of a valid big game license may surrender a big game license to the Department for reissuance to a disabled veteran or to a permanently disabled person who uses a wheelchair. The person surrendering the license may designate that their license be donated to a disabled veteran or to a permanently disabled person who uses a wheelchair, and may designate a qualified nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs. Donated licenses not designated to a qualified nonprofit charitable organization, or donated licenses not assigned to a sponsored individual within fifteen (15) days after a nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disability who use wheelchairs has been notified of license availability, shall be made available for reissuance on a first-come, first-served basis to a qualified nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(i) The unused, unaltered license with all coupons intact shall be submitted along with a form provided by the Department which indicates the license holders' desire to surrender the license issued in their name and donate the surrendered license under this Section. The person surrendering the license shall sign an affidavit verifying that the license was not used during any hunting season.

(ii) Any person surrendering a valid big game license to be reissued under this Section, shall not be eligible to receive a duplicate license for the same species, hunt area and type as the surrendered license.

(iii) A surrendered license shall count against the maximum number of licenses a person may otherwise apply for and receive as a condition of Commission regulation.

(iv) Any person surrendering a valid big game license for reissuance under this Section, for which preference points have been accumulated, shall not have preference points restored.

(b) The surrendered license shall be reissued by the Department's License Section to a qualified person who has been selected and sponsored by a nonprofit charitable organization providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(i) As a condition to reissue a license in this subsection, the Department shall require an authorized officer of the sponsoring organization to certify under penalty of law that the respective organization is a nonprofit charitable organization, that provides hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(ii) The sponsoring organization shall submit a completed application form for the issuance of a license on forms provided by the Department. Donated license applications, and any documentary evidence, shall be completed each year regardless of whether an applicant has received a donated license in a previous year.

(A) For a license being reissued to a disabled veteran, documentary evidence provided by the United States Department of Veterans Affairs that the applicant currently receives at least fifty percent (50%) or more service connected disability compensation shall be submitted with the application form.

(B) For a license being reissued to a permanently disabled person who uses a wheelchair, a statement by a licensed physician, on forms provided by the Department, that the applicant has a permanent disability that requires the applicant to, at all times, be confined to a wheelchair for mobility purposes.

(iii) The license shall be reissued to a qualified applicant at no fee.

(iv) The license shall be reissued for the same species, area and license type as the license donated.

Section 16. Active Duty Wyoming Resident in Combat Zone Licenses.

Complimentary resident general elk, resident general deer, resident game bird, resident small game and resident daily fishing licenses shall be issued to any Wyoming resident currently serving on active duty in the United States military deployed to a combat zone while home on military leave during the applicable hunting or fishing season. Applicants for licenses in this subsection shall meet the statutory requirements established in W. S. § 23-2-101 (a), and shall provide to the Department a valid, current military identification card, military leave orders indicating the resident is currently deployed to a combat zone and is returning to a combat zone at the end of the current leave period, a current Leave and Earnings Statement indicating the applicant is receiving hostile fire compensation and proof of residency at the time of application. Licenses shall be issued through the ELS at no fee to the applicant and shall only be issued at Headquarters or Department Regional Offices.

Section 17. Depredation Licenses. Application shall be made to Department Regional Offices in the region where participation is desired on application forms provided by the

Department. Applicants shall apply annually to be included on priority lists. Applicants shall make separate application for each species. Application dates and priority listing name placement on each list shall be established in accordance with Commission Regulation Chapter 34, Depredation Prevention Hunting Seasons.

Section 18. Party Applications – Initial Drawing. In the initial drawing, the maximum allowable number of completed applications in a party shall be six (6). Residents and nonresidents shall not apply together in the same party. Completed applications from landowner applicants shall not be accepted as a party with non-landowner applicants. Nonresidents applying in the drawing for special licenses shall not apply as a party with nonresidents applying in the drawing for regular licenses. No party applications shall be accepted for moose, bighorn sheep, mountain goat, or wild bison recreational hunting season licenses. Party applicants are required to submit their applications for the same species, hunt area, and type in the same order of preference.

Section 19. Proof of Residency for Resident Licenses, Permits or Preference Points.

(a) Any qualified individual may apply for or receive a resident game and fish license, permit or preference point if the person meets the residency requirements pursuant to W.S. § 23-1-102 (a) (ix) (xv) and § 23-1-107. When an individual signs an application to obtain a resident license, permit or preference point or signs a resident license or permit the individual swears that they are a Wyoming resident as defined in W.S. § 23-1-102 (a) (ix) (xv), § 23-1-107 and § 23-2-101 (a).

(b) Any person applying for or purchasing a resident license, permit, preference point, or tag shall provide proof of their residency. License selling agents and the Department shall consider as documentary evidence of residency the applicant's Wyoming driver's license or Wyoming identification card, a copy of their school records, a completed military form DD214, a completed and signed proof of residency statement on a form provided by the Department or a completed proof of residency affidavit issued through the ELS. Documentary evidence furnished by an applicant for a resident license shall not be considered conclusive proof in a court of law that the applicant is a resident in accordance with Wyoming statutes.

(c) A person qualifying as a Wyoming resident in accordance with W.S. § 23-1-107 (c) shall not gain or lose residency for the purpose of serving full time for a period not to exceed four (4) years in an established volunteer service program for charitable purposes, humanitarian purposes, or religious purposes. A letter, signed and notarized by the volunteer service program's director, which describes the services provided (including that they were provided without remuneration), the duration of service, and the hours served may be used to establish compliance with W.S. § 23-1-107 (c).

(d) A person qualified as a Wyoming resident as defined in W.S. § 23-1-102 (a) (ix) and § 23-1-107, is not considered a nonresident for the purposes of applying for or purchasing licenses, permits, tags or preference points.

Section 20. Application Dates.

(a) Completed applications for initial limited quota drawings, leftover drawings, purchase of preference points only; and applications for the Department's Super Tag Trifecta and Super Tag license competitive raffle, shall only be submitted through the ELS during the application periods stated in this section. Electronic applications shall provide for an electronic signature process for residency oaths, certification to the correctness of information provided, or any other assertions as may be required by this regulation on the completed applications.

Evidence of electronic signatures on drawing applications and licenses purchased may not be excluded in legal proceedings. Ref: W.S. § 40-21-113. The Department shall begin accepting completed applications at 8:00 a.m. on the first business day of the month or the specified date listed in subsections (d) and (e) of this Section.

(b) Completed applications submitted through the ELS shall not be accepted after 12:00 midnight Mountain Standard Time zone on the respective application deadline dates listed in subsection (e). If the deadline date occurs on a day when Headquarters has been closed for license sales (weekends, holiday, etc.), the ELS shall be available until 12:00 midnight Mountain Standard Time zone on the next business day.

(c) If the ELS is closed or otherwise unavailable to the public during the deadline date listed in subsection (e), the Department shall accept completed applications through the ELS until 12:00 midnight Mountain Standard Time zone on the next calendar day.

(d) Landowner License Application Dates: Completed applications for landowner licenses shall be submitted to the game warden or the regional wildlife supervisor in whose geographic area of responsibility the land listed on the application occurs or through the ELS. Completed applications for landowner licenses shall not be accepted after 12:00 midnight Mountain Standard Time zone on respective application dates listed in this subsection.

LICENSE	BEGINNING APPLICATION MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
ANTELOPE			
Limited Quota Nonresident Landowner	Jan.	May 15	May 31
Limited Quota Reduced Price Nonresident Landowner Doe/Fawn	Jan.	May 15	May 31
Limited Quota Resident Landowner	Jan.	May 15	May 31
Limited Quota Reduced Price Resident Landowner Doe/Fawn	Jan.	May 15	May 31
DEER			
Limited Quota Nonresident Landowner	Jan.	May 15	May 31

LICENSE	BEGINNING APPLICATION MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
DEER			
Limited Quota Resident Landowner	Jan.	May 15	May 31
Limited Quota Reduced Price Nonresident Landowner Doe/Fawn	Jan.	May 15	May 31
Limited Quota Reduced Price Resident Landowner Doe/Fawn	Jan.	May 15	May 31
ELK			
Limited Quota Nonresident Landowner	Jan.	Jan. 31	May 8
Limited Quota Reduced Price Nonresident Landowner Cow/Calf	Jan.	Jan. 31	May 8
Limited Quota Reduced Price Resident Landowner Cow/Calf	Jan.	May 15	May 31
Limited Quota Resident Landowner	Jan.	May 15	May 31
WILD TURKEY			
Limited Quota Nonresident Landowner			
Spring	Jan.	Jan. 20	Feb. 3
Fall	Apr.	May 31	May. 31
Limited Quota Resident Landowner			
Spring	Jan.	Jan. 20	Feb. 3
Fall	Apr.	May 31	May. 31

(e) Non-Landowner Application Dates:

LICENSE	BEGINNING APPLICATION MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
ANTELOPE			
Limited Quota Nonresident	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Doe/Fawn	Jan.	May 31	May 31
Limited Quota Reduced Price Resident Doe/Fawn	Jan.	May 31	May 31
Limited Quota Resident	Jan.	May 31	May 31
BIGHORN SHEEP			
Limited Quota Nonresident	Jan.	Feb. 28*	Apr. 15

LICENSE	BEGINNING APPLICATION MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
BIGHORN SHEEP			
Limited Quota Resident	Jan.	Feb. 28*	Apr. 15
Nonresident Preference Point Only	Jul.	Oct. 31	n/a
Resident Preference Point Only	Jul.	Oct. 31	n/a
COMPETITIVE RAFFLE CHANCES			
Super Tag License	Jul. 15	Jul. 1	n/a
Super Tag Trifecta License	Jul. 15	Jul. 1	n/a
DEER			
General and Limited Quota Resident	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Doe/Fawn	Jan.	May 31	May 31
Limited Quota Reduced Price Resident Doe/Fawn	Jan.	May 31	May 31
Nonresident Preference Point Only	Jul.	Oct. 31	n/a
Region and Limited Quota Nonresident	Jan.	May 31	May 31
ELK			
General and Limited Quota Nonresident	Jan.	Jan. 31	May 8
General and Limited Quota Resident	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Cow/Calf	Jan.	Jan. 31	May 8
Limited Quota Reduced Price Resident Cow/Calf	Jan.	May 31	May 31
Nonresident Preference Point Only	Jul.	Oct. 31	n/a
FURBEARING ANIMAL			
Limited Quota Furbearing Animal Trapping Permit	Apr.	May 31	n/a
MOOSE			
Limited Quota Nonresident	Jan.	Feb. 28*	Apr. 15
Limited Quota Resident	Jan.	Feb. 28*	Apr. 15
Nonresident Preference Point Only	Jul.	Oct. 31	n/a
Resident Preference Point Only	Jul.	Oct. 31	n/a

LICENSE	BEGINNING APPLICATION MONTH	LASTE DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
MOUNTAIN GOAT			
Limited Quota Nonresident	Jan.	Feb. 28*	Apr. 15
Limited Quota Resident	Jan.	Feb. 28*	Apr. 15
PHEASANT			
Glendo Permit	Apr.	May 31	n/a
Springer Permit	Apr.	May 31	n/a
PREFERENCE POINT ONLY			
Nonresident	Jul.	Oct. 31	n/a
Resident	Jul.	Oct. 31	n/a
SANDHILL CRANE			
Limited Quota	Apr.	May 31	n/a
WILD BISON			
	Mar.	Mar. 31	Apr. 15
WILD TURKEY			
Limited Quota Nonresident Spring Fall	Jan. Apr.	Jan. 31 May 31	Feb. 3 May. 31
Nonresident General Spring Fall	Jan. Jul.	Jan. 31 Jan. 31	Feb. 3 Feb. 3
Limited Quota Resident Spring Fall	Jan. Apr.	Jan. 31 May 31	Feb. 3 May. 31
Resident General Spring Fall	Jan. Jul.	Jan. 31 Jan. 31	Feb. 3 Feb. 3

* February 29 on leap year

Section 21. Drawing Advantage. The Department shall develop and maintain a license issue system that allows qualified persons, as prescribed below, who have either purchased a preference point or were unsuccessful in the preference point drawing for a full price bighorn sheep or moose license, or purchased a preference point for nonresident antelope, deer or elk, a drawing advantage in future years as prescribed in Wyoming statutes. All applicants participate in the preference point drawing regardless of their preference point balance.

(a) All preference points accumulated through methods not authorized by this regulation or statute shall be subject to deletion.

(b) Preference points shall be assigned to persons who apply to receive preference points during authorized application periods. The following provisions apply to the issuance of preference points.

(i) No person shall apply for or receive a preference point during any calendar year in which the person's privilege to obtain a license has been revoked or suspended by a court or the Wildlife Violator Compact.

(ii) Preference points are not transferable from one person to another or from one species to another.

(iii) No person may apply for more than one (1) preference point per species in the same calendar year. If the applicant applies for a preference point for moose or bighorn sheep during the initial license drawing period and is either awarded a preference point or receives their first choice license in the initial drawing, they shall not apply for a preference point for the same species during the preference point only application period in the same calendar year. Any preference point awarded in a calendar year shall not be considered for advantage in any license drawings during the same calendar year in which it was awarded.

(iv) A person shall not apply for or receive a separate preference point in the same calendar year in which the person receives a full price bighorn sheep or moose license or a first choice license in the initial drawing for nonresident antelope, deer or elk.

(v) A person eleven (11) years of age may apply for a preference point if the person shall become twelve (12) years of age in the same calendar year as the application for a preference point is made.

(vi) For the purpose of assigning preference points in this Section, any unsuccessful full price bighorn sheep or moose license applicant failing to apply for a license or preference point during a second consecutive calendar year shall lose all accumulated preference points and shall be considered as a first year applicant for any subsequent calendar year in which the applicant submits an application for a license or a preference point for that particular species.

(vii) For the purpose of retaining nonresident antelope, deer or elk preference points in this Section, any sportsperson failing to purchase a preference point within two (2) consecutive calendar years shall lose all accumulated preference points for that species and shall be considered as a first year applicant for any subsequent calendar year in which the applicant submits an application for a license.

(viii) For the purpose of retaining bighorn sheep and moose preference points in this Section, any sportsperson whose residency status changes and who has accumulated preference points shall retain those points as long as the sportsperson applies for a license for that

particular species within two (2) consecutive calendar years. Failing to apply for a license or preference point within two (2) consecutive calendar years, the sportsperson shall lose all accumulated preference points for that particular species.

(ix) A person may only request to contest their preference point values to the License Review Board for the five (5) year period immediately preceding their request.

(c) If a person desires to apply for a preference point only and not receive a license, the person shall apply for and receive a preference point by paying the proper fee and making application during the preference point only application period specified in Section 20 of this regulation.

(d) If an applicant's preference points have been deleted because the applicant caused more than one (1) customer record to be generated then those preference points shall not be restored. The Fiscal Division Chief may make an exception in the case of name changes because of marriage, divorce, adoption, or legal name change.

(e) The preference points associated with a sportsperson identification number provided on an application shall be the only preference points considered for an individual applicant participating in a preference point drawing.

(f) Upon drawing a full price bighorn sheep or moose license, all accumulated preference points by the applicant for that species shall be deleted. No person shall apply for or receive a full price bighorn sheep license or preference point for full price bighorn sheep within any consecutive five (5) year period of having received a full price bighorn sheep license through the drawing. No person shall apply for or receive a moose license or preference point for moose within any consecutive five (5) year period of having received a moose license through the drawing.

(i) Preference points are assigned to residents and nonresidents who are unsuccessful in either the full price bighorn sheep or moose drawings. The nonresident preference point fee, in addition to the statutorily prescribed application fee, shall be retained from the license fee remitted. The preference point fee for nonresidents shall be one hundred fifty dollars (\$150) for full price bighorn sheep and one hundred fifty dollars (\$150) for moose.

(ii) In lieu of applying for a full price bighorn sheep or moose license, a person may elect to purchase a preference point for each species. The applicant is not required to pay the statutorily prescribed application fee. The preference point fee for residents shall be seven dollars (\$7) per species and the fee for nonresidents shall be one hundred fifty dollars (\$150) for full price bighorn sheep, and one hundred fifty dollars (\$150) for moose.

(g) A preference point shall only be assigned to nonresident antelope, deer or elk applicants who participate in the initial drawing for full price licenses and who have remitted the proper preference point fee and who are unsuccessful in drawing their first choice license. The preference point fee, in addition to the statutorily prescribed application fee, shall be retained

from the total amount remitted. The preference point fee for nonresidents shall be thirty-one dollars (\$31) for antelope, forty-one dollars (\$41) for deer, fifty-two dollars (\$52) for elk and ten dollars (\$10) per species for nonresident youth.

(i) In lieu of applying for a nonresident antelope, deer or elk license and remitting the proper preference point fee, a nonresident applicant may elect to purchase a preference point for each species. The preference point fee for nonresidents shall be thirty-one dollars (\$31) for antelope, forty-one dollars (\$41) for deer, fifty-two dollars (\$52) for elk and ten dollars (\$10) per species for nonresident youth. The applicant, when only applying for preference points, is not required to pay the statutorily prescribed application fee. Individuals who have drawn their first choice license in the initial draw are prohibited from purchasing or receiving a preference point in the same calendar year.

(ii) Upon drawing a license for the applicant's first choice in the initial drawing for nonresident antelope, deer or elk, all accumulated preference points by the applicant for that species shall be deleted and the applicant shall be prohibited from purchasing a preference point for that species in the same calendar year.

Section 22. Leftover Drawing. Limited quota licenses that were not issued through the initial drawings shall be offered in a competitive leftover drawing.

(a) A leftover drawing shall be conducted for antelope, bighorn sheep, deer, elk, moose, wild bison and mountain goat licenses remaining after the initial drawings.

(b) The application period shall be determined on an annual basis by the Fiscal Division Chief. Completed applications and license fees must be submitted during the application period.

(c) Both residents and nonresidents shall draw against the same quota.

(d) The maximum allowable number of applications in a party shall be six (6). Residents and nonresidents may apply together in the same party. Party applicants are required to submit their applications for the same species, hunt area and type in the same order of preference. All members of a party may either receive licenses or refunds on their license fees.

(e) All applicants shall participate in the respective random leftover drawing, giving no advantage to applicants with preference points.

Section 23. Reservation of Full Price Licenses. Individuals who have been issued a Governor's Complimentary License for a full price big game animal and who have been unable to use the license for good cause, may reserve a license for the same species for the immediately succeeding hunting season only. Individuals who have been issued a limited quota, full price big or trophy game license and who have been unable to use the license for good cause may reserve a license for the same species, hunt area, and season type for the immediately succeeding hunting season only.

(a) To qualify for consideration of reservation of a limited quota, full price big or trophy game license due to a majority of the hunting opportunity being lost due to administrative actions of a governmental agency or due to a natural disaster, the licensee shall:

- (i) Request the reservation on a form provided by the Department;
- (ii) Submit the unused and unaltered license with all coupons intact to the Department; and,
- (iii) Sign an affidavit verifying that the licensee did not exercise any hunting privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

(b) To qualify for consideration of reservation of a limited quota, full price big or trophy game license due to disabling injury or illness, the licensee shall:

- (i) Request the reservation on a form provide by the Department;
- (ii) Submit the unused and unaltered license with all coupons intact to the Department;
- (iii) Submit a Physician Certification for License Reservation Form and a written “Restriction from Hunting Activity” statement, written on the physician’s official prescription slip or physician’s letterhead within thirty (30) days from the date an applicant’s completed License Reservation Request Form is received by the Department; and,
- (iv) Sign an affidavit verifying that the licensee did not exercise any hunting privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

(c) To qualify for consideration of reservation of a limited quota, full price big or trophy game license for reasons related to being unable to use the license for good cause concerning military personnel who receive permanent change of station (PCS) orders or are assigned away from their home duty station on temporary order (TDY) for the majority of the regular season, the licensee shall:

- (i) Request the reservation on a form provided by the Department;
- (ii) Provide the Department a copy of official military orders from the Armed Forces of the United States;
- (iii) Submit the unused and unaltered license with all coupons intact to the Department; and,
- (iv) Sign an affidavit verifying that the licensee did not exercise any hunting

privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

(d) All requests for the reservation of licenses shall be reviewed and determined by the License Review Board.

(i) For any license reservation in which the hunting season to use the license expires on December 31 of the year issued, the deadline to submit a request for a license reservation shall be December 31 of that year.

(ii) For any license reservation in which the hunting season to use the license has been extended into January of the succeeding calendar year, the deadline to submit a request for a license reservation shall be January 31 of the year in which the hunting license expires.

(iii) For all other licenses, the deadline to submit a request for a license reservation shall be on the last date the individual license is valid.

(e) Any resident who has been granted a limited quota elk or limited quota deer license reservation from the License Review Board related to being unable to use the license for good cause may subsequently purchase a general license, if eligible, for the same species during the current hunting season.

(f) Prior to the respective drawing, license quotas in the subsequent hunting season for areas where licenses have been reserved may be adjusted to reflect reservations as provided by Wyoming statute and this Chapter.

(g) In circumstances where related season, quota or sex limitation of the hunt area for the unused license changes in the subsequent hunting season, the following options shall be offered:

(i) If the unused license allowed taking either sex of animal, but that type no longer exists, the licensee shall be given a choice of a license for an antlered (male) or antlerless (female) animal in the subsequent hunting season.

(ii) If the unused license was limited to taking an antlerless or female animal, but that license type no longer exists, the licensee shall be given either an any or an antlered or male only license at the Department's discretion in the subsequent hunting season.

(iii) If the license was limited to taking an antlered or male animal, but that type no longer exists, the licensee shall be given either an any or an antlerless or female only license at the Department's discretion in the subsequent hunting season.

(iv) If in the subsequent hunting season, the entire hunt area is closed to hunting of the species listed on the unused license, the licensee shall be offered a license for the same species and sex limitations in another area of the licensee's choice.

(v) If in the next hunting season, the entire state has been closed to hunting of the species listed on the unused license, the licensee shall not be issued another license to hunt that species. Under this circumstance, the licensee shall be issued a refund of the fee paid for the unused license.

(h) Applicants requesting the reservation of a limited quota, full price big or trophy game license shall submit the administrative fee of ten dollars (\$10) no later than May 15 in the succeeding calendar year, along with a completed Department form prior to the reissuance of the license.

(i) Any limited quota, full price big or trophy game license that is reissued to a qualified applicant shall count toward the total number of licenses a person may apply for and receive during any one calendar year.

(j) Any person who has been granted a license reservation under this section, for which preference points have been accumulated, shall not have preference points restored and may not be eligible to purchase a preference point for that species during the same year the original license was issued.

(k) Any person who has been granted a license reservation under this section shall not be eligible to participate in the initial drawing the following year for the same species and license type.

Section 24. Applicant Disqualification. The applicant(s) is solely responsible for the veracity of information on the completed application submitted through the ELS. Applications shall be disqualified from participating in drawings for the following reasons:

(a) The applicant's privilege to purchase or receive any hunting license or preference points has been suspended by a court order or the Wildlife Violator Compact;

(b) The applicant causes more than one (1) sportsperson identification number to have been assigned;

(c) Submission by an individual of more than one (1) completed application for a license for the same big or trophy game species, wild turkey or wild bison unless authorized by Commission regulation;

(d) Applying for a license the applicant is not eligible to receive by Rule and Regulation or Statute;

(e) The applicant will not reach twelve (12) years of age by December 31 of the year the application is made for the purchase of a preference point. An applicant less than twelve (12) years of age may apply for and receive a big or trophy game hunting license provided the applicant will reach twelve (12) years of age during the season for the designated species as specified in Commission Rules and Regulations during the year for which the license is valid.

(f) The applicant attempts to manipulate or circumvent Department licensing security procedures in the ELS system in order to submit or modify an application.

(g) Any person who has an application disqualified under this section 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.

Section 25. Suspension or Revocation of License.

(a) Non-Payment of Child Support.

(i) Upon receipt from the Department of Family Services of a certified copy of an order from a Court to withhold, suspend, or otherwise restrict a license or preference point issued by the Commission, the Game and Fish Department shall notify the party named in the court order by first-class mail of the withholding, suspension, or restriction in accordance with the court order. The Game and Fish Department shall mail this notice by first-class mail to the party named and to the address provided by the Department of Family Services.

(ii) Upon receipt of a notice from the Department of Family Services that the obligor is in compliance with the court order, the Game and Fish Department shall immediately reinstate the license unless the license has been suspended or revoked for other reasons. The Department shall by first-class mail notify the party named and to the address provided by the Department of Family Services that the individual's license privileges have been reinstated. The Department shall also mail by first-class mail to the obligor any licenses in the Game and Fish Department's possession at the time of reinstatement.

(iii) The Department shall maintain a written record indicating to whom the notice was mailed and the address to which the notice was mailed.

(b) Wildlife Violator Compact. The Department may suspend license privileges in accordance with Commission Regulation, Chapter 54, Home State Suspension Procedures for the Wildlife Violator Compact dated July 10, 2015, and which does not include any later amendments or editions of the incorporated matter.

Section 26. Withdrawal or Modification of Application, Refund of License Fees and Reissuance of Certain Licenses. Licenses, permits, stamps, tags, preference points or competitive raffle chances issued under Title 23, Wyoming Statutes or this regulation become the permanent property of the licensee and shall not be canceled or any fee refunded after the license, permit, stamp, tag, preference point or competitive raffle chance(s) has been issued, except as specified in this section or otherwise as set forth in Commission regulation.

(a) A request for a voluntary withdrawal of an application before a drawing shall be accepted through the ELS by the date indicated in Section 20(d) and (e) for the initial drawing, and by the application closing date for the leftover drawing.

(i) Applicants may not submit a voluntary withdrawal form for the purchase of a preference point only, Super Tag or Super Tag Trifecta competitive raffle chance.

(b) A modification of an application must be completed through the ELS by the date indicated in Section 20(d) and (e) for the initial drawing, and by the application closing date for the leftover drawing.

(i) An applicant may only request changes to hunt area and type or change their withdrawal flag indicator on their reduced price application for the initial drawing through the ELS.

(c) To request a refund of a license fee in this subsection, the licensee shall submit the request for a refund in writing along with the license unaltered and with all coupons intact to the Department during the calendar year for which the license is valid. The licensee shall also execute and submit at the time of a refund request a Department affidavit describing the reason(s) the licensee was not able to exercise the license privileges which includes a sworn statement that the licensee did not exercise any hunting privileges granted by the license including any or all seasons for the designated species as specified in Commission regulation during the calendar year for which the license was valid. If the license is destroyed, lost or illegible, the licensee shall state on the Department affidavit to that effect and submit with the written request for refund in the calendar year for which the license is valid. If the licensee is granted a refund for a license, the individual may apply for and receive any remaining issue-after license for the same species in accordance with state statutes and Commission regulations. Application fees and any applicable preference point fees will not be refunded. All license refund requests shall be reviewed and determined by the License Review Board.

(d) To qualify for a refund of a license fee in accordance with this section, the licensee shall meet one (1) of the following provisions:

(i) In the case of the death of the licensee, a written request for a license refund supported by a copy of the respective death certificate shall be submitted to the Department. The date of death on such certificate shall have resulted in the licensee not being able to participate in the majority of the regular or special archery season. All refunds issued under this subsection shall be made payable to the estate of the decedent unless the license fee was paid by a nonprofit charitable organization. The nonprofit charitable organization shall provide supporting documentation of payment of the license fee.

(ii) In the case of the death of the licensee's spouse, parents, grandparents, siblings, lineal descendants and their spouses, step-parent, step-sibling, step-children, father-in-law, mother-in-law, brother-in-law, sister-in-law, step-son-in-law or step-daughter-in-law or the death of a member of a party application, the licensee shall submit a written request on a form provided by the Department for a license refund supported by the respective death certificate. The date of death shall have resulted in the licensee not being able to participate in the majority of the regular or special archery season.

(iii) In the case of incapacitating illness or injury of the licensee, the licensee's spouse, parents, grandparents, siblings, lineal descendants and their spouses, step-parent, step-sibling, step-children, father-in-law, mother-in-law, brother-in-law, sister-in-law, step-son-in-law or step-daughter-in-law, or incapacitating illness or injury of a member of a party application, supported by a physician's sworn statement on a Department form that the licensee is incapable of performing tasks necessary to exercise the privileges of the license;

(iv) Military personnel who receive permanent change of station (PCS) orders and military personnel who are assigned away from their home duty station on temporary orders (TDY) for the majority of the regular season, all of this being supported by a copy of official military orders from the Armed Forces of the United States, and such orders require the affected personnel to move away from their home duty station, shall accompany the written request for the license refund;

(v) Individuals who are not able to participate in the majority of the regular season for the species specified in Commission rules and regulations during the year for which the license is issued as a result of a court subpoena, jury duty, Grand Jury investigation or attorneys required to attend criminal cases. A certified copy of the court document shall accompany the written request for the license refund;

(vi) When the Department determines fifty percent (50%) or more of the hunting opportunity and access to the public land within an individual hunt area outside of designated wilderness has been closed due to administrative actions of the state or federal government in closing of the public access to public lands, or due to a natural disaster, including but not necessarily limited to, wildland fires, the licensee of a limited quota antelope, full price bighorn sheep, limited quota deer, limited quota elk, moose, mountain goat, or wild bison license may request a license fee refund;

(A) When the Department determines one hundred percent (100%) of all the hunt areas are closed or the hunting season is prevented from occurring due to administrative actions of the state or federal government, a black bear, gray wolf, mountain lion or wild bison licensee may request a license fee refund. The closing of hunt areas due to harvest quotas being met does not qualify a licensee for a license fee refund.

(vii) An error on the part of the Department or its authorized agent where the applicant has been issued a license not requested. An applicant may request in writing to the License Review Board to review a decision made by a Department employee or an agent of the Department in the handling of the application for, or the issuance of a license, permit, or preference point if the decision is contrary to statute or rule and regulation promulgated by the Commission. All decisions of the License Review Board shall abide by provisions of state and federal statutes and Commission regulations.

(viii) Any youth licensee may be granted a license refund if the youth licensee's opportunity to hunt is jeopardized as a result of any license refund granted by the Department as specified in sections (i), (ii), (iii), (iv), (v), (vi), (vii), or (viii) of this subsection;

(ix) A sponsoring organization of a person with a life-threatening illness that has received a license under Section 13 may be granted a license refund if the licensee's opportunity to hunt is jeopardized as a result of incapacitating illness or injury supported by a physician's sworn statement on forms provided by the Department that the licensee is incapable of performing tasks necessary to exercise the privileges of the license.

(e) Refunds shall not be allowed under the following circumstances:

(i) The licensee illegally purchased more licenses than what was authorized for purchase by Commission regulation or Wyoming statute;

(ii) For any license, permit or stamp in which the hunting season to use the license, permit or stamp expires on December 31 in the year issued, the deadline to submit a written request for a refund shall be December 31 of that year.

(iii) For any license in which the hunting season to use that license has been extended into January of the succeeding calendar year, the deadline to submit a written request for a refund of that license shall be January 31 of the year in which the hunting season expires. For all other licenses, the deadline to submit a written request for refund shall be on the last date the individual license is valid.

(iv) Refunds shall be denied in any circumstance where the licensee hunted on the license for the designated species as specified in Commission rules and regulations, including special archery seasons, during the year for which the license is issued.

(f) There shall be no right of appeal to the Commission for any decision rendered by the License Review Board or the Department for any provision of this section.

(g) Restoration of preference points. In any case where a license may be obtained by the accumulation of preference points, or preference points may be obtained in lieu of application for a license and a license refund is granted by the Department, all accumulated preference points, including any preference point that may have been earned for the year the license is issued, shall be restored to the applicant.

(h) In the case of the death of a licensee who has been issued an any wild bison license or a mountain goat license, a written request for the license to be surrendered to the Department and reissued to an immediate family member of the decedent shall be made to the License Review Board. The request shall be supported by a copy of the respective death certificate, and the date of death on such certificate shall have resulted in the licensee not being able to participate in the majority of the regular or special archery hunting season.

(i) The license shall be reissued to a qualified immediate family member of the decedent at no fee.

(ii) The license shall be reissued for the same species, hunt area and license type as the license surrendered.

(iii) A license reissued to an immediate family member of a decedent shall count against the maximum number of licenses a person may otherwise apply for and receive as a condition of Commission regulations.

Section 27. Alteration or Transfer of Licenses, Permits, Stamps, Tags, Preference Points or Competitive Raffle Chances to Another Person Prohibited; Use by Another Person Prohibited; Invalidation by Improper Fees. Department licenses, permits, stamps or tags shall not be altered by anyone other than authorized Department personnel.

(a) No license, permit, stamp, tag, preference point or competitive raffle chances shall be transferred, or used for the purpose of taking wildlife, except by the individual to whom it was issued and therein named and while in that individual's possession. No individual shall take or attempt to take any wildlife using another individual's license, permit, stamp or tag. Any license, permit, stamp, tag, preference point or competitive raffle chances shall not be valid unless the proper fees have been received by the Department.

(b) Licenses, excluding lifetime licenses, shall only become valid when signed by the person in whose name the license is issued in the space provided on the license for the owner's signature, and where applicable, co-signed by a parent or legal guardian.

(c) Any Department enforcement officer may seize as evidence any license, permit, stamp or tag that was obtained in violation of Commission regulations or Wyoming statute.

Section 28. License and Conservation Stamp Expiration.

(a) Fishing licenses, small game licenses, game bird licenses, combination small game/game bird licenses, furbearer hunting or trapping licenses and game bird farm licenses shall be valid until the expiration date as indicated on the individual license. All other licenses expire on the last day of the calendar year in which issued.

(b) The Commission by regulation provides that big game animal and wild bison licenses issued in one (1) calendar year are valid through the closing date established in January of the next succeeding calendar year when the Commission establishes a hunting season for big game animals or wild bison for which the licenses are valid for hunting seasons that open during one (1) calendar year and close in January of the next succeeding calendar year.

(c) All daily hunting or fishing licenses shall only be valid for the calendar day(s) delineated on the license. A nonresident five (5) day fishing license is only valid for five (5) consecutive calendar days.

(d) Conservation Stamps.

(i) Printed Conservation Stamps shall expire on the last day of the calendar year printed on the stamp.

(ii) Conservation Stamp Authorizations issued through the ELS shall expire twelve (12) months from the date of purchase or twelve (12) months from the previous Conservation Stamp expiration date as indicated on the stamp.

Section 29. Super Tag Licenses and Super Tag Trifecta Licenses. Wyoming statutes provide for the issuance of big game, trophy game and wild bison licenses to be issued through a competitive raffle process. Big game, trophy game and wild bison licenses authorized under this section shall be valid for the species for which the license has been issued.

(a) These licenses shall be valid in any hunt area in accordance with Commission regulations, except for the following:

(i) A Super Tag License or a Super Tag Trifecta License for moose shall not be valid in any moose hunt area which has a total quota of ten (10) or less antlered or any moose licenses.

(ii) A Super Tag License or a Super Tag Trifecta License for full price bighorn sheep shall not be valid in any bighorn sheep hunt area which has a total quota of eight (8) or less full price bighorn sheep licenses.

(iii) A Super Tag License or a Super Tag Trifecta License shall not be valid within Grand Teton National Park.

(iv) A Super Tag License or a Super Tag Trifecta License for wild bison shall not be valid in any wild bison hunt area which has a total quota of ten (10) or less any wild bison licenses.

(b) Recipients of a Super Tag License and Super Tag Trifecta License shall be exempt from the provisions in this Chapter limiting the number of big game, trophy game or wild bison licenses an individual may possess in any one (1) calendar year. An individual is eligible to receive a Super Tag License or Super Tag Trifecta License for big game, trophy game or wild bison annually. Recipients shall be exempt from the five (5) year waiting period and preference points shall not be lost if an individual receives a Super Tag License or Super Tag Trifecta License for moose or a full price bighorn sheep and shall be exempt from the once in a lifetime license restriction for mountain goat and wild bison licenses. Preference points shall not be lost if an individual receives a Super Tag License or Super Tag Trifecta License for antelope, deer or elk.

(c) There shall be up to eleven (11) successful recipients of licenses from all the individuals that purchased a Super Tag License or Super Tag Trifecta License competitive raffle chance. Up to ten (10) individual recipients shall be issued one Super Tag License as follows: one (1) antelope license, or one (1) bighorn sheep license, or one (1) black bear license, or one (1) deer license, or one (1) elk license, or one (1) gray wolf license, or one (1) moose license, or one (1) mountain goat license, or one (1) mountain lion license or one (1) wild bison license. The successful recipient of a Super Tag License shall be based on what species of big game, trophy game or wild bison license was randomly drawn for the participating recipient. One (1)

successful applicant shall be issued Super Tag Trifecta Licenses, allowing that individual to choose, at their discretion, no more than three (3) different species of big game, trophy game and wild bison licenses.

(d) Super Tag License and Super Tag Trifecta License competitive raffle chances shall be sold annually beginning on July 15 and ending on July 1 each succeeding year.

(i) The price for a single Super Tag License competitive raffle chance shall be ten dollars (\$10) for both residents and nonresidents. The price for a single Super Tag Trifecta License competitive raffle chance shall be thirty dollars (\$30) for both residents and nonresidents. The number of competitive raffle chances that any one person may purchase is not limited in number.

(ii) For an individual species Super Tag License competitive raffle chance, a person shall choose which species of big game or trophy game or wild bison they purchase a competitive raffle chance for. An applicant may choose to purchase a competitive raffle chance(s) for multiple species.

(iii) For a Super Tag Trifecta License competitive raffle chance, a person does not need to select the individual species of big game or trophy game or wild bison at the time they purchase a raffle chance.

(iv) A person purchasing a Super Tag License or Super Tag Trifecta License competitive raffle chance shall not be eligible to submit a voluntary withdrawal form or be eligible for a refund for competitive raffle chances purchased.

(e) A competitive drawing shall be conducted to determine the winners of the individual species Super Tag Licenses and Super Tag Trifecta License.

(i) There shall be no preference given to residents or nonresidents in the drawing or issuance of a Super Tag License or Super Tag Trifecta License.

(f) License fees for successful Super Tag License and Super Tag Trifecta License holders shall be as set forth in Wyoming Statute or Commission regulation.

(g) No person shall purchase a competitive raffle chance for a Super Tag License or Super Tag Trifecta License during any calendar year in which the person's privilege to obtain a license or preference point has been revoked or suspended by a court or the Wildlife Violator Compact.

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

CHAPTER 44

REGULATION FOR ISSUANCE OF LICENSES, PERMITS, STAMPS, TAGS, PREFERENCE POINTS AND COMPETITIVE RAFFLE CHANCES

Section 1. Authority. This regulation is promulgated by authority of Wyoming Statutes § 6-7-101, § 9-4-217(h), § 20-6-112, § 23-1-102, § 23-1-107, § 23-1-302, § 23-1-702, § 23-1-703, § 23-1-704, § 23-1-705, § 23-2-101, § 23-2-102, § 23-2-107, § 23-2-109, § 23-2-201, § 23-2-207, § 23-2-301, § 23-2-306, § 23-2-307, § 23-2-401 and § 23-3-403, § 23-6-301 through § 23-6-303.

Section 2. Regulation. The Commission authorizes the Department to issue licenses, permits, stamps, tags, preference points and competitive raffle chances, and to develop and maintain policies, processes and procedures necessary to carry out the provisions of this Chapter. The Commission hereby adopts the following regulation governing the issuance of licenses. This regulation shall remain in effect until modified or repealed by the Commission.

Section 3. Definitions. For the purpose of this regulation, definitions shall be as set forth in Title 23, Wyoming Statutes, Commission regulations and the Commission also adopts the following definitions:

(a) “Application Fee” means a fee authorized by the Legislature enabling the Department to recover a portion of its costs associated with compensating owners or lessees of property damaged by game animals and game birds. In addition, the application fee is used by the Department to recover costs associated with license issuance. This fee is nonrefundable.

(b) “Charitable Purpose” means motivated by sympathy and understanding and generosity and done without any remuneration.

(c) “Commissioner Complimentary License” means an antelope, deer or elk license issued at the existing statutory price at the request of a Commissioner.

(d) “Completed Application” means all required portions of the application have been properly completed with correct applicant information, submitted within the proper time period and accompanied by the proper fee. A completed application includes the applicant’s name, physical address, mailing address if different than the physical address, date of birth, physical description (height, weight, eyes, hair and sex), telephone number or email address, years of residency and proof of residency for resident fee types, Social Security Number (SSN), Individual Tax Identification Number (ITIN) or Passport Number from non-U.S. citizens, desired valid hunting license specifications, and an original signature for residents submitting paper applications. Completed application specifications refer to licenses sold through the Electronic Licensing Service (ELS) and manually issued licenses and permits.

(e) “Disabilities” as used in this Chapter means permanent anatomical, physiological or mental deficiencies that prevent or restrict normal achievement.

(f) “Document” means an instrument on which information has been recorded by means of letters, figures, or marks and which may be used as evidence.

(g) “Documentary Evidence” means evidence furnished by written instruments, inscriptions, or documents of all kinds.

(h) “Duplicate License” means a license issued by the Department to replace an original license that is valid and has not expired and has been lost or destroyed. If the original license was issued through the Electronic Licensing Service (ELS), a duplicate license shall only be required if the original license contained a carcass coupon; ~~otherwise, a replacement license may be issued.~~

(i) “Electronic Application” means the license or permit application form submitted through the Electronic Licensing Service (ELS).

(j) “Electronic Licensing Service (ELS)” means the Department’s Electronic Draw Application System, Internet Point of Sale System and Online Internet Sales System used by the Department, license selling agents and the public to apply for or purchase licenses, permits, stamps, tags and preference points.

(k) “Electronic Signature” means an electronic process attached to or logically associated with any electronic transaction including the license, preference point or permit application submitted to the Wyoming Game and Fish Department that requires substantiation of the identity of the person initiating the electronic transaction. This process includes, but may not be limited to, use of personal credentials to gain access to the system, entering a keystroke at a specified prompt that indicates the submitter’s acceptance of an assertive statement, or the use of any other technology that is in compliance with the state of Wyoming’s Electronic Signature Rules as promulgated by the Office of the Chief Information Officer. This process can be used to indicate the applicant’s acceptance of an assertion such as a residency requirement or veracity of the application at a specified prompt. Ref: W.S. § 40-21-102 (a) (viii).

(l) “Full Price License” means a deer, antelope, elk, mountain lion or ram bighorn sheep license issued that is not a reduced price doe/fawn, cow/calf, ewe/lamb or mountain lion license.

(m) “Full Time” means performing duties and responsibilities at the request or direction of an established charitable, humanitarian, or religious organization for more than thirty (30) hours per calendar week every week the person is absent from the state.

(n) “General Licenses” means big or trophy game or wild turkey licenses valid in any hunt area in which licenses have not been totally limited in number. General licenses shall be

valid only under species, sex, age class and harvest limitations that are in effect for each hunt area.

(o) “Governor Complimentary License” means hunting or fishing license issued for no fee at the request of the Governor.

(p) “Gunpowder or Buckskin Hunt” means the annual Gunpowder and Buckskin Hunt conducted by the Sheridan, Wyoming Rotary Club.

(q) “Headquarters” means the Cheyenne Office of the Wyoming Game and Fish Department located at 5400 Bishop Blvd., Cheyenne, WY 82006.

(r) “Humanitarian Purpose” means for the promotion of human welfare and the advancement of social reforms and done without remuneration.

(s) “Immediate Family Member of the Decedent” means spouse, parent, grandparent, sibling or lineal descendants and their spouses.

(t) “Initial Drawing” means a computer processed drawing held for initial offering of resident and nonresident licenses and permits.

(u) “Issue-After License” means licenses that are limited in number and that were not issued in the initial or leftover drawings; these licenses shall be issued on an as processed basis through the ELS.

(v) “Landowner” means an individual, partnership, corporation, trust, limited liability company or combination of these, which either owns real property in fee simple title or is acquiring equitable interest by written contract.

(w) “Landowner Applicant” means an individual who either owns real property solely or jointly with other individuals or who holds an interest in a corporation, partnership, trust or limited liability company, which owns real property or is a member of the “immediate family” of the individual.

(x) “Landowner Applicant’s Immediate Family” means the landowner applicant’s spouse, landowner applicant’s parents, landowner applicant’s grandparents, landowner applicant’s lineal descendants and their spouses, or landowner applicant’s siblings.

(y) “Leftover Drawing” means a computer processed random drawing to issue licenses remaining after the initial drawings.

(z) “Leftover Licenses” means limited quota licenses and nonresident region general deer licenses issued in the leftover drawing.

(aa) “Leftover Permits” means permits that are limited in number and were not issued in the initial drawing and shall be issued on an as processed basis through the ELS.

(bb) “License” means a document issued by the Department, through the authority of the Commission, to a qualified individual that grants certain privileges to take fish or wildlife in accordance with statutory or regulatory provisions.

(cc) “License Authorization” means a document approved by the Governor or by a member of the Commission that empowers the Department to issue a Governor complimentary or Commissioner complimentary license in the name of the applicant designated on the document.

(dd) “License Review Board” means a three (3) member board of Department employees consisting of the Deputy Director of Internal Operations, the Fiscal Division Chief and the Chief Game Warden, or their designee, that review and determine all license reservation requests, license refund requests, preference point issues and other license or permit issuance matters.

(ee) “Limited Quota Drawing” means the processing of an application for limited quota or general big game licenses, trophy game licenses, wild turkey licenses, permits, wild bison licenses or Super Tag and Super Tag Trifecta competitive raffles through a drawing.

(ff) “Limited Quota Licenses” means licenses that are limited in number and valid only in a hunt area(s) or portion(s) of a hunt area. Limited quota licenses shall be valid only under species, sex, age class, harvest, and weapon type limitations that are in effect for each hunt area.

(gg) “Limited Quota Reduced Price Cow or Calf (cow/calf) License” means a license which may be authorized in specific hunt areas allowing a person to take cow or calf elk independent of what may be taken on a general license or full priced limited quota license.

(hh) “Limited Quota Reduced Price Doe or Fawn (doe/fawn) License” means a license which may be authorized in specific hunt areas allowing a person to take doe or fawn animals independent of what may be taken on a general license or full priced limited quota license.

(ii) “Limited Quota Reduced Price Ewe or Lamb (ewe/lamb) License” means a license which may be authorized in specific hunt areas allowing a person to take a ewe or lamb bighorn sheep independent of what may be taken on a full priced limited quota license.

(jj) “Minor Dependent” means an individual less than eighteen (18) years of age who is domiciled with parent(s) or legal guardian.

(kk) “National Bow Hunt” means an archery-only hunt that is sponsored and administered by the Wyoming National Bowhunt, Inc.

(ll) “Nonprofit Charitable Organization” means an organization which engages in activities providing the general public with benefits designed to aid in educational, moral, physical, conservation, or social improvement and which is not established for profit.

(mm) “Nonprofit Organization Dedicated to Providing Hunting Opportunities to Individuals with Disabilities” means an organization certifying they are nonprofit and that their primary purpose or mission as stated in their charter is to provide hunting opportunities to individuals with disabilities defined in this regulation.

(nn) “Nonresident” means any person who is not domiciled in Wyoming for at least one (1) year immediately preceding making application for a license and who is not a resident as defined by W.S. § 23-1-102 (a) (ix), § 23-1-107 and § 23-2-101 (a).

(oo) “One-Shot Antelope Hunt” means the One-Shot Antelope Hunt sponsored by the One-Shot Antelope Club in Lander, Wyoming.

(pp) “Party” means a group of individuals with the same residency status who apply together in the initial drawing for hunting licenses for the same species, area and type, and who have expectations of receiving the same treatment in processing of their applications and receiving the same drawing results. For purposes of this regulation, a Party does not include anyone else, regardless of whether or not they may accompany the party of hunters during the hunt.

(qq) “Party Application” means a group of applications in which all applicants with the same residency status specify the same species, hunt area and type in the same order of preference, and all applicants expect the same processing and draw results in the initial drawing.

(rr) “Permit” means a document that authorizes a license holder to carry out activities not authorized by the license itself.

(ss) “Person’s Privilege to Obtain a License Has Been Revoked or Suspended by a Court or the Wildlife Violator Compact” means revocation or suspension of the person’s license or preference point(s).

(tt) “Pioneer Heritage Licenses” means antelope, deer, elk or wild turkey licenses issued to Wyoming residents who are at least seventy (70) years of age prior to the issuance of the license and have continuously resided in Wyoming for at least fifty (50) years immediately preceding application for the license. The fee for the Heritage License shall be established by the Department by multiplying the fee for resident licenses for the same species and license type by sixty-five percent (65%) and rounding down to the next whole dollar amount.

(uu) “Pioneer Licenses” means antelope, deer, elk or wild turkey licenses issued to Wyoming residents who are at least seventy-five (75) years of age prior to the issuance of the license, and who have continuously resided in Wyoming for at least fifty (50) years immediately preceding the application for a license.

(vv) “Potential to Use License” means the license shall be considered to be in possession of the person in whose name it was issued on or after the earliest opening date for which the license is valid if the license is not in the possession of an authorized Department employee.

(ww) “Proper Application Form” means the document prescribed by the Department, a photocopy of the document, or facsimile of the document. These documents shall be the only documents accepted by the Department.

(xx) “Properly Completed Duplicate License Affidavit” means a Department affidavit document signed by the person applying for a duplicate license.

(yy) “Proper Fee” means cash or a negotiable instrument as set forth by W.S. § 34.1-3-104 which results in full payment to the Department, in U.S. dollars for the amount specified by law or regulation for the respective licenses, permits, stamps, tags, preference points or certificates.

(zz) “Qualified Person” means an individual who meets the statutory and regulatory requirements to apply for or receive a license or a preference point. A person shall not be qualified if their privilege to apply for or receive a license or a preference point has been revoked, suspended, or restricted by a court in Wyoming or has been revoked or suspended in Wyoming through the Wildlife Violator Compact.

(aaa) “Quota” means the maximum specified number of licenses to be issued for a given hunt area and species as provided by Commission regulation; in the case of nonresident elk hunt area quotas, the maximum number of specified licenses to be issued by hunt area as provided in writing by the Wildlife Division to the Fiscal Division.

(bbb) “Reduced Price Mountain Lion License” means a license which may be authorized in specific hunt areas allowing a person to take a mountain lion in addition to what may be taken on a full price mountain lion license.

(ccc) “Region General Deer Licenses” means general nonresident deer licenses that shall be limited in number and valid for a specified group of hunt areas in accordance with Commission regulations. A license issued for a region shall only be valid in hunt areas within the region where limitations in Commission regulations specify general licenses. A license issued for a region shall not be valid in any hunt area within that region in which licenses are totally limited in quota, unless specified by Commission regulations.

(ddd) “Religious Purpose” means actions taken to advance sacred matters, religion or a church and done without remuneration.

(eee) “Replacement License” means the reprint of a license, permit, or stamp that does not contain a carcass coupon and the license was originally issued by the Department or license selling agent through the ELS, is currently valid and has not expired.

(fff) “Resident” means a United States citizen or legal alien who is domiciled in Wyoming for at least one (1) full year immediately preceding making application for any resident game and fish license, preference point, permit or tag, shall not have claimed residency in any other state, territory, or country for any other purpose during that one (1) year period, and meets the requirements specified in W.S. § 23-1-102, § 23-1-107 and § 23-2-101 (a).

(ggg) “Special Nonresident Antelope, Deer or Elk Licenses” means those licenses having a fee greater than that of a regular nonresident antelope, deer or elk license as defined in Wyoming Statute and which the statutes provide for a separate nonresident drawing with specific percentages of nonresident quotas designated for only those applicants paying the higher license fees.

(hhh) “Sportsperson Identification Number” means the unique number assigned by the Department to each individual license applicant on the ELS.

(iii) “Super Tag License” means a species specific big game, trophy game or wild bison license issued to the winner of the competitive raffle and upon submission of the proper fee for the appropriate species license set forth by statute.

(jjj) “Super Tag Trifecta Licenses” means a combination of big game, trophy game and wild bison licenses, not to exceed three (3) different species of big game, trophy game and wild bison licenses, issued to the winner of the competitive raffle and upon submission of the proper fee for the appropriate species license set forth by statute.

(kkk) “Transfer” means to convey a license authorization, (from one (1) person to another) as set forth in Section 27 of this regulation.

(lll) “Type” means a limitation on a license in a particular hunt area for the sex of animal, the species of animal, the length of the season, the type of weapon, or a portion of the hunt area in which the license shall be valid.

(mmm) “Unable to Use the License For Good Cause” means an individual is unable to use a limited quota, full price big or trophy game license due to disabling injury or illness, military personnel who receive permanent change of station (PCS) orders or are assigned away from their home duty station on temporary orders (TDY) for the majority of the regular season, or when the Department has determined a majority of, or the entire hunting opportunity has been lost in a specific limited quota hunt area for a full price big or trophy game animal due to the administrative actions of the state or federal government in closing the majority of or all public access to a hunt area, or due to a natural disaster, including, but not necessarily limited to, wildland fires.

(nnn) “Under the Care and Supervision of the Residing Facility” means the person is an employee of the appropriate institution or facility that issued the special limited fishing permit.

(ooo) “Unlimited Reduced Price Cow or Calf (cow/calf) License” means a license which may be authorized in specific hunt areas allowing a person to take cow or calf elk independent of what may be taken on a general license or full price limited quota license.

(ppp) “Unlimited Reduced Price Doe or Fawn (doe/fawn) License” means a license which may be authorized in specific areas allowing a person to take doe or fawn animals independent of what may be taken on a general license or full price limited quota license.

(qqq) “Wyoming Women’s Antelope Hunt” means a women’s antelope hunt sponsored by the Wyoming Women’s Foundation.

(rrr) “Youth License” means a big game license that may be issued to a resident or nonresident individual who is at least eleven (11) years of age and who has not attained eighteen (18) years of age at the time of application. The license shall not be valid until the licensee reaches their twelfth (12th) birthday. For all other species, excluding furbearing animals, requiring a license to take, youth license means a license that may be issued to a resident or nonresident individual who has not attained eighteen (18) years of age. For a resident youth trapping license, youth license means a license that may be issued only to residents under the age of seventeen (17).

Section 4. Method of License Issuance and Accounting. The Fiscal Division shall maintain inventory control and account for the issuance and sale of all licenses, permits, stamps and tags issued under the authority of the Commission. All licenses, permits and tags shall be issued on the basis of a completed application. Applications may be in the form of a separate document or may be incorporated into and considered as part of the license document.

(a) Licenses issued over-the-counter. All licenses that are not limited in number shall be issued by the Department through the ELS and designated Department personnel and facilities or designated license selling agents.

(b) Licenses issued through competitive drawings. Except as provided in this Chapter, all licenses and permits that are limited in number shall be issued through competitive drawings conducted by the Department’s License Section. Entry into the drawing for a limited quota license or permit shall be upon submission of a completed application.

(c) Commercial license issuance. All commercial licenses shall be issued through the ELS by the Department’s License Section at Headquarters, by designated Department personnel or at facilities in accordance with applicable statutes and regulations.

(d) Licenses issued after initial or leftover drawings. Licenses remaining after the initial or leftover drawings shall be sold through the ELS and on a first-come, first-served basis.

(e) Depredation license issuance. Depredation licenses may be issued through the ELS at designated Department locations when additional harvest is needed as determined by the Wildlife Division.

(f) ~~Effective January 1, 2019, the~~ The Department shall charge an applicant a two point five percent (2.5%) credit card processing fee of the cost of any license, permit, stamp, tag, preference point or competitive raffle chance applied for or purchased by the use of a credit card.

Section 5. License Issuance.

(a) In circumstances where the demand for a particular type of license exceeds the supply, a competitive drawing shall be held when feasible to determine successful applicants.

(b) The Department shall only issue licenses in excess of established quotas in the following circumstances:

(i) To accommodate a successful party application in a limited quota drawing;

(ii) To process a Commissioner or Governor license authorization;

(iii) Upon authorization by the License Review Board to resolve a Department license issuance error; or,

(iv) As provided by Commission regulation.

(c) To establish the number of licenses available for the leftover drawing, the Department may continue alternately running the unsuccessful applicants of each resident and nonresident drawing until there are no unissued licenses or permits for which there are unsuccessful applications.

(d) License selling agents shall comply with the following procedures for the sale of limited quota full and reduced price issue-after licenses.

(i) License selling agents shall not sell or allocate licenses prior to the date and time established annually by the Fiscal Division Chief.

(ii) All applications for resident licenses, preference points and permits shall contain the resident applicant's original or electronic signature and when applicable, the parent or legal guardian's signature in accordance with Wyoming statute. Applications for youth licenses and permits may contain a signature from the youth's parent or legal guardian in lieu of the youth applicant's signature. All applications for nonresident licenses and permits shall contain either the nonresident applicant's signature or the signature of the person submitting the application on behalf of the nonresident applicant; and,

(A) In the event the license is issued through the ELS, the resident ~~licensee~~applicant shall be present at the license selling agent location to purchase the license. The parent or legal guardian of a resident youth applicant shall be present at the license selling agent location to purchase a license for the resident youth applicant.

(iii) License selling agents and the ELS shall only issue licenses to one customer at a time, first-come, first-served in the order the individuals are present in line. The agent may issue up to the maximum number of licenses specified by Chapter 2, General Hunting Regulation to a single individual who provides the required information for license issuance.

(e) Big Game Licenses. No individual shall apply for or receive more than one (1) license for each big game species during any one (1) calendar year, except as otherwise provided in Commission regulation(s).

(i) Antelope. Eighty percent (80%) of the total available limited quota antelope licenses shall initially be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of full price antelope licenses as specified in Chapter 2, General Hunting Regulation. The order of the resident antelope initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(A) Statutes provide for up to one hundred sixty (160) licenses to be available for up to two (2) antelope hunt events each year. These licenses shall be issued above quotas established for the hunt area(s) and shall be allocated to residents and nonresidents, taking into consideration resource management requirements as designated by the Wildlife Division. These licenses are exempt from the provisions in this Chapter limiting the number of big game licenses an individual can obtain in one (1) calendar year. For the 2019 antelope hunting season:

(I) Up to eighty (80) antelope licenses shall be available for the One-Shot Antelope Hunt sponsored by the One-Shot Antelope Club.

(II) Up to eighty (80) antelope licenses shall be available for the Wyoming Women's Antelope Hunt sponsored by the Wyoming Women's Foundation.

(III) For the 2020 antelope hunting season, the Department shall accept applications from organizations who desire to receive antelope hunt event licenses. The application period to conduct an antelope hunt event for the 2020 antelope hunting season shall be August 1, 2019 through August 30, 2019. Applications shall be reviewed by the Department and brought before the Commission for final approval and selection. The Commission may designate an organization to receive antelope hunt event licenses for up to three (3) consecutive hunting seasons before requiring the organization to reapply. Applications for any future antelope hunt event licenses shall be accepted as advertised by the Department.

(IV) An application for an antelope hunt event shall be submitted on a form provided by the Department and shall specify:

- (1.) The name of the organization; and,
- (2.) The organization's history, background and mission; and,
- (3.) The number of antelope licenses requested by individual hunt area and type; and,

(4.) The number of consecutive years antelope hunt event licenses are being requested; and,

(5.) The organization's financial plan to benefit wildlife, conservation and the community with funds raised from the antelope hunt event.

(V) The Commission may revoke an organization's opportunity to receive antelope hunt event licenses if any information provided on their application is incorrect or is no longer valid.

(B) The Commission may, upon receipt of payment of antelope license fees as specified in W. S. § 23-1-705, issue up to a total of fifty (50) antelope licenses each year for the exclusive distribution by nonprofit organizations dedicated to providing hunting opportunities to individuals with disabilities.

(I) Qualifying organizations shall make application to the License Section of the Department on or before January 31 for ~~the~~these antelope licenses. The application shall specify:

(1.) The total number of licenses requested; and,

(2.) The Hunt Area and Type designation of the licenses requested; and,

(3.) Certification that shows the organization qualifies under the definition of a "Nonprofit Organization Dedicated to Providing Hunting Opportunities to Individuals with Disabilities".

(II) In the event that more than one (1) qualifying organization requests licenses under this subsection, the Department shall allocate the licenses through a random drawing to the specific qualifying organization(s).

(III) The antelope licenses issued shall be issued through the Department above quotas established for the hunt area(s) and shall be allocated to residents or nonresidents as designated by the nonprofit organization(s).

(C) The order of the nonresident antelope initial drawing set forth in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, then Nonresident Regular Licenses. The allocation of remaining licenses after the Landowner License Drawing shall be forty percent (40%) to the Nonresident Special License Drawing and sixty percent (60%) to the Nonresident Regular License Drawing.

(D) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident antelope licenses to a preference point drawing in the initial drawing. The order of the nonresident antelope preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this

section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate up to twenty-five percent (25%) of the available nonresident antelope licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. All unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with a differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(E) Antelope licenses that have not been applied for and issued through initial drawings or leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(F) Eighty percent (80%) of the total available limited quota reduced price doe/fawn antelope licenses shall be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of reduced price doe/fawn antelope licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer doe/fawn antelope licenses shall be made available through the ELS. In addition to the statutorily prescribed application fees, the price of reduced price doe/fawn antelope licenses shall be twenty-two dollars (\$22) for residents, fourteen dollars (\$14) for resident youth, two dollars (\$2) for resident pioneers, eighteen dollars (\$18) for pioneer heritage, thirty-four dollars (\$34) for nonresidents and nineteen dollars (\$19) for nonresident youth.

(ii) Bighorn Sheep. Seventy-five percent (75%) of the total available limited quota full price bighorn sheep licenses shall initially be offered to residents in the initial drawings. The Department shall allocate not less than seventy-five percent (75%) of the available resident full price bighorn sheep licenses and not less than seventy-five percent (75%) of the available nonresident full price bighorn sheep licenses to a preference point drawing in the initial drawing. The order of the resident and nonresident full price bighorn sheep preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled. The Department shall allocate up to twenty-five percent (25%) of the available resident full price bighorn sheep licenses and shall allocate up to twenty-five percent (25%) of the available nonresident full price bighorn sheep licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed.

(A) Seventy-five percent (75%) of the total available limited quota reduced price ewe/lamb licenses shall be offered to residents in the initial drawing, except as otherwise provided by Commission regulations. An applicant may only apply for and receive

the maximum number of reduced price ewe/lamb licenses as specified in Chapter 2, General Hunting Regulation. In addition to the statutorily prescribed application fees, the price of reduced price ewe/lamb licenses shall be thirty-six dollars (\$36) for residents, twenty dollars (\$20) for resident youth, two hundred forty dollars (\$240) for nonresidents and one hundred dollars (\$100) for nonresident youth.

(iii) Deer. Eighty percent (80%) of the total available limited quota deer licenses shall initially be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of full price deer licenses as specified in Chapter 2, General Hunting Regulation. The order of the resident deer initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(A) The Commission shall annually establish the nonresident region general deer license quotas in addition to license quotas for limited quota hunt areas. Nonresident region general deer license quotas shall not include hunt areas with limited quota licenses issued to nonresidents.

(B) Statutes provide for up to seventy-five (75) nonresident special deer licenses to be available for a national bow hunt. This quota shall be deducted from the nonresident special deer quota for the nonresident deer region in which the national bow hunt is held. National bow hunt deer licenses shall only be valid during the hunt dates established by Wyoming National Bowhunt, Inc. and the Department. These dates shall be within the existing special archery season dates as set forth in the most current Commission Regulation Chapter 6 Deer Hunting Seasons of the Commission regulations for the specific deer hunt area(s) in which the hunt will occur.

(C) Statutes provide for up to twenty-five (25) licenses, which may be issued for a gunpowder or buckskin hunt(s). These licenses shall be issued above quotas and allocated to residents and nonresidents as designated by the Wildlife Division. These licenses are exempt from the provisions in this Chapter limiting the number of big game licenses an individual can obtain in one (1) calendar year.

(D) The order of the nonresident deer initial drawings described in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, and then Nonresident Regular Licenses. The allocation of remaining licenses after the nonresident landowner drawing shall be forty percent (40%) to the Nonresident Special License Drawing and sixty percent (60%) to the Nonresident Regular License Drawing.

(E) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident deer licenses to a preference point drawing in the initial drawing. The order of the nonresident deer preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate

up to twenty-five percent (25%) of the available nonresident deer licenses to a random drawing in the initial drawing which unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. Unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(F) Nonresident Region General deer licenses that have not been applied for and issued through the initial drawing and leftover drawing shall be offered to nonresidents as issue-after licenses.

(G) Limited quota deer licenses that have not been applied for and issued through the initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(H) Eighty percent (80%) of the total available limited quota reduced price doe/fawn deer licenses shall be offered to residents in the initial drawing. An applicant may only apply for and receive the maximum number of reduced price doe/fawn deer licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer doe/fawn deer licenses shall be made available for sale through the ELS. In addition to the statutorily prescribed application fees, the price of reduced price doe/fawn deer licenses shall be twenty-two dollars (\$22) for residents, fourteen dollars (\$14) for resident youth, two dollars (\$2) for resident pioneers, eighteen dollars (\$18) for pioneer heritage, thirty-four dollars (\$34) for nonresidents and nineteen dollars (\$19) for nonresident youth.

(I) Resident general deer licenses shall not be limited in number and shall be issued through the ELS. Resident general deer licenses may also be applied for and issued through the initial drawings by submission of a completed application.

(iv) Elk. A total license limit of seven thousand two hundred-fifty (7,250) nonresident elk licenses shall be made available to nonresident applicants in the initial drawing each year. Reduced price cow/calf elk licenses and limited quota elk licenses remaining after the initial drawing may be made available to nonresidents in addition to the limit of seven thousand two hundred fifty (7,250). Sixteen percent (16%) of the total available limited quota full price and reduced price cow/calf elk licenses shall initially be offered to nonresidents in the nonresident elk initial drawing. The order of the nonresident elk initial drawings described in this section shall be Nonresident Landowner Licenses, Nonresident Special Licenses, and then Nonresident Regular Licenses. Following the Nonresident Landowner License Drawing, licenses available in the initial drawing from the seven thousand two hundred-fifty (7,250) limit shall be allocated as follows: The allocation of remaining licenses after the nonresident landowner drawing shall be forty percent (40%) to the Nonresident Special License Drawing and

sixty percent (60%) to the Nonresident Regular License Drawing. If the seven thousand two hundred-fifty (7,250) license quota is not issued in the initial nonresident drawings, the Department may achieve the seven thousand two hundred-fifty (7,250) license quota by issuing nonresident general elk licenses. Licenses remaining for limited quota areas resulting from this procedure may be made available in the resident elk initial drawing.

(A) The Department shall allocate not less than seventy-five percent (75%) of the available Special and Regular Nonresident elk licenses to a preference point drawing in the initial drawing. The order of the nonresident elk preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this section; then the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled for all first choice selections. The Department shall allocate up to twenty-five percent (25%) of the available nonresident elk licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed. The preference point drawing advantage shall only apply to an applicant's first choice selection. All unsuccessful applicants in the preference point drawing shall participate in the respective random drawing for all remaining choices, giving no advantage to applicants with preference points.

(I) In addition to the restrictions set forth in Section 18 of this Chapter, party applications with differing number of preference points among party members shall have preference points averaged and rounded out to four (4) decimal places.

(B) Following the nonresident elk initial drawing, quotas for resident limited quota full priced and reduced price cow/calf elk licenses shall be the greater of the elk quotas established by Commission regulation less any elk licenses currently issued to nonresidents or eighty-four (84%) percent of the quota established by Commission regulation in the initial drawing. The order of the resident elk initial drawings depicted in this section shall be Resident Landowner Licenses, then Resident Regular Licenses.

(C) Elk licenses that have not been applied for and issued through the initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(D) An applicant may only apply for and receive the maximum number of full price antlerless and reduced price cow/calf elk licenses as specified in Chapter 2, General Hunting Regulation. Reduced price pioneer cow/calf elk licenses shall be made available for sale through the ELS. In addition to the statutorily prescribed application fees, the price of reduced price cow/calf elk licenses shall be forty-three dollars (\$43) for residents, twenty dollars (\$20) for resident youth, five dollars (\$5) for resident pioneers, twenty-seven dollars (\$27) for pioneer heritage, two hundred eighty-eight dollars (\$288) for nonresidents and one hundred dollars (\$100) for nonresident youth.

(E) Resident general elk licenses shall not be limited in number and shall be issued through the ELS. General elk licenses may also be applied for and issued through the initial drawings by submitting a completed application.

(v) Moose. Eighty percent (80%) of the total available limited quota moose licenses shall be offered to residents in the initial drawing. The Department shall allocate not less than seventy-five percent (75%) of the available resident moose licenses and not less than seventy-five percent (75%) of the available nonresident moose licenses to a preference point drawing in the initial drawing. The order of the resident and nonresident moose preference point drawing shall allow individual applicants with the highest number of preference points to be given a drawing advantage for the total number of available licenses to be issued in accordance with this Section; then, the applicants with the next highest number of preference points shall be selected, and so forth, until the quota has been filled. The Department shall allocate up to twenty-five percent (25%) of the available resident moose licenses and shall allocate up to twenty-five percent (25%) of the available nonresident moose licenses to a random drawing in the initial drawing in which all unsuccessful applicants from the preference point drawing shall be placed.

(vi) Mountain Goat. Seventy-five percent (75%) of the total available limited quota mountain goat licenses shall be offered to residents in the initial drawing.

(A) Any person who has been issued a mountain goat type one (1) or a type two (2) license shall not be eligible to apply for or receive a mountain goat type one (1) or a type two (2) license in any subsequent year.

(B) Any person who has been issued a mountain goat type one (1) or type two (2) license in a previous year may apply for and receive a mountain goat Type A license in any subsequent year.

(C) Any person who applies for and receives a mountain goat Type A license shall be eligible to apply for or receive a mountain goat Type A license in any future year.

(f) Trophy Game. No individual shall apply for or receive more than one (1) license for a specific trophy game species during any one (1) calendar year, except as otherwise provided in Commission regulation.

(i) Black Bear. Black bear licenses shall not be limited in number. ~~They and~~ shall be issued through the ELS.

(ii) Gray Wolf. Gray wolf licenses shall not be limited in number. ~~They and~~ shall be issued through the ELS.

(iii) Grizzly Bear. No licenses shall be issued for this species until such time as the Commission may establish an open grizzly bear hunting season.

(iv) Mountain Lion. Full price mountain lion licenses and reduced price mountain lion licenses shall not be limited in number. They shall be issued through the ELS. A person may apply for and receive a maximum of one (1) full price mountain lion license and one

(1) reduced price mountain lion license during any one (1) calendar year. Reduced price mountain lion licenses are only valid in specified hunt areas. A person shall possess and exhibit a full price mountain lion license for the current calendar year in order to receive a reduced price mountain lion license for the same calendar year. The price of a reduced price mountain lion license shall be twenty dollars (\$20) for residents and ninety-two dollars (\$92) for nonresidents.

(g) Wild Bison. Eighty (80%) percent of the wild bison recreational hunting season licenses shall be initially offered to residents in the initial drawing. If the number of resident applicants for wild bison licenses does not meet or exceed the resident wild bison license allocation, the remaining resident allocation may be issued to nonresidents. If the number of nonresident applicants for wild bison does not meet or exceed the nonresident wild bison allocation, the remaining license allocation may be issued to residents.

(i) Completed applications for resident and nonresident wild bison recreational hunting season licenses shall only be accepted through the ELS. Applicants shall have the choice of applying for any wild bison or any female or calf wild bison. A computer random drawing shall be utilized to determine successful applicants.

(ii) Wild bison licenses that have not been applied for and issued through initial and leftover drawings shall be offered to residents and nonresidents as issue-after licenses.

(iii) Any person who is issued an any wild bison license and harvests; a wild bison is subject to eligibility and waiting periods outlined in W. S. § 23-2-107(f) prior to applying for any future wild bison hunting license.

~~(A) — A bull wild bison shall not be eligible to apply for or receive an any wild bison license in any future year, but shall be eligible to apply for and receive a female or calf wild bison license in the immediately following year;~~

~~————— (B) — A female or calf wild bison shall not be eligible to apply for or receive a female or calf wild bison license in the immediately following five (5) year period, but shall be eligible to apply for and receive an any wild bison license in the immediately following year.~~

~~————— (iv) — Any person who is issued a female or calf wild bison license and harvests a female or calf wild bison shall not be eligible to apply for or receive an any wild bison license or a female or calf wild bison license in the immediately following five (5) year period.~~

(h) Bird.

(i) Falconry.

(A) Hunt with Falcon licenses shall be issued as over-the-counter licenses through the ELS.

(B) General Raptor Capture licenses shall be issued as over-the-counter licenses through the ELS at Headquarters. Limited Quota Raptor Capture licenses shall be issued in accordance with Commission Regulation Chapter 25 Falconry Regulation.

(ii) Game Bird. Game Bird licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(iii) Wild Turkey. Eighty percent (80%) of the total available spring and fall limited quota wild turkey licenses shall be offered to residents in the initial drawing. The order of the initial drawings shall be resident landowner licenses, resident regular licenses, nonresident landowner licenses, and then nonresident regular licenses.

(A) Limited quota wild turkey licenses that have not been applied for and issued through the initial drawing shall be offered to residents and nonresidents as issue-after licenses.

(B) The Commission may authorize general wild turkey licenses, which shall not be limited in number. Those licenses shall be issued as over-the-counter licenses through the ELS. These licenses may also be applied for and issued through the initial drawing process.

(i) Small Game. Small Game licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(j) Furbearing Animals.

(i) Trapping. Resident furbearing animal trapping licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS. Nonresident furbearing animal trapping licenses shall not be limited in number and shall be issued in accordance with W.S. § 23-2-303 at Headquarters.

(ii) Capture Furbearing Animal for Domestication. Capture Furbearing Animal for Domestication licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(k) Archery. Archery licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(l) Commercial Licenses. Commercial licenses require written approval by Department personnel prior to issuance.

(i) Commercial Fish Hatchery. Commercial Fish Hatchery licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(ii) Deal in Live Bait. Deal in Live Bait licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters.

(iii) Fishing Preserve. Fishing Preserve licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(iv) Fur Dealer. Fur Dealer licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(v) Game Bird Farm. Game Bird Farm licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(vi) Taxidermist. Taxidermist licenses shall not be limited in number and shall be issued through the ELS at Headquarters.

(m) Fishing. Fishing licenses shall not be limited in number. They shall be issued as over-the-counter licenses through the ELS.

(i) Seine or Trap Fish. Seine or Trap Fish licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters. No person shall apply for or receive more than one (1) seine or trap fish license during a calendar year.

(n) Duplicate Licenses.

(i) In order for a duplicate license to be issued, a duplicate license affidavit shall be properly completed by the licensee.

(A) For a license, permit, stamp or tag that was originally issued through a manual process, the customer shall be required to purchase another license, permit, stamp or tag, rather than a duplicate license, as authorized by Commission regulation.

(B) For a license that was originally issued through the ELS, the license selling agent or sub-agent shall not be required to complete a duplicate license affidavit form prior to issuing a duplicate license as the affidavit is incorporated into the duplicate license document being issued through the ELS.

(ii) Duplicate licenses shall be issued through the ELS.

(iii) The Department and license selling agents shall charge a fee of seven dollars (\$7) for issuance of a duplicate license.

~~(iv) The Department shall not charge a fee for issuance of a duplicate license when the loss or destruction of the license is the fault of the Department or when an applicant does not receive a license which was mailed to the address on their application.~~

(iv) Once a duplicate license is issued, any previous license issued for the same species, hunt area and license type is no longer valid.

(o) Replacement Licenses.

(i) ~~The completion of a duplicate license affidavit form shall not be required for the issuance of a replacement license.~~ Once a replacement license is issued, any previous license issued for the same license type is no longer valid.

(ii) The Department and license selling agents shall charge a fee of seven dollars (\$7) for the issuance of a replacement license issued through the ELS.

(p) Resident Guide Licenses shall be issued for no charge through the ELS at Department Regional Offices and Headquarters, and shall be issued manually through designated Department personnel.

Section 6. Permits.

(a) Sandhill Crane.

(i) Limited Quota Sandhill Crane. Applicants shall be selected by random computer selection. Twenty percent (20%) of the total available limited quota sandhill crane permits shall initially be offered to nonresidents in the initial drawing. Limited quota sandhill crane permits that have not been applied for and issued through the initial drawing shall be issued through the ELS on an as processed basis until quotas have been reached or the permit is no longer valid.

(ii) General Sandhill Crane. Permits shall not be limited in number and shall only be available through the Department's website beginning August 1.

(b) Disabled Hunter and Disabled Hunter Companion Permits. Any person qualified to obtain a disabled hunter permit or purchase a disabled hunter companion permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(c) Hunters with a Shoot from a Vehicle Permit. Any person qualified to obtain a Shoot from a Vehicle Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(d) Hunting Season Extension Permit. Any person qualified to obtain a Hunting Season Extension Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

(e) Migratory Game Bird.

(i) Harvest Information Permit. Harvest Information Permits shall not be limited in number and shall only be available through the Department's website.

(f) Furbearing Animal, Limited Quota Beaver and Marten.

(i) Applicants shall be selected by random computer drawing. Both residents and nonresidents shall draw against the same quota. Leftover permits may be issued to the first eligible applicant as authorized by the Fiscal Division Chief.

(g) Pheasant.

(i) Glendo Permit. Eighty percent (80%) of the total available limited quota Glendo pheasant permits shall be offered to residents in the initial drawing. Glendo pheasant permits that have not been applied for and issued through the initial drawing shall be issued as authorized by the Fiscal Division Chief on an as processed basis until quotas have been reached or the permit is no longer valid. No person shall apply for or receive more than one (1) Glendo Permit in the initial drawing.

(ii) Springer Permit. Eighty percent (80%) of the total available limited quota Springer pheasant permits shall be offered to residents in the initial drawing. Springer pheasant permits that are not applied for and issued through the initial drawing shall be issued at the Springer Check Station or as authorized by the Fiscal Division Chief until the quotas have been reached or the permit is no longer valid. No person shall apply for or receive more than one (1) Springer Permit in the initial drawing.

(h) Special Management Permit. Any individual participating in a special management program shall be required to purchase a Special Management Permit. Special Management Permits shall not be limited in number and shall be issued through the ELS.

(i) Special Limited Fishing Permit.

(i) Any institution, facility or school designated by the Department to issue Special Limited Fishing Permits to any person under the care and supervision of the institution, residing facility, or school as authorized in W.S. § 23-2-207 may issue such permits to fish in accordance with Commission Regulation Chapter 46, Fishing Regulations.

(ii) Special Limited Fishing Permits shall specify the following information:

- (A) Name and date of birth of individual to whom the permit is issued;
- (B) Calendar year for which the permit is valid;
- (C) Name of institution, facility, or school issuing the permit; and,
- (D) Name of the person employed by institution, facility, or school

who issued the permit.

(iii) No person shall apply for or receive any permit under this section by false swearing, fraud or false statement of any kind or in any form.

(iv) Employees of institutions, facilities or schools as authorized in W.S. § 23-2-207 are not eligible to receive special limited fishing permits.

(v) Any institution, facility or school designated by the Department to issue special limited fishing permits shall submit an annual report to the Department's License Section. The report shall include the number of special limited fishing permits issued, the name of the institution, facility or school and any other required information as provided by the Department. Reports shall be due on or before January 31 following the reporting period year.

(j) Hunters with a Central Visual Acuity Disability Permit. Any person qualified to obtain a Central Visual Acuity Disability Permit shall apply on the proper application form to the Department's License Section at Headquarters or Department Regional Offices.

Section 7. Tags. Wyoming Interstate Game Tag. Wyoming Interstate Game Tags shall not be limited in number and shall be sold through Department Regional Offices, Headquarters, designated Department personnel, game tag distributors or their designees.

Section 8. Stamps.

(a) Conservation Stamp. Conservation Stamps shall not be limited in number and shall be sold through the ELS as a Conservation Stamp Authorization and manually as an actual stamp.

(i) Hunters or anglers acquiring a manually issued conservation stamp for the purpose set forth in W.S. § 23-2-306 shall validate the stamp by signing their name in ink in the space provided on the face of the stamp. Hunters or anglers who acquire a lifetime conservation stamp or a conservation stamp authorization through the ELS shall not be required to meet the signature provisions of this subsection.

(ii) The validated stamp, or the document exhibiting the stamp privilege, shall be in possession of any person required by W.S. § 23-2-306 to obtain a stamp if the person is engaged in the act of hunting or fishing and shall be immediately produced for inspection upon request from any Department personnel.

(b) Wildlife Damage Management Stamp. Wildlife Damage Management Stamps shall not be limited in number and shall be sold through the ELS. The price for the stamp shall be established by the Wyoming Animal Damage Management Board.

(c) Reciprocity Stamp. Reciprocal agreements provide for licensing for fishing of residents of Wyoming and adjoining states upon artificial impoundment of water forming the

boundary between Wyoming and adjoining states. Reciprocity stamps shall not be limited in number and shall be sold through the ELS.

Section 9. Landowner Licenses. Landowner licenses shall only be issued to those landowners who own land which provides habitat for antelope, deer, elk or wild turkeys and meets the requirements as set forth in this section. Any lands purchased or subdivided for the primary purpose of obtaining landowner licenses shall not be eligible for landowner licenses. The Wyoming Game and Fish Commission authorizes the issuance of landowner licenses in order to provide the opportunity for a landowner applicant or member of the landowner applicant's immediate family to hunt antelope, deer, elk or wild turkey on the landowner's property in the case where licenses for a hunt area have been limited in number and only available through a competitive drawing.

(a) In order to qualify for a license issued under this section, the deeded land qualifying the landowner applicant shall be located in the hunt area for which applied, shall consist of a minimum of one hundred sixty (160) contiguous acres and shall be utilized by the type of big game or wild turkeys for which the applicant applied to the extent the land provides food, cover and water. The landowner applicant shall demonstrate that the species of wildlife for which the license application has been made utilized the described land for a minimum of two thousand (2,000) days of use during the twelve (12) month period immediately preceding the date of application. In no case shall more than two (2) big game licenses per species or more than two (2) spring wild turkey or no more than two (2) fall wild turkey licenses be issued for a parcel of deeded land meeting the above qualifications in a calendar year.

(b) Resident or nonresident landowner applicants that own land in Wyoming or members of the landowner applicant's immediate family may be issued licenses upon application and payment of the specified fee. Licenses shall be issued to landowners without participating in a competitive drawing unless the number of landowner license applications exceeds the number of licenses authorized for the hunt area by the Commission. In such cases, a competitive drawing shall be utilized to determine successful landowner license applicants. Landowner license applications shall be drawn first in each respective resident and nonresident initial drawing and shall be drawn against the total quota available in each respective hunt area.

(c) As a condition of eligibility for licenses issued to landowners, landowner applicants shall provide on and with the application for a license issued to landowners, documentation that substantiates in which capacity the individual qualifies as a landowner applicant under the definition of a landowner applicant or landowner's immediate family in this Chapter. Documentation shall include the completion of the landowner license application form provided by the Department, and any attachments required by the Department to determine eligibility of the applicant. The Department shall consider the eligibility of the applicant based on the requirements in this regulation and documentation provided by the landowner. ~~Applicants for landowner licenses shall be submitted to the game warden or the regional wildlife supervisor in whose geographic area of responsibility the land listed on the application occurs.~~

(d) In the case of resident license availability, no full price landowner licenses shall be authorized if hunting with a general license is allowed at any time during the hunting season, unless the general license is valid for antlerless deer or antlerless elk hunting only.

(e) In the case where a nonresident landowner qualifies for a landowner license in a hunt area where the current hunting season provides for both limited quota and general license hunting during the established hunting season for the species applied for, the nonresident landowner may apply as a nonresident applicant for either the limited quota license for the area in which the applicant is qualified, or a general license in the initial drawing. If the nonresident landowner is unsuccessful in obtaining a limited quota license in the nonresident drawing, the nonresident landowner may subsequently apply to the Department for the issuance of a general license.

(f) Landowner licenses shall be designated by the landowner and applied for by a landowner applicant, or a member of the landowner applicant's immediate family.

(i) An individual landowner applicant may apply for or receive:

(A) No more than one (1) full price elk and one (1) limited quota reduced price elk landowner license in a calendar year.

(B) No more than one (1) full price antelope or up to two (2) limited quota reduced price antelope landowner licenses in a calendar year.

(C) No more than one (1) full price deer or up to two (2) limited quota reduced price deer landowner licenses in a calendar year.

(D) No more than one (1) spring wild turkey landowner license and one (1) fall wild turkey landowner license in a calendar year.

(ii) A maximum of two (2) licenses for antelope, deer and elk may be allowed to a landowner applicant regardless of the number of landholdings in which the landowner applicant holds an interest.

(iii) Regardless of a change in ownership of a particular parcel of land, no more than two (2) landowner licenses for each big game species (antelope, deer, and elk) shall be issued in any calendar year on the basis of the qualification of the particular parcel.

(iv) Regardless of a change in ownership of a particular parcel of land, no more than two (2) spring wild turkey and two (2) fall wild turkey landowner licenses shall be issued in any calendar year on the basis of the qualification of the particular parcel.

(g) Landowners shall submit applications for landowner licenses as listed in Section 20 of this regulation.

Section 10. Lifetime Licenses and Conservation Stamp. Any resident qualified to purchase a lifetime fishing, lifetime archery or lifetime combination license pursuant to Wyoming statute may obtain a lifetime license from the Department's License Section at Headquarters or license selling locations as designated by the Fiscal Division Chief.

(a) ~~Wyoming statute provides for a lifetime conservation stamp.~~ Any person may purchase a lifetime conservation stamp from the Department's License Section at Headquarters or license selling locations as designated by the Fiscal Division Chief.

(b) Receiving a lifetime license grants the recipient the privilege of utilizing the license for his lifetime; however, the license shall not be construed as exercising resident hunting or fishing privileges in Wyoming when and if the person leaves the state of Wyoming.

(c) A resident lifetime fishing license and conservation stamp may be issued to any resident who is permanently and totally disabled and is unable to engage in any substantial gainful activity. For purposes of this subsection, substantial gainful activity shall be as determined by the U.S. Social Security Administration for the purpose of determining eligibility for Supplemental Security Income or Social Security Disability Insurance benefits.

(i) Any person applying for a resident lifetime fishing license and conservation stamp under this subsection shall apply on a form provided by the Department and shall provide a copy of their Social Security Disability Benefit letter issued from the U.S. Social Security Administration indicating the applicant's inability to engage in any substantial gainful activity.

(ii) A resident lifetime fishing license and conservation stamp issued under this subsection shall remain valid as long as the recipient remains a resident as defined by W.S. § 23-1-102, § 23-1-107 and § 23-2-101.

Section 11. Governor Complimentary Licenses. Wyoming statutes provide for the issuance of complimentary licenses to be issued at the request of the Governor. Big game licenses authorized under this section shall be valid for the species for which the license has been issued.

(a) These licenses shall be valid in any hunt area in accordance with Commission regulations, except for the following:

(i) Complimentary moose licenses shall not be valid in any moose hunt area, which has a total quota of ten (10) or less antlered or any moose licenses.

(ii) Complimentary full price bighorn sheep licenses shall not be valid in any bighorn sheep hunt area that has a total quota of eight (8) or less full price bighorn sheep licenses.

(iii) Complimentary wild bison licenses shall not be valid in any wild bison hunt area which has a total quota of ten (10) or less any wild bison licenses.

(iv) Governor's Complimentary licenses shall not be valid within Grand Teton National Park.

(b) Holders of Governor Complimentary licenses shall be exempt from the provisions in this Chapter limiting the number of big game or wild bison licenses an individual can possess in any one (1) calendar year or during an individual's lifetime. An individual is eligible to receive a Governor Complimentary moose license, Governor Complimentary full price bighorn sheep license, and a Governor Complimentary wild bison license annually. Recipients shall be exempt from the five (5) year waiting period and preference points shall not be lost if an individual receives a Governor Complimentary moose or full price bighorn sheep license. Nonresident preference points shall not be lost if an individual receives a Governor Complimentary antelope, deer or elk license.

Section 12. Commissioner Complimentary Licenses.

(a) Wyoming statutes provide that each appointed Commissioner may cause, through the issuance of license authorizations to nonprofit charitable organizations, to be issued at full price, complimentary antelope, deer or elk licenses.

(i) Once the commissioner complimentary license authorization has been auctioned or otherwise bid to the highest bidder or raffled to members of the public by the nonprofit charitable organization, the recipient of the license authorization may only transfer the license authorization to another person if no additional consideration above the bid or raffle price is paid by the transferee.

(ii) The recipient of the license authorization may donate the license authorization back to the nonprofit charitable organization that originally bid the license authorization to be rebid to a new highest bidder.

(iii) The Department shall issue the license in the name of the person who submits the authorization for license issuance.

(iv) All big game licenses authorized under this section are valid for a specific region or hunt area as designated by the applicant at the time of application. Commissioner Complimentary licenses shall not be valid within Grand Teton National Park.

(v) The specific region, or hunt area, or type shall not be changed following the issuance of the license by the Department.

(vi) As a condition to issuance of a Commissioner Complimentary license, the Department shall require an authorized officer of the recipient organization to certify under

penalty of law that the respective organization is a nonprofit charitable organization as defined in this regulation and eligible to receive the Commissioner Complimentary license authorization.

(b) Holders of Commissioner Complimentary licenses shall be exempt from the provisions in this Chapter limiting the number of licenses an individual can possess in any one (1) calendar year. Nonresident recipients shall not lose preference points for receiving a Commissioner Complimentary antelope, deer or elk license.

Section 13. Commissioner Complimentary Licenses for Persons with Life Threatening Illnesses.

(a) The Commission may, upon receipt of payment of the proper fee issue up to twenty-five (25) antelope licenses, twenty-five (25) deer licenses, twenty-five (25) elk licenses and twenty-five (25) turkey licenses to persons twenty (20) years of age or younger with a life-threatening illness and who is sponsored by a nonprofit charitable organization whose mission it is to provide opportunities and experiences to persons with life-threatening or serious illnesses. Licenses issued under this subsection shall be issued above quotas established for the hunt area(s) by Commission regulation. However, no more than ten (10) limited quota antelope, ten (10) limited quota deer, ten (10) limited quota elk or ten (10) limited quota turkey licenses shall be issued for any one hunt area during the same calendar year.

(i) The sponsoring organization shall submit a request for the number of licenses and species requested on or before January 31 for antelope, deer, elk, spring and fall turkey.

(ii) After notification that a sponsoring organization's request has been granted, the sponsoring organization shall submit a completed application and appropriate license fee for the person with a life-threatening or serious illness to the Department's License Section for license issuance.

(iii) As a condition to issuance of a license in this subsection, the Department shall require an authorized officer of the sponsoring organization to certify under penalty of law that the respective organization is a nonprofit, charitable organization as defined in this regulation.

(iv) The sponsoring organization shall provide a statement from a licensed physician stating the license recipient is clinically diagnosed with a life-threatening or serious illness.

(v) The Department shall issue licenses to individuals sponsored by qualifying organizations meeting the provisions under this subsection to residents and nonresidents in accordance with Section 5(e) (i), 5 (e) (iii), 5(e) (iv), and Section 5(h) (iii) of this Chapter. In the event the number of applications exceeds the number of licenses available under this subsection, the Department shall allocate the licenses through a random drawing on or before February 10.

Licenses remaining after the initial issuance shall be available on a first come, first served basis until the quotas for licenses in this subsection have been allocated.

Section 14. Pioneer Licenses, Pioneer Heritage Licenses, Honorably Discharged Pioneer Veterans Licenses, One Hundred Percent (100%) Disabled Resident Veterans Licenses, Resident Disabled Veterans Lifetime Fishing Licenses and Purple Heart Medal Recipients.

(a) Pioneer lifetime combination game bird/small game/fishing licenses may be issued to qualified individuals. The Pioneer game bird/small game/fishing licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters.

(b) Pioneer heritage antelope, deer, elk or wild turkey licenses shall be issued through the ELS to any qualified resident. ~~The fee for such licenses shall be: pioneer heritage antelope license, twenty dollars (\$20); pioneer heritage deer license, twenty three dollars (\$23); pioneer heritage elk license, thirty two dollars (\$32); and, pioneer heritage wild turkey license, ten dollars (\$10).~~ Effective January 1, 2019, the fee for such licenses shall be: pioneer heritage antelope license, twenty-two dollars (\$22); pioneer heritage deer license, twenty-six dollars (\$26); pioneer heritage elk license, thirty-five dollars (\$35); and, pioneer heritage wild turkey license, ten dollars (\$10). Reduced price pioneer heritage doe/fawn antelope, doe/fawn deer and cow/calf elk licenses shall be issued through the ELS system.

(c) Honorably discharged pioneer veteran combination game bird/small game/fishing licenses may be issued to qualified individuals. Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as honorably discharged pioneer veterans. The honorably discharged pioneer veteran game bird/small game/fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence that he qualifies as an honorably discharged pioneer veteran.

(d) One hundred percent (100%) disabled resident veteran combination game bird/small game/fishing license may be issued to qualified individuals. Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as one hundred percent (100%) disabled resident veterans. The one hundred percent (100%) disabled resident veteran game bird/small game/fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Department of Veterans Affairs that the resident veteran qualifies as one hundred percent (100%) disabled. For the purpose of this subsection, one hundred percent (100%) disabled does not refer to disability compensation.

(e) Wyoming statutes provide for the issuance of antelope, deer, elk or wild turkey pioneer licenses to individuals qualified at the time of license issuance. For purposes of drawings for which the submission of a completed application shall be required, license

applicants shall qualify by June 20 of the current calendar year. Any resident person qualified to receive a limited quota pioneer big game or wild turkey license shall make application through the ELS. Limited quota pioneer licenses for antelope, deer, elk and wild turkey shall be applied for in accordance with Section 20 of this Chapter. Pioneer general deer, general elk and general wild turkey licenses shall be issued through the ELS. Limited quota reduced price pioneer doe/fawn antelope, doe/fawn deer and cow/calf elk licenses shall be issued through the ELS system.

(f) Resident disabled veteran's lifetime fishing license. Any resident disabled veteran who receives fifty percent (50%) or more service connected disability compensation from the United States Department of Veterans Affairs may apply on the proper application form for a resident disabled veteran's lifetime fishing license. The disabled veteran's resident lifetime fishing license shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Department of Veterans Affairs that ~~he~~the applicant receives fifty percent (50%) or more service connected disability compensation. The license shall remain valid for the lifetime of the person in whose name it is issued.

(g) Combination game bird/small game/fishing licenses may be issued to residents of the state who qualify as a United States Military Purple Heart Medal recipient. These combination licenses shall not be limited in number and shall be issued through the ELS at Department Regional Offices and Headquarters upon submission by the applicant of documentary evidence provided by the United States Military Department that the resident qualifies as a purple heart recipient.

Section 15. Donation of Big Game Licenses to a Disabled Veteran or to a Permanently Disabled Person Who Uses a Wheelchair.

(a) The holder of a valid big game license may surrender a big game license to the Department for reissuance to a disabled veteran or to a permanently disabled person who uses a wheelchair. The person surrendering the license may designate that their license be donated to a disabled veteran or to a permanently disabled person who uses a wheelchair, and may designate a qualified nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs. Donated licenses not designated to a qualified nonprofit charitable organization, or donated licenses not assigned to a sponsored individual within fifteen (15) days after a nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disability who use wheelchairs has been notified of license availability, shall be made available for reissuance on a first-come, first-served basis to a qualified nonprofit charitable organization dedicated to providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(i) The unused, unaltered license with all coupons intact shall be submitted along with a form provided by the Department which indicates the license holders' desire to surrender the license issued in their name and donate the surrendered license under this Section.

The person surrendering the license shall sign an affidavit verifying that the license was not used during any hunting season.

(ii) Any person surrendering a valid big game license to be reissued under this Section, shall not be eligible to receive a duplicate license for the same species, hunt area and type as the surrendered license.

(iii) A surrendered license shall count against the maximum number of licenses a person may otherwise apply for and receive as a condition of Commission regulation.

(iv) Any person surrendering a valid big game license for reissuance under this Section, for which preference points have been accumulated, shall not have preference points restored.

(b) The surrendered license shall be reissued by the Department's License Section to a qualified person who has been selected and sponsored by a nonprofit charitable organization providing hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(i) As a condition to reissue a license in this subsection, the Department shall require an authorized officer of the sponsoring organization to certify under penalty of law that the respective organization is a nonprofit charitable organization, that provides hunting opportunities to disabled veterans or persons with permanent disabilities who use wheelchairs.

(ii) The sponsoring organization shall submit a completed application form for the issuance of a license on forms provided by the Department. Donated license applications, and any documentary evidence, shall be completed each year regardless of whether an applicant has received a donated license in a previous year.

(A) For a license being reissued to a disabled veteran, documentary evidence provided by the United States Department of Veterans Affairs that the applicant currently receives at least fifty percent (50%) or more service connected disability compensation shall be submitted with the application form.

(B) For a license being reissued to a permanently disabled person who uses a wheelchair, a statement by a licensed physician, on forms provided by the Department, that the applicant has a permanent disability that requires the applicant to, at all times, be confined to a wheelchair for mobility purposes.

(iii) The license shall be reissued to a qualified applicant at no fee.

(iv) The license shall be reissued for the same species, area and license type as the license donated.

Section 16. Active Duty Wyoming Resident in Combat Zone Licenses.

Complimentary resident general elk, resident general deer, resident game bird, resident small game and resident daily fishing licenses shall be issued to any Wyoming resident currently serving on active duty in the United States military deployed to a combat zone while home on military leave during the applicable hunting or fishing season. Applicants for licenses in this subsection shall meet the statutory requirements established in W. S. § 23-2-101 (a), and shall provide to the Department a valid, current military identification card, military leave orders indicating the resident is currently deployed to a combat zone and is returning to a combat zone at the end of the current leave period, a current Leave and Earnings Statement indicating the applicant is receiving hostile fire compensation and proof of residency at the time of application. Licenses shall be issued through the ELS at no fee to the applicant and shall only be issued at Headquarters or Department Regional Offices.

Section 17. Depredation Licenses. Application shall be made to Department Regional Offices in the region where participation is desired on application forms provided by the Department. Applicants shall apply annually to be included on priority lists. Applicants shall make separate application for each species. Application dates and priority listing name placement on each list shall be established in accordance with Commission Regulation Chapter 34, Depredation Prevention Hunting Seasons.

Section 18. Party Applications – Initial Drawing. In the initial drawing, the maximum allowable number of completed applications in a party shall be six (6). Residents and nonresidents shall not apply together in the same party. Completed applications from landowner applicants shall not be accepted as a party with non-landowner applicants. Nonresidents applying in the drawing for special licenses shall not apply as a party with nonresidents applying in the drawing for regular licenses. No party applications shall be accepted for moose, bighorn sheep, mountain goat, or wild bison recreational hunting season licenses. Party applicants are required to submit their applications for the same species, hunt area, and type in the same order of preference.

Section 19. Proof of Residency for Resident Licenses, Permits or Preference Points.

(a) Any qualified individual may apply for or receive a resident game and fish license, permit, or preference point or tag if the person meets the residency requirements pursuant to W.S. § 23-1-102 (a) (ix) (xv) and § 23-1-107. When an individual signs an application to obtain a resident license, permit, or preference point or signs a resident license, or permit the individual swears that ~~he is~~ they are a Wyoming resident as defined in W.S. § 23-1-102 (a) (ix) (xv), § 23-1-107 and § 23-2-101 (a).

(b) Any person applying for or purchasing a resident license, permit, preference point, or tag shall provide proof of their residency. License selling agents and the Department shall consider as documentary evidence of residency the applicant's Wyoming driver's license or Wyoming identification card, a copy of their school records, a completed military form DD214, a completed and signed proof of residency statement on a form provided by the Department or a completed proof of residency affidavit issued through the ELS. Documentary evidence

furnished by an applicant for a resident license shall not be considered conclusive proof in a court of law that the applicant is a resident in accordance with Wyoming statutes.

(c) A person qualifying as a Wyoming resident in accordance with W.S. § 23-1-107 (c) shall not gain or lose residency for the purpose of serving full time for a period not to exceed four (4) years in an established volunteer service program for charitable purposes, humanitarian purposes, or religious purposes. A letter, signed and notarized by the volunteer service program's director, which describes the services provided (including that they were provided without remuneration), the duration of service, and the hours served may be used to establish compliance with W.S. § 23-1-107 (c).

(d) A person qualified as a Wyoming resident as defined in W.S. § 23-1-102 (a) (ix) and § 23-1-107, is not considered a nonresident for the purposes of applying for or purchasing licenses, permits, tags or preference points.

Section 20. Application Dates.

(a) Completed applications for initial limited quota drawings, leftover drawings, purchase of preference points only; and applications for the Department's Super Tag Trifecta and Super Tag license competitive raffle, shall only be submitted through the ELS during the application periods stated in this section. Electronic applications shall provide for an electronic signature process for residency oaths, certification to the correctness of information provided, or any other assertions as may be required by this regulation on the completed applications. Evidence of electronic signatures on drawing applications and licenses purchased may not be excluded in legal proceedings. Ref: W.S. § 40-21-113. The Department shall begin accepting completed applications at 8:00 a.m. on the first business day of the month or the specified date listed in subsections (d) and (e) of this Section.

(b) Completed applications submitted through the ELS shall not be accepted after 12:00 midnight Mountain Standard Time zone on the respective application deadline dates listed in subsection (e). If the deadline date occurs on a day when Headquarters has been closed for license sales (weekends, holiday, etc.), the ELS shall be available until 12:00 midnight Mountain Standard Time zone on the next business day.

(c) If the ELS is closed or otherwise unavailable to the public during the deadline date listed in subsection (e), the Department shall accept completed applications through the ELS until 12:00 midnight Mountain Standard Time zone on the next calendar day.

(d) Landowner License Application Dates: Completed applications for landowner licenses shall be submitted to the game warden or the regional wildlife supervisor in whose geographic area of responsibility the land listed on the application occurs or through the ELS. Completed applications for landowner licenses shall not be accepted after 12:00 midnight Mountain Standard Time zone on respective application dates listed in this subsection.

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
ANTELOPE				
Limited Quota Nonresident Landowner	Paper	Jan.	May 15	May 31
Limited Quota Nonresident Landowner with Preference Point	Paper	Jan.	May 15	May 31
Limited Quota Reduced Price Nonresident Landowner Doe/Fawn	Paper	Jan.	May 15	May 31
Limited Quota Resident Landowner	Paper	Jan.	May 15	May 31
Limited Quota Reduced Price Resident Landowner Doe/Fawn	Paper	Jan.	May 15	May 31
DEER				
Limited Quota Nonresident Landowner	Paper	Jan.	May 15	May 31
Limited Quota Nonresident Landowner with Preference Point	Paper	Jan.	May 15	May 31
Limited Quota Resident Landowner	Paper	Jan.	May 15	May 31
Limited Quota Reduced Price Nonresident Landowner Doe/Fawn	Paper	Jan.	May 15	May 31

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
DEER				
Limited Quota Reduced Price Resident Landowner Doe/Fawn	Paper	Jan.	May 15	May 31
ELK				
Limited Quota Nonresident Landowner	Paper	Jan.	Jan. 20 <u>31</u>	Feb. 3 <u>May 8</u>
Limited Quota Nonresident Landowner with Preference Point	Paper	Jan.	Jan. 20	Feb. 3
Limited Quota Reduced Price Nonresident Landowner Cow/Calf	Paper	Jan.	Jan. 20 <u>31</u>	Feb. 3 <u>May 8</u>
Limited Quota Reduced Price Resident Landowner Cow/Calf	Paper	Jan.	May 15	May 31
Limited Quota Resident Landowner	Paper	Jan.	May 15	May 31
WILD TURKEY				
Limited Quota Nonresident Landowner Spring Fall	Paper Paper	Jan. Jul <u>Apr.</u>	Jan. 20 Jul. 15 <u>May 31</u>	Feb. 3 Jul <u>May. 31</u>
Limited Quota Resident Landowner Spring Fall	Paper Paper	Jan. Jul <u>Apr.</u>	Jan. 20 Jul. 15 <u>May 31</u>	Feb. 3 Jul <u>May. 31</u>

(e) Non-Landowner Application Dates:

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
ANTELOPE				
Limited Quota Nonresident	Online	Jan.	May 31	May 31
Limited Quota Nonresident with Preference Point Option	Online	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Doe/Fawn	Online	Jan.	May 31	May 31
Limited Quota Reduced Price Resident Doe/Fawn	Online	Jan.	May 31	May 31
Limited Quota Resident	Online	Jan.	May 31	May 31
BIGHORN SHEEP				
Limited Quota Nonresident	Online	Jan.	Feb. 28*	Apr. 15
Limited Quota Resident	Online	Jan.	Feb. 28*	Apr. 15
Nonresident Preference Point Only	Online	Jul.	Oct. 31	n/a
Resident Preference Point Only	Online	Jul.	Oct. 31	n/a
COMPETITIVE RAFFLE CHANCES				
Super Tag License	Online	Jul. 15	Jul. 1	n/a
Super Tag Trifecta License	Online	Jul. 15	Jul. 1	n/a

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY WITHDRAW
DEER				
General and Limited Quota Resident	Online	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Doe/Fawn	Online	Jan.	May 31	May 31
Limited Quota Reduced Price Resident Doe/Fawn	Online	Jan.	May 31	May 31
Nonresident Preference Point Only	Online	Jul.	Oct. 31	n/a
Region and Limited Quota Nonresident	Online	Jan.	May 31	May 31
Region and Limited Quota Nonresident with Preference Point Option	Online	Jan.	May 31	May 31
ELK				
General and Limited Quota Nonresident	Online	Jan.	Jan. 31	Feb. 3 <u>May 8</u>
General and Limited Quota Nonresident with Preference Point Option	Online	Jan.	Jan. 31	Feb. 3
General and Limited Quota Resident	Online	Jan.	May 31	May 31
Limited Quota Reduced Price Nonresident Cow/Calf	Online	Jan.	Jan. 31	Feb. 3 <u>May 8</u>

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
ELK				
Limited Quota Reduced Price Resident Cow/Calf	Online	Jan.	May 31	May 31
Nonresident Preference Point Only	Online	Jul.	Oct. 31	n/a
FURBEARING ANIMAL				
Limited Quota Furbearing Animal Trapping Permit	Online	Jul. Apr.	Sep. 1 May 31	n/a
MOOSE				
Limited Quota Nonresident	Online	Jan.	Feb. 28*	Apr. 15
Limited Quota Resident	Online	Jan.	Feb. 28*	Apr. 15
Nonresident Preference Point Only	Online	Jul.	Oct. 31	n/a
Resident Preference Point Only	Online	Jul.	Oct. 31	n/a
MOUNTAIN GOAT				
Limited Quota Nonresident	Online	Jan.	Feb. 28*	Apr. 15
Limited Quota Resident	Online	Jan.	Feb. 28*	Apr. 15
PHEASANT				
Glendo Permit	Online	Jul. Apr.	Sep. 15 May 31	n/a
Springer Permit	Online	Jul. Apr.	Sep. 15 May 31	n/a
PREFERENCE POINT ONLY				
Nonresident	Online	Jul.	Oct. 31	n/a
Resident	Online	Jul.	Oct. 31	n/a

LICENSE	METHOD OF SUBMISSION	BEGINNING APPLICATION DATE MONTH	LAST DATE TO ACCEPT APPLICATIONS	LAST DATE TO MODIFY/ WITHDRAW
SANDHILL CRANE				
Limited Quota	Online	Jul <u>Apr.</u>	Jul <u>May 31</u>	n/a
WILD BISON				
	Online	Feb <u>Mar.</u>	Feb. 28* <u>Mar. 31</u>	Apr. 15
WILD TURKEY				
Limited Quota Nonresident Spring Fall	Online	Jan. Jul <u>Apr.</u>	Jan. 31 Jul <u>May 31</u>	Feb. 3 Jul <u>May. 31</u>
Nonresident General Spring Fall	Online	Jan. Jul.	Through end of season <u>Jan. 31</u> Through end of season <u>Jan. 31</u>	n/a <u>Feb. 3</u> n/a <u>Feb. 3</u>
Limited Quota Resident Spring Fall	Online	Jan. Jul <u>Apr.</u>	Jan. 31 Jul <u>May 31</u>	Feb. 3 Jul <u>May. 31</u>
Resident General Spring Fall	Online	Jan. Jul.	Through end of season <u>Jan. 31</u> Through end of season <u>Jan. 31</u>	n/a <u>Feb. 3</u> n/a <u>Feb. 3</u>

* February 29 on leap year

Section 21. Drawing Advantage. The Department shall develop and maintain a license issue system that allows qualified persons, as prescribed below, who have either purchased a preference point or were unsuccessful in the preference point drawing for a full price bighorn sheep or moose license, or purchased a preference point for nonresident antelope, deer or elk, a drawing advantage in future years as prescribed in Wyoming statutes. All applicants participate in the preference point drawing regardless of their preference point balance.

(a) All preference points accumulated through methods not authorized by this regulation or statute shall be subject to deletion.

(b) Preference points shall be assigned to persons who apply to receive preference points during authorized application periods. The following provisions apply to the issuance of preference points.

(i) No person shall apply for or receive a preference point during any calendar year in which the person's privilege to obtain a license has been revoked or suspended by a court or the Wildlife Violator Compact.

(ii) Preference points are not transferable from one person to another or from one species to another.

(iii) No person may apply for more than one (1) preference point per species in the same calendar year. If the applicant applies for a preference point for moose or bighorn sheep during the initial license drawing period and is either awarded a preference point or receives their first choice license in the initial drawing, they shall not apply for a preference point for the same species during the preference point only application period in the same calendar year. Any preference point awarded in a calendar year shall not be considered for advantage in any license drawings during the same calendar year in which it was awarded.

(iv) A person shall not apply for or receive a separate preference point in the same calendar year in which the person receives a full price bighorn sheep or moose license or a first choice license in the initial drawing for nonresident antelope, deer or elk.

(v) A person eleven (11) years of age may apply for a preference point if the person shall become twelve (12) years of age in the same calendar year as the application for a preference point is made.

(vi) For the purpose of assigning preference points in this Section, any unsuccessful full price bighorn sheep or moose license applicant failing to apply for a license or preference point during a second consecutive calendar year shall lose all accumulated preference points and shall be considered as a first year applicant for any subsequent calendar year in which the applicant submits an application for a license or a preference point for that particular species.

(vii) For the purpose of retaining nonresident antelope, ~~elk or deer~~ deer or elk preference points in this Section, any sportsperson failing to purchase a preference point within two (2) consecutive calendar years shall lose all accumulated preference points for that species and shall be considered as a first year applicant for any subsequent calendar year in which the applicant submits an application for a license.

(viii) For the purpose of retaining bighorn sheep and moose preference points in this Section, any sportsperson whose residency status changes and who has accumulated preference points ~~will~~ shall retain those points as long as the sportsperson applies for a license for that particular species within two (2) consecutive calendar years. Failing to apply for a license or preference point within two (2) consecutive calendar years, the sportsperson shall lose all accumulated preference points for that particular species.

(ix) A person may only request to contest their preference point values to the License Review Board for the five (5) year period immediately preceding their request.

(c) If a person desires to apply for a preference point only and not receive a license, the person shall apply for and receive a preference point by paying the proper fee and making application during the preference point only application period specified in Section 20 of this regulation.

(d) If an applicant's preference points have been deleted because the applicant caused more than one (1) customer record to be generated then those preference points shall not be restored. The Fiscal Division Chief may make an exception in the case of name changes because of marriage, divorce, adoption, or legal name change.

(e) The preference points associated with a sportsperson identification number provided on an application shall be the only preference points considered for an individual applicant participating in a preference point drawing.

(f) Upon drawing a full price bighorn sheep or moose license, all accumulated preference points by the applicant for that species shall be deleted. No person shall apply for or receive a full price bighorn sheep license or preference point for full price bighorn sheep within any consecutive five (5) year period of having received a full price bighorn sheep license through the drawing. No person shall apply for or receive a moose license or preference point for moose within any consecutive five (5) year period of having received a moose license through the drawing.

(i) Preference points are assigned to residents and nonresidents who are unsuccessful in either the full price bighorn sheep or moose drawings. The nonresident preference point fee, in addition to the statutorily prescribed application fee, shall be retained from the license fee remitted. The preference point fee for nonresidents shall be one hundred fifty dollars (\$150) for full price bighorn sheep and one hundred fifty dollars (\$150) for moose.

(ii) In lieu of applying for a full price bighorn sheep or moose license, a person may elect to purchase a preference point for each species. The applicant is not required to pay the statutorily prescribed application fee. The preference point fee for residents shall be seven dollars (\$7) per species and the fee for nonresidents shall be one hundred fifty dollars (\$150) for full price bighorn sheep, and one hundred fifty dollars (\$150) for moose.

(g) A preference point shall only be assigned to nonresident antelope, deer or elk applicants who participate in the initial drawing for full price licenses and who have remitted the proper preference point fee and who are unsuccessful in drawing their first choice license. The preference point fee, in addition to the statutorily prescribed application fee, shall be retained from the total amount remitted. The preference point fee for nonresidents shall be thirty-one dollars (\$31) for antelope, forty-one dollars (\$41) for deer, fifty-two dollars (\$52) for elk and ten dollars (\$10) per species for nonresident youth.

(i) In lieu of applying for a nonresident antelope, deer or elk license and remitting the proper preference point fee, a nonresident applicant may elect to purchase a preference point for each species. The preference point fee for nonresidents shall be thirty-one

dollars (\$31) for antelope, forty-one dollars (\$41) for deer, fifty-two dollars (\$52) for elk and ten dollars (\$10) per species for nonresident youth. The applicant, when only applying for preference points, is not required to pay the statutorily prescribed application fee. Individuals who have drawn their first choice license in the initial draw are prohibited from purchasing or receiving a preference point in the same calendar year.

(ii) Upon drawing a license for the applicant's first choice in the initial drawing for nonresident antelope, deer or elk, all accumulated preference points by the applicant for that species shall be deleted and the applicant shall be prohibited from purchasing a preference point for that species in the same calendar year.

Section 22. Leftover Drawing. Limited quota licenses that were not issued through the initial drawings shall be offered in a competitive leftover drawing.

(a) A leftover drawing shall be conducted for antelope, bighorn sheep, deer, elk, moose, wild bison and mountain goat licenses remaining after the initial drawings.

(b) The application period shall be determined on an annual basis by the Fiscal Division Chief. Completed applications and license fees must be submitted during the application period.

(c) Both residents and nonresidents shall draw against the same quota.

(d) The maximum allowable number of applications in a party shall be six (6). Residents and nonresidents may apply together in the same party. Party applicants are required to submit their applications for the same species, hunt area and type in the same order of preference. All members of a party may either receive licenses or refunds on their license fees.

(e) All applicants shall participate in the respective random leftover drawing, giving no advantage to applicants with preference points.

Section 23. Reservation of Full Price Licenses. Individuals who have been issued a Governor's Complimentary License for a full price big game animal and who have been unable to use the license for good cause, may reserve a license for the same species for the immediately succeeding hunting season only. Individuals who have been issued a limited quota, full price big or trophy game license and who have been unable to use the license for good cause may reserve a license for the same species, hunt area, and season type for the immediately succeeding hunting season only. ~~Conditions of this reservation are set forth in subsections (a), (b), (c) and (d) of this Section.~~

(a) To qualify for consideration of reservation of a limited quota, full price big or trophy game license due to a majority of the hunting opportunity being lost due to administrative actions of a governmental agency or due to a natural disaster, the licensee shall:

~~(i) request~~Request the reservation on a form provided by the Department;
~~The request, along with the unused and unaltered license with all coupons intact, shall be received by the Department before the earliest opening date of the season for the designated species, including the special archery season, as specified in Commission rules and regulations during the year for which the initial license is issued. The licensee requesting a license reservation shall sign an affidavit verifying that the license was not used during any hunting season. All requests for the reservation of licenses shall be reviewed and determined by the License Review Board.~~

~~(ii)~~ Submit the unused and unaltered license with all coupons intact to the Department; and,

~~(iii)~~ Sign an affidavit verifying that the licensee did not exercise any hunting privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

~~(b) For reasons related to being unable to use the license for good cause, other than natural disaster and military deployment, the licensee shall request the reservation on a form provided by the Department. To qualify for consideration of reservation of a limited quota, full price big or trophy game license due to disabling injury or illness, the licensee shall:~~

~~(i) The licensee shall fully complete the license reservation request form. This form, and the unused and unaltered license with all coupons intact, shall be submitted to the Department by the deadline date listed on the License Reservation Information sheet. Request the reservation on a form provide by the Department;~~

~~(ii)~~ Submit the unused and unaltered license with all coupons intact to the Department;

~~(iii)~~ Submit a Physician Certification for License Reservation Form and a written "Restriction from Hunting Activity" statement, written on the physician's official prescription slip or physician's letterhead, shall be submitted to the Department within thirty (30) days from the date an applicant's completed License Reservation Request Form is received by the Department; and,

~~(iii) For reasons related to being unable to use the license for good cause, other than natural disaster and disabling injury or illness, military personnel who receive permanent change of station (PCS) orders or are assigned away from their home duty station on temporary orders (TDY) for the majority of the regular season, shall provide to Headquarters a copy of official military orders from the Armed Forces of the United States along with the unused and unaltered license with all coupons intact.~~

~~(iv)~~ Sign an affidavit verifying that the licensee did not exercise any hunting privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

(c) To qualify for consideration of reservation of a limited quota, full price big or trophy game license for reasons related to being unable to use the license for good cause concerning military personnel who receive permanent change of station (PCS) orders or are assigned away from their home duty station on temporary order (TDY) for the majority of the regular season, the licensee shall:

(i) Request the reservation on a form provided by the Department;

(ii) Provide the Department a copy of official military orders from the Armed Forces of the United States;

(iii) Submit the unused and unaltered license with all coupons intact to the Department; and,

(iv) Sign an affidavit verifying that the licensee did not exercise any hunting privilege for the specified license, in any manner, during any portion of the hunting season authorized by the license.

~~(ivd) In no case shall a person be allowed to reserve any license if the person fails to submit the unused and unaltered license with all coupons intact to the Department before the earliest opening date of the season, including special archery seasons, for the designated species as specified in Commission rules and regulations during the year for which the license is issued. The licensee requesting a license reservation shall sign an affidavit verifying that the license was not used during any hunting season. All requests for the reservation of licenses shall be reviewed and determined by the License Review Board.~~

(i) For any license reservation in which the hunting season to use the license expires on December 31 of the year issued, the deadline to submit a request for a license reservation shall be December 31 of that year.

(ii) For any license reservation in which the hunting season to use the license has been extended into January of the succeeding calendar year, the deadline to submit a request for a license reservation shall be January 31 of the year in which the hunting license expires.

(iii) For all other licenses, the deadline to submit a request for a license reservation shall be on the last date the individual license is valid.

(ee) Any ~~person~~ resident who has been granted a limited quota elk or limited quota deer license reservation from the License Review Board related to being unable to use the license for good cause may subsequently purchase a general license, if eligible, for the same species during the current hunting season.

(df) Prior to the respective drawing, license quotas in the subsequent hunting season for areas where licenses have been reserved may be adjusted to reflect reservations as provided by Wyoming statute and this Chapter.

(~~eg~~) In circumstances where related season, quota or sex limitation of the hunt area for the unused license changes in the subsequent hunting season, the following options shall be offered:

(i) If the unused license allowed taking either sex of animal, but that type no longer exists, the licensee shall be given a choice of a license for an antlered (male) or antlerless (female) animal in the subsequent hunting season.

(ii) If the unused license was limited to taking an antlerless or female animal, but that license type no longer exists, the licensee shall be given either an any or an antlered or male only license at the Department's discretion in the subsequent hunting season.

(iii) If the license was limited to taking an antlered or male animal, but that type no longer exists, the licensee shall be given either an any or an antlerless or female only license at the Department's discretion in the subsequent hunting season.

(iv) If in the subsequent hunting season, the entire hunt area is closed to hunting of the species listed on the unused license, the licensee shall be offered a license for the same species and sex limitations in another area of the licensee's choice.

(v) If in the next hunting season, the entire state has been closed to hunting of the species listed on the unused license, the licensee shall not be issued another license to hunt that species. Under this circumstance, the licensee shall be issued a refund of the fee paid for the unused license.

(~~fh~~) Applicants requesting the reservation of a limited quota, full price big or trophy game license shall submit the administrative fee of ten dollars (\$10) no later than May 15 in the succeeding calendar year, along with a completed Department form prior to the reissuance of the license.

(~~gi~~) Any limited quota, full price big or trophy game license that is reissued to a qualified applicant shall count toward the total number of licenses a person may apply for and receive during any one calendar year.

(~~hj~~) Any person who has been granted a license reservation under this section, for which preference points have been accumulated, shall not have preference points restored and may not be eligible to purchase a preference point for that species during the same year the original license was issued.

(~~ik~~) Any person who has been granted a license reservation under this section shall not be eligible to participate in the initial drawing the following year for the same species and license type.

Section 24. Applicant Disqualification. The applicant(s) is solely responsible for the veracity of information on the completed application submitted through the ELS. Applications shall be disqualified from participating in drawings for the following reasons:

- (a) The applicant's privilege to purchase or receive any hunting license or preference points has been suspended by a court order or the Wildlife Violator Compact;
- (b) The applicant causes more than one (1) sportsperson identification number to have been assigned;
- (c) Submission by an individual of more than one (1) completed application for a license for the same big or trophy game species, wild turkey or wild bison unless authorized by Commission regulation;
- (d) Applying for a license the applicant is not eligible to receive by Rule and Regulation or Statute;
- (e) The applicant will not reach twelve (12) years of age by December 31 of the year the application is made for the purchase of a preference point. An applicant less than twelve (12) years of age may apply for and receive a big or trophy game hunting license provided the applicant will reach twelve (12) years of age during the season for the designated species as specified in Commission Rules and Regulations during the year for which the license is valid.
- (f) The applicant attempts to manipulate or circumvent Department licensing security procedures in the ELS system in order to submit or modify an application.
- (g) Any person who has an application disqualified under this section 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.

Section 25. Suspension or Revocation of License.

- (a) Non-Payment of Child Support.
 - (i) Upon receipt from the Department of Family Services of a certified copy of an order from a Court to withhold, suspend, or otherwise restrict a license or preference point issued by the Commission, the Game and Fish Department shall notify the party named in the court order by first-class mail of the withholding, suspension, or restriction in accordance with the court order. The Game and Fish Department shall mail this notice by first-class mail to the party named and to the address provided by the Department of Family Services.
 - (ii) Upon receipt of a notice from the Department of Family Services that the obligor is in compliance with the court order, the Game and Fish Department shall immediately reinstate the license unless the license has been suspended or revoked for other reasons. The Department shall by first-class mail notify the party named and to the address provided by the

Department of Family Services that the individual's license privileges have been reinstated. The Department shall also mail by first-class mail to the obligor any licenses in the Game and Fish Department's possession at the time of reinstatement.

(iii) The Department shall maintain a written record indicating to whom the notice was mailed and the address to which the notice was mailed.

(b) Wildlife Violator Compact. The Department may suspend license privileges in accordance with Commission Regulation, Chapter 54, Home State Suspension Procedures for the Wildlife Violator Compact dated July 10, 2015, and which does not include any later amendments or editions of the incorporated matter.

Section 26. Withdrawal or Modification of Application, Refund of License Fees and Reissuance of Certain Licenses. Licenses, permits, stamps, tags, preference points or competitive raffle chances issued under Title 23, Wyoming Statutes or this regulation become the permanent property of the licensee and shall not be canceled or any fee refunded after the license, permit, stamp, tag, preference point or competitive raffle chance(s) has been issued, except as specified in this section or otherwise as set forth in Commission regulation.

(a) A request for a voluntary withdrawal of an application before a drawing shall be accepted through the ELS by the date indicated in Section 20(d) and (e) for the initial drawing, and by the application closing date for the leftover drawing.

(i) Applicants may not submit a voluntary withdrawal form for the purchase of a preference point only, Super Tag or Super Tag Trifecta competitive raffle chance.

(b) A modification of an application must be completed through the ELS by the date indicated in Section 20(d) and (e) for the initial drawing, and by the application closing date for the leftover drawing.

(i) An applicant may only request changes to hunt area and type or change their withdrawal flag indicator on their reduced price application for the initial drawing through the ELS.

(c) To request a refund of a license fee in this subsection, the licensee shall submit the request for a refund in writing along with the license unaltered and with all coupons intact to the Department during the calendar year for which the license is valid. The licensee shall also execute and submit at the time of a refund request a Department affidavit describing the reason(s) the licensee was not able to exercise the license privileges which includes a sworn statement that the licensee did not exercise any hunting privileges granted by the license including any or all seasons for the designated species as specified in Commission regulation during the calendar year for which the license was valid. If the license is destroyed, lost or illegible, the licensee shall state on the Department affidavit to that effect and submit with the written request for refund in the calendar year for which the license is valid. If the licensee is granted a refund for a license, the individual may apply for and receive any remaining issue-after

license for the same species in accordance with state statutes and Commission regulations. Application fees and any applicable preference point fees will not be refunded. All license refund requests shall be reviewed and determined by the License Review Board.

(d) To qualify for a refund of a license fee in accordance with this section, the licensee shall meet one (1) of the following provisions:

(i) In the case of the death of the licensee, a written request for a license refund supported by a copy of the respective death certificate shall be submitted to the Department. The date of death on such certificate shall have resulted in the licensee not being able to participate in the majority of the regular or special archery season. All refunds issued under this subsection shall be made payable to the estate of the decedent unless the license fee was paid by a nonprofit charitable organization. The nonprofit charitable organization shall provide supporting documentation of payment of the license fee.

(ii) In the case of the death of the licensee's spouse, parents, grandparents, siblings, lineal descendants and their spouses, step-parent, step-sibling, step-children, father-in-law, mother-in-law, brother-in-law, sister-in-law, step-son-in-law or step-daughter-in-law or the death of a member of a party application, the licensee shall submit a written request on a form provided by the Department for a license refund supported by the respective death certificate. The date of death shall have resulted in the licensee not being able to participate in the majority of the regular or special archery season.

(iii) In the case of incapacitating illness or injury of the licensee, the licensee's spouse, parents, grandparents, siblings, lineal descendants and their spouses, step-parent, step-sibling, step-children, father-in-law, mother-in-law, brother-in-law, sister-in-law, step-son-in-law or step-daughter-in-law, or incapacitating illness or injury of a member of a party application, supported by a physician's sworn statement on a Department form that the licensee is incapable of performing tasks necessary to exercise the privileges of the license;

(iv) Military personnel who receive permanent change of station (PCS) orders and military personnel who are assigned away from their home duty station on temporary orders (TDY) for the majority of the regular season, all of this being supported by a copy of official military orders from the Armed Forces of the United States, and such orders require the affected personnel to move away from their home duty station, shall accompany the written request for the license refund;

(v) Individuals who are not able to participate in the majority of the regular season for the species specified in Commission rules and regulations during the year for which the license is issued as a result of a court subpoena, jury duty, Grand Jury investigation or attorneys required to attend criminal cases. A certified copy of the court document shall accompany the written request for the license refund;

(vi) When the Department determines fifty percent (50%) or more of the hunting opportunity and access to the public land within an individual hunt area outside of

designated wilderness has been closed due to administrative actions of the state or federal government in closing of the public access to public lands, or due to a natural disaster, including but not necessarily limited to, wildland fires, the licensee of a limited quota antelope, full price bighorn sheep, limited quota deer, limited quota elk, moose, mountain goat, or wild bison license may request a license fee refund;

(A) When the Department determines one hundred percent (100%) of all the hunt areas are closed or the hunting season is prevented from occurring due to administrative actions of the state or federal government, a black bear, gray wolf, mountain lion or wild bison licensee may request a license fee refund. The closing of hunt areas due to harvest quotas being met does not qualify a licensee for a license fee refund.

(vii) An error on the part of the Department or its authorized agent where the applicant has been issued a license not requested. An applicant may request in writing to the License Review Board to review a decision made by a Department employee or an agent of the Department in the handling of the application for, or the issuance of a license, permit, or preference point if the decision is contrary to statute or rule and regulation promulgated by the Commission. All decisions of the License Review Board shall abide by provisions of state and federal statutes and Commission regulations.

(viii) Any youth licensee may be granted a license refund if the youth licensee's opportunity to hunt is jeopardized as a result of any license refund granted by the Department as specified in sections (i), (ii), (iii), (iv), (v), (vi), (vii), or (viii) of this subsection;

(ix) A sponsoring organization of a person with a life-threatening illness that has received a license under Section 13 may be granted a license refund if the licensee's opportunity to hunt is jeopardized as a result of incapacitating illness or injury supported by a physician's sworn statement on forms provided by the Department that the licensee is incapable of performing tasks necessary to exercise the privileges of the license.

(e) Refunds shall not be allowed under the following circumstances:

(i) The licensee illegally purchased more licenses than what was authorized for purchase by Commission regulation or Wyoming statute;

(ii) For any license, permit, ~~or stamp or tag~~ in which the ~~privilege~~ hunting season to use the license, permit, ~~or stamp or tag~~ expires on December 31 in the year issued, the deadline to submit a written request for a refund shall be December 31 of that year.

(iii) For any license in which the hunting season to use that license has been extended into January of the succeeding calendar year, the deadline to submit a written request for a refund of that license shall be January 31 of the year in which the hunting season expires. For all other licenses, the deadline to submit a written request for refund shall be on the last date the individual license is valid.

(iv) Refunds shall be denied in any circumstance where the licensee hunted on the license for the designated species as specified in Commission rules and regulations, including special archery seasons, during the year for which the license is issued.

(f) There shall be no right of appeal to the Commission for any decision rendered by the License Review Board or the Department for any provision of this section.

(g) Restoration of preference points. In any case where a license may be obtained by the accumulation of preference points, or preference points may be obtained in lieu of application for a license and a license refund is granted by the Department, all accumulated preference points, including any preference point that may have been earned for the year the license is issued, shall be restored to the applicant.

(h) In the case of the death of a licensee who has been issued an any wild bison license or a mountain goat license, a written request for the license to be surrendered to the Department and reissued to an immediate family member of the decedent shall be made to the License Review Board. The request shall be supported by a copy of the respective death certificate, and the date of death on such certificate shall have resulted in the licensee not being able to participate in the majority of the regular or special archery hunting season.

(i) The license shall be reissued to a qualified immediate family member of the decedent at no fee.

(ii) The license shall be reissued for the same species, hunt area and license type as the license surrendered.

(iii) A license reissued to an immediate family member of a decedent shall count against the maximum number of licenses a person may otherwise apply for and receive as a condition of Commission regulations.

Section 27. Alteration or Transfer of Licenses, Permits, Stamps, Tags, Preference Points or Competitive Raffle Chances to Another Person Prohibited; Use by Another Person Prohibited; Invalidation by Improper Fees. Department licenses, permits, stamps or tags shall not be altered by anyone other than authorized Department personnel.

(a) No license, permit, stamp, tag, preference point or competitive raffle chances shall be transferred, or used for the purpose of taking wildlife, except by the individual to whom it was issued and therein named and while in that individual's possession. No individual shall take or attempt to take any wildlife using another individual's license, permit, stamp or tag. Any license, permit, stamp, tag, preference point or competitive raffle chances shall not be valid unless the proper fees have been received by the Department.

(b) Licenses, excluding lifetime licenses, shall only become valid when signed by the person in whose name the license is issued in the space provided on the license for the owner's signature, and where applicable, co-signed by a parent or legal guardian.

(c) Any Department enforcement officer may seize as evidence any license, permit, stamp or tag that was obtained in violation of Commission regulations or Wyoming statute.

Section 28. License and Conservation Stamp Expiration ~~Effective January 1, 2019.~~

~~(a) All licenses, excluding annual fishing, annual small game, annual game bird, combination annual small game/game bird, annual furbearer hunting or trapping licenses, and licenses to operate game bird farms shall expire on the last day of the calendar year in which issued.~~

(ia) ~~Annual fishing licenses, annual~~ Fishing licenses, small game licenses, ~~annual~~ game bird licenses, combination ~~annual~~ small game/game bird licenses, ~~and annual~~ furbearer hunting or trapping licenses and game bird farm licenses shall be valid ~~for twelve (12) months from the date of purchase or for twelve (12) months from the previous license expiration until the expiration date as indicated on the individual license.~~ All other licenses expire on the last day of the calendar year in which issued.

(b) The Commission by regulation provides that big game animal and wild bison licenses issued in one (1) calendar year are valid through the closing date established in January of the next succeeding calendar year when the Commission establishes a hunting season for big game animals or wild bison for which the licenses are valid for hunting seasons that open during one (1) calendar year and close in January of the next succeeding calendar year.

(c) All daily hunting or fishing licenses shall only be valid for the calendar day(s) delineated on the license. A nonresident five (5) day fishing license is only valid for five (5) consecutive calendar days.

(d) Conservation Stamps.

(i) Printed Conservation Stamps shall expire on the last day of the calendar year printed on the stamp.

(ii) Conservation Stamps Authorizations issued through the ELS shall expire twelve (12) months from the date of purchase or twelve (12) months from the previous Conservation Stamp expiration date as indicated on the stamp.

Section 29. Super Tag Licenses and Super Tag Trifecta Licenses. Wyoming statutes provide for the issuance of big game, trophy game and wild bison licenses to be issued through a competitive raffle process. Big game, trophy game and wild bison licenses authorized under this section shall be valid for the species for which the license has been issued.

(a) These licenses shall be valid in any hunt area in accordance with Commission regulations, except for the following:

(i) A Super Tag License or a Super Tag Trifecta License for moose shall not be valid in any moose hunt area which has a total quota of ten (10) or less antlered or any moose licenses.

(ii) A Super Tag License or a Super Tag Trifecta License for full price bighorn sheep shall not be valid in any bighorn sheep hunt area which has a total quota of eight (8) or less full price bighorn sheep licenses.

(iii) A Super Tag License or a Super Tag Trifecta License shall not be valid within Grand Teton National Park.

(iv) A Super Tag License or a Super Tag Trifecta License for wild bison shall not be valid in any wild bison hunt area which has a total quota of ten (10) or less any wild bison licenses.

(b) Recipients of a Super Tag License and Super Tag Trifecta License shall be exempt from the provisions in this Chapter limiting the number of big game, trophy game or wild bison licenses an individual may possess in any one (1) calendar year. An individual is eligible to receive a Super Tag License or Super Tag Trifecta License for big game, trophy game or wild bison annually. Recipients shall be exempt from the five (5) year waiting period and preference points shall not be lost if an individual receives a Super Tag License or Super Tag Trifecta License for moose or a full price bighorn sheep and shall be exempt from the once in a lifetime license restriction for mountain goat and wild bison licenses. Preference points shall not be lost if an individual receives a Super Tag License or Super Tag Trifecta License for antelope, deer or elk.

(c) There shall be up to eleven (11) successful recipients of licenses from all the individuals that purchased a Super Tag License or Super Tag Trifecta License competitive raffle chance. Up to ten (10) individual recipients shall be issued one Super Tag License as follows: one (1) antelope license, or one (1) bighorn sheep license, or one (1) black bear license, or one (1) deer license, or one (1) elk license, or one (1) gray wolf license, or one (1) moose license, or one (1) mountain goat license, or one (1) mountain lion license or one (1) wild bison license. The successful recipient of a Super Tag License shall be based on what species of big game, trophy game or wild bison license was randomly drawn for the participating recipient. One (1) successful applicant shall be issued Super Tag Trifecta Licenses, allowing that individual to choose, at their discretion, no more than three (3) different species of big game, trophy game and wild bison licenses.

(d) Super Tag License and Super Tag Trifecta License competitive raffle chances shall be sold annually beginning on July 15 and ending on July 1 each succeeding year.

(i) The price for a single Super Tag License competitive raffle chance shall be ten dollars (\$10) for both residents and nonresidents. The price for a single Super Tag Trifecta License competitive raffle chance shall be thirty dollars (\$30) for both residents and nonresidents. The number of competitive raffle chances that any one person may purchase is not limited in number.

(ii) For an individual species Super Tag License competitive raffle chance, a person shall choose which species of big game or trophy game or wild bison they purchase a competitive raffle chance for. An applicant may choose to purchase a competitive raffle chance(s) for multiple species.

(iii) For a Super Tag Trifecta License competitive raffle chance, a person does not need to select the individual species of big game or trophy game or wild bison at the time they purchase a raffle chance.

(iv) A person purchasing a Super Tag License or Super Tag Trifecta License competitive raffle chance shall not be eligible to submit a voluntary withdrawal form or be eligible for a refund for competitive raffle chances purchased.

(e) A competitive drawing shall be conducted to determine the winners of the individual species Super Tag Licenses and Super Tag Trifecta License.

(i) There shall be no preference given to residents or nonresidents in the drawing or issuance of a Super Tag License or Super Tag Trifecta License.

(f) License fees for successful Super Tag License and Super Tag Trifecta License holders shall be as set forth in Wyoming Statute or Commission regulation.

(g) No person shall purchase a competitive raffle chance for a Super Tag License or Super Tag Trifecta License during any calendar year in which the person's privilege to obtain a license or preference point has been revoked or suspended by a court or the Wildlife Violator Compact.

WYOMING GAME AND FISH COMMISSION

~~Mark Anselmi~~David Rael, President

Dated: ~~November 13, 2018~~July 18, 2019

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.

The Commission proposes to amend the Wyoming Game and Fish Commission Gray Wolf Hunting Seasons regulation to establish annual hunting seasons, licensing limitations, gray wolf harvest registration procedures and bag limits for the 2019 hunting season. At the time of this filing, the 2018 gray wolf harvest information is not yet available to the Department. Individual hunt area season dates, mortality limits and specific hunt area limitations may be modified as a result of harvest data currently being evaluated. Any additional proposed changes to season dates, specific hunt area limitations, mortality limits, hunt area boundaries or other gray wolf hunting provisions shall be made available for public comment during all public meetings held around the state.

Section 3. An edit has been made indicating there shall be an open season during 2019 for the hunting of gray wolves as set forth in this regulation.

Section 4. Mortality limits and season dates may be modified to reflect the current population of gray wolves in Wyoming and future management through hunter harvest. Proposed hunt area mortality limits are being developed in conjunction with 2018 harvest data and 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
MARK GORDON

DIRECTOR
BRIAN R. NESVIK

COMMISSIONERS
DAVID RAEL – President
PETER J. DUBE – Vice President
RALPH BROKAW
GAY LYNN BYRD
PATRICK CRANK
RICHARD LADWIG
MIKE SCHMID

July 26, 2019

MEMORANDUM

TO: David Dewald, Senior Assistant Attorney General

FROM: Mike Choma, Wildlife Law Enforcement Supervisor

COPY TO: Rick King, Scott Edberg, Doug Brimeyer, Dan Thompson and Terri Weinhandl

SUBJECT: Summary of Public Comments and Responses; Chapter 47, Gray Wolf Hunting Seasons

The Wyoming Game and Fish Department (Department) conducted 12 public meetings to address draft regulation proposals for Wyoming Game and Fish Commission (Commission) Regulation Chapter 47, Gray Wolf Hunting Seasons. A draft regulation proposal was also available for viewing and public comment through the Department website from April 29, 2019 through June 17, 2019.

The Department received 98 total comments for Chapter 47. Major public comment topics include: opposition to wolf/trophy hunting, the importance of wolves in the ecosystem, negative impacts to tourism/economy, the value of wolf viewing opportunities, opposition to the wolf population objective, the advantage of wolves in disease reduction, opposition to longer season dates in Gray Wolf Hunt Area 13, use of non-lethal depredation techniques, opposition to management for special interest/agriculture/etc., national park boundary buffers, disruption of wolf social structure, and claims that the Department management of wolves is not science based.

Many public comments relate to philosophical differences of opinion regarding the management of gray wolves in Wyoming. The Department continues utilizing the best science available to manage wolf populations and recommends continuing to use hunting seasons as part of ongoing management efforts for gray wolves. Department harvest and management data is also supportive of the mortality limits and season dates as proposed. The proposed hunt area mortality limits and hunting season dates have been developed to maintain a recovered gray wolf population. The Department is committed to managing for a recovered gray wolf population.

After consideration of all the public comments received, the Department made no additional changes to this draft regulation. The Commission also considered all the public comments they received and made no additional changes to the proposed regulation.

Wyoming Game and Fish Department
Comment Form



The Department welcomes comment regarding proposed changes to regulations. Questions about these proposed regulation changes should be directed to Department Regional Offices for clarification. No individual Department response will be generated from questions submitted through this comment form. Written comments shall be accepted at all public meetings, by standard mail at the address below, or on the WGFD website at <https://wgfd.wyo.gov/Get-Involved/Public-Meetings>. 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 17, 2019.

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

Please use a separate form for each of the categories below:

☒ Gray Wolf Hunting Seasons



Comments:

Briefly,
Am in full support of proposed Wolf hunt quotas for 2019.

I attended 2 separate presentations by Ken Mills; both were excellent. His/the Department's well-articulated and well-researched proposal convinced me that it is essential we keep our management priority status in the Trophy hunt area (the WTGMA). The proposed 2019 quotas assure that.

It is obvious we need, as a state, to avoid re-listing the wolf and/or inciting Federal agency sanction.

Thanks for your hard work on this issue as well as all the other areas of wildlife management here in our great state.

-R.B. Betts Jr.

mail

Budd Betts
Printed Name
P.O. Box 929
Dubois, Wyo.
82513

(Please use reverse for additional comments.)

June 7, 2019

Date

4/2019



June 4, 2018

Wyoming Game and Fish Department
Wildlife Division
3030 Energy Land
Casper WY 82604

Attn: Regulations Chapter 47, Gray Wolf Hunting Season
Submitted electronically at WGFD site

Dear Commissioners,

Thank you for the opportunity to submit the following comments regarding the Draft Chapter 47, Wyoming Gray Wolf Hunting Season (Plan) on behalf of the 20,000-plus regional and national followers of Wyoming Untrapped (WU). Wyoming Untrapped is a 501(c)3, not-for-profit organization based in Jackson, Wyoming whose mission it is to *"create an environment safe for people, pets and wildlife through education, trapping reform and advocacy."*

Living and working in Wyoming for decades, we greatly appreciate the state's unparalleled wildlife diversity and abundance. We also recognize and respect that what we have is in many ways the result of the good work of the Wyoming Game and Fish Department's (Department) dedicated biologists and the agency's leadership. We thank you for that.

STATEMENT:

Wyoming Untrapped would like to thank the Department for prohibiting wolf trapping and the use of dogs for wolf hunting within the Trophy Game Area. WU would also clearly state that we oppose any sport hunting of wolves, whether as trophy game or as predators.

NEED FOR A WOLF HUNT:

Wyoming Untrapped takes exception to the premises put forth by Department staff for continuing Wyoming's wolf hunt and specifically for increasing the kill quota. At a recent meeting in Jackson, Department personnel attempted to make the case for both the hunt and the quota increase based on the premise that wolves had "moved elk off historical winter grounds" (specifically Department operated feed grounds in the Upper Gros Ventre

fedex

Valley). Department personnel added that this was upsetting to the Department feeding crew, and without proof, implied that this movement was also detrimental to the elk (Koshmrl 2018).

Regarding elk abandoning their traditional feed grounds, this may very well turn out to be beneficial for the habitat surrounding the feed grounds. Without hundreds of elk concentrated on that small area for 5 to 6 months each year, the habitat may now have a chance to rebound a bit. And, there was no evidence provided that the elk suffered higher than usual winter mortality on their new winter habitat. WU sees this concern as being more about having decades of tradition suddenly change and the Department not being willing to accept change. We submit that change might be beneficial for the elk and the habitat. For the Department to imply that wolves had “done bad” and thus deserve more hunting pressure is unfounded, unprofessional and unfortunate.

A second reason put forth for a wolf hunt is the assertion that wolves need to be “controlled” i.e. killed, to protect domestic livestock. Recent studies have shown that when anthropogenic removal of wolves occurred over a broad landscape (such as Wyoming’s wolf Trophy Game Area) *“the odds of livestock depredations increased 4% for sheep and 5% for cattle with increased wolf control-up until wolf mortality exceeded the mean intrinsic growth rate for wolves at 25%.” “Depredations began to decline after mortality exceeded 25%.”* (Wieglus, R. 2014).

Professional opinion has it that an annual wolf mortality rate greater than 25% is not sustainable over the long period if federal relisting of wolves is to be avoided. The assumption is that mortality rates greater than 25% will likely result in breeder loss, smaller pack size, pack instability and possible dissolution followed by compensatory increases in breeding pairs, numbers of wolves and hence, increases in depredations.

WU understands the rights and needs of livestock owners to protect their property, but this may be better accomplished with focused removal of depredating wolves carried out by professional personnel instead of the broad-scale and un-focused approach of a hunting season.

APPROPRIATENESS OF A WOLF HUNT:

We are opposed to sport hunting of wolves for several reasons, including the significant role wolves play as an apex predator within the Greater Yellowstone Ecosystem. Researchers over the past twenty-plus years have compiled an indisputable body of evidence supporting the conclusions that the random, continuous and large-scale removal of wolves, and other apex predators has a disproportionate, cascading impact on the entire ecosystem they occupy. (We will only provide a few critical citations, the Department’s biological staff is aware of these publications, and we are confident that other commenters will cite this point in detail.)

These negative impacts begin when a population of apex predators, particularly wide-ranging, low-density species such as the wolf are subject to indiscriminate, random anthropogenic removals, particularly hunting. Not only is there an impact to ecosystem function brought on simply because the population is held below environmental limitations, but there are additional and significant impacts resulting from the disruption of the social order within packs when key members are removed.

Ken Mills, Large Carnivore Specialist, is credited as saying during a Jackson meeting that it is “possible” that some packs may incur heavy losses due to changes in the Gros Ventre hunting Plan, but he doesn’t think that any packs will be wiped out (Koshmrl 2018). WU thinks that this sentiment is misinformed.

A Comprehensive study of wolf populations from throughout North America, authored by 19 leading wolf biologists, concluded that when key individuals, usually breeding individuals, are removed, some packs dissolved and abandoned their territories (av. 38.2%). For example, when one breeder was removed, 25.8% of the packs dissolved whereas 84.6% of the packs dissolved when both breeders were removed. Reproduction occurred in 56.2% of the packs the year after the loss of one breeder and only 9.1% of the time when both breeders were removed (Brainerd, S. et al 2006). Clearly, random killing of pack members can have impacts significantly greater than just the addition of one or two bodies added to the mortality tally. With no disrespect meant towards Mr. Mills, WU stands by this and other research documenting similar outcomes following the loss of key pack members—a scenario likely to play out repeatedly with Wyoming’s proposed wolf plan.

Cassidy, K.A. et al (2016), spell out how pack stability and survivorship, and consequently territorial integrity and population limitations are positively affected by larger, stable packs made up of a range of ages. And with significant disruption (loss of key members), the pack age and social structure, hunting patterns and efficiency can be negatively impacted. It is no stretch to anticipate that under these conditions, smaller packs consisting of younger and less experienced members may turn to easier prey such as domestic stock.

There is also strong scientific evidence that when populations of apex predators, and again specifically wolves are left to their own devices and grow to the limits of the system’s carrying capacity, they begin to control their numbers through fewer and smaller litters and increased intra-specific territorial conflicts resulting in deaths (Smith, D.W et al. 2012). And the opposite is also true; when wolf numbers are artificially reduced, and all other environmental factors remain supportive, wolves are very likely to compensate by increasing litter size and having younger and/or more adults breeding.

Research demonstrates that if a population is reduced by whatever action(s), it will likely rebound to the point where it will once again become self-limiting. All this is to say that when left alone, wolves are density-dependent and will limit their own numbers.

Because of their high sociability, stable packs develop hunting strategies including extraordinary cooperation during hunting. Stable packs are likely to initiate higher degrees of territorial behavior than packs whose members are in flux due to human-caused removals, including sanctioned hunting seasons. And stable packs will have more accumulated knowledge of their territory and its prey distribution, again likely resulting in higher hunting efficiency and prey utilization.

Another advantage of having stable packs that know and defend their territories is that they will likely avoid dangerous areas, such as occupied livestock range. Simply stated, a stable wolf population will partition the landscape into defended territories and exist at a population level that the environment can support.

The indiscriminate hunting of wolves can have significant impacts that will reverberate throughout the ecological systems. Wolves are apex species and exist not as individuals but as social units-as packs. Leave them alone and they will flat out control their own numbers (Ordiz, A. et al. 2013.). Witness the Yellowstone wolf population: after 20-plus years, this sub-population has stabilized around 100 individuals—without human intervention, control or hunting. And the Northern elk herd, a primary food source is on a steady increase.

Another reason often put forth to justify a sanctioned wolf hunt is the claim that wolves need to be “controlled” i.e. killed, to protect domestic livestock. Recent studies have shown that when anthropogenic removal of wolves occurred over a broad landscape (such as Wyoming’s wolf Trophy Game Area) *“the odds of livestock depredations increased 4% for sheep and 5% for cattle with increased wolf control-up until wolf mortality exceeded the mean intrinsic growth rate for wolves at 25%.” “Depredations began to decline after (wolf) mortality exceeded 25%.”* (Wieglus, R. 2014).

The research did show that livestock depredations did decrease as wolf mortality exceeded the 25% threshold. However, professional opinion holds that an annual wolf mortality rate greater than 25% is likely not sustainable over the long period if federal relisting of wolves is to be avoided. And even if the wolf population did persist, the impacts of a high mortality rate will likely result in more depredations, the very opposite of the intended outcome.

Wyoming Untrapped understands the rights and needs of livestock owners to protect their property, but this may be better accomplished with professional agency personnel focused on the removal of depredating wolves instead of the broad-scale and un-focused hunting season approach. And, any agency removal should only occur after all reasonable non-lethal methods have been employed.

THE NORTH AMERICAN MODEL OF WILDLIFE CONSERVATION:

Wyoming Untrapped also opposes the hunting of wolves because it violates several principles of the North American Model of Wildlife Conservation (NAMWC). First, wildlife is

held as a Public Trust Resource by state or federal agencies and is not owned by anyone. This, in conjunction with wildlife being Allocated by Wildlife Law wherein the public – all the public has input into law-making causes us to ask: why, after years of the Department “taking public comment,” we who have alternate views regarding wolf management have yet to see any significant changes made from any of the original Plans? This can hardly be viewed as respecting, let alone incorporating the public’s input.

WYOMING’S DUAL CLASSIFICATION:

We also disagree with the State of Wyoming and the Department for maintaining a Plan ascribing dual status to Wyoming’s wolves. In so doing, the State has designated, and the Department continues to manage 85% of the state as a Wolf-Predator Zone within which the State allows and condones the killing of wolves at any time, by any means and for no better reason than to simply kill a wolf. This means that wolves can be shot, trapped, run to death with snowmobiles or other vehicles at any time and nearly anywhere they exist. It allows for the killing of wolves in their dens- along with their dependent and defenseless offspring by gassing, explosives and execution with fires. This is amoral and absolutely contrary to the NAMWC principle that “Wildlife Should Only be Killed for a Legitimate Purpose” (Bookhout, T.A. 2012. P.18).

In addition, the killing of wolves in the Predator Zone by any means also violates the very premise of “Fair Chase” as defined by numerous individuals, organizations and in many publications. Nowhere is the principle of “Fair Chase” better defined then by Jim Posewitz (as quoted in Lein, D. 2014): [fair chase]” address *the balance between the hunter and the hunted. It is a balance that allows hunters to occasionally succeed while animals generally avoid being taken.*” Many of the actions carried out against wolves within the Predator Zone allow them no chance of escape. These activities are contrary to the principle of “Fair Chase.”

Discussions about what constitutes unethical hunting, inevitably concludes that the use of aircraft (and “drones”) to locate animals and the herding or chasing of animals with motorized vehicles violates the “Fair Chase” principle. In simple terms, “Fair Chase” means *“hunting without taking advantage of the animals and allowing them a fair chance to escape in defense[.]”* (Bullen, V. 2018). What is allowed and often happens within the Predator Zone cannot in any way be called hunting or “Fair Chase”—it is simply barbaric and inhumane behavior that brings disgrace to all bona-fide, ethical hunters.

How can the State of Wyoming and the Department support, let alone justify establishing a Predator Zone for wolves? Even if the abhorrent killing practices are technically legal within the Predator Zone, they are by every reasonable standard amoral and demonstrate a complete disregard for the principle of “Fair Chase” and the ethical treatment of wildlife. If the Department remains silent and does nothing to eliminate the Predator Zone, does not call-out the inhumane killing practices employed therein, and does nothing to remove the

wolf's Predator Status within 85% of the State, the Department, and the State are tacitly condoning and remain complicit in this unethical killing activity.

All Wyoming wolves, except those within Yellowstone (YNP) and Grand Teton National Parks (GTNP), the John D. Rockefeller Memorial Parkway (JDRP), the National Elk Refuge (NER) and the Wind River Indian Reservation (WRIR) should be designated as a game species without exception. The current dual status designation is not responsible, twenty-first century wildlife management; it is instead a total abdication of management responsibility by the Department.

And last, hunting wolves by the general public serves no purpose other than as an expression of "blood lust" and a catalyst for "bragging rights". There is no derived food value, only ego gratification. Many members of WU were brought up in hunting families and were taught that you only kill what you will eat. WU still subscribes to that value. A trophy hunt of wolves feeds nothing more than the personal ego, and as it all too often occurs within the Predator Zone, is a disgrace to the ethical hunting community. Again, Wyoming's wolves should have big game status with a year-round closed hunting season.

HUNT AREA CONFIGURATIONS Sec. 4(h):

For years WU, and many others have asked the Game and Fish Commission to change the configuration of the HA's, particularly HA's 1, 2, 3, 6, and 8, and 9. Instead of having these HA's radiate out from YNP, GTNP and the NER as they currently do, their boundaries should be reconfigured to resemble concentric arcs moving away from the park boundaries, with the HA closest to the parks acting as a buffer and having a very low or zero quota.

This configuration would have three positive aspects: first, it would protect wolves that venture out of the parks from being shot, second, it would allow for increased quotas focused farther from the parks where livestock depredations may be more likely to occur, and third, if quotas are judiciously applied, the overall quota can remain unchanged.

For two reasons, the current HA configuration exposes park and refuge wolves to considerable hunting pressure. First, because these wolves spend some or most of their time within the protective confines of the park and refuge (and near a conspicuous human population), they may be somewhat habituated to and less fearful of humans. And second, these wolves face significant hunting pressure because their home ranges and the HA's are relatively accessible to hunters.

In an attempt to assess hunter impact on these 6 wolf packs, we conducted a rough analysis of information from the 2017 season. We estimated that 15 hunter-killed wolves, or 34% of the 44 quota came from the 4 HA's abutting GTNP and the NER (HA's 6, 8, 9 and 10).

Based on further calculations, the 4 HA's contained at least 6 packs (totaling 46 individuals) that had home ranges partially or completely overlapping the park and/or the refuge

(Annual Report. 2017. Table 1, Fig. 1). And as many as 10 of the 15 (67%) wolves killed by hunters in the 4 HA's came from these 6 packs. When all known mortalities are added in, these 6 packs lost a grand total of 20 of their 46 members. In other words, at least 43% of the members of the packs whose home ranges overlap to some extent GTNP and the NER were lost in 2017. All but one of the mortalities is attributed to human actions.

When one considers the probability of these mortalities including one or both breeding adults in a pack and considering the potential for pack break-up and loss of reproductive potential due to breeder loss, and the subsequent flux in surrounding territories, we must conclude that human activities, particularly sanctioned hunting of wolves had a significant impact on the wolves of Grand Teton National Park and the National Elk Refuge.

ECONOMIC VALUE OF WOLVES:

Absent specific data regarding the positive economic impact of wolf viewing in Jackson Hole, we rely upon data from a 2005 survey conducted in YNP (Duffield, et al. 2006) which estimated the economic impact to the region of wolf tourism at +\$35.5 million (2005 dollars). We can safely say that the positive economic impact of having viewable wolves in the Jackson Hole is equally significant. In fact, it is likely tens-of-times greater than all the costs of managing wolves in the region, including livestock losses and alleged diminished hunting opportunities attributable to wolves. In other words, we feel confident in saying that a cost-benefit analysis of having wolves in the Jackson Hole region would show a very significant positive impact to the region's economy.

We have no way of knowing how the local economy is impacted by the loss of 43% of the 6 packs whose home ranges abut or overlap the park and refuge. However, we feel confident that a loss of this magnitude has a severe impact on viewing opportunities and hence, a related impact upon our tourism economy. Removing that many wolves from packs that spend some or most of their time in and near GTNP and the NER, is unwarranted and reflects little or no respect for local interests, national park values and mandates, and the local and state tourist economies.

Clearly, wolves are worth much more as "watchable wildlife" than as "hunnable wildlife." And wolves are worth much more alive than dead.

PROPOSED HA CONFIGURATIONS:

Before we proceed, we must reiterate our unequivocal opposition to any sport hunting of wolves in Wyoming. However, barring that preferred outcome, we strenuously object to increasing the kill for 2018. We bring this up here because it factors into the reconfiguration currently being proposed.

The 2018 Plan proposes splitting HA's 5 and 11 into two new units, 13 and 14 and increasing the kill quota for 2018 from 44 to 58—a 32% increase. We also do not understand the rationale for having a floating quota of 15 for HA's 8, 9 and the newly shrunken HA 11. If

there was ever an argument to be made by the Department that HA's were set up to direct off-take of wolves to specific landscapes, this new "floating" quota appears to blow that argument out of the water. As proposed, all 15 wolves killed by hunters could be from any one of several packs in the HA's. But more significantly, they could all be taken from packs that overlap GTNP and the NER. This is unacceptable and demonstrates no respect for GTNP or NER wolves and the interested public- who also owns these wolves.

Wyoming Untrapped respectfully requests that HA's 6,8, and 9 be reconfigured as previously described, and that if the two new HA's (13 & 14) are necessary, that they have lower kill quotas ascribed to each; quotas that in total come to far fewer than what is currently proposed for those HA's.

SEASONAL TROPHY HA 12:

Hunt Area 12 is of particular concern to WU. The Department states that HA 12 will be managed as a wolf movement corridor between Idaho and Wyoming to help ensure adequate genetic diversity within the Wyoming wolf population. However, when Wyoming's HA's management plan is viewed in context to that of neighboring Idaho- the anticipated "source" of immigrating wolves, the potential for successful movement between the two states is severely limited.

Between the two states and their various wolf hunting seasons (and trapping season in Idaho), there is not one single day of the year when wolves moving through that area are not subject to hunting or trapping on one or both sides of the state line. Not one.

Specifically, the Idaho Big Game (Wolf) Hunt Units (HU) adjacent to Wyoming's HA 12 are open to hunting from August 30th to March 31st (Idaho 2017-2018). Unfortunately, during that same time, and longer (March 1st to October 14th) Wyoming's HA 12 is officially a Predator Zone during which period all wolves can be killed by anyone at any time and by any means. Also, Idaho allows trapping from November 15th to March 31st within the HU along the northern approximate one-third of the shared state boundary. To be realistic, this so-called safe wolf movement corridor exists only on paper, certainly at no time does it exist upon the landscape.

If Wyoming is truly committed to maintaining genetic diversity within its wolf population, then WU urges the Commission to eliminate the Predator Zone aspect from HA 12 and manage it as a year-round, "zero quota" – i.e. "no take" HA. At least then, Wyoming can say it has done its part to accommodate inter-population, inter-state wolf movements.

DEFINITIONS – MORTALITY Sec. 2(a):

In defining mortality, dictionaries do not differentiate between types of death. Mortality means death, whatever the cause. When used to assess the status and condition of Wyoming's wolf population, mortality figures need to consider all mortality, whether human-caused or not. To exclude wolves killed by "Department take", "legal take permits",

and those “...taken under the authority of §W.S.23-3-115(c)”, which are all human-caused, is simply incomprehensible. Any wolf mortality is a dead wolf and needs to be accounted for and factored into any population assessment. And making an exemption for “...known natural and accidental gray wolf deaths[.]” is also unacceptable and diminishes the credibility of populations estimates and status reports.

Plus, what is an “accidental” death if not natural or human-caused?

Section 4(h) needs to be re-written to state that ALL known mortalities will be identified, recorded and used in all population assessments, modeling and predictions, and that this information will be made available to the public in the annual report.

HUNTING REGULATIONS Sec. 4(a):

The second sentence of Section 4 (a) needs to be re-written as follows: *“These regulations, and any allowance for hunting, do not apply to all lands within the boundaries of Grand Teton National Park, the John D. Rockefeller Memorial Parkway or the National Elk Refuge.”* The point is that hunting of wolves on Grand Teton Park inholdings and within the John D. Rockefeller Memorial Parkway should not occur.

Also, the last sentence of Sec. 4(a) should be re-written as follows: *“Gray wolves in Wyoming are designated as predatory animals as defined in §W.S. 23-1-101(a)(viii)(B) except for:*

- (ii) Yellowstone National Park, Grand Teton National Park, the John D. Rockefeller Memorial Parkway, the National Elk Refuge; and,*
- (iii) All lands within the boundaries of the Wind River Reservation.”*

Regarding Sec. 4(a)(ii), the point is that by omitting GTNP, the NER and the JDRP, it appears that Wyoming has management authority over wolves within those Federal jurisdictions. Gray wolves occurring within the boundaries of GTNP, the JDRP and the NER should never be hunted.

Regarding Sec. 4(a)(iii), the point of this recommendation is that all gray wolves within the boundaries of the Wind River Indian Reservation, including within private inholding, should be managed by and have their status determined by Reservation authorities.

Regarding Sec. 4(f), the last sentence should be re-written as follows: *“The pelt and skull shall be presented in an unfrozen condition to allow collection of biological samples for DNA analysis to assess genetic connectivity and to determine the age and sex of the gray wolf.”* DNA collection “may be request(ed) and “voluntarily provided...from the gray wolf...” killed within the Predator Zone for genetics sampling. This should be mandatory.

The point here is that tissue samples should be taken so that DNA analysis can be done on all hunter-taken wolves. Only through rigorous and extensive sampling can the genetic diversity- and health of the population be determined.

WOLVES DESIGNATED AS PREDATORY ANIMALS – Sec. 8:

Although WU vigorously opposes having any Predator Zone designation, barring that outcome, we request that Sec. 8(a) should contain a sentence making it clear that the public will have easy and timely access to the following information: the date, location, sex, and method of death of all wolves taken as designated predatory animals. Simply stated, this basic information (without individual hunter information) should be readily available to the public, which is currently not the case.

THE PUBLIC TRUST:

All wildlife Native to the United States is held in public trust by designated public agencies as described in The Public Trust Doctrine (PTD). In the case of wolves in Wyoming, their management is a responsibility shared between the Game and Fish Commission, the National Park Service and the National Wildlife Refuge System. In all cases, public trust means managing for the benefit of the resource and the public (Wildlife Society, 2010).

Wolf management decisions need to be founded on more than hunting quotas. They need to consider all mortality regardless of cause. At the end of 2017, it was estimated that 347 wolves resided in Wyoming, including the two parks and the WRIR (238 were counted within Wyoming's jurisdiction). And during the same year, it is reported that at least 168 wolves died from various causes throughout the state (162 mortalities occurred within Wyoming's jurisdiction) (Annual Report, 2018. Table 1).

Simple calculations would then conclude that at least 515 wolves (347 living + 168 deaths = 515) resided in the state at some time during 2017, and 400 of those (238 living + 162 deaths = 400) resided within Wyoming's jurisdiction. And simple calculations would conclude that Wyoming's entire wolf population suffered a mortality rate of 33% ($168/515 = 33\%$), and the state's jurisdictional wolves suffered a mortality rate of 41% ($162/400 = 41\%$). Hunters killed 44 wolves (43 legal + 1 Illegal taken by a hunter = 44) or 11% of Wyoming's portion of the mortality figure ($44\text{ kills}/400\text{ population} = 11\%$).

Wyoming's human-caused wolf mortality totaled 144 (Annual Report, 2018, Table 2) or 36% of the population ($144/400 = 36\%$). A wolf population cannot sustain itself for the long haul with an annual mortality rate of 41%. It cannot sustain itself with an annual, human-caused mortality rate of 36%.

Regardless of what the current wolf population might be, increasing the hunt quota to 58 will ensure that the overall mortality rate for 2018 will remain far above sustainable levels. This is not acceptable public trust management. Wyoming's wolf management plan should focus on reducing human-caused mortalities and accepting that natural mortalities and

depredation removals will occur, the logical place to lower the mortality figure is by closing the hunt season, or at least reducing the hunt quota, not increasing it.

Together, the NAMWC and the PTD, clearly state that wildlife should be managed by best science for the benefit of the public in compliance with existing laws. The National Park Service Organic Act of 1916 (Organic Act, 1916) proclaims the purpose of National Parks to be: *“...to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations[.]”* (emphasis added). Our National Parks, often called “America’s best idea,” and referred to by President G.W. Bush as “America’s gift to the world” (as cited by: U.S. Dept. Int. 2005), are a model for parks around the world. And Yellowstone and Grand Teton National Parks form the conservation core of the Greater Yellowstone Ecosystem.

The followers of WU, along with many citizens of the world expect our National Parks to act as “arks” for native wildlife—safe havens for those species residing therein. When the home ranges of wolf packs are reviewed, only 5 packs appear to have home ranges entirely within the boundaries of the parks, and all 5 occur within Yellowstone N.P., (Lamar Canyon, 8-Mile, Prospect Peak, Mollie’s, and Wapiti Lake). No packs have their entire home ranges within Grand Teton National Park. (Annual Report, 2017, Fig. 1 & Table 3). The 5 YNP packs account for a “minimum” of 55 wolves.

Of the 5 packs, only one, the 8-Mile pack is listed as *“Border pack with MT, assigned to Yellowstone National Park”*, making it very likely that members of this pack cross into the hunting zones of Montana (Annual Report, 2017, Table 3). Two additional packs, the Lamar Canyon and Prospect Packs have home ranges very near the Park’s boundaries.

It needs to be mentioned that home ranges very likely do not represent the actual and larger areas frequented by wolves—they simply represent the polygons formed by locations verified either visually or with radio collar monitoring. In other words, pack members likely venture beyond the limits of the polygons, and potentially out of the safe havens of the park and into state hunt areas. And, knowing the movement capabilities of wolves, most wolves within YNP, regardless of their home range descriptions might, during their lives venture beyond the Park’s protective boundaries.

If one divides the 55 wolves of the 5 “safe” park packs by the 515, the total population alive in 2017 (See: Public Trust, above), we can say that only 11% of the Wyoming’s wolf population is safely living within our protected National Parks. If we only count the two packs (Wapiti Lake and Mollie’s) with home ranges well within the safe confines of the Park’s borders we have 35 wolves divided by the region’s total population of 515, resulting in having only 7% of the region’s wolf population safe from sanctioned anthropogenic removal.

When we look at wolf distribution throughout the western United States, we see no other geographical area where wolves now exist that might provide a protected “no hunt zone.” None. In a 2010 article, renowned Yellowstone wolf biologist, Doug Smith is quoted as saying that in 2004 “...*there’s not one wolf pack entirely contained within Glacier National Park,*” (French, B. 2010). It is likely that the same holds true today. And there are no other parks or refuges large enough to exclusively accommodate a wolf pack.

Our point here is that throughout the lower 48 states, Yellowstone, the environmental core of the Greater Yellowstone Ecosystem, the protected core of Wyoming’s wolf population is likely the only area remaining in the 48 states where native wolves can find a safe harbor. And even in this instance, that safe harbor accommodates roughly 55 wolves—only 55 wolves out of the 400 to 500 wolves living in the GYE are mostly protected from sanctioned human killing. Only 55 wolves within the entire contiguous 48 states are free to live out their lives relatively free of human interference.

Although many may say that wolves are doing well in the region, it is WU’s conclusion that the Wyoming Game and Fish Department, with its proposed aggressive 2018 hunting season- a plan structured to maintain just the minimum population necessary to prevent re-listing under the Endangered Act, is not doing enough to insure the wolf’s long-term survival. We feel that the Department is not living up to the obligations of responsible wildlife stewardship as prescribed in the North American Model of Wildlife Conservation and the Public Trust Doctrine, and, that the Department is putting politics over best science. The Department is simply not living up to the public’s expectations to manage all wildlife, including wolves for the benefit of all citizens. And we feel the Department’s Plan may even jeopardize the wolves residing within our two premier National Parks.

CLOSING:

Wyoming Untrapped considers it philosophically indefensible to have a sanctioned gray wolf hunting season, or to allow wolves to be killed as predatory animals. And, although we firmly believe that the Department’s 2018 Wolf Management Plan ignores many of the fundamentals of both the North American Model of Wildlife Conservation and the Public Trust Doctrine, and that it largely ignores best available science, we respectfully submit these comments for your collective consideration. Thank you.

Respectfully,

Lisa Robertson,
President, Board of Directors
Franz J. Camenzind, Ph.D.
WU Advisory Council
Board of Directors

CITATIONS:

Annual Report. 2018. *Wyo. Gray Wolf Monitoring and Management 2017 Annual Reporting*

Bullen, V. 2018. *How Fair Chase Hunting Works*. Posted: howstuffworks.

Brainerd, S.M. et al. 2006. *The Effects of Breeder Loss on Wolves*. J. Wild. Mng.

Brookhout, T.A. ed. 2012. *The North American Model of Wildlife Conservation*. The Wildlife Society & Boone and Crockett Club. 47p.

Cassidy, K.A. et al. 2016. *Territoriality and Inter-Pack Aggression in Gray Wolves: Shaping a Social Carnivore's Life History*. In: Yellowstone Science. *Celebrating 20 Years of Wolves*.

Duffield, J. et al 2006. *Wolves and People in Yellowstone: Impacts on the Regional Economy*. Yellowstone Park 'Foundation.

French, B. 2010. *Wolf survival analysis shows success, but struggles in Glacier, Bob Marshall*. Billings gazette. May 16, 2010.

Idaho, 2017-2018. *Gray Wolf Hunting & Trapping Seasons & General Rules*.

Koshmrl, M. 2018. *Numbers of lobos targeted is raised*. JHN&G, 05/09/2018

Lien, D. 2014. *Hunting Ethics & Fair Chase*. Posted: coloradooutdoorscontributor.

Ordiz, A. at al. 2013. *Saving large carnivores, but losing the apex predator?* Biological Conservation. 168(2013)128-133.

Organic Act, 1916. *Title 16—Conservation, Shapter1 – National Parks, Military Parks, Monuments, and Seashores. Subchapter I—National Park Service (U.S.C., title 16, sec. 1.)*

Smith, D.W. et al. 2012. *Yellowstone Wolf Project, Annual Report 2011*. p.2.

U.S. Dept. Int. 2005. *NPS Organic Act*. Off. Of Congressional and Legislative Affairs. 12/14.2005.

Wiegls, R. et al. 2014. *Effects of Wolf Mortality on Livestock Depredations*. PLOS One.

Wildlife Society. 2010. *The Public Trust Doctrine: Implications for Wildlife Management and Conservation in the United States and Canada*. Tech. Rev. 10-01



**THE HUMANE SOCIETY
OF THE UNITED STATES**

1255 23rd Street, NW
Suite 450
Washington, DC 20037
P 202-452-1100
F 202-778-6132
humanesociety.org

Susan Atherton
Co-Chair

Thomas J. Sabatino, Jr.
Co-Chair

Kitty Block
President and CEO and
Chief International Officer

G. Thomas Waite III
Treasurer
Chief Financial Officer and
Acting Chief Operating Officer

Katherine L. Karl
General Counsel and
Chief Legal Officer

Michaelen Barsness
Controller and
Deputy Treasurer

Johanie V. Parra
Secretary

DIRECTORS

Jeffrey J. Arcinacio
Susan Atherton
Georgina Bloomberg
J. Elizabeth Bradham
Jerry Cesak
Neil B. Fang, Esq., CPA
Caren M. Fleit
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
Mary I. Max
C. Thomas McMillen
Sharon Lee Patrick
Marsha R. Perelman
Jonathan M. Ratner
Thomas J. Sabatino, Jr.
David O. Wiebers, M.D.

June 17, 2019

David Rael, President
Wyoming Game and Fish Commission
P.O. Box 628
Cowley, WY 82420
David.rael@wyo.gov

Brian Nesvik, Director
Wyoming Game and Fish Department
5400 Bishop Boulevard
Cheyenne, WY 82006
brian.nesvik@wyo.gov



#107

RE: Updates to Wyoming Hunting Regulations, Chapter 47, Gray Wolf Hunting Seasons

Dear President Rael, Director Nesvik and Members of the Commission:

On behalf of the Humane Society of the United States and our Wyoming supporters, we thank you for the opportunity to submit the following comments regarding the Wyoming Game and Fish Department's (WGFD) proposed updates to Wyoming Hunting Regulations, Chapter 47, Gray Wolf Hunting Seasons. While we support the proposed reduction in mortality limits (quotas) for gray wolves (*Canis lupus*) within the Wolf Trophy Game Management Area (WTGMA) and Seasonal WTGMA, we remain strongly opposed to the trophy hunting and trapping of wolves in Wyoming.

According to media reports, WGFD is seeking a 43 percent reduction (from 58 wolves in 2018 to 33 animals in 2019) in the total quota for the WTGMA because the estimated wolf population in the WTGMA fell 28 percent to 152 wolves—8 wolves below the population target for the WTGMA. The reduction in quotas is meant to increase the wolf population within the WTGMA to 160 animals. Wolves in the remaining 85 percent of the state outside the WTGMA continue to be classified as predators that can be killed indiscriminately.

For the reasons below, we urge WGFD to stop the cruel and damaging trophy hunting and trapping of Wyoming's wolves. Justification for such trophy hunting and trapping typically rests on the myth that killing wolves will reduce livestock losses and increase ungulate populations for human hunters. As we describe below, these myths are false and not based upon the best available science. The Humane Society of the United States would be happy to provide further details and/or supporting materials for the information contained within this comment at your request.

- 1. Killing wolves will not reduce rare conflicts with livestock. Non-lethal methods to protect livestock are more effective, economical, and humane.**

Despite fearmongering and myths to the contrary, wolves have a relatively negligible effect on livestock losses—the reason often cited for allowing them to be trophy hunted and trapped. Indeed, a bevy of studies have contradicted the efficacy of lethal predator control programs to remedy conflicts between wolves and livestock. Instead of finding them useful to society, wildlife biologists have declared that these programs are biologically and fiscally expensive.¹



In the United States, data show that wolves kill few cattle and sheep. While livestock predation data collected by various governmental bodies differ significantly due to differences in methodology, the most recent data published by the U.S. Department of Agriculture-Animal and Plant Health Inspection Service (USDA) show that farmers and ranchers lose *nine times more* cattle and sheep to health, weather, birthing and theft problems than to all native carnivores and domestic dogs combined. In Wyoming, USDA data attribute just 1.12 percent of unwanted cattle and sheep losses to wolves, while a whopping 78.89 percent is attributed to non-predator causes, such as illness, birthing problems, and other maladies.ⁱⁱ

The USDA's methodology involved collecting data from a few, mostly unverified sources, which the USDA then extrapolated statewide without calculating standard errors or using models to test relationships among various mortality factors.ⁱⁱⁱ This likely resulted in exaggerated livestock losses attributed to native carnivores and domestic dogs. When government agencies *confirm* data on livestock losses, the results show many fewer livestock losses than the USDA's unverified claims. In Wyoming, the U.S. Fish and Wildlife Service (FWS) attributed just 137 cattle and sheep losses to wolves using verified data—*four times less* than the USDA claimed for that same year.^{iv} More recently, the WGFD and USDA Wildlife Services confirmed just 69 cattle and sheep losses from wolves in 2018.

A. Non-lethal methods to protect livestock are more effective, economical, and humane.

New studies show that the best remedies for protecting cattle, sheep and other domestic animals come from non-lethal measures, such as sanitary carcass removal, fladry and or turbo fladry, synchronizing birthing seasons with native ungulates, changing livestock types or breeds, spot lights, airhorns, guard animals, range riders, electric fencing and Foxlights™.^v

In a seven-year case study of open-range sheep on public grazing lands in neighboring Idaho (known as the Wood River Wolf Project), researchers strategically applied a variety of non-lethal deterrents and animal husbandry techniques on an adaptive basis (i.e. based on terrain, proximity to den or rendezvous sites, avoiding overexposure to techniques such as certain lights or sound devices, etc.). In the adjacent, comparable study's control area, where wolves are routinely lethally controlled and no nonlethal protection measures were applied, sheep losses were 3.5 times higher over the seven-year period than in the study area after weighting the number of sheep killed by sheep days. Furthermore, no wolves were killed in the study area and sheep depredation losses to wolves were just 0.02 percent of the total number of sheep present—the lowest loss rate among sheep-grazing areas in wolf-occupied habitat statewide, thus demonstrating that non-lethal deterrents are far more effective than lethal ones.^{vi}

Organizations such as the Montana-based Tom Miner Basin Association provide another example of successfully utilizing non-lethal deterrents and livestock husbandry techniques to minimize conflicts between native carnivores, livestock and humans. Hilary Zaranek-Anderson, co-founder of the Association and Range Rider Coordinator, says, "We use a low-stress approach to livestock handling that encourages cattle to work together as a herd. We gather them together in open areas whenever possible in the evening, especially calves with mothers, which makes them less vulnerable to predation at night."^{vii} Range riders also monitor cattle for sickness and injury, removing them from the herd so they don't become targets for predation.

Several other scientific reviews have questioned the scientific merit and efficacy of lethal predator control.^{viii} Bryan et al. (2014) write: "Hunting can decrease pack size, which results in altered predation patterns, increased time spent defending kill sites from scavengers, and may lead to increased conflict with humans and livestock (Hayes et al. 2000; Wydeven et al. 2004; Zimmerman 2014)."^{ix}



WGFD's wolf management should be consistent with the latest scientific findings on non-lethal protections for livestock, which shows that killing wolves is not an effective tool at mitigating livestock losses.

2. Americans highly value wolves as evidenced by the enormous economic benefits derived from wolf-watching tourism.

Numerous studies and polls show that a majority of Americans want wolves conserved, protected and humanely treated.^x Since first measured in 1978, the public's values towards wolves has grown substantially more positive with 61 percent valuing wolves compared to 17 percent of the public holding them in low esteem.^{xi} Those negative few are "drowned out" by the vast majority of Americans who hold a growing concern for animal welfare, which should translate into innovative wildlife management.^{xii} At the broader scale, most Americans (86 percent) disapprove of big game trophy hunting and 62 percent say big game trophy hunting is wrong and should be legally banned (including 34 percent of hunters).^{xiii}

A. Wolf-watching tourism provides enormous economic benefits to Wyoming.

Allowing wolves to be trophy hunted and trapped will harm the state's economy because wildlife-watching tourism—which draws millions of visitors annually—is an enormous, dependable asset to Wyoming's economy, especially for wolf and grizzly bear watching.^{xiv} According to a 2019 economic report commissioned by the Wyoming Office of Tourism, travel spending in Wyoming amounted to \$10.4 million dollars *per day* amounting to \$3.8 billion in 2018.^{xv} That report suggests that tourism dollars has increased annually by 3.7 percent since 2007 and visitors support 32,290 Wyoming jobs by generating \$982 million in salaries for the travel industry.^{xvi} In, 2018, tourists contributed \$196 million in state and local taxes.^{xvii}

A 2018 study conducted by the University of Wyoming shows that wildlife watchers spent nearly twice (\$364,965,105) that of big game hunters (\$206,337,652) in Wyoming.^{xviii} A 2017 report from the U.S. Fish and Wildlife Service shows that hunting numbers across the country have plummeted by 21 percent, with big game hunters declining by 2.4 million since 2011. In the same period, wildlife watchers increased by 28 percent.^{xix}

Borg et al. (2016)^{xx} found that the trophy hunting of wolves in areas adjacent to protected areas (such as Yellowstone National Park) significantly reduces wolf sightings in those protected areas. Specifically, wolf sightings in Yellowstone National Park increased by 45% following years with no trophy hunting of a wolf from a pack. Wolf sightings were more than twice as likely in Denali National Park and Preserve during a period with a no trophy hunting buffer zone around the park than in years without the buffer. Other studies have had similar findings.^{xxi}

3. Wolves kill sick and weak ungulates, which helps to mitigate the spread of chronic wasting disease and other prey herd maladies.

Wyoming's elk and other ungulates are affected by chronic wasting disease (CWD), which is spreading alarmingly across Wyoming.^{xxii} Studies show that wolves are actually beneficial to herds of native ungulates such as deer and elk as they remove the least viable members, leaving forage for the strongest; they rarely prey upon the prime-age breeding animals favored by hunters.^{xxiii}

A myriad of factors including habitat loss or fragmentation, changes in forage quality, competition with other ungulates, predation, disease, increased hunting, poaching, stochastic weather events, fire suppression, noxious weeds, overgrazing by livestock, energy development, and changes in hydrology affect ungulate populations.^{xxiv}



Simply killing wolves and other native carnivores will not bring back the ungulate herds, but not persecuting wolves will help Wyoming rid its herds of infectious disease, which is spreading to nearby states.^{xxv}

Alaska researchers, Prugh and Arthur (2015), found that wolf control in their Alaska study area led to the decline of Dall's sheep. With the loss of wolves, coyote numbers increased and they more readily preyed upon young Dall's sheep.^{xxvi} This phenomenon has been documented many times in several ecosystems. Top carnivores limit the population size of smaller carnivores, which reduces overall predation pressures,^{xxvii} and this natural regulation is especially important for survival of neonate ungulates such as moose and caribou.^{xxviii}

Additionally, Mitchell et al. (2015), in their study found that heavy persecution of both wolves *and* coyotes initially increased the number of Dall's sheep in their study area, but when the sheep population approached or exceeded the carrying capacity, which is a maximum population size set by the amount of forage available or "K", a severe winter (with deep snows and heavy crusting) counteracted population increases.^{xxix} Meanwhile in the reference area (where no predator control measures were implemented), the Dall's sheep population remained constant.^{xxx} In other words, natural predation on Dall's sheep was "compensatory," meaning it merely replaced mortality from weather and starvation. These biologists caution against predator control policies as a means of increasing prey herds.

Mitchell et al. (2015) warn:

We note that [ADFG] biologists have previously attempted to manipulate moose and caribou population in central Alaska using harvest and predator control (Boertje et al. 1996, 2009), without considering K [carrying capacity] (Bowyer et al. 2005). This strategy had negative results, not only for moose populations and [hunter] harvest, but also for agency credibility (Young and Boertje 2011). Managers now realize that carrying capacity (Seaton et al. 2011) is an integral component of effective management of moose populations.... Management decisions regarding carnivore harvest should consider both the positive ecological roles of predators and the potential negative effects on both the carnivores populations, community ecology, and consideration (Roemer et al. 2009; Ordiz et al. 2013). This should help wildlife managers avoid the unintended consequences in various management actions.^{xxxi}

The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous,^{xxxii} including removing the sick and weak animals which would die of other natural causes anyway.^{xxxiii}

For these reasons, predator-control schemes are an unreliable way to increase the abundance of ungulates.^{xxxiv} Ironically, human hunters are responsible for the decline of large-bodied mammals.^{xxxv} WGFD must not assume that by killing wolves, ungulate numbers will grow.

4. Because of their biology, wolves cannot withstand WGFD's proposed levels of hunting and trapping.

The best available science demonstrates that trophy hunting and trapping may have an additive or even super-additive effect on wolf mortality through the additional loss of dependent offspring or by disrupting pack structure.^{xxxvi} This can result in a change in pack size^{xxxvii} and/or reproductive and breeding strategies, reduce individual fitness, and increase the risk for population extinction.^{xxxviii} Wolf populations are generally limited by prey availability, as well as density dependent factors, including disease, human densities, terrain, and pack stability and territoriality.^{xxxix}



As evidenced by the drop below WGFD population goals in the WTGMA last year, wolves are particularly susceptible to social disruption from high mortality because their complex social structure affects many aspects of wolf population dynamics.^{xl} Wolves can suffer physical, psychological, and emotional trauma.^{xli} Social disruption can cause packs to disband and elimination of the breeding pair can lead to the loss of pups from starvation.^{xlii}

Added to this, in 85 percent of Wyoming, designated as the “predator zone,” trophy hunters and trappers are permitted to kill wolves year-round, using aggressive and violent methods—even on pups. Just last year, 4 pups were killed under the predatory animal designation.^{xliii}

By failing to regulate wolf hunting in the vast majority of the state, brutal and vicious behaviors by wolf hunters and trappers—behaviors that Americans are appalled to witness—will undoubtedly continue. After wolves were removed from federal protection, Wyoming’s draconian hunting and trapping policies targeted Yellowstone’s wolves, even radio-collared research animals. This reduces both wolf-watching opportunities and scientific study,^{xliv} wasting taxpayer funds and unnecessarily creating international enmity for Wyoming wildlife officials.^{xlv}

5. Conclusion

Wildlife management, as a contemporary institution, was founded with the intention to carry out the public trust doctrine asserting that wildlife is owned by no one and held in trust by governments for the benefit of present and future generations (United States Supreme Court in a 1842 ruling, *Martin v. Waddell*, 41 U.S. 234). Protecting Wyoming’s wolves for future generations depends on good governance and the employ of the best available science, rather than a myth-based approach.

While the Humane Society of the United States supports the proposed quota reductions, we remain strongly opposed to the trophy hunting or trapping of wolves for the reasons stated above. We urge the Commission to prohibit the trophy hunting of wolves in 2019 as well as in future years, especially in the vulnerable WTGMA surrounding Yellowstone and Grand Teton National Parks. Thank you for your consideration.

Sincerely,

Lisa Kauffman
Senior State Director, Idaho and Wyoming
The Humane Society of the United States

ⁱ B. J. Bergstrom, “Carnivore Conservation: Shifting the Paradigm from Control to Coexistence,” *Journal of Mammalogy* 98, no. 1 (Feb 2017), <http://dx.doi.org/10.1093/mammal/gyw185>; Adrian Treves, Miha Krofel, and Jeannine McManus, “Predator Control Should Not Be a Shot in the Dark,” *Frontiers in Ecology and the Environment* 14, no. 7 (2016), <http://dx.doi.org/10.1002/fee.1312>; Francisco J. Santiago-Avila, Ari M. Cornman, and Adrian Treves, “Killing Wolves to Prevent Predation on Livestock May Protect One Farm but Harm Neighbors,” *PLOS ONE* 13, no. 1 (2018), <http://dx.doi.org/10.1371/journal.pone.0189729>; A. Eklund et al., “Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores,” *Scientific Reports* 7 (May 2017), <http://dx.doi.org/10.1038/s41598-017-02323-w>; Robert J. Lennox et al., “Evaluating the Efficacy of Predator Removal in a Conflict-Prone World,” *Biological Conservation* 224 (2018/08/01/ 2018), <http://dx.doi.org/https://doi.org/10.1016/j.biocon.2018.05.003>.

ⁱⁱ U.S. Department of Agriculture-APHIS. (2017). “Death Loss in U.S. Cattle and Calves Due to Predator and Nonpredator Causes, 2015,” https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf; U.S. Department of Agriculture-APHIS. (2015). “Sheep and Lamb Predator and Non-Predator Death Loss in the United States,” https://www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf; see: https://www.humanesociety.org/sites/default/files/docs/HSUS-Wolf-Livestock-6.Mar_19Final.pdf

ⁱⁱⁱ *Ibid.*

- ^{iv} U.S. Fish and Wildlife Service. (2016). Northern Rocky Mountain Wolf Recovery: Program 2015 Interagency Annual Report. https://www.fws.gov/mountain-prairie/es/species/mammals/wolf/2016/FINAL_NRM%20summary%20-%202015.pdf, 2016.
- ^v William F. Andelt, "Carnivores," in *Rangeland Wildlife*, ed. P. R. Krausman (Denver: Society for Range Management, 1996); A. Treves and K. U. Karanth, "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide," *Conservation Biology* 17, no. 6 (Dec 2003), <Go to ISI>://000186869700009; Eklund et al; S. A. Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho," *Journal of Mammalogy* 98, no. 1 (Feb 2017), <http://dx.doi.org/10.1093/jmammal/gyw188>; M. Parks and T. Messmer, "Participant Perceptions of Range Rider Programs Operating to Mitigate Wolf-Livestock Conflicts in the Western United States," *Wildlife Society Bulletin* 40, no. 3 (Sep 2016), <http://dx.doi.org/10.1002/wsb.671>.
- ^{vi} Stone, S. A., Breck, S. W., Timberlake, J., Haswell, P. M., Najera, F., Bean, B. S., & Thornhill, D. J. (2017). Adaptive use of nonlethal strategies for minimizing wolf-sheep conflict in Idaho. *Journal of Mammalogy*, 98(1), 33-44
- ^{vii} See: <https://y2y.net/news/updates-from-the-field/co-existing-with-wildlife-in-montanas-tom-miner-basin> and <https://www.nrdc.org/onearth/roam-roam-range>
- ^{viii} See for example: Eklund, A., Lopez-Bao, J. V., Tourani, M., Chapron, G., & Frank, J. (2017). Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Scientific Reports*, 7; Lennox, R. J., Gallagher, A. J., Ritchie, E. G., & Cooke, S. J. (2018). Evaluating the efficacy of predator removal in a conflict-prone world. *Biological Conservation*, 224, 277-89; Treves, A., M. Krofel, and J. McManus. 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14:380-388.
- ^{ix} See also: RB Wielgus and KA Peebles, "Effects of Wolf Mortality on Livestock Depredations," *PLOS ONE* 9, no. 12 (2014).
- ^x Borg, B. L., Arthur, S. M., Bromen, N. A., Cassidy, K. A., McIntyre, R. Smith, DW, Prugh, L. R. (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; George, K. A., Slagle, K. M., Wilson, R. S., Moeller, S. J., and Bruskotter, J. T. (2016). Changes in attitudes toward animals in the United States from 1978 to 2014. *Biological Conservation* 201:237-242; Holsman, R., Kaner, N., and Petchenik, J. (2014). "Public Attitudes Towards Wolves and Wolf Management in Wisconsin," *Wisconsin Department of Natural Resources Bureau of Science Services*. <https://dnr.wi.gov/topic/wildlifehabitats/wolf/documents/wolfattitudesurveyreportdraft.pdf>; Lute, M., Nelson, M., Gore, M., Vucetich, J. (2012). Toward improving the effectiveness of wolf management approaches in Michigan: Insights from a 2010 statewide survey. Michigan State University; Manfredo, M.J., Sullivan, L., Don Carlos, A.W., Dietsch, A.M., Teel, T.L., Bright, A.D., and Bruskotter, J. (2018). *America's Wildlife Values: The Social Context of Wildlife Management in the U.S.* National report from the research project entitled "America's Wildlife Values." Fort Collins, CO: Colorado State University, Department of Human Dimensions of Natural Resources. https://www.fishwildlife.org/application/files/9915/4049/1625/AVV_-_National_Final_Report.pdf; Mason-Dixon Polling & Research Inc., June 2013 *HSUS Wisconsin Poll* (2013); Remington Research Group. (2018). "Alaskan Voters Strongly Oppose Cruel Methods of Killing Iconic Wildlife on National Preserves in Alaska," http://www.humaneociety.org/news/press_releases/2018/06/the-humane-society-of-the.html.
- ^{xi} George et al., 2016.
- ^{xii} Ibid.
- ^{xiii} HBO Real Sports/Marist Poll, 2015.
- ^{xiv} John W. Duffield, Chris J. Neher, and David A. Patterson, "Wolf Recovery in Yellowstone: Park Visitor Attitudes, Expenditures, and Economic Impacts," *Yellowstone Science* 16, no. 1 (2008); Bridget L. Borg et al., "Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities," *PLOS ONE* 11, no. 4 (2016), <http://dx.doi.org/10.1371/journal.pone.0153808>
- ^{xv} Dean Runyan Associates, "Wyoming Travel Impacts," https://www.travelwyoming.com/sites/default/files/uploads/industry/WY_Travel_Impacts_2018_final.pdf (March 2019).^{xvi} Ibid.
- ^{xvii} Ibid.
- ^{xviii} <https://wgfd.wyo.gov/News/Hunting-fishing-and-wildlife-viewing-are-economic>
- ^{xix} U.S. Department of the Interior - Fish and Wildlife Service and U.S. Department of Commerce -U.S. Census Bureau, "2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation," <http://www.census.gov/prod/www/fishing.html> (2011); U.S. Fish and Wildlife Service, "2016, National Survey of Fishing, Hunting, and Wildlife-Associated Recreation,"
- ^{xx} Borg et al. 2016.
- ^{xxi} Duffield, J.W., Neher, C.J., and Patterson, D. 2008. "Wolf Recovery in Yellowstone: Park Visitor Attitudes, Expenditures, and Economic Impacts," *Yellowstone Science* 16(1); Loomis, J. "Economic Values of Wolves in Denali National Park and Preserve (Dnpp): Concepts, Literature Synthesis, Data Gaps and Study Plan," <http://akwildlife.org/Documents/Loomis-Economic-Values-of-Wolves-in-Denali-NPP-Final-3-30->
- ^{xxii} <https://wgfd.wyo.gov/WGFD/media/content/PDF/Vet%20Services/CWD-Trifold-Factsheet-2016.pdf>; see GIS map: <http://www.thewildlifefews.com/wp-content/uploads/2017/04/CWD-in-Wyoming-map-March-2017.jpg>; Margaret A. Wild et al., "The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal on Prion Disease Dynamics in Deer," *Journal of Wildlife Diseases* 47, no. 1 (2011/01/01 2011), accessed 2017/06/13, <http://dx.doi.org/10.7589/0090-3558-47.1.78>.
- ^{xxiii} J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (Nov 2005), <http://dx.doi.org/10.1111/j.0030-1299.2005.14180.x>; G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (Aug 2006), [http://dx.doi.org/10.2193/0022-541x\(2006\)70\[1070:sonyeb\]2.0.co;2](http://dx.doi.org/10.2193/0022-541x(2006)70[1070:sonyeb]2.0.co;2).
- ^{xxiv} T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus hemionus* in North America," *Mammal Review* 43, no. 4 (Oct 2013), <http://dx.doi.org/10.1111/mam.12002>; K. L. Monteith et al., "Life-History

Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (Jul 2014), <http://dx.doi.org/10.1002/wmon.1011>.

^{xxxv} M. A. Hurley et al., "Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho," *Wildlife Monographs*, no. 178 (Aug 2011), <http://dx.doi.org/10.1002/wmon.4>. C. J. Bishop et al., "Effect of Enhanced Nutrition on Mule Deer Population Rate of Change," *Wildlife Monographs*, no. 172 (Jul 2009), <http://dx.doi.org/10.2193/2008-107>; Monteith et al.

^{xxxvi} L. R. Prugh and S. M. Arthur, "Optimal Predator Management for Mountain Sheep Conservation Depends on the Strength of Mesopredator Release," *Oikos* 124, no. 9 (2015).

^{xxxvii} W. J. Ripple et al., "Trophic Cascades from Wolves to Grizzly Bears in Yellowstone," *Journal of Animal Ecology* 83, no. 1 (2014); Wallach et al., "What Is an Apex Predator?"; K. R. Crooks and M. E. Soule, "Mesopredator Release and Avifaunal Extinctions in a Fragmented System," *Nature* 400, no. 6744 (1999); K.M. Berger, EM Gese, and Joel Berger, "Indirect Effects and Traditional Trophic Cascades: A Test Involving Wolves, Coyotes, and Pronghorn," *Ecology* 89, no. 3 (2008).

^{xxxviii} Prugh and Arthur, "Optimal Predator Management for Mountain Sheep Conservation Depends on the Strength of Mesopredator Release."; Berger, Gese, and Berger, "Indirect Effects and Traditional Trophic Cascades: A Test Involving Wolves, Coyotes, and Pronghorn."

^{xxxix} Mitchell et al.

^{xl} Ibid.

^{xli} Ibid., 26.

^{xlii} Callan, R., N. P. Nibbelink, T. P. Rooney, J. E. Wiedenhoft, and A. P. Wydeven. 2013. Recolonizing wolves trigger a trophic cascade in Wisconsin (USA). *Journal of Ecology* 101:837-845. Leopold, A. S., S. A. Cain, I. N. Gabrielson, C. M. Cottam, and T. L. Kimball. 1964. Leopold Report: Predator and Rodent Control in the United States: Report submitted to Department of Interior. Logan, K. A., and L. L. Swenar. 2001. Desert puma: evolutionary ecology and conservation of an enduring carnivore. Island Press, Washington, DC. Mitchell et al., 2015. Murie, A. 1940. Ecology of the Coyote in the Yellowstone. In U. S. D. o. Interior, editor. Fauna of the National Parks of the United States. U.S. Government Printing Office. Peckarsky, B. L., P. A. Abrams, D. I. Bolnick, L. M. Dill, J. H. Grabowski, B. Luttbeg, J. L. Orrock, S. D. Peacor, E. L. Preisser, O. J. Schmitz, and G. C. Trussell. 2008. Revisiting the Classics: Considering Nonconsumptive Effects in Textbook Examples of Predator-Prey Reactions. *Ecological Society of America* 89:2416-2425.

^{xliii} Krumm, C. E., M. M. Conner, N. T. Hobbs, D. O. Hunter, and M. W. Miller. 2009. Mountain lions prey selectively on prion-infected mule deer. *Biology Letters* 6:209-211. Mech, 2007. Monteith et al., 2014

^{xliii} Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28. Hurley, M. A., J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho. *Wildlife Monographs*:1-33. Mitchell et al., 2015. Mosnier, A., D. Boisjoly, R. Courtois, and J. P. Ouellet. 2008. Extensive predator space use can limit the efficacy of a control program. *Journal of Wildlife Management* 72:483-491.

^{xliv} Brackowski, A. R., G. A. Balme, A. Dickman, D. W. Macdonald, J. Fattebert, T. Dickerson, P. Johnson, and L. Hunter. 2015. Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *Plos One* 10. Darimont, C. T., S. M. Carlson, M. T. Kinnison, P. C. Paquet, T. E. Reimchen, and C. C. Wilmers. 2009. Human predators outpace other agents of trait change in the wild. *Proceedings of the National Academy of Sciences of the United States of America* 106:952-954. Palazy, L., C. Bonenfant, J. M. Gaillard, and F. Courchamp. 2012. Rarity, trophy hunting and ungulates. *Animal Conservation* 15:4-11. Ripple, W. J., G. Chapron, J. V. López-Bao, S. M. Durant, D. W. Macdonald, P. A. Lindsey, and L. Zhang. 2016. Saving the World's Terrestrial Megafauna. *BioScience*.

^{xlv} Brainerd, S. M., Andren, H., Bangs, E.E., Bradley, E. H., Fonatine, J.A., Hall, W., and Wydeven, A.P. 2008. The Effects of Breeder Loss on Wolves. *Journal of Wildlife Management*. 72(1): 89-98. <https://doi.org/10.2193/2006-305>; Murray, D.L., Smith, D.W., Bangs, E.E., Mack, C., Oakleaf, J.K., Fontaine, J., and Asher, V.J. (2010). Death from anthropogenic causes is partially compensatory in recovering wolf populations. *Biological Conservation* 143:2514-2524. <http://www.klamathconservation.org/docs/blogdocs/murrayetal2010.pdf>; Creel, S. and Rotella, J.J. (2010). Meta-analysis of relationships between human off-take, total mortality and population dynamics of gray wolves (*Canis lupus*). *PLoS ONE* 5(9):e12918. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0012918>; Rutledge, L. Y., Patterson, B.R., Mills, K.J., Loveless, K.M., Murray, D.L. and White, B.N. 2010. Protection from Harvesting Restores the Natural Social Structure of Eastern Wolf Packs. *Biological Conservation* 143(2): 332-329. <https://doi.org/10.1016/j.biocon.2009.10.017>; Ausband, D. E., Stansbury, C., Stenglein, J.L., Struthers, J.L. and Waits, L. P. 2015. Recruitment in a social carnivore before and after harvest. *Animal Conservation* 18: 415-423. <https://zslpublications.onlinelibrary.wiley.com/doi/abs/10.1111/acv.12187>; Borg, B.L., Brainerd, S.M., Meier, T. J., and Prugh, L. R. 2015. Impacts of breeder loss on social structure, reproduction and population growth in a social canid. *Journal of Animal Ecology* 84: 177-187. <https://doi.org/10.1111/1365-2656.12256>; Ausband, D.E. et al. 2017. Effects of breeder turnover and harvest on group composition and recruitment in a social carnivore. *Animal Ecology* 86: 1094-1101. <https://doi.org/10.1111/1365-2656.12707>.

^{xlvii} Hochard, J. and Finnoff, D. 2014. Gray wolf population projection with intraspecific competition. *Natural Resource Modeling* 27(3): 360.

^{xlviii} Bryan, H. et al. 2014. Heavily hunted wolves have higher stress and reproductive steroids than wolves with lower hunting pressure. *Functional Ecology* 29: 347-356. <https://doi.org/10.1111/1365-2435.12354>.

^{xlix} Cariappa, C. A., Oakleaf, J., Ballard, W., and Breck, S. 2011. A reappraisal of the evidence for regulation of wolf populations. *J. Wildlife Management* 75:3 (726-730). <https://pubag.nal.usda.gov/pubag/downloadPDF.xhtml?id=49624&content=PDF>; Rich LN, Mitchell M S, Gude JA, Sime CA. 2012. Anthropogenic Mortality, Intraspecific Competition, and Prey Availability Influence Territory Sizes of Wolves in Montana. *Journal of Mammalogy* 93(3):722. DOI:10.1644/11-MAMM-A-079.2; Hatton, I.A., McCann, K.S., Fryxell, J.M., Davies, T.J., Smerlak,

M., A. R. E. Sinclair, and M. Loreau. 2015. The predator-prey power law: Biomass scaling across terrestrial and aquatic biomes. *Science* 349: doi: <http://dx.doi.org/libraries.colorado.edu/10.1126/science.aac6284>; Lake, B.C., Caikoski, J.R., and Bertram, M.R. 2015. Wolf (*Canis lupus*) Winter Density and Territory Size in a Low Biomass Moose (*Alces alces*) System. *Arctic* 68: 62-68.

^{xi} Bryan et al.

^{xii} Jay S. Mallonee, "Hunting Wolves in Montana - Where Is the Data?," *Nature and Science* 9, no. 9 (2011).

^{xiii} Creel et al; Scott Creel and Jay Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)," *PLOS ONE* 5, no. 9 (2010).

^{xiv} Wyoming Game and Fish Department, U.S. Fish and Wildlife Service, National Park Service, USDA-APHIS-Wildlife Services, and Eastern Shoshone and Northern Arapahoe Tribal Fish and Game Department. 2019. Wyoming Gray Wolf Monitoring and Management 2018 Annual Report. K.J. Mills and Z. Gregory, eds. Wyoming Game and Fish Department, 5400 Bishop Blvd. Cheyenne, WY 82006. https://wgfd.wyo.gov/WGFD/media/content/PDF/Wildlife/Large%20Carnivore/WYWOLF_ANNUALREPORT_2018.pdf.

^{xv} Borg et al; Virginia Morell, "Research Wolves of Yellowstone Killed in Hunt," *Science* 326 (2009); Schmidt, Burch, and MacCluskie.

^{xvi} Nate Schweber, "Research Animals Lost in Wolf Hunts near Yellowstone," *The New York Times* https://green.blogs.nytimes.com/2012/11/28/research-animals-lost-in-wolf-hunts-near-yellowstone/?_r=0 (2012).

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 1** I am opposed to the 2020 nonresident elk application period. Please make the application deadline May 31, which is the resident application deadline. Even better would be to stick with the 2019 system where nonresidents know their elk draw results in February. Thank you.

Final Comment	SUTHERLAND, JASON	Whitehouse, TX	4/30/2019 11:54:00 AM
----------------------	--------------------------	-----------------------	-----------------------

- 2** I am just writing to let you know how upset I am with the proposed late NR draw results and WGFD keeping my application fee for four months, outrageous. Once I draw a tag I will not be applying to Wyoming after that, if this proposal is approved.

Final Comment	Renaud, Brian	Attica, NY	5/1/2019 5:31:00 AM
----------------------	----------------------	-------------------	---------------------

- 3** Good Morning! I am writing in response to proposed changes in Chapter 44 regarding a May/June draw for non resident elk tags. I am OK with doing so since it appears to be a science based decision since. I totally disagree with closing the application period on January 31. Not only does this lock up lots of money for non residents, up to 4 months, it keeps us in limbo from applying for other states. Changing the closing period for non resident elk applications to April 30 may be a good compromise. At the very least an easy way to withdraw an application at no cost to the hunter during mid May. Thank you!

Final Comment	rex, jason	Palmerton, PA	5/1/2019 6:21:00 AM
----------------------	-------------------	----------------------	---------------------

- 4** The proposed changes to the application dates for NRs clearly sends two messages: 1) there is little regard or concern for non-residents and no real effort to make applying to WY convenient or reasonable, and 2) the outfitters in WY have an absolute choke hold on the G&F. Regarding #1- if the message is intended to be that WY believes it is the only state that potential NRs will apply to and their application process operates within a silo, the message has been conveyed swimmingly. The message also conveys to NRs that the WY G&F really doesn't give a damn about them. This message has already been conveyed loud and clear by not letting unguided NRs hunt wilderness areas in the state (see point #2 above), but it's even more clear with this proposal. This proposal is insulting, idiotic, and ridiculous. It is impressive how it actually manages to screw over NRs and Rs alike in some ways. It's positively embarrassing that this is the best attempt that could be offered. I hope very much it is summarily dismissed and a reasonable alternative is offered.

Final Comment	Engel, Scott	Twin Valley, MN	5/2/2019 7:31:00 AM
----------------------	---------------------	------------------------	---------------------

- 5** It is my understanding that Wyoming is looking to move the nonresident (NR) draw date for elk back to coincide with the resident (R) draw. I understand the reasons to do this and support the change. It only makes sense to conduct the draw for everyone after the quotas and seasons have been set. While many NR hunters may not be happy with the later draw, I think it is for the best. I also have noticed that for some reason Wyoming wants to keep the NR application period for elk January 1-31st. This is absolutely ridiculous for multiple reasons. I can't understand how anyone could support this aside from outfitters wanting to prevent clients from applying in other states. First of all, how does it make sense to require NR hunters to apply for hunts before they even know the seasons and quotas? This is going to cause a huge headache both for NR applicants and for the Wyoming Game and Fish when they get customers complaining about putting in for seasons that may not even exist come time to draw. Secondly, the draw results are posted in June. It is not right to hold on to people's money for 5 months when it is completely unnecessary. If the deer and antelope application and draw can be the same for NR and R hunters, there is absolutely no reason the elk can't be the same. To put in bluntly, it's just plain stupid. It also looks bad for the state of Wyoming. Please consider the above thoughts from a long time hunter of Wyoming who travels nearly yearly to your state and spends a lot of money there on hunting trips. Thank you, Jim

Final Comment	Gerold, James	Prior Lake, MN	5/3/2019 8:17:00 AM
----------------------	----------------------	-----------------------	---------------------

- 6** The wolf quotas recommended are too low. Please increase quotas from 2018 wolf quota numbers by 30% in areas 1,2,3,4, and 5. Please start management to benefit the ungulate populations.

Final Comment	HIRSCH, MICHAEL	POWELL, WY	5/22/2019 1:24:00 AM
----------------------	------------------------	-------------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 7 Following should be Prohibited for taking big or trophy game animal during the archery season. Tractable arrow technology Tractable arrow GPS devices Bluetooth arrow nocks Magnifying sights Holographic sights Attached range finding sights Thank you! Larry

Final Comment

Perkins, Larry

Cheyenne, WY

5/22/2019 2:27:00 PM

- 8 emerging trends in wolf wildlife management: The value of wolves to the health of our public landscapes outweighs the recreational opportunity to trap and kill with cruel and inhumane steel devices year-round without any scientific foundation. I request that the Wyoming Game and Fish Department and the Wyoming Game and Fish Commission permanently end hunting of wolves in the Trophy Zone. wolves are not trophies: The sport hunting of wolves by the general public serves no purpose other than as an expression of "blood lust" and a catalyst for "bragging rights." There is no derived food value, only ego gratification. Many people were brought up in hunting families and were taught that you only kill what you will eat and still subscribe to that value. A trophy hunt of wolves feeds nothing more than the personal ego, and as it all too often occurs within the Predator Zone, is a disgrace to the ethical hunting community. Again, Wyoming's wolves should have big game status with a year-round closed hunting season. wolves play a role as apex predators; I oppose sport hunting of wolves for several reasons, including the significant role wolves play as an apex predator within the Greater Yellowstone Ecosystem and how the indiscriminate killing of wolves can have a significant impact on the natural functioning of ecosystems. they can control their own numbers; The indiscriminate hunting of wolves can have significant impacts that will reverberate throughout the ecological systems. Wolves are apex species and exist not as individuals but as social units-as packs. Leave them alone and they will flat out control their own numbers (Ordiz, A. et al. 2013.). Witness the Yellowstone wolf population: after 20-plus years, this sub-population has stabilized around 100 individuals—without human intervention, control or hunting. And the Northern elk herd, a primary food source for a large portion of Yellowstone's wolves, is on a steady increase. Principles of the North American Model of Wildlife Conservation (NAMWC); I also oppose the hunting of wolves because it violates several principles of the North American Model of Wildlife Conservation (NAMWC). First, wildlife is held as a Public Trust Resource by state or federal agencies and is not owned by anyone. This, in conjunction with wildlife being Allocated by Wildlife Law wherein the public – all the public has input into law-making causes us to ask: why, after years of the Commission "taking public comment," we who have alternate views regarding wolf management have yet to see any significant changes made from any of the original Wyoming Gray Wolf Management Plan? This can hardly be viewed as respecting, let alone incorporating the public's input. management condoning and remaining complicit in unethical killing activity; How can the State of Wyoming and the Game and Fish Commission support, let alone justify a Predator Zone for wolves? Even if the abhorrent killing practices are technically legal within the Predator Zone, they are by every reasonable standard amoral and demonstrate a complete disregard for the principle of "Fair Chase" and the ethical treatment of wildlife. If the Commission remains silent and does nothing to eliminate the Predator Zone, does not call-out the inhumane killing practices employed therein, and does nothing to remove the wolf's Predator Status within 85% of the State, the Commission, and the State are tacitly condoning and remain complicit in this unethical killing activity. reconfigure the HA's and adjust hunting quotas; Disproportionally high wolf killings near the parks and refuge have undoubtedly impacted the ability of visitors to view wild wolves in the heart of their current range. We strongly urge the Commission to reconfigure the HA's and adjust hunting quotas to better protect wolves and wolf packs that utilize the parks and refuge for significant portions of their life cycle. Doing so will better serve the desires of tens-of-thousands of visitors who come to the region each year for a chance to view wolves in the wild- a critical part of the state's tourist economy. responsible wolf management; Wolf management decisions need to be founded on more than hunting quotas, the protection of livestock and for the benefit of "high dollar" game species. Responsible wolf management needs to consider all mortality regardless of cause. It needs to consider ecosystem function- it needs to represent a consensus of the majority of the public, and should not include sport hunting. policies over best science; It is my conclusion that the Wyoming Game and Fish Commission, with its proposed 2019 hunting season- a plan structured to maintain just the minimum population necessary to prevent re-listing under the Endangered Species Act, is not doing enough to ensure the wolf's long-term survival. I feel that the Commission is putting politics over best science. I believe that the Commission is simply not living up to the public's expectations to manage all wildlife, including wolves for the benefit of all citizens. And I feel the Commission's proposed Chapter 47, Gray Wolf Hunting Season continues to jeopardize the well being of the wolves residing within our two premier National Parks and it greatly hinders Wyoming's wolves from fulfilling their critical ecological niche. in summary; I consider it morally and philosophically indefensible to have a sanctioned gray wolf hunting season, or to allow wolves to be indiscriminately killed as predatory animals throughout 85 percent of the state. And, although we firmly believe that the Commission's Draft Chapter 47 Gray Wolf Hunting Season proposal ignores many of the fundamentals of both the North American Model of Wildlife Conservation and the Public Trust Doctrine, and that it largely ignores best available science, I submit these comments for

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

your collective consideration because I regrettably acknowledge that this is the environment we are now having to work within wolves are not trophies; I want to make clear that while we respectfully submit these comments for your consideration, in no way should this be construed as support for sport hunting of wolves, whether as trophy game or as predators.

Final Comment	Botes, Tarryn	Timsrand AH,	5/25/2019 5:58:00 PM
----------------------	----------------------	---------------------	-----------------------------

9 "Man is rich in proportion to the number of things he can afford to let alone." - Henry David Thoreau I trapped as a kid and that is now my biggest regret as a nature lover and photographer. To trap you have to not have empathy for other living things. To trap, you have to practice cruelty to innocent living beings. To trap, you have to not think beyond yourself. If Wyoming stil has more hunters and trappers than wildlife observers, photographers, and nature lovers, then that's sad. In WA, we're welcoming the return of grizzlies and wolves to our state.

Final Comment	SCHUSTER, MIKE	DEMING, WA	5/26/2019 1:47:00 PM
----------------------	-----------------------	-------------------	-----------------------------

10 Wyoming needs to put ethics and science into wolf management, instead of the current policy of politics, kowtowing, and disdain. Your "predator status" in 85% of the state is a disgrace to professional wildlife management, just as your elk feeding, and Grizzly Bear plans are. You enable and facilitate a black eye in the perception of hunters everywhere.

Final Comment	Ruane, Dave	Windsor, CO	5/27/2019 7:51:00 AM
----------------------	--------------------	--------------------	-----------------------------

11 I am writing to request that the Wyoming Game and Fish Department and the Wyoming Game and Fish Commission permanently end hunting of wolves in the Trophy Zone. I was raised in Wyoming and taught to kill what I eat, not to kill for trophy purposes. The hunt for wolves has become that. The hunting of wolves is a disgrace to the ethical hunting community. Sincerely, Cory Curtis

Final Comment	Curtis, Cory	Jackson, WY	5/27/2019 11:05:00 AM
----------------------	---------------------	--------------------	------------------------------

12 It is good that WG&F is reducing their wolf quota for next season. I live in zone 1. We have minimal conflict with livestock as there is essentially only one major producer, and they take their stock off during the winter. Our zone is adjacent to Lamar Valley and has, in the past, provided a genetic exchange for those Park wolves. We've lost an entire pack of 12-14 wolves in the last year. G&F doesn't seem to know what happened to the Beartooth Pack. The Hoodoo pack remains as our only pack of about 7 wolves. The quota of four is excessive for one pack in a remote area that is mostly wilderness. The commission decided last year to include September. That caused zone 1 quota to be filled almost immediately given the easy access here. Considering our wolves are mostly wilderness wolves and not problem wolves, why is that needed? Wyoming has wolf hunting opportunity 365 days/year. Wolves outside the trophy zone can be shot, trapped, run over, poisoned--essentially killed anytime anyway. Therefore, what is the purpose of the trophy zone when opportunity abounds--especially in areas without problem wolves, where the wolves provide wildlife watching opportunity, and where Park wolves come in and out? I would like to see the trophy zone divided up into areas that are "no hunt" with varied seasons in others. Right now all zones are exactly identical as to timing, unlike deer or elk. If you must have a trophy zone with more hunting opportunities than you already have in the predator zone, why not make it concentric circles using the Park to dictate no hunting to more hunting. Wyoming spends a lot of money and time advertising its biggest income resource--wildlife watching, yet at the same time is trying to reduce it's wolf population to the minimum so as not to be re-listed. Wildlife watching has increased in Wyoming due to the opportunity to see wolves and grizzlies. Wyoming G&F needs to figure out what it wants--wildlife watching opportunities or no wolves.

Final Comment	Patten, Leslie	Cody, WY	5/27/2019 11:47:00 AM
----------------------	-----------------------	-----------------	------------------------------

13 emerging trends in wolf wildlife management; The value of wolves to the health of our public landscapes outweighs the recreational opportunity to trap and kill with cruel and inhumane steel devices year-round without any scientific foundation. I request that the Wyoming Game and Fish Department and the Wyoming Game and Fish Commission permanently end hunting of wolves in the Trophy Zone. wolves play a role as apex predators; I oppose sport hunting of wolves for several reasons, including the significant role wolves play as an apex predator within the Greater Yellowstone Ecosystem and how the indiscriminate killing of

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

wolves can have a significant impact on the natural functioning of ecosystems. they can control their own numbers; The indiscriminate hunting of wolves can have significant impacts that will reverberate throughout the ecological systems. Wolves are apex species and exist not as individuals but as social units-as packs. Leave them alone and they will flat out control their own numbers (Ordiz, A. et al. 2013.). Witness the Yellowstone wolf population: after 20-plus years, this sub-population has stabilized around 100 individuals—without human intervention, control or hunting. And the Northern elk herd, a primary food source for a large portion of Yellowstone's wolves, is on a steady increase. Principles of the North American Model of Wildlife Conservation (NAMWC); I also oppose the hunting of wolves because it violates several principles of the North American Model of Wildlife Conservation (NAMWC). First, wildlife is held as a Public Trust Resource by state or federal agencies and is not owned by anyone. This, in conjunction with wildlife being Allocated by Wildlife Law wherein the public – all the public has input into law-making causes us to ask: why, after years of the Commission "taking public comment," we who have alternate views regarding wolf management have yet to see any significant changes made from any of the original Wyoming Gray Wolf Management Plan? This can hardly be viewed as respecting, let alone incorporating the public's input. management condoning and remaining complicit in unethical killing activity; How can the State of Wyoming and the Game and Fish Commission support, let alone justify a Predator Zone for wolves? Even if the abhorrent killing practices are technically legal within the Predator Zone, they are by every reasonable standard amoral and demonstrate a complete disregard for the principle of "Fair Chase" and the ethical treatment of wildlife. If the Commission remains silent and does nothing to eliminate the Predator Zone, does not call-out the inhumane killing practices employed therein, and does nothing to remove the wolf's Predator Status within 85% of the State, the Commission, and the State are tacitly condoning and remain complicit in this unethical killing activity.

Final Comment	Botes, Tarryn	Timsrand AH,	5/28/2019 12:20:00 PM
----------------------	----------------------	---------------------	------------------------------

- 14** As a many year Bullet caster and knowing the correct mix of soft lead to hard lead so you get quit enough expansion to enough mass to penetrate it's not right for another freedom to be taken away. Full metal jacket I see plenty wrong with that but with properly mixed lead it will expand as well or better than any premium bullet. Marschell Wayment

Final Comment	Wayment , Marschell	Oakley , ID	5/30/2019 4:20:00 PM
----------------------	----------------------------	--------------------	-----------------------------

- 15** For seven brutal and bloody years, since you have taken over the "management" of wolves, their populatoin has significantly decreased. The low numbers of wolves is close to being unsustainable which is apparently what you want. Wolves are a keystone species and vital to the health of forests and animals. Instead you allow a small minority of hunters, trappers and special interests to overrule the will of the people. Your citizens want more wolves, not less. I travel often to view wildlife and will spend my vacation dollars elsewhere should you keep up your war on animals.

Final Comment	Varga, Dolores	San Tan Valley, AZ	5/30/2019 6:40:00 PM
----------------------	-----------------------	---------------------------	-----------------------------

- 16** In the near future, I plan to hunt Wyoming. It would be nice to be able use cast bullets (non-expanding) on a hunt in the great state of Wyoming. I understand Wyoming is intending to prohibit the use of non-expanding bullets. I would like to express my opposition to any such proposal. Regards, Roger Carlton

Final Comment	Carlton, Roger	Sand Springs, OK	5/30/2019 7:22:00 PM
----------------------	-----------------------	-------------------------	-----------------------------

- 17** As someone who used to travel through Wyoming on my way to Yellowstone to watch wolves and other wildlife I would like for you to stop the hunting of the iconic gray wolf. At this point the wolf population has fallen so low due to hunting that it is no longer worth my while to spend money in your state to view wolves. There are many more of us non-consumptive users of wildlife (photographers, etc) than hunters and we spend a lot more money in places that cherish and protect wildlife that it is probably worth your while to cater to those of us who like our wildlife alive. Join the 21st century Wyoming.

Final Comment	Doucet, Lisha	Wellington, CO	5/31/2019 10:25:00 AM
----------------------	----------------------	-----------------------	------------------------------

- 18** Wyoming wildlife management are reporting an alarming reduced number of wolves over the state since WGFD took over management and initiated wolf hunting. The sport of hunting wolves serves no purpose other than blood lust and ego. Wyoming families grew up knowing that you only kill what you eat. Trophy

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

hunting is a poor excuse for bragging rights. Wildlife is held as a public trust in a state know and valued for its beauty of land and species. The WG&F Commission cannot remain silent, ie condone and support, the indiscriminate and inhumane killing of the called for in the "Predator Zone". This is a disregard for all Wyomians who live by the principle of ethical treatment of wildlife. Please do not fail them.

Final Comment	Lazarus, Marianne	Melbourne, FL	6/1/2019 8:49:00 AM
----------------------	--------------------------	----------------------	----------------------------

- 19** The gray wolf hunting season and number of tags should be reduced dramatically. We need more wolves across the state of Wyoming to keep prey populations healthy. Wolves target the weaker/sick animals and are one easy way to help with CWD. Further, wolves need a pack and the removal of a single wolf from a pack can dramatically change the dynamic of the pack and lead to problems. There's no social or economic benefit to killing wolves. Humans don't eat wolf meat, and outdoor enthusiasts enjoy seeing living wolves.

Final Comment	Seymour, Charles	Denver, CO	6/1/2019 6:13:00 PM
----------------------	-------------------------	-------------------	----------------------------

- 20** I oppose any hunting of wolves near our national parks.

Final Comment	Steinman, Joe	Syracuse, NY	6/2/2019 5:55:00 AM
----------------------	----------------------	---------------------	----------------------------

- 21** Wyoming wolves are trapped and killed in almost any manner in over 85% of the state. But yet, the WGFD continues to reduce the population to minimum numbers. No more hunting, trapping and snaring of what few wolves are left. Extinction is forever.

Final Comment	Shabbott, Mary	Punta gorda, FL	6/3/2019 2:34:00 PM
----------------------	-----------------------	------------------------	----------------------------

- 22** How can the State of Wyoming and the Game and Fish Commission support, let alone justify a Predator Zone for wolves? Even if the abhorrent killing practices are technically legal within the Predator Zone, they are by every reasonable standard amoral and demonstrate a complete disregard for the principle of "Fair Chase" and the ethical treatment of wildlife. If the Commission remains silent and does nothing to eliminate the Predator Zone, does not call-out the inhumane killing practices employed therein, and does nothing to remove the wolf's Predator Status within 85% of the State, the Commission, and the State are tacitly condoning and remain complicit in this unethical killing activity. reconfigure the HA's and adjust hunting quotas; Disproportionally high wolf killings near the parks and refuge have undoubtedly impacted the ability of visitors to view wild wolves in the heart of their current range. We strongly urge the Commission to reconfigure the HA's and adjust hunting quotas to better protect wolves and wolf packs that utilize the parks and refuge for significant portions of their life cycle. Doing so will better serve the desires of tens-of-thousands of visitors who come to the region each year for a chance to view wolves in the wild- a critical part of the state's tourist economy.

Final Comment	Frank, Mitzi	Sharon Center, OH	6/4/2019 2:47:00 AM
----------------------	---------------------	--------------------------	----------------------------

- 23** Dear Wyoming Game & Fish Department, I fully appreciate that the subject of wolves in our state is a profoundly polarizing subject. As the entity that has been tasked with managing our wolf population, I know the Wyoming Game & Fish Department's job is a difficult one, a job that I'm sure feels impossible to do to the satisfaction of our citizens due to pronounced, opposing opinions on the matter. Modern scientific and economic research suggests that the current management technique of keeping our Wyoming wolf population at the minimum possible count without being re-listed on the Endangered Species Act is directly detrimental to our state's economy and our ecosystems. It is now well-established that apex predators, the wolf in particular, have a pronounced trophic cascade effect that greatly benefits the healthy operation of the ecosystems they interact with. Wolves don't decimate prey populations, they disperse them—keeping their target-prey species from overgrazing and over-populating while keeping the herds split into smaller, healthier, more sustainable herd-groups. It has been scientifically proven, beyond reasonable doubt, that when left unimpeded wolves effectively manage their own numbers. They are hyper-aware of pack boundaries, pack sizes, and prey availability. They will not overpopulate, nor will they over-predate. They are a self-regulating species with myriad reverberating effects that are vital to the health and sustainability of our state's natural ecosystems. "Scientists have recently begun to understand the vital role played by top predators in ecosystems and the profound impacts that occur when those predators are wiped out. Now, researchers are citing new evidence that shows the importance of lions, wolves, sharks, and other

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

creatures at the top of the food chain. ("The Crucial Role of Predators." Yale School of Forestry & Environmental Studies.) While there is great pressure from our state's stock growers to eliminate wolves, the overruling decision made by Wyoming's Legislature more than a decade ago to classify our state's wolf population as varmints to be killed indiscriminately by whatever means available throughout our state's Predator Zone is an embarrassing example of abhorrent wildlife mismanagement. Recent research published in the *Frontiers in Ecology and the Environment* journal revealed that, after studying predator management techniques and their effects on livestock predation, that there is little evidence to support that killing predators effectively protects livestock. Modern scientific evidence now suggests that non-lethal predator control has the potential to be significantly more effectual than lethal control measures. Practices such as implementing fladry, livestock guarding animals, predator lights, motion sensor stimuli (even low-investment tools such as Halloween decorations), random-location radios set to talk radio around livestock perimeters, and—most promisingly—conditioned taste aversion (CTA) have the ability to be significantly more economic and effectual methods of protecting our livestock than the tradition model of lethal control. Apex predators are highly intelligent and intuitive species; it's well documented that wolves pass information down to their young generation after generation. By practicing non-lethal predator control with today's wolf population, we will be effectively teaching/training next generation's wolves how to act. Inversely, by continuing to indiscriminately kill wolves in the manner that our state allows, we are supporting a continued model of wolf destabilization which causes packs and territories to dissolve and reform sporadically and unsustainably creating more young individuals, many desperate and uneducated, traveling alone—as well as the formation of young and inexperienced packs with unestablished territories. This inevitably leads to our livestock being predated as our livestock are the easiest-available prey, and the destabilized wolves have not learned through negative-reinforcement to avoid hunting them. That is to say, the more lethal interference we impose upon our state's wolf population, the more trouble we make for ourselves and our agricultural efforts. I fully appreciate that our state's stock growers face tremendous economic difficulty, and each added burden to the course of their work further over-leverages their operations. While adopting and developing this new method of non-lethal management will inevitably lead to short-term frustrations, the long-term benefit of this shift in predator control ideology could prove to be far more beneficial both to our livestock operations and our state's wildlife than our current model of management. The idea of modifying our hunting regulations to cater to trophy and/or sport hunters should be dismissed entirely. The practice of sport hunting wolves—that is to say deriving pleasure from the act of killing itself in the absence of harvesting the carcass for any utilitarian means—exists in direct opposition to the North American Model of Wildlife Conservation (which states "Wildlife can only be killed for a legitimate purpose," and that, "Science is the proper tool for discharge of wildlife policy.") as well as our state's values of good sportsmanship and land stewardship. "Predators are a public trust asset, their destruction cannot be undertaken lightly without evidence of effectiveness, nor for the sole benefit of a narrow minority of private interests such as livestock owners." (Adrian Treves, Nelson Institute for Environmental Studies at the University of Wisconsin, Madison.) Finally, recent studies suggest that the economic value of live, healthy wolves—and the recurring revenue that they have the ability to generate—eclipses any value that could be derived from the killing of wolves. With more and more individuals across the globe taking direct interest in observing and learning about wildlife, wolves have proven to be a tourist favorite. They've inspired a brand new population of tourist called 'wolf-watchers' that travel from all over the world to see Wyoming's wildlife and wild places. By cultivating this new tradition of respect and interest in our unimpeded natural world, our state is in the unique position to create a best-of-all-worlds scenario where our wildlife, our citizens, our agricultural industry, and our state's economy can all benefit from a healthy relationship with our state's apex predators. "Greater Yellowstone's 'predator guild' of wolves, grizzly and black bears, lions and coyotes makes it a draw for wildlife watchers from around the world, helping to fuel a \$1-billion annual nature-tourism economy." (Lloyd Dorsey, Conservation Director, Wyoming Sierra Club.) For these reasons, I strongly urge the Wyoming Game & Fish Department to reassess and reform our methods of wolf management and predator control—to replace our detrimental, traditional practices with new techniques that will see wolves respected and treated as the invaluable asset to our state's ecosystems and economy that they are. Sincerely, Douglas Balmain

Final Comment	Balmain, Douglas	Laramie, WY	6/6/2019 9:53:00 AM
----------------------	-------------------------	--------------------	---------------------

24 pleas : be kind each Wolf (T/Y)

Final Comment	Bullock, Norvie	NEH, ME	6/6/2019 10:05:00 AM
----------------------	------------------------	----------------	----------------------

25 I am writing to oppose no-quota beaver trapping seasons in Teton County. I am a hunter, and I respect the livelihoods of trappers, but the economic benefit of trapping beaver in Teton County is a fraction of the

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

economic benefit of people visiting Teton County to view wildlife. Quite simply, a live beaver is worth more to Teton County and the State's economy than a trapped beaver.

Final Comment	Muromcew, Alexander	Jackson, WY	6/7/2019 12:22:00 PM
----------------------	----------------------------	--------------------	----------------------

- 26** While I am not a WY resident, WY is part of our country and what happens in WY does affect the US and the world. There is NO reason for wolves to be hunted at all. The loss of an apex predator has vast effects on the surrounding landscape and health of all related animals. Killing an animal for "sport" is disgusting, especially if they are trapped. The loss of a leader in the pack is devastating for the pack, too. Please consider banning hunting wolves (and other furbearing animals and hunters like coyotes, mt. lions, etc.

Final Comment	Young, Lahna	West Bloomfield, MI	6/9/2019 8:27:00 PM
----------------------	---------------------	----------------------------	---------------------

- 27** Dear WGFWD, It is so very frustrating for most Americans to have to write a letter to you explaining, pleading for you to protect an Apex predator, a magnificent, essential bio-diversity saving creature such as the essential gray wolf. You must understand the science backs protecting gray wolves from their slaughter by trappers and hunters. You surely know the love of murdering this misunderstood creature is morally and ethically wrong. When di the WGFWD stop protecting our wildlife? Is it that oil companies and hunters and trappers have a big lobby, more money? Is it trump's admin that would be happy to kill all wildlife? Look into your souls. If you are employed by an agency we pay for, listen up, Americans want to see wolves in the wild forever. Stop this or i pray you are all replaced by people who care, and get it and are not afraid to stand up for what is right.

Final Comment	Dern Junior, Rhonda	Evergreen, CO	6/9/2019 8:55:00 PM
----------------------	----------------------------	----------------------	---------------------

- 28** Hunting wolves is horrible. It totally destroys the family pack of the wolves! Some of the hunting has been done within the Yellowstone park. An alpha wolf does not recognize a man made boundary. A wolf is more valuable as people love to watch the wolves vs. as a trophy for a few individual hunters. The state of WY and MT will make much more money from visitors watching the wolves vs. hunting licenses, and the family of the wolves will be better. I went with 4 other women to Yellowstone in February, 2019 on a Wolf Tour with the Teton Science School. We saw 19 of the 60 wolves within the park. We spent a lot of money to have the opportunity to watch the wolves, and many a viewer was also there. It was a fabulous trip! Numerous friends hope to also do the trip. I suggest you read, The American Wolf. Terri Thomas

Final Comment	Thomas, Terri	Houston, TX	6/10/2019 7:14:00 AM
----------------------	----------------------	--------------------	----------------------

- 29** The idea of any kind of "sport" or trophy hunting of wolves is something I just don't understand. No one eats wolf meat, do they? I would like to register my opinion that there should be NO sport to trophy hunting of wolves anywhere in Wyoming. On a recent trip to Yellowstone my husband and I were hoping to see wolves, as we have in many springs in the past, but there were none visible on our trip. It seems as if there just aren't as many now. Please don't allow politics to get in the way of science and vote NO on this kind of hunting. They are beautiful animals, and many people come to Wyoming to see them, bringing money into the state in many forms. They should be treasured not killed. Thanks for listening.

Final Comment	McGregor, Kim	Jackson, WY	6/10/2019 11:45:00 AM
----------------------	----------------------	--------------------	-----------------------

- 30** I would like to express my thoughts and concerns regarding the proposed deregulating of hunting and trapping in Wyoming. It concerns me greatly that there is so little protection given to Wyoming's wildlife. Most recently I have been made aware of the proposals to keep wolves reduced to minimal numbers. Wolves now may be killed in any manner in all "predator" zones of the state with zero regulation. This makes it impossible for stable packs to form. A stable pack could exercise a positive influence on the animals it preys on by encouraging herd movement and general health. Unlimited quotas on trapping bobcats has been proposed in Management Area 1. This in spite of the fact that there is no information regarding the number of bobcats in the area. What is the justification for this? Increased Recreational opportunity for trappers. Trappers who can buy inexpensive permits, trap at will, and sell pelts at a profit. This is certainly an idea that benefits the few, at an unknown cost for the many. It is my opinion that bobcat trapping should be ceased outright in Management Area 1 until reliable information with regards to their current population can be scientifically and responsibly obtained. Unlimited quotas on trapping beaver in

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

area 101, 102, 103, and 104 is up for consideration. This in spite of the wealth of data that shows how uniquely beneficial beavers are to the environment. What is the justification for this? Again apparently the "recreation" and personal interests of the few. The idea of opening these historically limited areas to unlimited trapping permits is completely unacceptable to me. And why is it freely allowed, with no consequence whatsoever, to run animals to death on snowmobiles? Another recreational activity I presume. I would like to believe that we as a people, as a state, can be better than this. I would like to see this made to be illegal. It is, in my opinion, fantastically shortsighted to continue to allow - even encourage the senseless, brutal killing of what is surely a valuable Wyoming resource. There are many residents who are here because of the unique opportunities to view wildlife in its natural habitat. There are many tourists who come to this state, spending time and money, specifically because of these rich opportunities. I believe our voices should be heard and considered, not just the voices of the few who profit from the exploitation of these wondrous resources. Please consider the inherent value of our wildlife and wild places. Please consider the future ramifications of depleting these resources cruelly and needlessly. Please consider thoughtful, scientifically based actions that take into account the values of all of Wyoming's residents and visitors when making policy. Thank you for your time and consideration, Lisa Balmain Laramie, Wyoming

Final Comment	Balmain, Lisa	Laramie, WY	6/10/2019 11:45:00 AM
----------------------	----------------------	--------------------	-----------------------

- 31** Wolves are one of our most important predators in Wyoming. More wolves equals healthier ungulate populations, period. Wolves should have big game status with a year-round closed hunting season.

Final Comment	Haberfeld, Louise	Jackson, WY	6/10/2019 12:40:00 PM
----------------------	--------------------------	--------------------	-----------------------

- 32** There's no place in our culture for trophy hunting. It certainly makes much more economic sense to see them in their natural habitat. Against trophy hunting.

Final Comment	Brown, Sharon	Palm Springs, CA	6/10/2019 8:40:00 PM
----------------------	----------------------	-------------------------	----------------------

- 33** The value of these eco-engineers to the health of our public landscapes outweighs the recreational opportunity to trap and kill beavers with cruel and inhumane steel devices seven months of the year without any scientific foundation. With the amount of recreation use in the four areas included in this proposal, a more sensible option would be to reduce or eliminate the take on beavers, at least until a population survey can be done. I request that the Wyoming Game and Fish Department and the Wyoming Game Commission permanently close these four unlimited quota harvest areas (101,102,103,104) in Teton County to beaver trapping harvest until these areas are surveyed and a population count is established. It's not just beavers that suffer from being trapped out, there goes the habitat for amphibians, fish, songbirds, herons, on and on. There is nothing scientifically justifiable for an unlimited trapping zone – it's plain irresponsible. Beavers are eco-engineers, not trophies; These areas have seen reduced interest in beaver trapping. Beaver pelts continue to decline in value, averaging around \$10-13 each. We value beavers as eco-engineers, not trophies. If few people are interested in trapping, it is probably part of a trend: we are seeing an increase in understanding about the benefits of this species and the wetlands it inhabits. If few people are interested in trapping, why invite more? A lot more people are interested in viewing beavers and their ponds than trapping them. My specific concerns about the effect of existing and potential increase of trapping in the 4 areas; Area 101: Ditch Creek. This is an area used by people for all kinds of recreation, including walking and swimming their dogs. Encouraging more trapping will have increased negative impacts on other uses. • Area 102: Willow Creek. Beavers have made diverse wetlands in this drainage. We prefer to allow them to continue to do so. It's another place where people hike, ride, hunt, fish, and camp and safety for children and dogs remains a concern. • Area 103: Game Creek and Little Horse Creek. Beavers have created some of the most incredible wetlands in this drainage, and as old ponds fill in others replace them. It's a great place to witness the evolution of the beavers' ephemeral ponds. The willow flats in Game Creek are lush and wide in part because of beavers, plus it is a heavily used recreation area, again by people with their dogs. Little Horse Creek is only accessible to the public via Camp Creek Divide, so we wonder who is going to be trapping there. Perhaps on the elk feed ground by permission? • Area 104: Fall Creek, Mosquito Creek and Dog Creek. More great wetlands here, thanks to beavers. More concerns about safety, especially where trails and dispersed use camping and picnicking take place. One of the greatest pleasures experienced in the forest is wandering along the deep blue-green beaver ponds when the willows and aspens are turning gold, in both forks of Fall Creek and Mosquito Creek. Beaver activity is quite proximate to the roads in all except the upper reaches of these creeks, and therefore the ease of trapping is increased in the same places where people camp and picnic. Instead of

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

going to an unlimited take of beavers in these areas, we would urge the WGFD to approach the trapping regulations with caution, realizing that this activity can be incompatible with other public uses of the national forest. The more dogs that end up in leg-hold traps or snares or Conibears, the more public outrage will turn toward trapping in general. Beavers as an ecosystem; Beavers, the animal that doubles as an ecosystem, are ecological and hydrological Swiss Army knives, capable, in the right circumstances, of tackling just about any landscape-scale problem you might confront. Trying to mitigate floods or improve water quality? There's a beaver for that. Concerned about sedimentation, wildlife? Take two families of beaver and check back in a year. A growing coalition of "Beaver Believers"; Today, a growing coalition of "Beaver Believers" – including scientists, ranchers, and passionate citizens – recognizes that ecosystems with beavers are far healthier, for humans and non-humans alike, than those without them. Wyoming Game and Fish Department stated in a recent newsletter: "The economic benefits of trapping to the state cannot begin to compare with the economic benefits derived from the beavers' stabilizing influence on watersheds." Beavers and coexistence; Zero-tolerance mentality remains more rule than the exception, but that is rapidly changing. We need to shift to a modern world of coexistence with our wild beavers, and initiate non-lethal controls if necessary. WGFD states: "We recognize the keystone nature of beavers," McWhirter said, "and their extremely valuable role on the landscape. We don't want to see that impacted", but they set an uncapped harvest quota. Beavers' myriad skills; A better understanding of beavers' myriad skills will have us all wanting to restore beaver populations in our local environment. We believe that the WGFD leaders and game wardens should gain the knowledge to protect and preserve these crucial eco-engineers. Beavers can help us fight drought, flooding, wildfire, extinction, and the ravages of climate change. Our challenge is to teach the public and our wildlife managers to coexist, harmoniously and even beneficially, with our fellow travelers on this planet. Beavers and all furbearers as a public treasure; Our wildlife is a public treasure owned equally by all citizens and taxpayers. Therefore, it is not just that a few people are allowed to indiscriminately and kill this wildlife. Trapping and snaring greatly reduces the number of animals and thus the number of wildlife sightings for the public – depriving them of much pleasure. Unacceptable deaths and severe injuries to non-target species; even animals released alive may later die from their injuries; In addition to beavers, protected animals, migratory birds and other non-target animals are caught in these traps and snares, injured or killed each year. Opening these areas to unlimited trapping could increase these numbers significantly. We need to know about these hundreds, perhaps thousands of casualties each year. Trappers should be required to report all non-target animals. The absence of sportsmanship, fair chase, and compassion in trapping; Every animal in Wyoming, including endangered species, is a possible victim of traps and snares. Is it fair chase not to know your target? Or to sit at home on a couch and wait for a catch? This reflects badly on hunters, and on our state. The pure cruelty of trapping causing injuries, exposure, dehydration and mental stress, and often immense suffering; Should all trap-check time requirements for beavers be reduced to 24-hour trap checks instead of 3 – 13 days, or should traps be eliminated from our landscapes? Jeremy Bentham famously asked, "The question is not, 'Can they reason?' Nor, 'Can they talk?' But, 'can they suffer?'" Our public lands should remain safe havens for all; All people, pets and wildlife should have a reasonable expectation for safety on our public lands, which means trap-free areas for all, including areas 101, 102, 103, and 104. The overall management of trapping is rarely cost-effective; A beaver (furbearer) trapping license costs \$45 for all you can catch. How can that be cost-effective for our state? If beaver (furbearer) trapping/snaring continues then one license should be required for each beaver (furbearer) trapped, similar to game animals. Trapping, which is not based on a science foundation, does little or nothing for effectively managing any species population; We don't have a population count on our state beavers (and all furbearers), but we allow unlimited quotas. We should place quotas on all beaver (furbearer trapping), or just end trapping altogether. Where is the science? Trapping has long ago lost its charm as a Wyoming tradition, let alone an American one; A growing debate about the legitimacy of trapping shows that a shift is coming. Trapping for fun, trophies, fur and feeding one's ego is no longer acceptable by a growing modern population.

Final Comment	Behrens, Joanna	Star Valley Ranch, WY	6/10/2019 9:18:00 PM
----------------------	------------------------	------------------------------	-----------------------------

- 34** Nonresident Elk Draw If you're going to change the nonresident elk draw as proposed, can you at least publish the draw results prior to the deadline for the nonresident antelope and deer applications? I would still like to see the nonresident elk drawing remain unchanged from 2019. Thank you.

Final Comment	SUTHERLAND, JASON	WHITEHOUSE, TX	6/11/2019 2:25:00 PM
----------------------	------------------------------	-----------------------	-----------------------------

- 35** WG&F Commission: I am an advocate for ecosystem integrity whereby all native wildlife is permitted to exist and thrive in a natural condition. In the last decade I have seen the wolf population in Teton County

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

reduced from common sitings to currently rare to see. A total population (outside of Yellowstone NP) of less than 200 wolves total is not a reasonable number for a keystone species. Wolves lived in balance with elk and other species for thousands of years in this region. However, due to the ranching, hunting outfitter communities and outdated wildlife biases, disdain for wolves has resulted in these groups totally dominating the WG&F Commission's extreme management of this animal, artificially limiting the number to a token population. The rest of the public is left out of the decision making process it would seem. Additionally, with the coming potential danger of CWD, plentiful wolves are a natural and inexpensive way to help control this disease. The commission must be aware that the disease transmission of prions is neutralized when wolves digest ungulate protein. Additionally, wolves will single out the possible CWD carriers and help eliminate them from the healthier members of ungulate herds. Finally, I would request that all wolf hunting be eliminated in Teton County. As a whole Teton County residents do not support wasteful trophy hunting and would much rather have wolves, along with all of our wildlife protected and plentiful. Please take our request for protection of our wolves and the chance to see these incredible animals seriously. Western Wyoming is made up of much more than those who represent the ranching and hunting outfitter communities. Thank you

Final Comment	Wilkinson, DL	Jackson, WY	6/11/2019 8:24:00 PM
----------------------	----------------------	--------------------	----------------------

- 36** The sport hunting of wolves by the general public serves no purpose other than as an expression of "blood lust" and a catalyst for "bragging rights." There is no derived food value, only ego gratification. A trophy hunt of wolves feeds nothing more than the personal ego, and as it all too often occurs within the Predator Zone, is a disgrace to the ethical hunting community. Again, Wyoming's wolves should have big game status with a year-round closed hunting season. Thank you for your time . . .

Final Comment	Umphries, Andrew	Tucson, AZ	6/13/2019 10:23:00 AM
----------------------	-------------------------	-------------------	-----------------------

- 37** My wife and I bought a ranch in Wyoming and moved here several years ago because we have always loved Wyoming and wildlife, We have cattle on the ranch and cut hay. We also have lots of predators and prey and they are all put here by God and have an important place. Far more people come to Wyoming to see all the beautiful animals than come here to kill them. I wish I had wolves in my area and am glad they are back. I hope they are protected and expand their range. There are close to 8 billion people on the planet and if every animal that someone has a problem with is killed there will be nothing left but people and the domestic animals that feed them. I think the majority of Americans want wolves, grizzlies, mountain lions and other predators protected and are willing to pay to see that they are. The wildlife of Wyoming brings in far more dollars when they are alive and they contribute to a healthier ecosystem. Thanks, Scott Johnson

Final Comment	Johnson, Scott	Sheridan, WY	6/13/2019 9:17:00 PM
----------------------	-----------------------	---------------------	----------------------

- 38** I am against wolf hunting in Wyoming. We need wolves in Wyoming to control diseases in ungulates such as chronic wasting disease, brucellosis, and others. Wolves cull sick animals. Wolves are not eaten but hunted for sport - I am against sport hunting for this and any animal. My husband and I moved to Wyoming to be in nature and to enjoy its beauty. We are not hunters. We hunt with cameras. Wolves were one of the reasons that we chose Wyoming and now we both work here, live here, and contribute to the state in many ways. Wolves bring money to Wyoming and need to be protected. Finally, livestock owners are already compensated for losses and need to learn how to live with wolves, not try to wipe them out completely. I do not agree with your proposed hunting changes in the Yellowstone area. Protect this area and its inhabitants - all inhabitants, including wolves. Frankly, I am ashamed of how Wyoming has handled its wolf population in the past. Please don't make it worse.

Final Comment	Chesnut, Lorie	Cheyenne, WY	6/14/2019 1:56:00 AM
----------------------	-----------------------	---------------------	----------------------

- 39** Please reconsider your excessive quotas on the killing of wolves in Wyoming. These top level predators can help restore/establish better balance in the ecosystem - culling sick and injured big game, allowing for better long-term restoration of wildlife. Wolves also represent big financial gains (possibly millions of dollars) for the state from international tourism. Lastly, ranchers are already compensated for predation losses, and could do more to mitigate depredation and foster cohabitation with wolves. Do NOT continue to demonize wolves.

Final Comment	Kratschmer, Robin	Billings, MT	6/14/2019 7:47:00 AM
----------------------	--------------------------	---------------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 40** I am generally opposed to hunting wolves in Wyoming at all. Given my stance, I do not believe it is prudent or necessary to extend the wolf hunting season and/or bag limits. I also do not believe there should be any differentiation between the trophy management area and the rest of the state. Wolves should be allowed to populate every part of the state without a kill on site provision outside the trophy management area. With the threat of CWD spreading west and the disaster that of the feedground model, it is important to let wolves do the work they have evolved to do in the ecosystem. Please reduce hunting pressure on the wolves and allow them to occupy additional lands in Wyoming.

Final Comment **Crabtree, Justin** **Wilson, WY** 6/14/2019 9:06:00 AM

- 41** I oppose grey wolves being hunted in the proposed numbers. A healthy wolf population is essential for the tourism industry in Wyoming as well as helping to keep healthy numbers of elk, deer and moose. Right now, there are too many of these animals, as illustrated by the outbreaks of hoof and mouth, brucellosis and other diseases. Livestock owners are already compensated for wolf kills and should be required to use intensive herding, flagging fence top wires, using guard animals, adjusting timing of livestock release on public land, and others to help reduce depredation.

Final Comment **Seitz, Drew** **Lander, WY** 6/14/2019 9:21:00 AM

- 42** Wolves should not be killed for sport in the excessive numbers they have proposed. Given the onslaught of chronic wasting disease, brucellosis and hoof rot, the WGFD should allow wolves and other top carnivores to help restore healthy, free-ranging elk and deer herds throughout the state through natural culling of sick animals. Wyoming, Idaho, and Montana tourism industries generate billions of dollars annually to our states' economies. Millions of people come to the region specifically to see wolves and other free-ranging, healthy wildlife. Livestock owners, who are already compensated for losses in the trophy area, should be required throughout Wyoming and the region to implement measures known to minimize depredation on cattle and sheep*.

Final Comment **Pahre, James** **Bozeman, MT** 6/14/2019 10:09:00 AM

- 43** June 14, 2019 Wyoming Game & Fish Department Wildlife Division 3030 Energy Lane Casper, WY 82604 RE: Chapter 47 2019 Wolf Hunting Season Regulations CC: Ken Mills, WGFD Large Carnivore Biologist To the Wyoming Game and Fish Department and Commissioners: Please accept these comments from the Sierra Club Wyoming Chapter and Wyoming Wildlife Advocates on the Chapter 47 Gray Wolf Hunting Seasons for 2019. Our members, board, and staff in Wyoming and throughout the United States value and appreciate healthy functioning ecosystems and especially wolves that should be integral to balancing deer and elk with the available habitat. Over 7.5 million people visited Yellowstone and Grand Teton National Parks in Wyoming in 2018 with many people travelling specifically to see bears and wolves (NPS, 2018). Wyoming's travel and tourism industry generates \$3.8 billion annually to Wyoming's economy. Wolves and other large carnivores are sought by millions of people coming to Wyoming to view wildlife. Visitors to the national parks alone brought in over \$1 billion worth of economic value to Wyoming with over 12,000 jobs created. This value wouldn't exist without the unique presence of bears and wolves in and around these parks. Introduction With disease such as chronic wasting disease, brucellosis, and hoof rot affecting elk and deer herds in Wyoming, the presence of wolves on the landscape is more important than ever. Gone are the days where carnivores were considered pests to be eradicated. This 21st Century should be an era of progressive scientifically-based wildlife management that values all functional parts of the ecosystem including prey and predators (Fraser, 2011). The ecological and economic value of wolves to Wyoming cannot be overstated; instead of managing for the lowest numbers that will keep them from being relisted under the Endangered Species Act, we should be supporting the presence of wolves across the state and teaching ranchers how to coexist alongside them. Wolf populations should be optimized not managed down to an artificial minimum. The regulations as they are recommended to the Wyoming Game and Fish Commissioners are inadequate to ensure robust wolf populations that could ensure the state would benefit from the ecosystem services provided by wolves. We have several recommendations for the upcoming 2019 wolf hunting season. 1. Extending hunting in area 13 to March 31 is unnecessary to protect bighorn sheep and will leave wolf pups abandoned. The reasoning given by Ken Mills during the public meeting in Jackson on June 6, 2019 for the extension in the hunting season dates was that the season would be extended to protect the Whiskey Mountain bighorn sheep herd. The Whiskey Mountain bighorn sheep herd are still hunted with a quota of four rams. Human disturbance to this herd on their winter range has been reduced by limiting motorized recreation, but is still allowed by people on foot and horseback which impacts

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

the bighorn sheep in this area. Bighorn sheep are rarely prey for wolves and Wyoming's bighorn sheep herds declined precipitously over the past century in the absence of wolves (Dekker, 2009; Wyoming Game and Fish Department, 2019). If the status of this bighorn sheep herd is at risk, hunting for the herd should be suspended, with all human activity on their winter range ceased, and domestic sheep (which can transmit diseases to wild bighorns and are largely responsible for the regional decline of bighorns) should be removed from the area. A research project (Peterson, 2019) is currently in its third year to determine what the cause of the decline of bighorn sheep are in the Whiskey Mountain area. On June 13, 2019, Kevin Monteith presented findings from the study to the Animal Damage Management Board in order to receive further funding for this project. Kevin stated that there were three known depredations on bighorn lambs which were caused by a coyote, an eagle, and a mountain lion. Kevin's presentation did not include wolves as a known source of predation on lambs in the Whiskey Mountain herd. The Whiskey Mountain Bighorn Sheep Management Plan (2019) states, "Fine-scale location data from ongoing bighorn sheep monitoring indicates increased wolf activity on preferred, low elevation bighorn sheep winter range near Dubois has impacted the WMBS herd over at least the past three years, primarily through distributional displacement. More recently, increased wolf activity on preferred, low elevation wintering areas has displaced sheep onto marginal, high elevation wintering sites apparently in search of better escape terrain." In an astonishing contradiction, wolves are to be removed from this area and the dates for hunting are to be extended in this hunt area, however people are still permitted to be on foot or horseback from December 1 to May 15. Further, wolf hunters who will be present from September 1 to March 31 is certain to provide an additional, and arguably, larger source of disturbance than the wolves. If the main purpose is to diminish the disturbance to the herd and they are in that much jeopardy, all human activity should be removed from this region before removing wolves. Kevin's presentation and the management plan both state that lamb survival is the main limiting factor of the bighorn sheep herd. If that is true and lambs are not being preyed upon by wolves, there is no reason to extend the season. If no evidence exists to show that wolves have been preying upon the Whiskey Mountain bighorn sheep herd, the wolf pack should be left intact with no further hunting of wolves in this area in order to minimize human disturbance. As Kevin stated, there are many variables that are a factor in this study. In addition, hunting wolves into March will leave pups orphaned if pack adults or the lactating alpha female is killed. This would decimate the local wolf pack. We don't see this reflected in the number of wolves included in the take for area 13. Two wolves were illegally killed from this region in 2018 with the number of poached wolves likely higher (Treves, et al., 2017).

2. Wolves and coursing predators are the best defense against chronic wasting disease (CWD) in elk and mule deer. The state of Wyoming is desperately trying to mitigate the effects of CWD and reduce the prevalence of the disease statewide. According to the presentation by the Department in recent public meetings concerning CWD, the Department has put together a group that is tasked with the objective "to explore CWD scientific information, cervid management, and public input to evaluate management options to minimize CWD in Wyoming's cervid populations." The Working Group will create recommendations to the Department for incorporation into a revised CWD management plan (version 3) based on meaningful public input and science. There is strong evidence from research and modeling by wildlife scientists that predators can help mitigate the effects of CWD in free-ranging herds of cervids. We offer here excerpts from "The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal on Prion Disease Dynamics in Deer," by Margaret A. Wild, PhD., et al., 2011, in *Journal of Wildlife Diseases*: "(T)he role of predators should be considered in devising strategies for control of emerging or reemerging pathogens in natural populations" (Wild et al, 2011, p.79). "Nonselective predation could dampen epidemic dynamics by reducing host densities and contact rates or by lowering the total number of infected individuals in a host population (Heesterbeek and Roberts, 1995; Barlow, 1996; Packer et al., 2003). Similarly, selective predation on infected individuals could eliminate pathogens or prevent their establishment under some circumstances" (Heesterbeek and Roberts, 1995; Gross and Miller, 2001; Packer et al., 2003) (Wild et al., 2011, p. 78). "(I)f predators prey selectively on diseased individuals, it is reasonable to expect that they might reduce disease prevalence much more rapidly than would occur if mortality were nonselective. Evidence that predators have a greater selectivity for diseased prey has been widely observed" (Wild et al., 2011, p. 79, emphasis added). While reducing densities of vulnerable cervids is a recommended action to mitigate the effects of CWD and other diseases long-term (Alberta, 2008, p. 2, etc.; CCWHC, 2004, p. 21; Monello, et al., 2013, p. 277; Smith, 2012, p. 226), "Thus far, control strategies relying on hunting or culling by humans to lower deer numbers and subsequently CWD prevalence have not yielded demonstrable effects (Conner, et al., 2007)" (Wild, et al., 2011, p.80). "What is most clear [in our model] is a consistent and robust trend toward decreasing CWD prevalence in populations subject to predation, particularly selective predation, over a range of parameter estimates..." (Wild, et al., 2011, p. 85 brackets added). "Even in cervid herds and areas not yet endemic for CWD, "Simulation results suggested that selective predation could also dampen or eliminate the emergence of CWD in new locations...adding support to speculation that the absence of large predators presents an amplification risk factor for establishment of CWD (Samuel, et al., 2003). (O)ur simulations suggest that had selective predation by

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

wolves been present during that period [of initial CWD eruption in cervids in Colorado], CWD may never have been established or detected" (Wild, et al., 2011, p. 85 brackets added). "(T)he absence of large predators, particularly wolves, over much of their native range in the United States...has likely played a significant role in the current unnatural distribution and prevalence of this [CWD] disease" (Wild, et al., 2011, p. 86 brackets added). "The prolonged clinical course and type of clinical abnormalities associated with CWD make it the prototypic disease for selection by predators. Chronic wasting disease produces subtle changes in behavior and body condition that progress over weeks or months to overt signs of end-stage disease typified by loss of attentiveness or response to external stimuli, emaciation, and weakness (Williams and Young, 1980, 1992; Wild et al., 2002)" (Wild, et al., 2011, p. 86). "(W)e believe that selective predation modeled at a rate four times higher than that of healthy deer is a reasonable, if not conservative, estimate" (Id.). "Although here we modeled wolf predation on deer, similar outcomes would be expected for wolf predation on other species susceptible to CWD...We considered the wolf, a large coursing predator, to be most effective in selective removal of deer vulnerable from CWD infection; however, opportunistic mountain lions (Krum et al. 2009), and potentially coyote...packs, would likely benefit from lack of vigilance by CWD-affected deer as well" (Wild, et al., 2011, p. 87). "We suggest that predation, particularly wolf predation, may be a useful tool for management of CWD" (Id. emphasis added). Dr. Doug Smith, Dr. Gary J. Wolfe (Former MFWP Commissioner), Kevin van Tighem (Former superintendent of Banff National Park), Dr. David Mech, Dr. Valerius Geist, Princeton University biologist Andrew Dobson, Dr. Paul Paquet, P.J. White & Troy Davis (Yellowstone Science), Bill Geer (Montana Wildlife Federation), and Mike Miller (CWD expert and research veterinarian for Colorado Division of Wildlife) all say that wolves are most likely one of the best defenses against chronic wasting disease. Dr. Doug Smith says, "Wolves pick up on stuff we can't see. They are most efficient at exploiting weaknesses in prey because their survival depends on it." Dr. Gary J. Wolfe, former Montana Fish, Wildlife and Parks Commissioner, former project leader of the CWD Alliance, and former Rocky Mountain Elk Foundation president and CEO for 15 years states, "While I don't think any of us large carnivore proponents are saying that wolf predation will prevent CWD, or totally eliminate it from infected herds, it is ecologically irresponsible to not consider the very real possibility that wolves can slow the spread of CWD and reduce its prevalence in infected herds...We should consider wolves to be 'CWD border guards,' adjust wolf hunting seasons accordingly, and let wolves do their job of helping to cull infirm animals from the herds." Dr. David Mech, one of the most experienced wolf biologists in the world states, "Based on everything I've seen over the course of my career, I generally stand behind the assertion that wolves make prey populations healthier...The evidence to support it is overwhelming" (Wilkinson, 2018). Mike Miller, a CWD expert and research veterinarian for the Colorado Division of Wildlife, thinks wolves are "probably the single best way to stop the spread of CWD. Chronic wasting disease causes animals to act weird. Wolves kill animals like that" (Chronic Wasting Disease Alliance, n.d.). University of Calgary professor Dr. Valerius Geist, an expert on deer and elk, is also convinced. "Wolves will certainly bring the disease to a halt. They will remove infected individuals and clean up carcasses that could transmit the disease" (Chronic Wasting Disease Alliance, n.d.). With Wyoming having a high prevalence of CWD and the potential to have wolves statewide, if wolves are not managed down to an artificial minimum population as proposed by the Wyoming Game and Fish Department, the perfect conditions are created for the research of predators and their effects on reducing CWD and improving the health of our herds. Wyoming can be a true pioneer in CWD research and chart a new path forward for healthy elk and deer management. 3. WGFD wildlife managers need to consult with WGFD and other agency disease professionals On Tuesday, June 4, 2019 the Wyoming Game and Fish Department gave a public presentation about Chronic Wasting Disease in Pinedale, Wyoming. Among several PowerPoint presentations given by Department personnel, the following slide was included in a presentation by Dr. Mary Wood, the wildlife veterinarian for the Department: Two days later, on June 6, 2019, WGFD biologist Ken Mills gave a PowerPoint and question and answer presentation in Jackson about the alleged need for killing approximately 70 wolves in northwest Wyoming to mitigate conflicts with livestock, reduce or eliminate natural predation on cervid herds, and manage wolves down to a minimum, ostensibly barely enough to avoid litigation from wildlife enthusiasts. When questioned by members of the audience, and in contrast with the presentation given by Department scientists and biologists two days previously in Pinedale, biologist Mills refused to acknowledge the value of wolves in helping ensure the long term health of elk and deer herds. This is a complete denial of the extensive and prevailing body of science supporting the ecological values of large carnivores. It is in the public's interest for the Wyoming Game and Fish Department personnel to familiarize themselves with the current science and speak with one voice to inform the public about the long term ecological and economic value of wolves and other large carnivores and manage the public's wildlife accordingly. 4. The number of wolves killed because of livestock conflicts could be reduced greatly by encouraging ranchers who are successfully using non-lethal methods to train Wyoming ranchers. The WGFD should also be educating ranchers on these methods in order to reduce conflicts between livestock and carnivores. A majority of wolf deaths in 2018 (61.6%) were from conflict control and predatory take (Wyoming Game and Fish Department, et al., 2019). The WGFD could be

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

helping ranchers to use non-lethal methods to deter wolf attacks on livestock such as intensive herding, not running unprotected calves or sheep, fladry, and guard animals. Non-lethal co-existence measures have been proven time and time again to be more effective at preventing livestock losses than an archaic policy of automatic lethal removal of wolves or any carnivore (Western Landowners Alliance, 2018). Wolves are critically needed ecological stewards and the public's valued wildlife and should not be needlessly sacrificed. Ranchers like Hilary and Andrew Anderson, Malou-Anderson Ramirez, Melissa Dinino, Mike Phillips, and John Hansen in Montana, Ted Birdseye in Oregon, Tom, John, and Diane Peavey in Idaho, Greg Hertel in Wyoming, and Joe Englehart in Alberta are all successfully raising full-weight cattle and sheep with little to no losses to their livestock using non-lethal methods to reduce conflicts. Instead of reimbursing livestock producers for the cost of lost livestock and still killing wolves anyway, which sets up a vacuum that will be filled by more wolves in the future, the WGFD should educate ranchers on non-lethal methods that will keep livestock safe and wolves alive. Training a wolf pack not to eat livestock is more effective than lethally removing wolves each year or every couple of years. As Matt Barnes, rangeland consultant says, "It is more effective to manage the prey species (livestock) than try to manage the freeroaming predator" (Western Landowners Alliance, 2018). "Nonlethal and lethal deterrents can be complementary; the possibility of lethal consequences can prolong and accentuate the effectiveness of nonlethal deterrents (Walters et al. 2010). At the same time, contributors agree that lethal control is only effective in the long term if it is used in conjunction with nonlethal deterrents and conflict reduction practices. Without proactive, nonlethal deterrents, lethal control of coyotes and wolves is at best a temporary reprieve because reproduction rates are high and eliminated pack members will soon be replaced. Contributors recommend keeping non-depredating resident wolf packs intact. As one contributor explains, "If a pack is not killing, leave them be. The worst thing you can do is remove a breeding pair, particularly the alpha female, from a resident pack that is preying on native ungulates rather than livestock" (Western Landowners Alliance, 2018, pp. 51). By randomly allowing the killing of wolves in areas where they are not depredating, wolf hunters are inadvertently causing increases in livestock depredations. The case for decreasing the number of wolves taken and increasing proactive, preventative measures is strong as demonstrated above.

Final Comment

Combs, Kristin

Wilson, WY

6/14/2019 11:25:00 AM

4 5. Quotas are not low enough to encourage wolves to repopulate their historic range. While the lower quotas for wolves in the recommended hunting seasons are a step in the right direction, they do not go far enough in light of the fact that almost half of the wolf population was removed in 2018 (Wyoming Game and Fish Department, 2019) with the total population at the end of the year 18% lower than at the end of 2017. Wolves should be allowed to meet carrying capacity in the northwestern part of the state and spread outward to be a barrier and potential defense against CWD and repopulate their historic range (Chambers, et al., 2012). 6. The start date of the hunting season should be returned to October 1. The start date of September 1 for the wolf hunting season should be returned to October 1. In 2018, the date was moved to September 1 to provide greater opportunity for hunting in order to lower the wolf population in 2018. With quotas lower in 2019 and fewer wolves targeted by the Department, the date should be returned to October 1. Mostly pups were killed in September of 2018 in the Trophy Game Management hunt areas (Wyoming Game and Fish Department, 2019). Ken Mills in his presentation in Jackson on June 6, stated that the date would remain the same solely for consistency for hunters. Fewer wolves are slated to be killed in 2019 therefore the hunting season should be returned to October 1. 7. Wolf-viewing is a big economic driver for communities surrounding the national parks and will be impacted by decimation of wolves. The Gros Ventre valley east of Grand Teton National Park lost nearly all of its wolves in 2018. At the end of the 2018 hunting season, Aly Courtemanch, biologist with the Wyoming Game and Fish Department, stated that there were "five, maybe six wolves at the most in the Gros Ventre" (Koshmrl, 2019). Wildlife tour operators who reported seeing wolves on a regular basis in 2016 and 2017 have seen few if any wolves in 2018 or 2019. The decimation of Wyoming's wolf populations by sport hunting and agency removals has resulted in diminished experiences for wildlife enthusiasts and reduced revenue for the community and wildlife-based businesses. With wolf watching being a huge economic force in Northwestern Wyoming, wildlife watchers- who far outnumber hunters and ranchers- shouldn't be expected to make do with small token numbers of the most popular species of wildlife. 8. Manage for healthy wildlife The current model of wildlife management as implemented by the Wyoming Game and Fish Department focuses on maximum numbers of deer and elk throughout the state regardless of the health of the deer and elk or their habitat. Wyoming has approximately 30% more elk than the statewide objective, and many are sick. The Department also defers entirely to livestock and hunting outfitter interests and summarily dismisses the views and requests of non-consumptive wildlife enthusiasts on the management of wildlife including wolves. This biased approach which ignores contemporary wildlife science by the Wyoming Game and Fish Department results in unhealthy elk and deer herds, unhealthy ecosystems, and harms the public's wildlife and is not in the public interest. In order to combat CWD and other cervid diseases the Department must manage for a healthy ecosystem, as

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

natural as possible. Rather than focus on maximum numbers of deer and elk, the Game and Fish Department and other agencies (e.g., U.S. Fish and Wildlife Service, US Forest Service, Bureau of Land Management, National Park Service, and tribal wildlife professionals) should lead the effort to educate the public and shift the emphasis to achieving healthier herds that are managed according to the carrying capacity of healthy habitat, especially native winter range. The important role of wolves and other carnivores in keeping elk and deer healthy should be emphasized and applied in all wildlife management plans. Conclusion The proposed 2019 hunting regulations cater primarily to hunters, outfitters, and livestock interests with little left over for millions of wildlife-watchers who support Wyoming's economy by visiting our state to enjoy wolves in their natural habitat. Wolves are a valued ecological and economic resource and should be managed to fulfill their ecological niches. To manage wolves down to an artificial minimum number is irresponsible and unscientific and doesn't account for the intricacies of their social structures. Wolf/livestock conflicts are being exacerbated by random hunting of individuals with quotas still much too high in most hunting units. The season should be adjusted to begin on October 1 and end on December 31 for all units. Wolves could be our greatest ally in the fight against CWD. The WGFD should not discredit the value wolves hold in this respect. Sincerely, Kristin Combs Executive Director Wyoming Wildlife Advocates PO Box 1772, Wilson WY 83014 307-413-4116 kristin@wyowild.org Lloyd Dorsey Conservation Program Manager Sierra Club Wyoming Chapter PO Box 12047, Jackson WY 83002 307-690-1967 Lloyd.dorsey@sierraclub.org

References: Chambers, S.M., Fain, S.R., Fazio, B., Amaral, M. (2012). An account of the taxonomy of North American wolves from morphological and genetic analyses. *North American Fauna*: (77): 1 – 67. Chronic Wasting Disease Alliance. (2019). Officials fighting CWD ponder a natural partner: Wolves. Retrieved from <http://cwg-info.org/officials-fighting-cwd-ponder-a-natural-partner-wolves/> Dekker, D. (2009). Declines of bighorn sheep, *Ovis canadensis*, on deteriorating winter range in Jasper National Park, Alberta, 1981–2010. *Canadian Field-Naturalist*, 123(2): 157–164. Retrieved from <http://journals.sfu.ca/cfn/index.php/cfn/article/viewFile/931/932> Estes, J.A. Terborgh, J., Brashares, J.S., Power, M.E., Berger, J., Bond, W.J...Wardle, D.A. (2011). Trophic downgrading of planet earth. *Science*, 333(6040), 301-306. doi: 10.1126/science.1205106 Francisco J. Santiago-Avila, F.J., Cornman, A.M., Treves, A. (2018). Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *s. PLoS ONE* 13(1): e0189729. <https://doi.org/10.1371/journal.pone.0189729> Fraser, C. (2011). The crucial role of predators: A new perspective on ecology. *Yale Environment* 360. Retrieved from https://e360.yale.edu/features/the_crucial_role_of_predators_a_new_perspective_on_ecology Koshmrl, M. (2019). Did killing wolves make elk stay put? Jackson Hole News and Guide. Retrieved from https://www.jhnewsandguide.com/news/environmental/did-killing-wolves-make-elk-stay-put/article_28608fb3-4377-5546-aeef-6d7f8500c9d5.html#comments National Park Service (NPS). (2018). National park visitor spending effects: Economic contributions to local communities, states, and the nation. Retrieved from: <https://www.nps.gov/subjects/socialscience/vse.htm> Peterson, C. (2019). A first-of-its-kind bighorn sheep study hopes to offer answers to an iconic Wyoming herd's slow demise. *Casper Star-Tribune*. Retrieved from https://trib.com/outdoors/a-first-of-its-kind-bighorn-sheep-study-hopes-to/article_91203097-f895-5022-99ac-c842b9982280.html 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 Mammology*, xx(x):1–9. doi: 10.1093/jmammal/gyx052 Western Landowners Alliance. (2018). Reducing conflicts with grizzly bears, wolves and elk: A western landowner's guide. Santa Fe, NM: Western Landowners Alliance. Retrieved from https://westernlandowners.org/lp/reducing-conflict-with-grizzly-bears-wolves-elk/?fbclid=IwAR3UviSgvS2iZvzaB9pLLi_8U5IjhTXsSIJOLHOAPSeCyo2Lp85t55-Vn1M Wild, M.A., Hobbs, N.T., Graham, M.S., & Miller, M.W. (2011). The role of predation in disease control: A comparison of selective and nonselective removal on prion disease dynamics in deer. *Journal of Wildlife Disease*, 47(1), 78-93. Wilkinson, T. (2017). The undeniable value of wolves, bears, lions and coyotes in battling disease. *Mountain Journal*. Retrieved from: <https://mountainjournal.org/predators-and-chronic-wasting-disease> Wyoming Game and Fish Department. (2019). Whiskey Mountain bighorn sheep plan. Cheyenne, WY: Wyoming Game and Fish Department. Retrieved from https://wgfd.wyo.gov/WGFD/media/content/PDF/Regional%20Offices/Lander/Big%20Horn%20Sheep%20WM/WMBHS_v052819_DRAFT-Plan.pdf Wyoming Game and Fish Department. (2019). Whiskey Mountain bighorn sheep: Draft plan presentation and discussion [PowerPoint slides]. Retrieved from <https://wgfd.wyo.gov/WGFD/media/content/PDF/Regional%20Offices/Lander/Big%20Horn%20Sheep%20WM/WMBHS-Plan-Presentation-pptx.pdf> Wyoming Game and Fish Department. (2019). Wyoming Game and Fish Commission Chapter 47 gray wolf hunting seasons: Proposed 2019 season [PowerPoint slides]. Wyoming Game and Fish Department, U.S. Fish and Wildlife Service, National Park Service, USDA-APHIS-Wildlife Services, and Eastern Shoshone and Northern Arapahoe Tribal Fish and Game Department. (2019). Wyoming gray wolf monitoring and management 2018 annual report. Mills, K.J. & Gregory, Z. Cheyenne, WY: Wyoming Game and Fish Department.

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 45** As a frequent visitor to the beautiful state of Wyoming I am concerned about the trapping and hunting of its wildlife. My main reason for visiting the state is to experience the wonder of viewing wildlife which I am unable to see in my home state of Arizona. I have a true love of animals and I hate to see them needlessly killed for trivial things like their fur which brings in a minimal amount of money. Animals such as beavers, wolves and mountain lions all play an important part in our ecosystem and each one does their job in our environment. I am hoping that the state of Montana will not increase their hunting quotas or extend the hunting season for the Gray Wolf. This magnificent animal keeps everything in balance as we have witnessed in Yellowstone National Park. They must not be killed in the belief that there are too many of them or that they are a threat to the local ranchers. Many ranchers have worked out ways for their livestock and wolves to live in harmony as we have seen nearby my home state with the Mexican Gray wolf, and I know that Wyoming also has many responsible ranchers that have worked with wildlife experts trying to keep their cattle safe from wolves. I am hoping that more can be done in this goal of living in harmony. Visitors to Wyoming are thrilled to experience the sighting of a gray wolf and we hope you will not increase the quotas or extend the hunting season. Thank you very much.

Final Comment	Kyriakopoulos, Jill	Sedona, AZ	6/14/2019 12:17:00 PM
----------------------	----------------------------	-------------------	-----------------------

- 46** I am writing to you today to request that more thought goes into the laws and rules for Wyoming trapping. As a frequent visitor, I bring in tourist dollars which help the Wyoming economy. The only reason I visit Wyoming is to experience wildlife and it is upsetting to me that there are leg hold traps scattered throughout the state killing animals needlessly. I am especially concerned about the trapping of beavers, the worker of the state. The beaver plays such an important part in the environment and they need more protection. I learned that trapping and killing of beaver increases costs to ranching, Wyoming tourism, fire fighting, big game and predators and the fishing industry by reducing groundwater, affecting the wetlands and other negative results. Beaver numbers have been constantly declining and trapping is harming their recovery. They are much needed in Wyoming to help the ecosystem and I am asking you to please add stricter laws to protect the beaver and discontinue their trapping. Thank you.

Final Comment	Kyriakopoulos, Jill	Sedona, AZ	6/14/2019 12:29:00 PM
----------------------	----------------------------	-------------------	-----------------------

- 47** The proposed changes to have the Gray Wolf hunted or extended will cause a devastating loss due to the spread of Chronic Wasting Disease. Wolves are natural vaccines against this disease and the more you slaughter the more this disease will spread. It's due time that Hunters and Ranchers learn to coexist with these Iconic species before it's too late. Do not expand the hunting season for Gray Wolves.

Final Comment	Taylor , Evelyn	Hico , TX	6/14/2019 1:09:00 PM
----------------------	------------------------	------------------	----------------------

- 48** June 14, 2019 Wyoming 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 2019 Submitted electronically at: https://wgfapps.wyo.gov/WGFD_WebSurvey/CommentOnly.aspx Wyoming Game and Fish Department, Thank you for the opportunity to comment on the Wyoming Game and Fish Department's (WGFD) proposal for the 2019 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 1.8 million members and supporters nationwide, of which more than 2,600 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 as such. Wyoming wolves are also vital to natural re-colonization of historic habitat in places like Colorado. Defenders remains opposed to WGFD's biological goal to reduce the wolf population to 160 wolves, 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. At the April 24th Wyoming Game and Fish Commission meeting Ken Mills stated, "The more wolves we have the less likely the population is to grow." He stated that this was due in large part to recruitment impacts at higher population levels, resulting in the "need" for lower levels of human-caused mortality to stabilize the population at a given number. Biologically, Wyoming Game and Fish should manage towards a higher population number that is largely self-limiting, requiring

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

less human-caused mortality to regulate. WGFD is in a cycle of increasing human-caused mortality (2018), which resulted in a rapid decrease in the population – approaching the minimum number of wolves and consequently, the need to significantly reduce allowable human-caused mortality in 2019 to avoid overshooting the minimum set by the U.S. Fish and Wildlife Service. Wolves should be managed to maintain stable, healthy and abundant populations across large landscapes so that they may perform their important ecological role and reestablish historic habitat. The biological goal of 160 wolves is largely set to address livestock conflict and perceived pressure on ungulates (Koshmrl, April 17, 2019). 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; Santiago et al. 2018). Rather than allow for natural predator-prey dynamics, WGFD continues to kill wolves to appease the hunting and livestock community. 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, livestock producers and hunters should not be the drivers for WGFD's management of wolves. These decisions should be based in science. While we appreciate WGFD's reduction in allowable mortality for this upcoming season, we oppose WGFD's goal of managing for only 160 wolves. Proposed Hunt Area Quotas Around National Parks Some wolf packs in Wyoming have territories that straddle Yellowstone National Park, Grand Teton National Park or the John D. Rockefeller, Jr. National Parkway and areas outside the parks. In 2017, national park visitors to Wyoming spent approximately \$882 million in local gateway regions and supported 12.3 thousand jobs and \$1.1 billion in economic output to the Wyoming economy (Cullinane, et. al. 2018). For these reasons, 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 WGFD 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 new WHAs. Extending the Hunt Season in Hunt Area 13 WGFD reduces the quota in Hunt Area 13 but pushes the closing date to March 31. No rationale is provided for extending the season until March 31 in Hunt Area 13. Defenders asks this date to be moved back to December 31st and a rationale be provided in the future when changes to dates are suggested. John D. Rockefeller Parkway We support WGFD'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 With this proposal, the Wyoming Game and Fish Department continues to disregard the ecological, scientific and intrinsic role that wolves play in Wyoming. Rather than manage for a biological minimum WGFD feels it can reach – a goal of 160 wolves – we request WGFD manage for a population more in line with the biological carrying capacity of the region to provide for the ecological benefits of this keystone species. We further request WGFD protect wolf packs that straddle national park boundaries. Finally, we request WGFD provide greater outreach on the ecological role of wolves in the state and further promote the use of techniques that prevent conflicts between wolves and livestock. Thank you for the opportunity to comment on this plan. Erin Edge, Rockies and Plains Representative Defenders of Wildlife eedge@defenders.org 406-728-9436 P.O. Box 1858 Missoula, MT 59806 Citations Cullinane Thomas, C., and L. Koontz. 2018. 2017 national park visitor spending effects: Economic contributions to local communities, states, and the nation. Natural Resource Report NPS/NRSS/EQD/NRR—2018/1616. National Park Service, Fort Collins, Colorado. <https://www.nps.gov/subjects/socialscience/vse.htm> Accessed May 23, 2018. Harper, Elizabeth; Paul, William J.; Mech, L. David; and Weisberg, Sanford, "Effectiveness of Lethal, Directed Wolf-Depredation Control in Minnesota" (2008). USGS Northern Prairie Wildlife Research Center. Paper 99. <http://digitalcommons.unl.edu/usgsnpwrc/99> Hogberg, J., A. Treves, B. Shaw, L. Naughton, Public Attitudes towards wolves in Wisconsin: 2013 Survey Report. Carnivore Coexistence Lab. Madison, WI. October 2013. Koshmrl, M. By design wolf counts shrink. Jackson Hole News and Guide. April 17, 2019. Accessed on May 3, 2019. https://www.jhnewsandguide.com/news/environmental/article_8d1fce02-dd16-5d12-84d7-7684ba8627a3.html McManus, J. S., A. J. Dickman, D. Gaynor, B. H. Smuts and D. W. MacDonald. 2014. Dead or alive? Comparing costs and benefits of lethal and non-lethal human-wildlife conflict mitigation on livestock farms. *Flora and Fauna International* McNay, M. E. 2002. Investigation of Wolf Population Response to Intensive Trapping in the Presence of High Ungulate Biomass. Alaska Department of Fish and Game Research Final Report. July 1997- June 2002. Project 14.17. Santiago-Avila FJ, Cornman AM, Treves, A. 2018. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS ONE* 13(1): e0189729. <https://doi.org/10.1371/journal.pone.0189729> Spina, John. "Wyoming sets wolf population goal of 160." Jackson Hole News and Guide. May 24, 2017. Web. <http://www.jhnewsandguide.com/news/environmental/wyoming-sets-wolf-population-goal->

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

of/article_6ef7478e-7a4a-5eac-abc0-5f9f199e6d89.html. Accessed on May 26, 2017. Stone, S. A., S. W. Breck, J. Timberlake, P. M. Haswell, F. Najera, B. S. Bean, D. J. Thornhill. 2017. Adaptive use of non-lethal strategies for minimizing wolf-sheep conflict in Idaho. Journal of Mammalogy. 98(1): 33-44. <https://doi.org/10.1093/jmammal/gyw188> Wielgus RB, Peebles KA (2014) Effects of Wolf Mortality on Livestock Depredations. PLoS ONE 9(12): e113505. <https://doi.org/10.1371/journal.pone.01> Wyoming Game and Fish Commission Meeting. Accessed on May 21, 2019. <https://www.youtube.com/watch?v=CzflwNjNB9U>

Final Comment	Edge, Erin	Missoula, MT	6/14/2019 1:12:00 PM
----------------------	-------------------	---------------------	-----------------------------

- 49** 1. Wolves should not be killed for sport in the excessive numbers they have proposed. With over 47% of the wolf population being lost in 2018, it is time to allow the wolf population to recover and therefore I feel that the numbers proposed by Chapter 47 are too high. 2. Now that the onslaught of chronic wasting disease, brucellosis and hoof rot are present in the ungulate population, the WGFD should allow wolves and other top carnivores to help restore healthy, free-ranging elk and deer herds throughout the state through natural culling of sick animals. 3. Wyoming, Idaho, and Montana tourism industries generate billions of dollars annually to our states' economies. Millions of people come to the region specifically to see wolves and other free-ranging, healthy wildlife. I feel that by continuing to cull the wolf population through trophy hunting may cause a cost to our communities because tourists will not come to Wyoming in the future without proper stewardship of our carnivores. 4. Livestock owners, who are already compensated for losses in the trophy area, should be required throughout Wyoming and the region to implement measures known to minimize depredation on cattle and sheep. I feel for the losses to livestock owners, however, they are grazing on our national forests at a much reduced rate for a cow/calf unit and therefore should assume some risks.

Final Comment	Spahr, John	Jackson, WY	6/14/2019 1:57:00 PM
----------------------	--------------------	--------------------	-----------------------------

- 50** I think your proposal for 34 wolves to be killed in the trophy area is too high. It is clear that G&F wants to keep their numbers down to the absolute minimum. Though i grew up in Dubois and can see why you might want to protect the Whiskey Mt. sheep herd, I think your proposal will bring them below the level at which they will become protected again under Endangered Species Act. A lot more will be killed than the 34 from livestock conflicts. if they do go below the minimum, I will be among those loudly crying for them to be protected by the feds if we can't or won't do it right. We need to have top carnivores present and culling the elk as CWD advances. In addition, wolves and other wild animals are a huge economic boost for tourism.

Final Comment	Petersen, Leslie	Wilson, WY	6/14/2019 2:11:00 PM
----------------------	-------------------------	-------------------	-----------------------------

- 51** Too many wolves are being hunted for sport. They act as important natural predators to prevent spread of disease in elk and other hers in the state. Brucellosis and chronic wasting disease are top concerns. Please neither extend number of wolves that may be hunted nor length of hunting season for these beautiful animals and instead, encourage farmers to get donkeys and other non-lethal deterrents to wolf predation of their livestock.

Final Comment	Barton, Tanya	CHEYENNE, WY	6/14/2019 2:31:00 PM
----------------------	----------------------	---------------------	-----------------------------

- 52** Please do not extend wolf hunting season. They did not kill any sheep, pneumonia did. Alison James

Final Comment	James, Alison	Sandy Hook, CT	6/14/2019 2:40:00 PM
----------------------	----------------------	-----------------------	-----------------------------

- 53** The grey wolf needs more protection, not less. One major reason is to help eliminate sick prey. Taking 19 kills is not needed when the species is so limited. Keep the 19 and let the herd grow and due what they are built todo: self regulate other species. Thank you, William E. Johnson

Final Comment	Johnson, William	Cody, WY	6/14/2019 3:03:00 PM
----------------------	-------------------------	-----------------	-----------------------------

- 54** Wolves are a keystone species that is critical for a healthy ecosystem. These apex predators do not need to be hunted at all. These animals need to be protected and man does not need to hunt them to eat. They

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

are being killed for sport and the excuse used is to protect livestock and sheep Etc. The proof is in the science that these animals are essential and non-lethal means can be used to protect domesticated animals from predators. Do not extend the hunting season and do the right thing to protect our ecosystem, our Earth including all of our animals.

Final Comment	Kistler, Louise	Asheville , NC	6/14/2019 4:38:00 PM
----------------------	------------------------	-----------------------	-----------------------------

- 55** I disagree with the proposal to kill legally 34 more gray wolves in the trophy areas. I disagree with the trophy game area delineation. The Gray Wolf is the premier apex carnivore in North American and his presence in Wyoming ecosystems in ECOLOGICALLY significant numbers is absolutely essential to maintaining all the functions and processes of healthy wildlands. The wolf must be welcome on public lands across the state as the valued native wildlife species that he is. The state must stop trying to hammer the wof numbers down to the bare legal minimum where they have no meaningful ECOLOGICAL impact. Stop the legal hunt and let the wolf do his job in knocking down the severe and real threat to our ungulate populations by reducing wildlife diseases.

Final Comment	Neal, Chuck	Cody, WY	6/14/2019 6:41:00 PM
----------------------	--------------------	-----------------	-----------------------------

- 56** As a photographer and wildlife guide in Grand Teton and Yellowstone I have hundreds of clients a year from all over the planet who comes to Wyoming to see wolves and bears. There are hundreds of other guides whose livelihood relies on the millions of ecotourists who visit these national treasure, in addition to the economies of communities surrounding these parts. Wolves and bears are worth much more Alice than dead, and I'm very displeased by your failure to acknowledge facts and continue to kill park wolves immediately outside the park boundaries. There needs to be a large area surrounding each park that is closed to hunting to protect my business! This would also help prevent packing in the parks that poachers currently claim is caused by their confusion about where they are. Please stop destroying my livelihood with your antiquated, short-sighted and parochial persecution of predators in Wyoming. You are directly threatening tourism, one of the greatest and most important economic engines in Wyoming. Stop killing wolves in countries surrounding these parks!

Final Comment	Creek, Brian	Alpine, WY	6/15/2019 4:07:00 AM
----------------------	---------------------	-------------------	-----------------------------

- 57** I will always say that the idea of humans determining how many animals should live and die is disgraceful. Why are we the final arbiters of their survival? Is no consideration given to the fact that these animals are already being shot by hunters and ranchers with no consequence. "Shoot, shovel and shut up" is the phrase I hear about people in WY who kill wolves. Our planet is losing species all the time because of humans. We are the never ending predator and I am totally against this hunt. I support conservation groups quite substantially and would happily buy all the wolf tags if that could stop the killing.

Final Comment	Osnos, Annette	Jackson, WY	6/15/2019 5:10:00 AM
----------------------	-----------------------	--------------------	-----------------------------

- 58** Wolves are essential. I am asking you to OPPOSE the lengthened hunting season on wolves in reality, id like wolf hinting to stop all together. Wolves help strengthen gene pools of larger quadrupeds, and keep them moving so diseases are less likely to set upon a heard. Moving these animals also helps to keep riversides in tact which creates a safe environment for river filtration animals and weeds. Its all a balance. Without wolves, and apex predators these ecosystems collapse. Wolves have even been documented in helping CWD. They eat the sick, and weak, keeping herds of deer, sheep, elk healthy. Wolves also help with coyote populations and fox populations in a good way. Obviously you need coyotes and foxes too, but wolves help keep them in check.

Final Comment	McGuire, Emma	St. Johnsbury , VT	6/15/2019 8:12:00 AM
----------------------	----------------------	---------------------------	-----------------------------

- 59** Remember that we are intruders into wildlife territory who upset the balance of nature that existed long before humans stepped in. We have a pretty poor track record when we mess with Mother Nature. I am not opposed to compensating ranchers, eg, for losses even though they were well aware that they chose to go into areas where wolves and other predators resided. This is akin to what humans have done to many pre-existing situations and decided that our endeavors invalidate those who were there first. This is true for many species including humans. Stop this attempt to push animals out of their habitats for human short sightedness.

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

Final Comment	Mortenson, Sandra	Cassopolis, MI	6/15/2019 8:16:00 AM
----------------------	--------------------------	-----------------------	----------------------

60 As I understand, CWD is on the rise in the US. It only increases the spread of this disease by removing the natural predators like wolves. Now is the time to act responsibly and increase the wolf population

Final Comment	Williams, Tony	Dayton , OH	6/15/2019 8:43:00 AM
----------------------	-----------------------	--------------------	----------------------

61 As conservationists who have lived, worked and recreated in Greater Yellowstone for over 4 decades and who value our native carnivores, we ask you to reject the proposed changes to WY's Chapter 47, Gray Wolf Hunting Seasons. The hunting pressure WGFD proposes would drive down wolf numbers to their bare minimum, not taking into account wolves being killed for livestock depredations, and not requiring livestock owners to put measures in place to reduce depredations. This is not logical. We can co-exist with wolves. Visitors come from all over the world to view wolves, bears and other large mammals. The value of wildlife tourism to our region is extraordinary, but WGFD seems not to get the message. There is also the issue of wolves taking sick animals, like those affected with CWD and other diseases. This is a good thing. But if you wipe out wolves, the diseases will spread. We suggest that WGFD use real science on which to base its numbers and not just allow the livestock and hunting industries to dictate its quotas.

Final Comment	Richardson, Gail and John	Bozeman, MT	6/15/2019 8:53:00 AM
----------------------	----------------------------------	--------------------	----------------------

62 I am writing to request that you hold the wolf season. Wolves are under attack at every corner of the globe. Their numbers are down due to poisoning, trapping and other human impacts on their life. Wolves keep the natural balance as an Apex predator. They are much maligned and misunderstood. They along with coyotes deserve to have a dignified, meaningful life. Wolf whacking and Coyote whacking contests are inhumane and barbaric and need to be outlawed. Wolf hunting season does not take into account actual wolf numbers and the increasing numbers of hunters. Please please please stop hunting wolves before they go extinct

Final Comment	Tenzing, Terry	Half Moon Bay , CA	6/15/2019 9:30:00 AM
----------------------	-----------------------	---------------------------	----------------------

63 Please just let nature take care of the wolf. No need to kill them.. The wolf is a needed animal to help keep nature in a good balance.

Final Comment	Todd, Zeke	Newton, NC	6/15/2019 9:31:00 AM
----------------------	-------------------	-------------------	----------------------

64 I recently moved to your fine state for work and as an avid outdoors person, I am very appreciative of your natural beauty. I have already spent many hours picking up garbage from roadsides and trails as a way to give back to my community. On a recent hike I had the pleasure of seeing in plain sight a gorgeous Gray Wolf. The Wolf was more afraid of me than anything, and I had learned to use scare tactics from other residents so that it will learn to stay away from people. I was not threatened or harmed in any way, and in fact, I felt so fortunate to have seen such a beautiful animal in its native habitat. I will never forget that moment and I wish for others to experience it as well. Please consider reducing hunting limits in Carbon County so that our Ranch Guests can also enjoy this once in a lifetime opportunity.

Final Comment	Allen, Gretchen	Saratoga, WY	6/15/2019 9:36:00 AM
----------------------	------------------------	---------------------	----------------------

65 I oppose hunting of apex predators and Wyoming's treatment of wolves as "vermin" to be shot on sight causes me to not want to spend money in your state of travel to Wyoming for recreational reasons. Wyoming spends much money promoting its natural beauty and I have visited parks in the state from Sinks Canyon to Devil's Tower to Yellowstone, the Grand Tetons and the Snowy Range. Wyoming's policies towards its wildlife leaves a bad taste in my mouth. I no longer desire to spend tourism money in Wyoming due to its treatment of wildlife and the largely empty landscapes outside of Yellowstone. I remain a frequent traveler through Wyoming to visit my daughters in California but the wildlife policies promoting recreational hunting counsel me to spend as little money as possible in the state.

Final Comment	Dinkel, Mark	Salina, KS	6/15/2019 10:14:00 AM
----------------------	---------------------	-------------------	-----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

66 Please reduce the number of wolves being killed near the boundaries of the Grand Teton and Yellowstone I am a wildlife tourist that spent over 1500 dollars last year on a trip to Yellowstone. My number one reason for coming was to see a wolf or wolves in the wild. Your state already has a lot of negative publicity in regards to wildlife management and often cruel killings of wildlife. Send a positive message to us that you do indeed care about wildlife and the predators that play an important role in your ecosystem. Thank you for reading my comment.

Final Comment **Lheron, Wendy** **Tucson , AZ** 6/15/2019 10:43:00 AM

67 I'm asking that hunting quotas be much lower and that the state of Wyoming shouldn't be managing wolves down to the lowest possible numbers. You may look at my Florida address and think my opinion doesn't matter however my dollars and where I spend it does. And last I knew we were still the United States of America. Large predators need our protection, not our support to keep killing them so that another species is perceived protected so humans can kill it. When does the lunacy stop?

Final Comment **Torlay, Linda** **Fort Myers, FL** 6/15/2019 11:18:00 AM

68 Please stop hunting wolves to such low numbers!!! It is archaic that you continue to eradicate a species just because it doesn't fit into the lives of the ranchers and extractive industries. Decisions to hunt should be made based on current legitimate scientific data I think it's important to mention that my husband is from a small town in Wyoming and we have spent a lot of our adult life there with our family and the community; so please do not disregard my comments thinking that we don't have any idea what it's like there! Sincerely Renée Espenel

Final Comment **Espenel, Renee** **Portland, OR** 6/15/2019 12:44:00 PM

69 Wolves should not be killed for sport in the excessive numbers they have proposed. Given the onslaught of chronic wasting disease, brucellosis and hoof rot, the WGFD should allow wolves and other top carnivores to help restore healthy, free-ranging elk and deer herds throughout the state through natural culling of sick animals. Wyoming, Idaho, and Montana tourism industries generate billions of dollars annually to our states' economies. Millions of people come to the region specifically to see wolves and other free-ranging, healthy wildlife. Livestock owners, who are already compensated for losses in the trophy area, should be required throughout Wyoming and the region to implement measures known to minimize depredation on cattle and sheep*.

Final Comment **Case, Dudley** **Buffalo, WY** 6/15/2019 6:12:00 PM

70 I wish to make a few comments on the Wolf hunting. As a Midwesterner, what I can contribute are my observations to the state. We visit Wyoming a couple times a year and one of our joys is observing wildlife. This year, we noticed an increase in ALL hooved species. A decrease in views of wolves. While some native Wyoming hunters might appreciate this, there are issues with it. It upsets the balance of the ecosystem. Too large of herds puts too much stress on fragile ecosystems. And the facts are, one of the TWO most sought animals by tourists to Yellowstone & Tetons, is the Wolf. People pour millions, billions into the Wyoming economy to see wolves. So rather than constantly berating, killing, & destroying wolves or wolf packs, Wyoming govt officials should be protecting them like they are gold. Please be educated in the decision. Understand the economic importance of Wolves to the Wyoming economy. Please limit any hunting and protect the species. Thank you.

Final Comment **Weston, Carol** **Columbia, MO** 6/15/2019 6:31:00 PM

71 I write to urge Wyoming to reduce the number of wolves it allows to be killed every year. The Yellowstone wolf population is at an all time low since reintroduction. Wolves are important keystone predators providing natural balance to the ecosystems they inhabit. We saw this clearly when wolves were reintroduced to Yellowstone and got the deer and elk to move along from the river. Beavers came back and then frogs, song birds and more. Wolves improve biodiversity in an region and should be allowed to exist. Further, wolves can control their own numbers within a landscape. This is because they live in packs and only the breeding pair produces offspring. Wolves do not need hunters to control their numbers. Wolves should not be viewed as trophies. Rather they are valuable for tourism. Many visitors to Yellowstone and surrounding areas come to view wolves, as they are charismatic wildlife. In light of this,

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

hunting quotas around parks should be lowered. Visitors are seeing fewer and fewer wolves each years and this will impact tourism. Indeed, a buffer zone around the parks should be instituted but if the Commission is not willing to do this, it should at least lower the number of wolves killed near the parks. The Predator Zone should be outlawed as it allows unethical practices to occur there. Wyoming should only promote hunting that comports with the principles of "fair chase." Thank you for the opportunity to submit public comment. I oppose the hunting of gray wolves in its entirety but if the hunt will continue, I ask that you consider the above.

Final Comment	MacKenzie, Michelle	Menlo Park, CA	6/15/2019 9:03:00 PM
---------------	---------------------	----------------	----------------------

72 As a native of Wyoming who no longer resides in Wyoming, I am interested in wildlife in Wyoming. The billboards entering the state emboldening the phrase: Wyoming Wildlife--Worth the Watching, are a constant visualization of what Wyoming means to natives of nature and many people who visit the state and are thrilled to see wildlife in the wild. I no longer recommend friends visit Wyoming as it ranks 47-48 in humane treatment of animals of all kinds. Of particular interest is the proposal to extend the wolf hunting season to March 31 in order to save the Whiskey Mountain bighorn sheep herd which has no scientific basis because wolves are not preying on these sheep and researchers still don't understand why lambs aren't surviving. The herd took a hit from pneumonia back in 1991 and hasn't recovered since. Wolves were absent from the area for most of this time and bighorns suffer mostly from disease transmission from domestic sheep. I remember when the big horn sheep were dying many years ago from pneumonia and animal specialists were studying the cause. Seems there needs to be more studies performed to pin point the cause of the deaths occurring currently, rather than extending killing wolves. Killing the wolves seems to be the answer to all of Wyoming's problems in the wild. Facts show only 4 percent of the population now hunts. The following statistics show some serious "wildlife watching" figures for the State of Wyoming: Approximately 48 percent of all the dollars spent in 2016 for wildlife-related recreation was due to wildlife watching. Wildlife-watching participants 16 years or older spent \$75.9 billion, an average of \$1,193 per spender. An estimated 75 percent of all wildlife watchers spent money on their avocation. Wildlife watchers spent \$11.6 billion on trips pursuing their activities. Food and lodging accounted for \$6.1 billion (52 percent of all trip-related expenditures), transportation expenses totaled \$4.2 billion (36 percent), and other trip costs, such as land use fees and equipment rental, amounted to \$1.3 billion (11 percent) for the year. These recreationists purchased \$55.1 billion worth of equipment for wildlife watching. They spent \$12.1 billion (22 percent of all equipment expenditures) on wildlife-watching equipment including binoculars, cameras, bird food, and special clothing. Expenditures for auxiliary equipment, such as tents and backpacking equipment, totaled \$1.0 billion (2 percent) for the year. Participants spent \$41.9 billion (76 percent) on special equipment, including off-road vehicles, campers, and boats. Also for the year, wildlife watchers spent \$4.2 billion on land leasing and ownership; \$0.9 billion on plantings for the benefit of wildlife; \$3.8 billion on membership dues and contributions; and \$0.2 billion on magazines, books, and DVDs. U.S. Fish and Wildlife Service and U.S. Census Bureau 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. The excuse used for killing wolves for any reason is OLD, OUTDATED, WORN : Michael J. Robinson at Center for Biological Diversity, Tucson, AZ--Wolves were exterminated from the American West by a concerted campaign mounted by federal hunters funded with local, state, and federal revenues. The intent was to wipe the species off the face of the Earth. The livestock industry was the sole beneficiary of, and the greatest political impetus for, this campaign. Today the livestock industry stands at the heart of the opposition of wolf recovery and has blocked, hampered, and sabotaged reintroduction programs throughout the West. The livestock industry never "gives it a rest" when it comes to promoting any plan to kill the wolves--those of us who truly think wildlife are worth the watching are sick of a minority of old thinkers carrying a big stick in destroying wildlife throughout the United States. Scientific studies performed on the bighorn sheep by specialists in the field would be much more practical than picking up a gun and killing wolves. Find the real answer to the real problem--why are the sheep dying?

Final Comment	Campbell, Karolyn	Epsom, NH	6/16/2019 7:28:00 AM
---------------	-------------------	-----------	----------------------

73 Please do not let this bill pass. Its unbelievable that you allow hunting let alone extend the time frame. All the reasons I've read for allowing this just sounds like excuses to favor hunters. I had the best to move to your state a couple years ago. I turned it down due to beliefs such as this. This isn't the 1800's. You would think by now we would know better than to just kill everything in our way. We're supposed to have brains to find better solutions, I hope you do.

Final Comment	Treer , Ruthanne	Tucson , AZ	6/16/2019 8:20:00 AM
---------------	------------------	-------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

74 To Whom it may concern, I am a member of a ranching Family, and I know the coexisting methods work if we really want them to. Predator hunting is unnecessary, except occasionally in the case of trouble animals, as sick, injured animals, etc., can come back and threaten livestock or family members. I also know, wolf hunting is out of control. The bloodthirsty hunters and ranchers are killing animals as much as possible just because they want to, and they do not want to accept the fact that they are not the only creatures on the land. These animals have lived beside each other for 32000+ years. We, the People, feel like we need to dominate them all. I highly disagree with that. We need to live beside each other in harmony to maintain a robust ecosystem.

Final Comment	Young, Corey	Wellington, CO	6/16/2019 9:58:00 AM
----------------------	---------------------	-----------------------	----------------------

75 The proposed wolf hunting regulations are grossly inadequate, reckless, and cruel. For these reasons the proposed regulations should not be adopted in present form but instead should be revised. The proposed regulations should be amended to take into account the factors set out below. In particular, (1) Wolves should not be killed for sport in the excessive numbers as proposed in the regulations: (2) With the current level of chronic wasting disease, brucellosis and hoof rot, the WGFD should allow wolves and other top carnivores to help restore healthy, free-ranging elk and deer herds in Wyoming through natural culling of sick animals; (3) Wyoming, Idaho, and Montana tourism industries generate billions of dollars annually to those states' economies. Millions of people come to the region specifically to see wolves and other free-ranging, healthy wildlife; and (4) Livestock owners, who are already compensated for losses in the trophy area, should be required to implement measures known to minimize depredation on cattle and sheep.

Final Comment	Sanders, Clarence	Bozeman, MT	6/16/2019 12:16:00 PM
----------------------	--------------------------	--------------------	-----------------------

76 I strongly oppose extending the wolf hunting season in Wyoming. You should stop demonizing and killing wolves, for out-dated, cultural reasons that are unethical and not based in honest science. Wolves are not preying on the Whiskey Mountain bighorn sheep you claim you want to protect. Bighorns are dying from diseases they are getting from domestic sheep. This is a well known fact. If you want to protect bighorns, remove domestic sheep from bighorn habitat. To demonize, scapegoat and kill America's wolves again and again, is completely unjust and unethical. Your sadistic persecution and brutal slaughter of innocent, defenseless, ecologically vital wolves in Wyoming is a dark stain on the state. When will you there in Wyoming stop your unethical, anti-science, out-dated, 19th century persecution and destruction of wolves and other ecologically vital natural predators? When?

Final Comment	Goldman, Robert	Portland, ME	6/16/2019 1:01:00 PM
----------------------	------------------------	---------------------	----------------------

77 Hi there, I'd like to make the following comments : 1. Wolves should not be killed for sport in excessive numbers. 2. The Parks in Wyoming, Montana, and Idaho tourism industries generate billions of dollars annually to our economies, millions of people come to the region specifically to see wolves and other wildlife. 3. We need to learn to coexist with the carnivores instead of killing them. 4. Livestock owners should be required to implement measures KNOWN to minimize depredation of cattle and sheep. Thanks for listening and please consider my comments !! Mary Lynn Callahan

Final Comment	Callahan, Mary Lynn	Jackson, WY	6/16/2019 1:24:00 PM
----------------------	----------------------------	--------------------	----------------------

78 Dear Fish & Game Dept. Thank you for the opportunity to comment on the proposed hunting of wolves in Wyoming. You are fortunate to reside in a state with such unique resources, including wolves who have been persecuted by man for centuries. I hope you will deny the request to institute a wolf-killing season as wolves are an endangered species. The issue of a decreasing population of bighorn sheep is most likely from diseases spread by domestic sheep, not wolves. The most logical solution would be to graze sheep on private, not public lands near the bighorn. Wolves have been scapegoated for many things for years-- let's give them a break & let them be. Respectfully, Maureen A. Schiener

Final Comment	Schiener, Maureen	Amherst, NY	6/16/2019 5:55:00 PM
----------------------	--------------------------	--------------------	----------------------

79 If we have learned anything, it is that wolves are a vital part of maintaining the environment.

Final Comment	Bovenzi, Madeline	Warminster, PA	6/16/2019 6:26:00 PM
----------------------	--------------------------	-----------------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 80** Study after study has shown that we need apex predators . Wolf hunts only satisfy a small group from the hunting community. We need to listen to all who value and enjoy our wilderness and support the biodiversity that will help us continue into the next generations. Please stop the hunt.

Final Comment **Tondrick, Lynn** **Standforville , NY** 6/16/2019 6:28:00 PM

- 81** Their should be a reduced wolf hunting season for the following reasons: -Wolves help maintain the ecosystem in the area - They help maintain a strong Elk herd, by eliminating CWD - Wolves have a economic boost to the economy a lot of Yellowstone tourists come to see wolves and spend a lot of time trying to - Research shows that wolf population is actually decreasing - Wolf populations stay in control by their environment; other wolves, winter months, hunting fatalities (other animals; bison, elk, deer) Wolves are very important to the environment, killing them would ruin the ecosystem and a lot of tourists would be very disappointed if there were not as many wolf sightings for they are probably the number one attraction for tourists

Final Comment **Kircher , Ryan** **Papillion , NE** 6/16/2019 6:45:00 PM

- 82** I feel there should be a reduced hunting season on wolves because 1)studies have recently shown that the wolf population is actually decreasing and wolves will on their own maintain the proper amount of wolves in the ecosystem 2) wolves help control CWD in elk as they prey on the sick elk and the healthy elk will maintain the herd and you will end up with a healthier stronger herd, 3)the ecosystem needs the apex predators such as wolves and bears to maintain a healthy ecosystem, we should have learned this after wolves were eradicated from Yellowstone in the 30's and 40's and then brought back in the 90's. The ecosystem came back after wolves were reintroduced and many more animals came back to Yellowstone, 4) wolves have been a economic boon to Yellowstone as many tourists come from all over the world to view these animals in their natural habitat at all times of the year in the Great Yellowstone Ecosystem. I also think there should be a buffer zone around Yellowstone to protect these animals, 5) there should be an education program to help ranchers learn non lethal ways to deter predation of herds as some ranchers have accomplished this, and they will be able to live with each other. Thank you, Tom Kircher

Final Comment **Kircher, Tom** **Papillion, NE** 6/16/2019 6:48:00 PM

- 83** Please do not extend the hunting season for wolves !!!

Final Comment **Smith, Maria** **Lafayette , IN** 6/16/2019 9:19:00 PM

- 84** The sport hunting of wolves by the general public serves no purpose other than as an expression of "blood lust" and a catalyst for "bragging rights." There is no derived food value, only ego gratification. Many members of WU were brought up in hunting families and were taught that you only kill what you will eat. WU still subscribes to that value. A trophy hunt of wolves feeds nothing more than the personal ego, and as it all too often occurs within the Predator Zone, is a disgrace to the ethical hunting community. Wyoming's wolves should have big game status with a year-round closed hunting season. Wolves are an important part of a healthy ecosystem!

Final Comment **holloway, saundra** **El Cajon, CA** 6/16/2019 9:33:00 PM

- 85** Please STOP the hunting of wolves. PLEASE!!!

Final Comment **Jacobs, Kathy** **Fort Collins, CO** 6/16/2019 11:03:00 PM

- 86** We regularly visit Yellowstone to see the park and wildlife and will be in the park again later this month. We very much enjoy watching the wolves. If you can't manage the wolves in and around the parks without open seasons we will take our tourism dollars someplace else. Thanks for your consideration.

Final Comment **Moss, Kyle** **Las Vegas, NV** 6/17/2019 12:34:00 AM

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 87** The wolves and public lands belong to all of us, much as our coasts do. It is the responsibility of Wyoming to protect wolves and all wildlife for all of us in the US. I am opposed to any lethal "management" . Wildlife self-regulate, and are vital to a healthy ecosystem. Wildlife tourism is important to Wyoming, and will be adversely affected if wildlife, not private or special interests, are not protected. Please record my opposition to ANY wolf hunting.

Final Comment	Alba, Beverly	Winthrop, MA	6/17/2019 1:56:00 AM
----------------------	----------------------	---------------------	-----------------------------

- 88** Dear Sirs: I am writing to comment on your 2019 hunting season proposals. I live in Kentucky but am one of the tourists that come regularly to your area and contribute to the 30+ million dollars of tourism based on wolf watching. Although all your animals are spectacular, I come to see wolves. I understand that there is a proposal to extend the wolf hunting season to March 31, specifically to protect the whiskey mountain bighorn sheep herd. I further understand this decision is not based in science: the herd declined before there were ever wolves, the wolves rarely take bighorn sheep, the presence of domestic sheep is known to transmit fatal disease, and human hunting is still allowed. Hunting wolves this late in the year will surely kill the very pregnant mothers or milk dependent youngsters. As a veterinarian I see frequent references in the literature that predators can be expected to play an important role in limiting the danger presented by Chronic Wasting Disease. I would like to see the value of predators such as wolves in this regard reflected in your policies. Wolf watchers understand that we share the world with people that wish to kill wolves, but your current plan calls for too much killing. We would like to see the season start no earlier than October 1 and end by December 31. Wolf management should not be driven only by hunting and livestock interests. They should be treated as a valuable ecological and economic resource. Thank you for your time and attention. Chris Albert, DVM

Final Comment	Albert, Chris	Lebanon Junction, KY	6/17/2019 3:45:00 AM
----------------------	----------------------	-----------------------------	-----------------------------

- 89** What a shame for Wyoming! Wolves are strictly protected by international laws. They are very valuable for the ecological system, e.g. they select old and sick wild animals, what is not possible for hunters. The wolf population is not high enough, to guarantee a solid stability. Therefore there are no hunting quotas necessary. There is no scientific basis for this as wolves are NOT preying on the Whiskey Mountain bighorn sheep herd. Nature is regulating itself. Humans have not to restrict everything!

Final Comment	Geitner, Andreaq	Schliessee,	6/17/2019 5:28:00 AM
----------------------	-------------------------	--------------------	-----------------------------

- 90** Will this matter? Have you already promised some ranchers or lobbyist that you would cut their numbers? Colorado Public Radio had a scientist on the radio talk about prion diseases. They are spreading from the wild animals, elk, deer, to domesticated.. because managers like your self have eradicated the major predators. Don't give in to lobbyist, or rich ranchers. We need the predators that bring down mostly the sick, old, diseased game.. Or, you need to stop hunting game licenses.. Eating game meat is risking eating prion diseased meat, and getting Parkinson, Alzheimer, or a number of other prion related diseases.

Final Comment	Taylor, Debra	Denver, CO	6/17/2019 7:40:00 AM
----------------------	----------------------	-------------------	-----------------------------

- 91** I am writing to oppose the proposed wolf hunting regulations. Wolves serve a vital role in ecosystem health, help slow disease spread in wildlife including chronic wasting disease, are sought after and prized by wildlife viewers who contribute significantly to the state's recreation economy, can coexist with livestock, and should not be hunted in the excessive numbers the department has proposed.

Final Comment	Glantz, Cari	Laramie, WY	6/17/2019 8:21:00 AM
----------------------	---------------------	--------------------	-----------------------------

- 92** Trophy hunting of wolves in Wyoming has resulted in national and international condemnation of our State. It supports the view of Wyoming people and their civil servants as unusually cruel and backwards, a view expressed in popular fiction, movies, and social media. Please consider this. Even if you personally hate wolves, you should still be concerned about how trophy hunting hurts the respectability of the Department in the eyes of the world and many Wyoming residents. Stop the trophy hunts.

Final Comment	Patla, Debra	MORAN, WY	6/17/2019 9:11:00 AM
----------------------	---------------------	------------------	-----------------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 93** Your wolf killing policy is making your whole state look bad. Plenty of tourist are not spending money in your state because of this fact.

Final Comment	Hand , David	Whites creek , TN	6/17/2019 10:02:00 AM
----------------------	---------------------	--------------------------	-----------------------

- 94** Dear wildlife managers, As a wildlife lover, visitor to Wyoming's national parks, and biologist, I am writing to express concern about Wyoming's proposed hunting regulations for gray wolves. National park visitors and other wildlife watchers bring hundreds of millions of dollars to the Wyoming economy every year. Part of our desire in coming to your beautiful state is that we want to see wild animals in a natural setting--and this includes wolves. Increasing the length of the hunting season from October 1 to September 1 is antithetical to this kind of economic benefit. Besides being fascinating to humans, wolves also increase the health of ecosystems. In Yellowstone, they have brought about a widespread change in not only herbivore populations, but also the physical ecosystem itself, including plant life and waterways. Wolves also keep herbivore populations healthy by reducing chronic wasting disease in elk and mule deer. Hunting wolves to protect herbivores is an outdated idea, proven to be incorrect. Whereas hunters aim to take down healthy herbivores (and wolves), predators take out sick animals, thus increasing the overall health of the herd. Practical-minded wildlife managers and ranchers have discovered that using non-lethal methods to deal with wolf depredation is far more effective than killing wolves. I encourage you to explore those methods and to work with ranchers using those methods to train their peers. Consider taking every action to protect healthy wolf populations in Wyoming. This will help Wyoming's economy, its ecosystems, its ranchers, and its hunters. Thank you! Sincerely, Carol Blaney

Final Comment	Blaney, Carol	Running Springs, CA	6/17/2019 11:10:00 AM
----------------------	----------------------	----------------------------	-----------------------

- 95** I think the cottontail rabbit hunting period and licensure requirement should be removed -- cottontails are seriously overabundant and should be hunted year round without a license. they are a nuisance - eating gardens and girdling trees (in the winter) by eating the bark.

Final Comment	PAHL, DEBORAH	CHEYENNE, WY	6/17/2019 12:06:00 PM
----------------------	----------------------	---------------------	-----------------------

- 96** The hunting season for the entire state of Wyoming should be eliminated. The taking of problem wolves by game and fish professionals, or by landowners on there own property. should be permitted.

Final Comment	Poole, Steven	Wilson, WY	6/17/2019 12:23:00 PM
----------------------	----------------------	-------------------	-----------------------

- 97** Wolves must not be hunted. This issue is extremely important to me. After seeing the amazing revitalization of the Yellowstone ecosystem after wolves were reintroduced, how can Wyoming even think about killing wolves? How can the state even think about preventing such benefits outside Yellowstone and wherever the wolf range was before human beings came in and destroyed them, in total ignorance of the important role wolves play. You can rest assured that I will not visit Wyoming if you allow wolf hunts. Montana is also very beautiful and they are taking better care of their wildlife. Please do the right thing and the smart thing, and protect wolves.

Final Comment	Millner, Marjorie	Vancouver, WA	6/17/2019 1:01:00 PM
----------------------	--------------------------	----------------------	----------------------

- 98** I work at the JAC airport. I talk to visitors every day. When I ask them if they had a good trip they ALWAYS list the animals they saw. Wolves are low in the list of what people actually see but high (second to bears) of what they would like to see. Please protect them. Our tourism and livelihood depends on it. Thank you for your consideration, Christie Watts

Final Comment	Schutt, Christie	Jackson, WY	6/17/2019 1:22:00 PM
----------------------	-------------------------	--------------------	----------------------

- 99** The Center for Biological Diversity ("Center") presents the following comments concerning Wyoming's Chapter 47 Draft Regulation on Gray Wolf Hunting Seasons ("Regulations"). The Regulations proposed by the Wyoming Game and Fish Department ("WGFD") for maintaining an open season for trophy hunting of gray wolves will not properly manage Wyoming's wolf population at a sustainable level, and do not sufficiently ensure WGFD will maintain minimum population levels required by the U.S. Fish and Wildlife Service ("FWS"). The trends for wildlife recreation are transitioning with the majority of the revenue coming from residents and

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

non-resident visitors who want to observe wolves (“non-consumptive” recreation) and are concerned about wildlife conservation, rather than from visitors who want to hunt (“consumptive” recreation). In order to satisfy all of Wyoming’s wildlife enthusiasts, and to preserve the states beautiful wildlife and ecological landscape, the Center provides the following recommendations to WGFD to urge its responsible management of gray wolves.

I. End hunting seasons for gray wolves. A. Wolves are a keystone species and crucial for ecosystem health. Wolves are a keystone species, which benefit their habitat because they maintain healthy ungulate populations throughout Wyoming (Mills et al. 1993). Wolves move ungulates away from streambanks, which allows vegetation to grow, and in turn, produces shade and regulates water (Beschta & Ripple 2009). Water regulation is critical to fish health, and Wyoming relies on revenue from fishing (WGFD 2019; Edwards 2016). Wolves also increase the health of ungulate populations because they are able to identify those who are sick or weak. By preying on the sick and weak individuals, wolves may protect ungulate species from the spread of diseases, such as chronic wasting disease (Packer et al. 2003). Chronic wasting disease is spreading throughout Wyoming at a concerning rate and is quickly approaching elk feedgrounds. The disease endangers Wyoming’s ungulate populations and the state’s hunting seasons. Because hunters cannot use infected meat, they may decrease visits to the state. Because wolves prey on sick and weak elk, they also protect livestock from exposure to brucellosis through “commingling” between elk and cattle (WGFD 2017). For these reasons, the Center asks WGFD propose and conduct a study that increases wolf populations to determine if wolves could play a larger, more beneficial role in curtailing disease in ungulates, focusing on chronic wasting disease, which severely threatens to decimate Wyoming’s elk population. This study may also benefit private landowners because wolves prey on elk who carry brucellosis. Elk sick with brucellosis would interact less with cattle, which would decrease cattle’s rate of contracting the disease, which would prevent farmers from having to manage high rates of morbidity and sterility in their livestock (Zahoor Kahn & Zahoor 2018). B. Aggressive gray wolf hunting seasons risk future failure to meet delisting criteria. Scientists have shown that wolf packs that are protected from hunting exist for as long as twenty years while hunted wolf packs only last two to three years if hunters kill the alpha members of the pack (Robbins 2017). Furthermore, studies show states that allow hunting seasons for wolves experience increased rates of illegal poaching and decreased growth rates in those wolf populations (Chapron et al. 2016). Hunting and poaching impede WGFD’s ability to measure current wolf populations because wolf packs’ social dynamics change when they are encumbered by human consumption (Robbins 2017). Wolf packs’ social structures are delicate and packs take time to establish after exposure to human-caused mortality. If hunters break apart enough wolf packs, WGFD may soon find the population does not have adequate numbers of breeding pairs to sustain current population numbers. Should the population reduction go too far, FWS would have to consider relisting the gray wolf under the Endangered Species Act, and the state would once again lose management control over wolves. II. Ban hunting of gray wolves in a 20-mile perimeter outside of Yellowstone National Park. Banning trophy hunting of gray wolves within a minimum 20-mile radius of Yellowstone National Park (YNP) will ensure YNP’s packs have a safe haven and will survive. Many wolves who traverse the land surrounding YNP are individuals who left packs located within YNP. If WGFD allows hunters to kill wolves that wander this 20-mile territory, hunters will kill the wolves YNP protects. FWS found states that permit wolf hunting in the territory that surrounds zones protected from hunting reduce sightings of wolves in those areas (FWS 2016). Wolves do not recognize protective zones’ artificial boundary lines. And frequently, wolves who are most often viewed in YNP are the same wolves who are most susceptible to harvest outside of YNP because they are comfortable around humans and traverse along the boundaries of YNP and external land (Borg et al. 2016). These facts indicate hunting in the area surrounding YNP would affect wolf sightings within YNP, and decrease YNP visitors’ wildlife experience. In fact, studies show YNP visitors experienced a 45% increase in opportunity to view wolves when WGFD protected wolves from harvest around the park the previous year. Id. YNP provides a unique environment to scientists because it is one of the few locations in the world in which wolves are able to live in their natural habitat unencumbered by human interference (Robbins 2017). This special environment makes YNP world re-known for protecting biological diversity and responsibly managing interactions between humans and wildlife. If WGFD protects wolves from harvest in the territory surrounding YNP, scientists will continue to use Wyoming and YNP as a resource to collect data, which can also help Wyoming conduct studies to better understand wolves and responsible ways to manage wolf populations. Furthermore, YNP and Wyoming will maintain their positive reputations for wildlife management, which will encourage people throughout the world to choose Wyoming and YNP as travel destinations. Unfortunately, YNP’s wolf population has reached its lowest level in years. As of 2019, YNP is home to only 80 wolves, which is less than half the population YNP experienced at its peak in 2003 (See e.g., MPR 2019). Though YNP’s wolf population is above its required minimum for now, its population and Wyoming’s population are on a steady decline from 2016, and the populations do not show signs they will stabilize (WGFD 2019). Wyoming’s wolf population decreased by 61 wolves between 2018 and 2019, and wolf pups only have a 7% chance of survival (Outdoor News 2019). Wolves are not reproducing and surviving at a rate fast enough or long enough to combat natural and human-caused mortality. Currently, Wyoming has the lowest population of wolves from any season since WGFD began managing the species and re-introduced hunting in the state (Id., referencing Koshmrl 2019). Hunting seasons in Wyoming will decimate

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

wolf populations in YNP, which are already threatened by its low pup survival rates, disease, and wolves leaving YNP territory (MPR 2019). III. WGFD should implement lower quotas per hunting area and minimize the length of hunting seasons. The Center supports WGFD's decreased wolf quotas and urges WGFD to implement even lower quotas to promote sustainable population rehabilitation. WGFD's data from its 2018 gray wolf hunting season indicates hunters did not fill WGFD's hunting quotas that year because WGFD's quotas were too high for Wyoming's current population level. Researchers found hunters are "more likely to fill hunting quotas" for large predators "when the relative availability of these species . . . [is] greater" (Bischof et al. 2012). Census data also shows that recreational hunting has declined, which means WGFD can decrease its quotas because hunters are not creating a demand for wolf licenses. A 2011 FWS survey showed 140,000 people spent \$288,736,000 in Wyoming to hunt, but 518,000 people spent \$350,256,000 in Wyoming to watch wildlife (FWS 2014). A 2016 FWS survey showed a 14% national decrease in hunting and a 20% national increase in wildlife watching (FWS 2018). Because there are more people spending money to watch wildlife than money spent to kill wolves, it makes sense to keep quotas low so that the population is large enough that opportunities for those wanting to see wolves remain positive. A. The Center opposes extending the hunting season for gray wolves in the Whiskey Mountain area to March 31st. In order to prevent exposure between wolves and bighorn sheep, WGFD should protect wolves from harvest in their natural territories or use non-lethal methods for relocating wolves from land bighorn sheep inhabit. If WGFD is concerned gray wolves' presence decreases the bighorn sheep population in the Whiskey Mountain area, WGFD should suspend sheep hunting until the sheep population recovers, rather than killing the wolves in the neighboring area. By suspending hunting of bighorn sheep and using non-lethal methods of protecting the sheep from wolves, WGFD will adequately conserve both species. This practice will benefit consumptive and non-consumptive wildlife enthusiasts who visit the area. On the contrary, if WGFD increases quotas and extends the hunting season for wolves in the area, even if all wolves currently inhabiting the area are killed, more wolves will move in to fill the void next year. This area will become another sink for wolves, making this technique for protecting bighorn sheep unsustainable for wolf management. IV. Conclusion WGFD's mission is to protect and responsibly manage Wyoming's wildlife populations for current and future generations to enjoy. In order to ensure WGFD upholds this responsibility, the Department must ensure the state's varied species exist for consuming and non-consuming wildlife enthusiasts. This means WGFD must continue to be a model of social tolerance for Wyoming residents and visitors from other states and countries. Social tolerance is not only a perspective that teaches respect between humans and wildlife, it is the majority perspective among consumptive and non-consumptive wildlife enthusiasts. Many of YNP and Wyoming's visitors contribute millions of dollars in revenue annually to watch wildlife thrive. During the 2016-2017 season, \$35 million flowed into the local economies surrounding YNP from visitors who only came to watch wolves in their natural environment (Robbins 2017). Wyoming's wolf population has positively impacted Wyoming's economy, ecological stability, and hunting and fishing enthusiasts in myriad ways. Rather than denying the benefit of gray wolves' presence in the state, the Center urges WGFD to be open to and accept the wolves' positive impact on the health of Wyoming's ecosystem and economy. WGFD should embrace the data scientists have published about wolves and encourage further research to promote a healthy, thriving environment in Wyoming. Sincerely, Jessica Chapman Law Clerk Center for Biological Diversity P.O. Box 11374 Portland, OR 97211-0374 Tel: (503) 283-5474 Email: jchapman@biologicaldiversity.org Andrea Santarsiere Senior Attorney Center for Biological Diversity P.O. Box 469 Victor, ID 83455 Tel: (303) 854-7748 Email: asantarsiere@biologicaldiversity.org

References* Associated Press. 2019. Wolf Population Declining in Yellowstone National Park. Montana Public Radio (MPR). Available at: <https://www.mtpr.org/post/wolf-population-declining-yellowstone-national-park>. Associated Press. 2019. Wolf population declining in Yellowstone National Park. Outdoor News. Available at: <https://www.outdoornews.com/2019/04/22/wolf-population-declining-in-yellowstone-national-park/>. 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. doi: 10.1016/j.biocon.2009.06.015. R. Bischof et al. 2012. Implementation uncertainty when using recreational hunting to manage carnivores. *J Appl. Ecol.* 49: pp. 824-832. doi: 10.1111/j.1365-2664.2012.02167.x. B. Borg et al. 2016. Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities. *PLOS One.* 11(4): e0153808. doi: doi.org/10.1371/journal.pone.0153808. G. Chapron and A. Treves. 2016. Blood does not buy goodwill: allowing culling increases poaching of large carnivore. *Proc. R. Soc. B* 283(1830): pp. 1-7. doi: 10.1098/rspb.2015.2939. M. Edwards. 2016. Hunting And Fishing Generate Over \$1 Billion A Year in Wyoming. Wyo. Public Media. Dec. 9, 2016. Available at: <https://www.wyomingpublicmedia.org/post/hunting-and-fishing-generate-over-1-billion-year-wyoming#stream/0>. M. Koshmrl. 2019. By design, wolf counts shrink. Jackson Hole News & Guide. Available at: https://www.jhnewsandguide.com/news/environmental/by-design-wolf-counts-shrink/article_8d1fce02-dd16-5d12-84d7-7684ba8627a3.html. L. Mills et al. 1993. The Keystone-Species Concept in Ecology and Conservation. *BioScience* 43(4): pp. 219-224. doi: 10.2307/1312122. C. Packer et al. 2003. Keeping the herds healthy and alert: implications of predator control for infectious disease. *Ecol Lett.* 6(9): pp. 797-802. doi: 10.1046/j.1461-0248.2003.00500.x. Robbins, Jim. 2017. The New Threat to Wolves in and Around Yellowstone. N.Y Times. May 1, 2017. Available at:

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

<https://www.nytimes.com/2017/05/01/science/wolves-hunting-yellowstone-national-park.html>. A. Treves & K. Ullas Karanth. 2003. Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide. *Cons. Bio.* 17(6): pp. 1491-1499. doi: 10.1111/j.1523-1739.2003.00059.x. U.S. Fish & Wildlife Service. 2014. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. pp. 1-94. Available at: <https://www.census.gov/prod/2013pubs/fhw11-wy.pdf>. U.S. Fish & Wildlife Service. 2018. 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. pp. 1-144. Available at: https://wsfrprograms.fws.gov/Subpages/NationalSurvey/nat_survey2016.pdf. U.S. Fish & Wildlife Service. 2016. Wyoming Wolf Recovery 2016 Annual Report. pp. 1-18. Available at: <https://www.fws.gov/mountain-prairie/es/pdf/wyoming-annual-wolf-recovery-report-2016.pdf>. Wyo. Game & Fish Dept. 2017. U.S. Fish and Wildlife Service Comprehensive Management System Annual Report. pp. 1-205. Available at: https://wgfd.wyo.gov/WGFD/media/content/PDF/About%20Us/Commission/WGFD_ANNUALREPORT_2017.pdf. Wyo. Game & Fish Dept. 2019. About the Wyoming Game and Fish Department. Last visited June 9, 2019. Available at: <https://wgfd.wyo.gov/About-Us/About-the-Department>. Wyo. Game & Fish Dept. 2019. Wyoming's wolf population above recovery criteria for 16th straight year. Last visited June 10, 2019. Available at: <https://wgfd.wyo.gov/News/Wyoming%E2%80%99s-wolf-population-above-recovery-criteria>. Wyo. Game & Fish Dept et al. 2019. Wyoming Gray Wolf Monitoring and Management 2018 Annual Report. Available at: https://wgfd.wyo.gov/WGFD/media/content/PDF/Wildlife/Large%20Carnivore/WYWOLF_ANNUALREPORT_2018.pdf. M. Zahoor Khan & M. Zahoor. 2018. An Overview of Brucellosis in Cattle and Humans, and its Serological and Molecular Diagnosis in Control Strategies. *Trop Med Infect Dis.* 3(2): pp. 1-14. doi: 10.3390/tropicalmed3020065. *References may be provided upon request.

Final Comment	Santarsiere, Andrea	Victor, ID	6/17/2019 1:22:00 PM
----------------------	----------------------------	-------------------	----------------------

100 Wolves should not be designated as trophy animals. Predators such as wolves are important to the ecosystem and to keeping the herds of prey species healthy. I am against a gray wolf hunting season, whether wolves lose their protected status or not. I am planning a visit to Wyoming and hoping to see and hear wolves in the wild. My tourist dollars are as important as those of hunters coming into the state.

Final Comment	Yarnell, Karen	Fairmont, WV	6/17/2019 1:24:00 PM
----------------------	-----------------------	---------------------	----------------------

101 Wolves are apex predators that balance the ecosystems they live in. Wolf hunting quotas should be much lower and that the state of Wyoming shouldn't be managing wolves down to the lowest possible numbers. Tourists to Yellowstone and Grand Teton National Parks bring in over \$1 billion to the economy of Wyoming. Many travel here just to see wolves. The state of Wyoming needs to stop their relentless war on wolves and start valuing them for the allies they are. Give evaluators enough time to figure out why young bighorn sheep are not making it to the wintering grounds. There is no evidence that it is the fault of wolves.

Final Comment	Helwig, Susan	Aurora, IL	6/17/2019 1:29:00 PM
----------------------	----------------------	-------------------	----------------------

102 Do not expand the hunting season. If you do, no more tourist dollars for me. As you see, I am from Denver. This is an unscientific reason to allow wolf hunters "increased opportunity" to kill wolves. Pups will be orphaned and if the lactating alpha female is killed, the pack would suffer huge losses, including the pups. The state of Wyoming shouldn't be managing wolves down to the lowest possible numbers. Tourists to Yellowstone and Grand Teton National Parks bring in over \$1 billion to the economy of Wyoming. Many travel here just to see wolves. The state of Wyoming needs to stop their relentless war on wolves and start valuing them for the allies they are.

Final Comment	Sivey, Justini	Denver, CO	6/17/2019 1:38:00 PM
----------------------	-----------------------	-------------------	----------------------

103 I don't think I have to remind anyone that Grey Wolves are not a natural resource to be 'Managed ' they are an important part of the wildlife cycle. I was born in Wyoming and I treasure the wild freedom of the Wind River and now, after all these centuries, it's time leave wild animals Wild. Cattle are an invasive species there as everywhere else. Manage but manage on the side of nature. Cattle have had their kingdom to long. Bring in the Range Riders plan and work FOR nature and biodiversity for everyone and Be a leader among other States. Thank you.

Final Comment	Boyer, Jim	San Francisco, CA	6/17/2019 2:12:00 PM
----------------------	-------------------	--------------------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

104 I travel to Wyoming every year to watch wolves and while there I spend money on food, housing, etc. Please lower your hunting quotas and recognize the value of wolves in the state of Wyoming.

Final Comment **saunders, katherine** **Neskowin, OR** 6/17/2019 2:15:00 PM

105 Please do not hunt grey wolves. I have read many articles and studies on their importance to the health of the Yellowstone ecosystem, that should be enough to maintain them. Thanks

Final Comment **Saunders, Carolyn** **Neskowin , OR** 6/17/2019 2:34:00 PM

106 Shame on you for ignoring science data that provides information and statistics on the benefits that wolves have on the environment and other species. In addition, the wolf species is complex with their pack orders. The killing of wolves is more than just population numbers. The killing of an alpha wolf can bring havoc to the rest of a pack. If tourism money that Yellowstone receives from people that visit in the hopes of glimpsing a wolf doesn't speak volumes than for crying out loud listen to science!!!

Final Comment **Soto, Jennifer** **Keizer, OR** 6/17/2019 3:37:00 PM

107 June 17, 2019 David Rael, President Brian Nesvik, Director Wyoming Game and Fish Commission Wyoming Game and Fish Department P.O. Box 628 5400 Bishop Boulevard Cowley, WY 82420 Cheyenne, WY 82006 David.rael@wyo.gov brian.nesvik@wyo.gov RE: Updates to Wyoming Hunting Regulations, Chapter 47, Gray Wolf Hunting Seasons Dear President Rael, Director Nesvik and Members of the Commission: On behalf of the Humane Society of the United States and our Wyoming supporters, we thank you for the opportunity to submit the following comments regarding the Wyoming Game and Fish Department's (WGFD) proposed updates to Wyoming Hunting Regulations, Chapter 47, Gray Wolf Hunting Seasons. While we support the proposed reduction in mortality limits (quotas) for gray wolves (*Canis lupus*) within the Wolf Trophy Game Management Area (WTGMA) and Seasonal WTGMA, we remain strongly opposed to the trophy hunting and trapping of wolves in Wyoming. According to media reports, WGFD is seeking a 43 percent reduction (from 58 wolves in 2018 to 33 animals in 2019) in the total quota for the WTGMA because the estimated wolf population in the WTGMA fell 28 percent to 152 wolves—8 wolves below the population target for the WTGMA. The reduction in quotas is meant to increase the wolf population within the WTGMA to 160 animals. Wolves in the remaining 85 percent of the state outside the WTGMA continue to be classified as predators that can be killed indiscriminately. For the reasons below, we urge WGFD to stop the cruel and damaging trophy hunting and trapping of Wyoming's wolves. Justification for such trophy hunting and trapping typically rests on the myth that killing wolves will reduce livestock losses and increase ungulate populations for human hunters. As we describe below, these myths are false and not based upon the best available science. The Humane Society of the United States would be happy to provide further details and/or supporting materials for the information contained within this comment at your request. 1. Killing wolves will not reduce rare conflicts with livestock. Non-lethal methods to protect livestock are more effective, economical, and humane. Despite fearmongering and myths to the contrary, wolves have a relatively negligible effect on livestock losses—the reason often cited for allowing them to be trophy hunted and trapped. Indeed, a bevy of studies have contradicted the efficacy of lethal predator control programs to remedy conflicts between wolves and livestock. Instead of finding them useful to society, wildlife biologists have declared that these programs are biologically and fiscally expensive. In the United States, data show that wolves kill few cattle and sheep. While livestock predation data collected by various governmental bodies differ significantly due to differences in methodology, the most recent data published by the U.S. Department of Agriculture-Animal and Plant Health Inspection Service (USDA) show that farmers and ranchers lose nine times more cattle and sheep to health, weather, birthing and theft problems than to all native carnivores and domestic dogs combined. In Wyoming, USDA data attribute just 1.12 percent of unwanted cattle and sheep losses to wolves, while a whopping 78.89 percent is attributed to non-predator causes, such as illness, birthing problems, and other maladies. The USDA's methodology involved collecting data from a few, mostly unverified sources, which the USDA then extrapolated statewide without calculating standard errors or using models to test relationships among various mortality factors. This likely resulted in exaggerated livestock losses attributed to native carnivores and domestic dogs. When government agencies confirm data on livestock losses, the results show many fewer livestock losses than the USDA's unverified claims. In Wyoming, the U.S. Fish and Wildlife Service (FWS) attributed just 137 cattle and sheep losses to wolves using verified data—four times less than the USDA claimed for that same year. More recently, the WGFD and USDA Wildlife Services confirmed just 69 cattle and sheep losses from wolves in 2018. A. Non-lethal methods to protect livestock are more effective, economical, and humane. New studies show that the best remedies

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

for protecting cattle, sheep and other domestic animals come from non-lethal measures, such as sanitary carcass removal, fladry and or turbo fladry, synchronizing birthing seasons with native ungulates, changing livestock types or breeds, spot lights, airhorns, guard animals, range riders, electric fencing and FoxlightsTM. In a seven-year case study of open-range sheep on public grazing lands in neighboring Idaho (known as the Wood River Wolf Project), researchers strategically applied a variety of non-lethal deterrents and animal husbandry techniques on an adaptive basis (i.e. based on terrain, proximity to den or rendezvous sites, avoiding overexposure to techniques such as certain lights or sound devices, etc.). In the adjacent, comparable study's control area, where wolves are routinely lethally controlled and no nonlethal protection measures were applied, sheep losses were 3.5 times higher over the seven-year period than in the study area after weighting the number of sheep killed by sheep days. Furthermore, no wolves were killed in the study area and sheep depredation losses to wolves were just 0.02 percent of the total number of sheep present—the lowest loss rate among sheep-grazing areas in wolf-occupied habitat statewide, thus demonstrating that non-lethal deterrents are far more effective than lethal ones.

Organizations such as the Montana-based Tom Miner Basin Association provide another example of successfully utilizing non-lethal deterrents and livestock husbandry techniques to minimize conflicts between native carnivores, livestock and humans. Hilary Zaranek-Anderson, co-founder of the Association and Range Rider Coordinator, says, "We use a low-stress approach to livestock handling that encourages cattle to work together as a herd. We gather them together in open areas whenever possible in the evening, especially calves with mothers, which makes them less vulnerable to predation at night." Range riders also monitor cattle for sickness and injury, removing them from the herd so they don't become targets for predation. Several other scientific reviews have questioned the scientific merit and efficacy of lethal predator control. Bryan et al. (2014) write: "Hunting can decrease pack size, which results in altered predation patterns, increased time spent defending kill sites from scavengers, and may lead to increased conflict with humans and livestock (Hayes et al. 2000; Wydeven et al. 2004; Zimmerman 2014)." WGFD's wolf management should be consistent with the latest scientific findings on non-lethal protections for livestock, which shows that killing wolves is not an effective tool at mitigating livestock losses.

2. Americans highly value wolves as evidenced by the enormous economic benefits derived from wolf-watching tourism. Numerous studies and polls show that a majority of Americans want wolves conserved, protected and humanely treated. Since first measured in 1978, the public's values towards wolves has grown substantially more positive with 61 percent valuing wolves compared to 17 percent of the public holding them in low esteem. Those negative few are "drowned out" by the vast majority of Americans who hold a growing concern for animal welfare, which should translate into innovative wildlife management. At the broader scale, most Americans (86 percent) disapprove of big game trophy hunting and 62 percent say big game trophy hunting is wrong and should be legally banned (including 34 percent of hunters).

A. Wolf-watching tourism provides enormous economic benefits to Wyoming. Allowing wolves to be trophy hunted and trapped will harm the state's economy because wildlife-watching tourism—which draws millions of visitors annually—is an enormous, dependable asset to Wyoming's economy, especially for wolf and grizzly bear watching. According to a 2019 economic report commissioned by the Wyoming Office of Tourism, travel spending in Wyoming amounted to \$10.4 million dollars per day amounting to \$3.8 billion in 2018. That report suggests that tourism dollars has increased annually by 3.7 percent since 2007 and visitors support 32,290 Wyoming jobs by generating \$982 million in salaries for the travel industry. In, 2018, tourists contributed \$196 million in state and local taxes. A 2018 study conducted by the University of Wyoming shows that wildlife watchers spent nearly twice (\$364,965,105) that of big game hunters (\$206,337,652) in Wyoming. A 2017 report from the U.S. Fish and Wildlife Service shows that hunting numbers across the country have plummeted by 21 percent, with big game hunters declining by 2.4 million since 2011. In the same period, wildlife watchers increased by 28 percent. Borg et al. (2016) found that the trophy hunting of wolves in areas adjacent to protected areas (such as Yellowstone National Park) significantly reduces wolf sightings in those protected areas. Specifically, wolf sightings in Yellowstone National Park increased by 45% following years with no trophy hunting of a wolf from a pack. Wolf sightings were more than twice as likely in Denali National Park and Preserve during a period with a no trophy hunting buffer zone around the park than in years without the buffer. Other studies have had similar findings.

3. Wolves kill sick and weak ungulates, which helps to mitigate the spread of chronic wasting disease and other prey herd maladies. Wyoming's elk and other ungulates are affected by chronic wasting disease (CWD), which is spreading alarmingly across Wyoming. Studies show that wolves are actually beneficial to herds of native ungulates such as deer and elk as they remove the least viable members, leaving forage for the strongest; they rarely prey upon the prime-age breeding animals favored by hunters. A myriad of factors including habitat loss or fragmentation, changes in forage quality, competition with other ungulates, predation, disease, increased hunting, poaching, stochastic weather events, fire suppression, noxious weeds, overgrazing by livestock, energy development, and changes in hydrology affect ungulate populations. Simply killing wolves and other native carnivores will not bring back the ungulate herds, but not persecuting wolves will help

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

Wyoming rid its herds of infectious disease, which is spreading to nearby states. Alaska researchers, Prugh and Arthur (2015), found that wolf control in their Alaska study area led to the decline of Dall's sheep. With the loss of wolves, coyote numbers increased and they more readily preyed upon young Dall's sheep. This phenomenon has been documented many times in several ecosystems. Top carnivores limit the population size of smaller carnivores, which reduces overall predation pressures, and this natural regulation is especially important for survival of neonate ungulates such as moose and caribou. Additionally, Mitchell et al. (2015), in their study found that heavy persecution of both wolves and coyotes initially increased the number of Dall's sheep in their study area, but when the sheep population approached or exceeded the carrying capacity, which is a maximum population size set by the amount of forage available or "K", a severe winter (with deep snows and heavy crusting) counteracted population increases. Meanwhile in the reference area (where no predator control measures were implemented), the Dall's sheep population remained constant. In other words, natural predation on Dall's sheep was "compensatory," meaning it merely replaced mortality from weather and starvation. These biologists caution against predator control policies as a means of increasing prey herds. Mitchell et al. (2015) warn: We note that [ADFG] biologists have previously attempted to manipulate moose and caribou population in central Alaska using harvest and predator control (Boertje et al. 1996, 2009), without considering K [carrying capacity] (Bowyer et al. 2005). This strategy had negative results, not only for moose populations and [hunter] harvest, but also for agency credibility (Young and Boertje 2011). Managers now realize that carrying capacity (Seaton et al. 2011) is an integral component of effective management of moose populations.... Management decisions regarding carnivore harvest should consider both the positive ecological roles of predators and the potential negative effects on both the carnivores populations, community ecology, and consideration (Roemer et al. 2009; Ordiz et al. 2013). This should help wildlife managers avoid the unintended consequences in various management actions. The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous, including removing the sick and weak animals which would die of other natural causes anyway. For these reasons, predator-control schemes are an unreliable way to increase the abundance of ungulates. Ironically, human hunters are responsible for the decline of large-bodied mammals. WGFD must not assume that by killing wolves, ungulate numbers will grow. 4. Because of their biology, wolves cannot withstand WGFD's proposed levels of hunting and trapping. The best available science demonstrates that trophy hunting and trapping may have an additive or even super-additive effect on wolf mortality through the additional loss of dependent offspring or by disrupting pack structure. This can result in a change in pack size and/or reproductive and breeding strategies, reduce individual fitness, and increase the risk for population extinction. Wolf populations are generally limited by prey availability, as well as density dependent factors, including disease, human densities, terrain, and pack stability and territoriality. As evidenced by the drop below WGFD population goals in the WTGMA last year, wolves are particularly susceptible to social disruption from high mortality because their complex social structure affects many aspects of wolf population dynamics. Wolves can suffer physical, psychological, and emotional trauma. Social disruption can cause packs to disband and elimination of the breeding pair can lead to the loss of pups from starvation. Added to this, in 85 percent of Wyoming, designated as the "predator zone," trophy hunters and trappers are permitted to kill wolves year-round, using aggressive and violent methods—even on pups. Just last year, 4 pups were killed under the predatory animal designation. By failing to regulate wolf hunting in the vast majority of the state, brutal and vicious behaviors by wolf hunters and trappers—behaviors that Americans are appalled to witness—will undoubtedly continue. After wolves were removed from federal protection, Wyoming's draconian hunting and trapping policies targeted Yellowstone's wolves, even radio-collared research animals. This reduces both wolf-watching opportunities and scientific study, wasting taxpayer funds and unnecessarily creating international enmity for Wyoming wildlife officials. 5. Conclusion Wildlife management, as a contemporary institution, was founded with the intention to carry out the public trust doctrine asserting that wildlife is owned by no one and held in trust by governments for the benefit of present and future generations (United States Supreme Court in a 1842 ruling, *Martin v. Waddell*, 41 U.S. 234). Protecting Wyoming's wolves for future generations depends on good governance and the employ of the best available science, rather than a myth-based approach. While the Humane Society of the United States supports the proposed quota reductions, we remain strongly opposed to the trophy hunting or trapping of wolves for the reasons stated above. We urge the Commission to prohibit the trophy hunting of wolves in 2019 as well as in future years, especially in the vulnerable WTGMA surrounding Yellowstone and Grand Teton National Parks. Thank you for your consideration. Sincerely, Lisa Kauffman Senior State Director, Idaho and Wyoming The Humane Society of the United States

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

- 108** I'm not convinced that ranchers are the driving force behind wolf hunting. Based on what I've read and seen for myself it appears that the bulk of the motivation comes from hunters who enjoy the hobby of shooting. Look at them for yourselves and see if you don't see hunters going after wolves as if they are the mysterious monsters of the dark. The reaction of ranchers is basically "ya, please go ahead and shoot all the wolves you want because they don't help me and my ranch one bit." So don't look at ranchers to help moderate the shooting of predators. That's your job.

Final Comment	Howe, Daniel	Portland, OR	6/17/2019 4:03:00 PM
----------------------	---------------------	---------------------	----------------------

- 109** Grey wolf numbers have considerably been reduced since a recent count before the annual hunting season. Because of this, there is a possibility that too many wolves will be killed in the trophy zones and thus, depletion of numbers will go over that which is set for wolf management in those areas. I ask that the annual wolf hunt be withheld for this year so numbers can be verified and not be just an estimation. I am very aware that there are vast numbers of haters of the wolves and they would do anything to kill them. Bragging rights seem so important to them. In order to do as is required to keep numbers regulated, you must consider a ban for this year's hunting season.

Final Comment	Wolfe, Shelley	Rock Springs, WY	6/17/2019 4:22:00 PM
----------------------	-----------------------	-------------------------	----------------------

- 110** Our world is quickly changing. We must change our antiquated approach of trapping. I have traveled to Wyoming for 30 years as a Wildlife artist. Please do everything in your power to protect wild animals from disappearance . We have already lost 60% in my lifetime. Be the change

Final Comment	Griffin , Pat	East Stroudsburg , PA	6/17/2019 4:28:00 PM
----------------------	----------------------	------------------------------	----------------------

- 111** I am submitting these comments on behalf of an individual who wishes to remain anonymous. Please accept these as part of the public comment for Chapter 47 wolf hunting seasons for 2019. I am urging the hunting seasons in Wyoming be reduced and managed differently, without an open hunting season as proposed. I urge you to consider last year's wolf season/ calendar year for example. At the beginning of 2018, outside of Yellowstone National Park, there were approximately 368 wolves. According to the annual Wyoming wolf report (USFWS 2018), at the year's end, there were 196 wolves. This is a total known loss of 156 wolves, totaling 42.3% of the Wyoming wolf population. Of these 156 wolves, 39 were taken by harvest. The majority of the rest (106) were taken by agency/ private landowners, mostly to protect livestock- despite the fact that in 2018, only 70 livestock predations by wolves occurred. Nonlethal methods work the best on wolves, and areas allowing the shooting of wolves have shown 3.5 times higher wolf predation on sheep than areas not allowing lethal force (Stone et al 2017). Shortening the hunting season, or even ridding it completely, would at least help the gray wolf population increase again instead of starkly decreasing. The intrinsic growth rate of wild wolves- the maximum growth to maintain a carrying capacity- is about 0.776 (Balčiauskas, Kawata 2009). A 42.3% decrease is most certainly not meeting this ecological requirement. Of course, technically, 196 wolves is still above the required 150. However, I find it disappointing that Wyoming, home to most of Yellowstone, arguably the finest national park in America, is so determined to keep wolves hovering at that 150 wolf standard. Wolf-based tourism provides a net \$5 million in and around Yellowstone, after deductions lost from hunting outfitters, and nearly half of all YNP tourists say that wolves are the animal they most want to see (Duffield et al 2007). Tourists often come back year after year, but are less likely to return and benefit the economy when they learn that wolves are being shot directly outside of the park. For residents and nonresidents respectively, gray wolf tags are only \$21 and \$187. Most in 2018 were resident, and claimed only about \$46,662 (WY FWS). This money does not go directly to wolf conservation- claiming that wolf hunting pays for wolf programs is simply a falsehood. Comparatively, the cumulative (park and local communities) revenue for YNP in 2017 was over \$600 million (NPS). Big game hunting in WY brings in only \$300 million (Southwick). Wolves are beneficial to the environment. They are perhaps the greatest natural defense against CWD (Dobson 2014). They have reduced coyotes, which are routinely the biggest threat to livestock across America (USDA 2017). Despite claims by outdoorsmen, the ungulate population in Wyoming has increased (USFWS) at no correlation to higher or lower wolf numbers. Elk 2009 = 9.3 million —> Elk 2017 = 10.4 million; mule deer 2013 = 376 million —> mule deer 2018 = 396 million. Please reduce the time of the Wyoming hunting season, or halt it altogether. Wyoming is a cornerstone for great American conservation- hoping to manage wolves to protect ungulates for harvesting is simply not the place I would choose to spend my money in the future, or where I want my federal tax dollars to go.

Final Comment	Combs, Kristin	Wilson, WY	6/17/2019 4:31:00 PM
----------------------	-----------------------	-------------------	----------------------

WGFD Web Comment Report

Chapter 47, Gray Wolf Hunting Seasons

112 To whom it may concern While I may be pleased to see that the quarters have been lowered and many of the units. I am displeased on the plans to extend the season in unit 13. My assumption is that this is based on the study, that has yet to be completed. Below is an excerpt from published documentation: The most commonly voiced concerns were related to low lamb recruitment and disease. Respondents seemed very aware and worried about the low numbers of lambs born and the low numbers of lambs that survive. An associated concern was disease pathogens, especially related to pneumonia, which are perceived to be one of the main causes of low survival rates among lambs. Another frequently mentioned concern was in relation to both summer and winter ranges. Summer ranges are perceived to be instrumental to maternal sheep health and therefore an important contribution to lamb nutrition. Respondents are concerned that lamb recruitment is threatened if female sheep do not have enough nutrition, and the right type of nutrition. Climate change was mentioned as a contributing factor to declining habitat conditions. When discussing winter range, a number of respondents made the connection to predation. These respondents were concerned that e.g. wolf predation and mere presence would chase the sheep to rockier areas with less nutrition, again decreasing lamb survival. When predation came up, respondents mentioned predation by wolves, coyotes and mountain lions especially. Some respondents questioned the role of predation in the ability of this sheep herd to thrive without being convinced this was a meaningful factor, others felt very sure that wolves and mountain lions are a major attribute to declining sheep herd numbers. Seems to me the questions regarding predation have yet to be answered. 43 wolves were lost to trophy hunting and 33 to supposed predatory acts. That's 81 to many as far as I'm concerned. I say NO to extending the season in unit 13. And ask that the units bordering YNP have a zero quota.

Final Comment

Meyer, Heather

Nampa, ID

6/17/2019 4:52:00 PM

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 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 per license during any one (1) calendar year (January 1 – December 31). A person may purchase up to two (2) gray wolf hunting licenses during any one (1) calendar year. 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 three (3) 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 their license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(A) A hunter taking a gray wolf in a designated wilderness area shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Department Regional Office during business hours for registration within three (3) days after returning from the wilderness or within ten (10) days from the date of harvest, whichever occurs first.

(iii) At the time of registration, the licensee shall provide their license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iv) 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).

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

Hunt Area	Season Dates		Mortality Limit
	Opens	Closes	
1	Sep. 1	Dec. 31	4
2	Sep. 1	Dec. 31	6
3	Sep. 1	Dec. 31	2
4	Sep. 1	Dec. 31	2
5	Sep. 1	Dec. 31	1
6, 7	Sep. 1	Dec. 31	3; SEE SECTION 4 (i)
8, 9, 11	Sep. 1	Dec. 31	7
10	Sep. 1	Dec. 31	2
12	Oct. 15	Dec. 31	2; SEE SECTION 4 (j)
13	Sep. 1	Mar. 31	4
14	Sep. 1	Dec. 31	1

(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 limit has been reached, 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 limitation. The gray wolf hunting season shall close in each gray wolf hunt area when the mortality limit for that area has been reached. If the mortality limit 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 drainage of the Clark's Fork Yellowstone River west of Wyoming Highway 120 and all of the drainage of Soda Butte Creek outside of Yellowstone National Park.

Area 2. North Fork. All of the drainage of the North Fork Shoshone River; all of the north drainage of the Shoshone River west of Wyoming Highway 120; all of the drainage

of Mountain Creek outside Yellowstone National Park; all of the drainage of Escarpment Creek outside of Yellowstone National Park.

Area 3. South Fork. All of the drainage of the South Fork Shoshone River; all of the south drainage of the Shoshone River west of Wyoming Highway 120; all of the drainage of Thorofare Creek outside Yellowstone National Park; all of the drainage of the Yellowstone River outside Yellowstone National Park; all of the drainage of the Yellowstone River outside Yellowstone National Park and upstream from the confluence with Thorofare Creek.

Area 4. Greybull. Beginning where Wyoming Highway 120 crosses 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 Wind River Reservation boundary; northerly along said boundary to the divide between South Fork Owl Creek and the Wind River; northerly along said divide to the Hot Springs County-Fremont County line; northwesterly along said county line to the Park County-Fremont County line; northwesterly along said county line to the divide between the Greybull River and South Fork Shoshone River; northwesterly along said divide to Wyoming Highway 120; southerly along said highway to the Greybull River.

Area 5. Wind River. Beginning where the Union Pass Road (Shoshone National Forest Road 263) crosses the Continental Divide; westerly and northerly along said divide to U.S. Highway 26/287; all of the drainage of the Wind River north of U.S. Highway 26/287 to the west boundary of the Wind River Reservation (WRR); southerly along said boundary to U.S. Highway 26/287; northwesterly along said highway to Soda Spring Drive (Fremont County Road 283A); westerly along said road to the Wildcat Loop Road (Shoshone National Forest Road 554); westerly along said road to the Union Pass Road (Shoshone National Forest Road 263); southerly along said road to the Continental Divide.

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 (Bridger-Teton National

Forest 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 the Grand Teton National Park boundary; northeasterly then southerly 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 Granite Creek and 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 (Bridger-Teton National Forest Road 600) intersects the Continental Divide; southerly along said divide to Mt. Helen; westerly to Summit Lake and the divide between the Green River and Pine Creek; northwesterly along said divide to the divide between the Green River and the New Fork River; northerly along said divide to the head of Jim 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 (Bridger-Teton National Forest 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 highway to Lincoln County Road 134; westerly along said road to the Wyoming-Idaho 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).

Area 13. Whiskey Mountain. Beginning where U.S. Highway 26 crosses the Western Boundary of the Wind River Reservation (WRR); south along said boundary to the Continental Divide; northwesterly along said divide to the Union Pass Road (Shoshone National Forest Road 263); northerly along said road to the Wildcat Loop Road (Shoshone National Forest Road 554); easterly along said road to Soda Springs Drive (Fremont County Road 283A); northeasterly along said road to U.S. Highway 26; southeasterly along said highway to the WRR boundary.

Area 14. Fremont Lake. Beginning at Mt. Helen; westerly to Summit Lake and the Divide between the Green River and Pine Creek; northwesterly along said divide to the divide between the Green River and New Fork River; northerly along said divide to the head of Jim Creek; westerly down said creek to the Bridger-Teton National Forest boundary; southerly along said boundary to Boulder Creek; easterly up said creek to the Middle Fork Boulder Creek; easterly up said creek to the Continental Divide; northerly up said divide to Mt. Helen.

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 their 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).

WYOMING GAME AND FISH COMMISSION

David Rael, President

Dated: July 18, 2019

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 2018~~ 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 per license during any one (1) calendar year (January 1 – December 31). A person may purchase up to two (2) gray wolf hunting licenses during any one (1) calendar year. 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 three (3) 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~~their license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(A) A hunter taking a gray wolf in a designated wilderness area shall present the pelt and skull to a district game warden, district wildlife biologist or Department personnel at a Department Regional Office during business hours for registration within three (3) days after returning from the wilderness or within ten (10) days from the date of harvest, whichever occurs first.

(iii) At the time of registration, the licensee shall provide their license number, date of kill and location of the site of kill to include hunt area, section, township and range or UTM coordinates.

(iv) 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).

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

Hunt Area	Season Dates		Mortality Limit
	Opens	Closes	
1	Sep. 1	Dec. 31	<u>74</u>
2	Sep. 1	Dec. 31	<u>86</u>
3	Sep. 1	Dec. 31	<u>52</u>
4	Sep. 1	Dec. 31	<u>42</u>
5	Sep. 1	Dec. 31	<u>31</u>
6, 7	Sep. 1	Dec. 31	3; SEE SECTION 4 (i)
8, 9, 11	Sep. 1	Dec. 31	45 <u>7</u>
10	Sep. 1	Dec. 31	<u>52</u>
12	Oct. 15	Dec. 31	2; SEE SECTION 4 (j)
13	Sep. 1	Dec. 31 <u>Mar. 31</u>	<u>54</u>
14	Sep. 1	Dec. 31	1

(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 limit has been reached, 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 limitation. The gray wolf hunting season shall close in each gray wolf hunt area when the mortality limit for that area has been reached. If the mortality limit 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 drainage of the Clark's Fork Yellowstone River west of Wyoming Highway 120 and all of the drainage of Soda Butte Creek outside of Yellowstone National Park.

Area 2. North Fork. All of the drainage of the North Fork Shoshone River; all of the north drainage of the Shoshone River west of Wyoming Highway 120; all of the drainage of Mountain Creek outside Yellowstone National Park; all of the drainage of Escarpment Creek outside of Yellowstone National Park.

Area 3. South Fork. All of the drainage of the South Fork Shoshone River; all of the south drainage of the Shoshone River west of Wyoming Highway 120; all of the drainage of Thorofare Creek outside Yellowstone National Park; all of the drainage of the Yellowstone River outside Yellowstone National Park; all of the drainage of the Yellowstone River outside Yellowstone National Park and upstream from the confluence with Thorofare Creek.

Area 4. Greybull. Beginning where Wyoming Highway 120 crosses 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 Wind River Reservation boundary; northerly along said boundary to the divide between South Fork Owl Creek and the Wind River; northerly along said divide to the Hot Springs County-Fremont County line; northwesterly along said county line to the Park County-Fremont County line; northwesterly along said county line to the divide between the Greybull River and South Fork Shoshone River; northwesterly along said divide to Wyoming Highway 120; southerly along said highway to the Greybull River.

Area 5. Wind River. Beginning where the Union Pass Road (Shoshone National Forest Road 263) crosses the Continental Divide; westerly and northerly along said divide to U.S. Highway 26/287; all of the drainage of the Wind River north of U.S. Highway 26/287 to the west boundary of the Wind River Reservation (WRR); southerly along said boundary to U.S. Highway 26/287; northwesterly along said highway to Soda Spring Drive (Fremont County Road 283A); westerly along said road to the Wildcat Loop Road (Shoshone National Forest Road 554); westerly along said road to the Union Pass Road (Shoshone National Forest Road 263); southerly along said road to the Continental Divide.

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 (Bridger-Teton National Forest 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 the Grand Teton National Park boundary; northeasterly then southerly 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 Granite Creek and 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 (Bridger-Teton National Forest Road 600) intersects the Continental Divide; southerly along said divide to Mt. Helen; westerly to Summit Lake and the divide between the Green River and Pine Creek; northwesterly along said divide to the divide between the Green River and the New Fork River; northerly along said divide to the head of Jim 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 (Bridger-Teton National Forest 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 highway to Lincoln County Road 134; westerly along said road to the Wyoming-Idaho 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).

Area 13. Whiskey Mountain. Beginning where U.S. Highway 26 crosses the Western Boundary of the Wind River Reservation (WRR); south along said boundary to the Continental Divide; northwesterly along said divide to the Union Pass Road (Shoshone National Forest Road 263); northerly along said road to the Wildcat Loop Road (Shoshone National Forest Road 554); easterly along said road to Soda Springs Drive (Fremont County Road 283A); northeasterly along said road to U.S. Highway 26; southeasterly along said highway to the WRR boundary.

Area 14. Fremont Lake. Beginning at Mt. Helen; westerly to Summit Lake and the Divide between the Green River and Pine Creek; northwesterly along said divide to the divide between the Green River and New Fork River; northerly along said divide to the head of Jim Creek; westerly down said creek to the Bridger-Teton National Forest boundary; southerly along said boundary to Boulder Creek; easterly up said creek to the Middle Fork Boulder Creek; easterly up said creek to the Continental Divide; northerly up said divide to Mt. Helen.

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~~ their 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).

WYOMING GAME AND FISH COMMISSION

David Rael, ~~Vice~~ President

Dated: ~~July 11, 2018~~ July 18, 2019



June 12, 2019

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



Dear Wyoming Game and Fish Department,

Enclosed please find 53 comments from supporters with the Center for Biological Diversity on the "Chapter 4, Furbearing Animal Hunting or Trapping Seasons" and "Chapter 47, Gray Wolf Hunting Seasons" regulations.

Thank you for your consideration.

For the wild,

Cybele Knowles
Communications Associate
cknowles@biologicaldiversity.org
(520) 623-5252 x 324

Enclosure

priority mail

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I am a life long resident of Wyoming, amounting to over 50 years. I fiercely hope we will protect our wildlife and I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Stephanie Reutner
Jelm, WY 82063

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state. Oh that's right.. are you able to do the right thing?

Sincerely,

Jessica Jern
Wilson, WY 83014

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

Even though this is a form letter it expresses my opinion exactly. I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Nancy Carson
Wilson, WY 83014

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering my comments.

Sincerely,

Richard Spotts
Saint George, UT 84790

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Cybele Knowles
Tucson, AZ 85733

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Kathie Kay
Sheridan, WY 82801

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Ljiljana Milic
, CA 11000

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Chrissie Rappolt
Lodi, NY 14860

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Mary Thomas
Richmond, CA 94801

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

mike robertson
Pasadena, MD 21122

Wyoming Game and Fish Department

Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

**Raleigh koritz
Minneapolis, MN 55442**

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Deborah Richards
Burns, WY 82053

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Peter Galvin
Whitethorn, CA 95589

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Christopher Wenzel
Torrington, WY 82240

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Deborah Stowe
Cheyenne, WY 82009

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Lisa Mazzola
Tampa, FL 33612

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Jean Priest
Cheyenne, WY 82009

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Roger Hayden
Jackson, WY 83001

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Kathleen Mireault
Jamaica Plain, MA 0190

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Michael Friedmann
Bronx, NY 10461

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Joanna Behrens
Thayne, WY 83127

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Colleen Lobel
San Diego, CA 92126

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Lisa Neste
High Point, NC 27265

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Dawn Lynn
Cheyenne, WY 82001

Wyoming Game and Fish Department

Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

jeff hopkins
Lake Villa, IL 60046

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Robert Ferrara
Cheyenne, WY 82009

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Geoff Long
Casper, WY 82609

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Allen Olson
Minneapolis, MN 55409

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Cynthia Dietzmann
Wilson, WY 83014

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Paul Shindell
Kelly, WY 83011

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Harry Knapp
Riverside, CA 92507

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Judith Wilson
Wheatland, WY 82201

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Cindy Booth
Wilson, WY 83014

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Nancy Currah
Casper, WY 82601

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Freya Harris
Atlanta, GA 30342

Wyoming Game and Fish Department

Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Animae Chi
Gainesville, FL 32607

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Cher Clarke
Beverly Hills, CA 90210

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Danuta Watola
, PR 42660

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Lise vandal
Schenectady, NY 12345

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Inge Bjorkman
Placerville, CA 95667

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

WALTER Firth
Sparkill, NY 10976

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

S Jitreun
Ann Arbor, MI 48104

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Ann Breuer
Centralia, IL 62801

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Spencer Busteed
Cody, WY 82414

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Tina Hart
Buffalo, WY 82834

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Peter Suesserman
Boulder, WY 82923

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Evelyn Griffin
Pavillion, WY 82523

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Jamey Wilson
Cheyenne, WY 82007

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Andrea Sipe
Casper, WY 82609

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Carl Stapler
Evanston, WY 82930

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

George Simmons
Green River, WY 82935

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Hristina Boncheva
Phoenix, AZ 85001

Wyoming Game and Fish Department
Re: Revise Proposed Hunting and Trapping Rules for Wolves and Beavers

Dear Wyoming Game and Fish Department,

I strongly oppose Wyoming's new proposal allowing a beaver-trapping season in the Jackson Region with an unlimited quota. Beavers are important ecosystem engineers and are needed to keep fisheries healthy. Traps also pose a safety risk to people and pets. I urge you to remove this proposal. I support the lowering of quotas for wolves in areas of Wyoming, but ask that you consider lowering quotas even further to allow wolves to flourish in their native landscape. As a keystone species, wolves are critical to keeping ecosystems healthy. They also may help strengthen ungulate populations by removing weak and sick individuals, improving future hunting opportunities. Thank you for considering these comments. I urge you to do the right thing for wildlife and healthy ecosystems in our state.

Sincerely,

Ms Zentura
Casper, WY 82609