

Wyoming Game and Fish Department Comment Form



Please take a few minutes to write down your comments related to the proposed regulation recommendations and what changes, if any, you would suggest.

Written public comments shall be accepted at all public information gathering meetings, open houses, by standard mail at the address below or on the WGFD website at wgfd.wyo.gov. Comments WILL NOT be accepted via *e-mail, fax or telephone*. Unsigned comment forms WILL NOT be forwarded to the Commission for their consideration.

All written comments must be received at the below address no later than 5:00 p.m. Monday, November 10, 2014.

Chapter 65, Regulation to Adopt Wyoming's Gray Wolf Management Plan and Addendum

- I agree with the proposed new regulation
- I disagree and offer the following comments

Comment form may be submitted at
meetings or sent to:

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

Comments:

Please accept the comments of The Cougar Fund on the Wyoming Game and Fish Commission's *Regulation to Adopt Wyoming's Gray Wolf Management Plan and Addendum*.

The Cougar Fund is a national organization based in Jackson, Wyoming dedicated to the protection of cougars and other large carnivores through education, advocacy, and policy monitoring. We are concerned about a number of facets of Wyoming's Wolf Management Plan.

The impression that we are left with after reading the Plan is that WGFD actively promotes managing wolves in the state by lethal removal, via a structured hunting season, Lethal Take Permits, and shoot-on-sight regulations in the "predator zone." This, however, is inconsistent with the efforts WGFD has made in recent years to promote non-lethal predator deterrents. We would like to see WGFD place a greater emphasis on non-lethal methods for reducing conflict with wolves, and we have confidence the Department can achieve this. There is already precedent for implementing effective non-lethal predator deterrents: The Cougar Fund commends WGFD for requiring hunting outfitters to utilize electric fencing in areas inhabited by grizzly bears. While we understand there was initial resistance to this program, it has proven very successful and is now embraced. The Department has already received funding and purchased equipment that can help livestock producers reduce conflict with wolves. We hope that WGFD will actively distribute the equipment and continue to educate about the benefits of non-lethal deterrents.

We share the concerns of many individuals and organizations that the “predator zone” sets a dangerous precedent for wildlife management (will such a management tool be applied to other large carnivores in the future?) and does not afford adequate protections to such a recently recovered species. The unregulated killing of wolves in this area does not seem justified given the fact that there are so few wolves present (approximately 20 according to recent WGFD estimates) and wolf conflict dropped in 2013. Additionally, random culling in the “predator zone” has the potential to disrupt the social hierarchy of wolves and result in more conflict. Non-lethal deterrents, infrequent conflict removal, and continued education to reduce attractants are all that is needed to protect people, pets, and livestock from the relatively small threat that wolves pose in the vast majority of Wyoming.

Our final comment concerns WGFD’s usage of the term “Predator” to classify wolves outside of the WTGMA. Labeling wolves as nothing more than “Predators” perpetuates archaic stereotypes and mythologies about the animal and devalues not only their ecological role, but also the important role they have in Wyoming’s tourism economy. It also suggests that the Department itself associates wolves with primarily negative connotations. We believe that WGFD should rethink this wording and take a more unbiased, scientific approach to classifying and managing wolves in the state. We hope that in doing so, WGFD can be a leader in changing cultural attitudes towards wolves and other predators.

Wolves aren’t “throwaway” animals; they aren’t simply a “burden.” Wolves are an important native species; they play a critical role in preventing the spread of diseases such as CWD; wolves reduce the densities of ungulate herds by dispersal, which in turn reduces habitat degradation (the greatest single threat to wildlife today); the desire to observe wolves contributes to our burgeoning tourism economy; and perhaps most significantly, many Wyoming citizens value them alive. We hope that you will fairly acknowledge these positive aspects of the wolf and consider their benefits when making significant management decisions.

Thank you for considering our comments,

Penny Maldonado
The Cougar Fund
Managing Director

Signature

Date