



JIM GIBBONS  
*Governor*

STATE OF NEVADA  
**DEPARTMENT OF WILDLIFE**

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November 16, 2010

Mr. Rowan Gould, Acting Director  
Attention: Mr. Gary Fraser  
U.S. Fish and Wildlife Service  
Coordinator  
585 Shepard Way  
Helena, Montana 59601

Dear Mr. Fraser:

As a result of the recent court ruling by the federal judge in Montana that put wolves back on the Endangered Species List as endangered in the Lower 48 States, the Nevada Wildlife Commission has raised the concern again about the management challenges we face as wolves continue to disperse from Idaho and explore into Nevada. At a Board of Wildlife Commissioners meeting in September, U.S. Fish and Wildlife Service State Director Bob Williams mentioned to the Commission that the Service may be reviewing the overall status of the species and considering a reclassification of the gray wolf under the Endangered Species Act. He indicated that if a reclassification was undertaken by the Fish and Wildlife Service that the area where the species would be given full protection might be adjusted from the current listing (protected in the Lower 48 States). Mr. Williams also agreed that historically, Nevada had very limited wolf habitat and the species was likely transient through the north areas of the State. He suggested that in such a reclassification that the Service could possibly use the established Distinct Population Segments (DPS) for where wolves would be protected. Wolves outside of the DPS would not be protected. The Commission would like to request and supports that the FWS proceed with such a reclassification so that Nevada would not be included in the area where wolves are fully protected.

In support of the reclassification, the Nevada Department of Wildlife maintains that there are no data to suggest that historically there ever was a resident wolf population in the State. Occasional reports of wolf observations in northeastern Nevada continue to be documented but no hard evidence has yet been recovered. Historical records from the 19<sup>th</sup> century along with scientific publications (Hall 1946) suggest wolves were sporadically present only in northern portions of Nevada. Contemporary evaluation of available habitat, corridors, roads, land use practices and total biomass of available prey species do not suggest any changes within the past 60 years that would make Nevada more suitable for wolves. Most of northern Nevada is inhabited by domestic sheep during the summer months and domestic cattle year around. Dispersing

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wolves entering Nevada from Idaho or eastern Oregon will likely become involved in livestock depredation, or negatively impact the relatively sparse big game resources in this area of the State. Therefore, the Nevada Department of Wildlife and Wildlife Commissioners request that Nevada not be considered as historical habitat and be excluded as an essential part of the area considered for protection and re-establishment of gray wolves in the Rocky Mountain DPS.

Sincerely,



Kenneth E. Mayer  
Director

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