



National Headquarters

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December 28, 2007

Attention: Cal Groen, Director
Idaho Department of Fish and Game
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Re: Idaho Wolf Population Management Plan Comments

Dear Director Groen:

Defenders of Wildlife (“Defenders”), the Boulder-White Clouds Council, Lands Council, Western Watersheds Project, Wolf Education and Research Center, and the Wolf Recovery Foundation wish to express our very serious concerns with the draft Idaho Wolf Population Management Plan that Idaho Department of Fish and Game (“IDFG”) released November 19, 2007.

The current Idaho wolf population is estimated at approximately 800 wolves in 42 breeding pairs however, the draft plan establishes a minimum of 104 wolves and 15 breeding pairs in the state. The plan would allow, and in certain areas compel, the removal of more than half of the current wolf population without valid justification for this aggressive reduction of the current wolf population. For example, the plan proposes to kill nearly all the wolves in the Frank Church River of No Return Wilderness Area, the largest wilderness area in the continental United States, covering an area even larger than Yellowstone National Park and, like Yellowstone, without any livestock grazing operations. But while Yellowstone currently holds about 150 wolves, IDFG plans to leave only between eight and 32 wolves in the entire Frank Church wilderness complex. There is no biological justification for reducing wolf numbers so dramatically.

In summary, this plan:

- Would result in the loss of hundreds of wolves, fragmenting the population from wolves in Canada, Montana, and Wyoming, and prevent wolves from fulfilling their ecological function in their native habitat;
- Fails to adequately integrate wolf behavior, conservation biology and traditional harvest strategies based on species population viability;
- Establishes a harvest season that is far too long, would disrupt pack structure and result in high pup and sub-adult mortality, and escalate conflicts with livestock losses;
- Would significantly impair the dispersal of wolves from Idaho to unoccupied wolf habitat in Washington and Oregon.

Our organizations, which collectively represent over 9,000 members and supporters in Idaho, strongly recommend that the IDFG revise its Draft Idaho Wolf Population Management Plan and submit the following comments and recommendations.

Organizations submitting comments

Defenders is a national non-profit conservation organization with more than 900,000 members and supporters nationwide. We are a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend, and have been involved in such efforts since the organization's establishment in 1947. Over the last three decades, Defenders has played a leading role in the recovery of wolves in the Northern Rockies. Defenders administers The Bailey Wildlife Foundation Wolf Compensation Trust, which has reimbursed ranchers more than \$950,000 for livestock losses since the program was founded in 1987, and The Bailey Wildlife Foundation Carnivore Conservation Fund, which assists family ranchers and wildlife agencies with nonlethal, proactive methods that help reduce or prevent livestock losses to wolves. These methods include sharing the cost of range riders, livestock guarding dogs, predator deterrent fencing, alternative grazing, and more.

Boulder-White Clouds Council was formed in 1989 to gain permanent protection for the 550,000-acre Boulder-White Cloud Mountains by securing designation within the National Wilderness Preservation System. We focus on protecting and improving watersheds, fish and wildlife habitat in Idaho's Upper Salmon River region. Our mission includes providing accurate information on many issues including gray wolf recovery to our 800 supporters who mostly reside in Central Idaho. We also provide information to the public at large, media, elected officials, and other conservation organizations in Idaho, the northern Rockies, the Northwest, and nationally, including Washington, D.C.

The Lands Council is a non-profit conservation organization, based in Spokane, Washington. We have 1400 members who are dedicated to protecting and restoring the forests and rivers of the Inland Northwest. We recognize the gray wolf as an important species that must be restored to its historical range.

Western Watersheds Project is an Idaho not-for-profit conservation organization with over 1,800 members. WWP manages the 432-acre Greenfire Preserve (a wildlife sanctuary) located on the East Fork Salmon River near Clayton, Idaho and has offices in Hailey and Boise, Idaho, Wyoming, California, Arizona and Utah. The mission of Western Watersheds Project is to protect and restore western watersheds and wildlife through education, public policy initiatives and litigation.

The Wolf Education and Research Center is dedicated to providing public education concerning the gray wolf and its habitat in the Northern Rocky Mountains. It is our goal to provide the public with the rare opportunity to observe and learn about wolves in their natural habitat. The Visitor Center is increasing public awareness of wolves and related issues with programs that educate, awaken, and motivate local as well as national residents, which may be the key for preserving wolves and their habitats in perpetuity.

The Wolf Recovery Foundation is an Idaho based non-profit 501(c)(3) corporation. Its mission is to foster our heritage of wild wolf communities by advocating their presence forever in places where they have been extirpated.

Background

More than 200,000 gray wolves (*Canis lupus*) once lived throughout the United States. Aggressive wildlife killing campaigns led to wolf eradication from most of the country by the mid 1930s. By the 1960s, only a few hundred wolves in northern Minnesota remained in the continental United States. Congress enacted the Endangered Species Act in 1973 to “provide for the conservation, protection, restoration, and propagation of species of fish, wildlife, and plants facing extinction.” S. Rep. No. 93-307, at 1 (1973), *reprinted in* 1982 U.S.C.C.A.N. 2989; *see also* 16 U.S.C. § 1531(b). To accomplish this, the Act authorizes the Secretary of the Interior to list domestic or foreign species as endangered or threatened. 16 U.S.C. § 1533(a)-(b). Once a species is so listed, it is afforded certain protections, and federal agencies assume special obligations to conserve, recover, and protect that species. For example, section 7(a)(1) authorizes the Secretary to “live” trap and “transplant” (reintroduce) rare species, if necessary, to bring an endangered or threatened species to the point at which the protective measures of the Endangered Species Act are no longer necessary. 16 U.S.C. §§ 1536(a)(1) and 1532(3) (definition of “conservation”).

Wolves dispersed from Canada to northern Montana in the 1980s. In 1987, a western wolf recovery team composed of scientists, biologists, and western agricultural representatives identified northwestern Montana, the Yellowstone ecosystem and central Idaho as three core wolf recovery areas. On November 22, 1994, the Service designated portions of Idaho, Montana, and Wyoming as two nonessential experimental population areas for the gray wolf under section 10(j) of the Endangered Species Act of 1973 (59 FR 60252, Nov. 22, 1994; 59 FR 60266). In 1995 and 1996, the Service reintroduced wolves from southwestern Canada into these areas (Bangs and Fritts 1996, pp. 407–409; Fritts *et al.* 1997, p. 7; Bangs *et al.* 1998, pp. 785–786). Thirty-five wolves were released in central Idaho’s Frank Church River of No Return Wilderness area and thirty-one wolves were released in Yellowstone National Park. These wolves were expected to help establish a region-wide wolf population in addition to the newly established wolf packs in northwest Montana. Scientists anticipated that the northern Rockies subpopulation would become connected to the Canadian wolf population. Today, the number of wolves in the region has grown to approximately 1500 although routine connectivity with the Canadian wolf population has not been secured.

On February 8, 2007, the Service published a proposed rule to establish and delist the Northern Rocky Mountain Distinct Population Segment (“DPS”) of gray wolves. Many of the undersigned organizations also submitted comments regarding the February 8th proposal on or before the initial comment period deadline of May 8, 2007 (see attached). The Service is expected to publish the final rule to delist wolves in the northern Rockies prior to March 2008.

Wolves have begun to restore natural balance to the areas they are reoccupying, by culling weak and diseased elk, deer, and other prey, and dispersing elk away from sensitive wetlands and meadows they were over-browsing. Elk populations remain high, however, and are more than sufficient to meet hunter demand. Ranchers are learning to successfully reduce the limited but inevitable wolf predation on livestock to manageable levels, and are compensated for most losses that do occur by Defenders or their state compensation program. Wolf-related tourism in the Yellowstone region has generated more than \$35 million annually for local communities in recent years.

On November 19, 2007, IDFG released a draft Idaho Wolf Population Plan that would be implemented after wolves are removed from the protection of the Endangered Species Act. This draft plan:

- Establishes wolf management objectives based on conflicts with elk and livestock yet fails to define conflict or how levels of conflict are determined;
- Seeks to reduce the wolf population by establishing an objective of 15 breeding pairs;
- Establishes a minimum wolf population of 104 wolves, down from 800 existing wolves today.

State Wolf Conservation Objectives

The normal purpose of a wildlife population management plan is to secure abundant and viable wildlife populations. As such, wildlife harvest plans are typically based on population surplus. The IDFG plan, however, bases wolf harvest levels on conflicts with elk and livestock and focuses exclusively on reducing the wolf population, not securing it. It aims to reduce wolf numbers where there are “unacceptable impacts” as directed by the Idaho Wolf Conservation Management Plan. Moreover, the plan fails to explain or limit the phrase “unacceptable conflict” in any way; so again, this is a virtually unlimited authorization to kill wolves by sport hunting and other, unspecified, means. The plan does not seek to harvest wolves as much as it seeks to treat wolves as just a predator, without harvest value. For example, if this were truly a harvest plan, it would focus on trapping wolves during the winter when their pelts are in good condition and would only allow the killing of surplus animals. Killing wolves in the spring and fall would be for the purpose of killing alone; it would not be for the purpose of salvaging anything from the kill.

Idaho state officials claim they want to manage wolves like they manage other wildlife, but the facts speak for themselves. There are 3,000 mountain lions, 20,000 black bears and more than 100,000 elk in Idaho – yet the management plans of these other big game species are not based on ungulate or livestock conflict, and IDFG has given no reason why this is the case for wolves. The selection of the above criteria as the basis of the plan is not justified, and seems arbitrary and capricious. The state plans to kill all but a few hundred wolves would limit the state’s wolf population to just 15 breeding pairs, placing an unjustified and artificial limitation on the population and risking the future of wolves in the state.

Instead of focusing so heavily on reducing wolf numbers, the plan should contain in-depth consideration of prey population dynamics, pack structure, illegal take and other mortality factors. The draft plan does not address these important criteria for setting population harvest levels or describe how the population will be monitored in a manner that protects the wolf population from dropping below 15 breeding pairs. Without these criteria in place, the plan's aggressive control level will lead to fragmentation and create instability within the population. This instability would lead to more conflicts as it disrupts the wolf pack’s social unit. Allowing the alphas or breeding pair of a pack to be killed often results in the disbanding of the pack (Brainerd et al 2006). If key members of a stable wolf pack are killed, remaining pack members that are unable to adequately hunt wild prey (e.g. pups and sub-adults) are more likely to kill livestock. The pack's territory then becomes a high conflict

area and even more wolves are killed. This scenario, if replicated widely, would lead to unsustainable and fragmented wolf population levels.

If a primary purpose of the plan is to reduce conflicts due to livestock losses, the plan must incorporate nonlethal, proactive methods or incentives to effectively resolve or prevent wolf depredations. By increasing assistance to livestock owners to implement animal husbandry practices (e.g. carcass and sick livestock removal when feasible) and preventative measures where appropriate, IDFG can play an important role in managing for fewer conflicts and promoting wolf conservation. Adding practical, proactive and nonlethal deterrent information in IDFG education and outreach materials could help to greatly reduce wolf related conflicts.

Under the current plan, however, hunting would be allowed across the entire state except for one to two temporary wolf viewing areas. Even here, ranching, elk hunting, and outfitting still have priority over wildlife watching. This is not an appropriate balance. Each IDFG Region should designate one or more permanent areas where watching wildlife is prioritized over other uses. The department can also fill an important role in assisting local communities and entrepreneurs in developing wolf watching areas that lead to positive economic gain through increased tourism revenue as currently occurring in the Yellowstone region. The suggestion that outfitters in these areas are eligible for financial compensation to offset differential losses suggests a transfer of ownership of Idaho elk from the state to outfitters. Not only is this contrary to Idaho law, which states that all wildlife belongs to the state, it also represents a threat to all Idaho wildlife and to all Idaho hunters, who may be next in line to reimburse outfitters for lost hunting opportunities.

The draft plan fails to describe adequately emergency measures for changing from control-focused management to conservation management to preserve the population's stability, integrity, and connectivity with other wolf populations in the region. The final plan must identify how the wolf population will be monitored to ensure that its long-term viability, connectivity to wolf populations in adjacent states and Canada, and ecological function are maintained as the primary purpose for a wolf population management plan. As the current plan allows the state wolf population to drop to 104 wolves, this would almost certainly trigger a need for emergency relisting of federal protection for the regional wolf population.

The dispersal of wolves from Idaho to the Greater Yellowstone Ecosystem is one of the most important aspects of the experimental population and of wolf recovery, yet both the Beaverhead and Upper Snake Data Analysis Units (DAU) have very low breeding pair objectives, 0-1 and 1-3 respectively. To date there is no documentation of genetically relevant wolf dispersal between Central Idaho and the Greater Yellowstone Ecosystem, and with these low objectives any chance of this will be removed. The wolf plan should seek to maintain genetic diversity. Therefore the breeding pair objective in these two DAUs should be among the highest in the state, not among the lowest.

The Status of Idaho's Elk Population

Idaho elk populations and hunter harvest levels are at or near all time highs (IDF&G Project W-170-R-30, Elk Surveys and Inventories, July 1, 2005 – June 30, 2006; see "There's plenty of game out there this season — you just need to find it", Idaho Statesman, August 30,

2007). IDFG's primary concerns center on elk harvest in Region 2, and more specifically on four hunting zones comprised of ten individual hunting units. IDFG data from 1988 to the present demonstrates a historical fluctuation in elk numbers within Region 2. These natural peaks and valleys occurred long before wolves were established in this area. Using the most current data from IDFG (Clearwater Region Sightability Estimates, Updated 2/26/07, Clay Hickey, IDFG, via email) regional elk numbers have increased in some areas despite a growing wolf population. Biologists have determined that habitat, not predation, is the main cause of elk population decline.

Since 2001, hunter harvest and elk numbers have steadily increased in the Selway zone. In the Elk City zones, hunter numbers have remained steady with an increase in harvest of both bull and cow elk, and in unit 10A harvest of bulls has risen since 1999 with cow harvest remaining steady. In the Lolo zone, after a drop off hunter and harvest numbers have increased since 1999. (IDF&G, Project W-170-R-30, Elk Surveys and Inventories July 1, 2005 – June 30, 2006). The premise that wolves are degrading hunter opportunity and success cannot be shown by IDF&G data.

In regard to elk calf mortality by predators, IDFG has conducted a study over the last four years funded by federal appropriations concerning predator manipulation (increased predator harvest) in several zones in Region 2. At the December 13th, 2007 Boise wolf plan meeting, IDFG biologist Jon Rachel described this study as the most in-depth study of any elk population in the world. He acknowledged that habitat is the over-riding limiting factor in regard to elk in this region but stated that repairing habitat was too expensive and would take a long period of time to achieve. Over the last seven years, IDFG also increased black bear and mountain lion harvest in the region. The results of the increased harvest showed no evidence of a measurable increase in the elk population or in calf to cow ratios. Results from different zones contradicted each other in calf mortality as well as the general population. IDF&G has labeled all of Region 2 as either high or moderate conflict areas for wolves with elk. Looking at the elk population in the Elk City Zone since 1988, there has been a steady increase in total population in all units (14, 15 & 16). In the Dworshak zone, unit 10A, since 1996 there has been an increase in elk population. In the Lolo, an area of great concern, unit 10 has shown an increase from 2643 total elk in 2003 to 3452 in 2006 with a calf/cow ratio of 29.4. Unit 12 in the Lolo zone has experienced a continued decline in elk since long before wolves appeared. Starting in 1985, when the elk population was 4767 with a calf/cow ratio of 30.1, the unit has had a straight drop in population to where it is now 1658 in total population with a calf/cow ratio of 20.1. In spite of these falling elk numbers, hunter numbers and harvest have increased steadily since 2000. The situation that has plagued unit 12 in the Lolo is shared with the Selway zone (units 16A, 17, 19 & 20). The typical straight-line and or population fluctuations and decline started long before wolves appeared. Yet again, after a drop off in hunter numbers and harvest in 2001, there has been a steady increase in both hunter numbers and harvest in the Selway. (IDF&G, Project W-170-R-30, Elk Surveys and Inventories July 1, 2005 – June 30, 2006).

In 2005, IDFG proposed to kill up to 75% of the wolves in the Clearwater Lolo District, and then maintain low wolf numbers for a five year period, in order to increase hunter harvest of elk. However, as IDFG's own peer reviewers noted in regard to the Clearwater wolf control proposal, scientific evidence points to habitat problems, not predation, as the

primary limiting factor for elk in the Lolo District (Kie 2006). According to Dr. Jim Peek, a noted University of Idaho wildlife scientist, many elk populations across the Western states tended to experience peaks in the late 1980s through the mid-1990s and declines since that time. He stated that “elk populations across the upper Clearwater apparently peaked in the late 1980s, after which both surveys of numbers and of cow-calf ratios showed declines. This occurred well before the introduction of wolves.” He also stated “there is very little evidence that the presence of wolves has caused a decline in elk numbers anywhere, especially in Central Idaho” and “[t]here is no evidence that wolves have decimated elk populations throughout Idaho” (Benson 2007).

IDFG more recently acknowledged that weed infestation, reduced logging, and a lack of fire (natural or prescribed) have caused habitat problems for elk herds and elk calf survival. Shrub fields are commonly believed to be one of the most important wintering habitat for elk in the Clearwater drainage (Leege and Hickey 1977). Until these habitat issues are addressed, killing predators, including wolves, will not secure higher hunter harvest in the region, no matter how many are killed.

The Benefits of Restoring a Healthy Wolf Population

Wolves were reintroduced to Idaho to restore their important role in nature, which is never more evident than by the wolf's keen skill in culling weak and diseased elk and deer. Scientists are documenting the positive benefits that are occurring throughout our region due to the return of the wolf. For example, wolves have helped reduce overgrazing by record-high elk populations by dispersing elk across more of their habitat, resulting in regrowth of native plants like aspen and willow along streambeds where they provide shade and food for native fish and song birds (Ripple & Beschta 2004, Smith 2005). Yet elk populations and harvest levels remain at or close to record highs compared to recent decades. Wolf-related tourism in Yellowstone has resulted in a 35 million dollar annual increase in revenue for our regional economy (Duffield et al 2006). Unfortunately, this information is not presented adequately in IDFG public communications concerning wolves. It is important to address these benefits and others when doing balanced public outreach and providing information.

Summary

Most Idaho ranchers never have losses to wolves but those who do are often finding ways to reduce their losses through proactive, nonlethal methods. Ranchers, wildlife supporters, biologists and others are working collaboratively to implement these measures and manage conflicts. Both Defenders of Wildlife and the state of Idaho are reimbursing ranchers for wolf-related livestock losses to help reduce the impacts of those losses. Most people recognize that wolves are once again part of our native wildlife heritage and are here to stay. We can co-exist with them, and we are finding better ways to do so every year.

Yet in the face of all this good news, IDFG put forth a wolf hunting plan with a goal of dramatically reducing Idaho's wolf population by aerial gunning and hunting in zones across the state.. There is no justification for killing so many wolves in our state's most pristine wilderness area, where no livestock graze and strong elk populations thrive. We ask that IDFG modify this plan to support a healthy, thriving wolf population in numbers that

maintain the integrity of the regional wolf meta-population and to include more balanced information about the benefits of a healthy wolf population.

Even with these changes to improve the plan, there is one major obstacle that must be first addressed: The plan is superseded by the state legislature's wolf management plan that calls for 15 packs of wolves to be managed at recovery levels after delisting and maintains the state's official position that all wolves should be removed "by any means necessary." In addition, Idaho Governor Butch Otter's January 2007 declaration that Idaho will seek to kill as many wolves as possible serves only to reinforce doubts regarding Idaho's intention to protect its wolf population. *See* "For Wolves, a Recovery May Not Be the Blessing It Seems" New York Times, February 6, 2007 ("In Idaho, the governor is ready to have hunters reduce the wolf population in the state from 650 to 100, the minimum that will keep the animal off the endangered species list."). These discrepancies and unfortunate overall hostility toward wolves undermines the public's confidence and trust in IDFG as a manager of the state's wolf population. We urge IDFG to take advantage of this opportunity to amend this plan to demonstrate the agency's commitment to managing for a healthy, viable, and abundant wolf population.

We appreciate your consideration of these comments.

Sincerely yours,



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