



**Western
Watersheds
Project**

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Working to protect and restore Western watersheds

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Via U.S. Mail and FAX to (208) 334-2148

Idaho Department of Fish and Game
Wolf Plan Comments
P.O. Box 25
Boise, ID 83707

Re: Draft Idaho Wolf Population Management Plan

Dear Idaho Fish and Game Commissioners:

These comments are submitted on behalf of Western Watersheds Project (“WWP”), a 501(c)(3) non-profit organization that works to protect and restore western watersheds and wildlife. As a keystone predator and an integral part of the natural ecosystem, the wolf is a species of special concern to WWP.

WWP is particularly concerned about the Draft Wolf Population Management Plan (hereafter “Draft Plan”)’s potential impact on all areas around the state. As an example, the McCall region contains excellent wolf habitat, which presently supports a significant number of wolves—the Draft Plan contains a current estimate of 9 packs in the McCall-Weiser DAU. However, the Draft Plan, if implemented in its present form, will likely result in the killing of many of wolves in this area, since it establishes an artificially low target of 1-4 breeding pairs. Even more egregious is that the only alleged “high” conflict in the McCall-Weiser DAU is based on livestock, many of which are on public lands in the vicinity and without the Draft Plan requiring any type of preventative measures on the part of livestock producers to avoid conflicts.

The Draft Plan as currently written is not scientifically-based, as it fails to take into account the significant research that wildlife biologists have conducted in recent decades that, for example, shows the wolf’s unique pack structure and beneficial impact on resources such as allowing for aspen and willow regeneration¹. Much of the plan lacks defined terms or criteria

¹ The internet site <http://www.idahowolves.org> states that” wolves play a key role in their ecosystem by culling weak and old elk and deer (Smith, Peterson and Houston 2003) and reducing the long-term concentration of elk herds on sensitive meadows and wetlands (Ripple and Beshta 2004). In what is known as the cascade effect, the presence of wolves affects a multitude of species within the ecosystem. Elk, wary of the new top predator, have altered their grazing behavior. With less grazing pressure from elk, streambed vegetation such as willow and aspen are regenerating after decades of over-browsing. As the trees are restored, they create better habitat for native birds and fish, beaver and other species. In addition, wolves have reduced the Park’s coyote population by as much as 50 percent in some areas, which led to increased populations of pronghorn antelope and red fox (Crabtree and Sheldon 1999). In short, wolves play an important role in nature and their presence enhances native biodiversity and healthy



on how it will be carried out, such as the procedure for verifying livestock depredation, identifying the various "conflict" zones, and establishing and managing the "wolf-viewing" areas.

Moreover, the draft plan appears to be based in large part on a non-representative "Stakeholder Group," and a flawed and biased "public survey," both of which skewed the results to favor input from a small minority of Idahoans hostile to wolves. The resulting draft Plan discriminates against the majority of Idahoans with ownership rights over the wildlife of the state, who do not want wolves exterminated and believe they have a rightful place in our wild spaces, provided that undue conflicts with humans do not occur.

Rather than tweaking various parts of this wholly unacceptable plan, the better approach would be for IDF&G to scrap it and start the planning process over, using sound scientific and sociological data. However, IDF&G does not need to start from scratch, as the State of Minnesota Department of Natural Resources in 2001 developed a detailed, biologically-based plan for managing its wolves post-delisting. Please refer to Minnesota's 2001 wolf plan² (hereafter "Minnesota Wolf Plan"), which includes details for carrying out wolf control where conflicts are confirmed, wolf ecotourism, and other information that IDF&G should adopt in lieu of the current poorly-drafted and unscientific Idaho Plan.

However, to the extent that the current Draft Plan continues to have any viability, the following points are submitted (Comments relate to the numbered sections of the Draft Plan, but have applicability anywhere else the same topic appears within the Draft Plan).

1. Introduction: Wildlife is expressly declared to be state property, with the state charged to "preserve, protect, perpetuate and manage" all wildlife. The Fish and Game Commission is charged with carrying out this policy, with flexibility to account for changing conditions and "dependent on the ascertainment of facts which from time to time exist...."³

Thus, the first predicate in IDF&G management of wildlife is to "ascertain the facts" relating to the issue under consideration for management. No scientific "facts" were provided in the Introduction or elsewhere as the basis of the Draft Plan, rather, the biases and beliefs of a small minority of Idahoans were its genesis. In contrast, see the Minnesota Plan's detailed discussion of facts in its "Biology and History of Wolves in Minnesota" at pages 10-17.

3. Issues: Under "Conflicts with Domestic Livestock" (Draft Plan p. 13), no data are provided that would permit a reader to compare the livestock losses due to depredation from wolves (stated at "199 sheep and 29 cattle during federal fiscal year 2006") compared to other

ecosystems. Source: Smith, D.W., R.O. Petersen, and D.B. Houston. 2003. *Yellowstone after Wolves*. *Bioscience* 53 (4): 330-340. Ripple, W.J., and R.L. Beschta. 2004. *Wolves, elk, willows, and trophic cascades in the upper Gallatin range of southwestern Montana, USA*. *Forest Ecology and Management* 200: 161-181. Crabtree R.L., and J.W. Sheldon. 1999. *Coyotes and canid coexistence*. Pp 127-163 in Clark TW, Curlee AP, Minta SC, Kareiva PM, eds. *Carnivores in Ecosystems: The Yellowstone Experience*. New Haven (CT): Yale University Press."

² http://files.dnr.state.mn.us/natural_resources/animals/mammals/wolves/wolfplan2000.pdf

³ Idaho Code § 36-103 (emphasis supplied).

predators or other mortality causes. An inclusion of such comparative data would show how minimal livestock losses to wolves are.

For example, the internet site <http://www.idahowolves.org> reports the following information: "According to the US Fish and Wildlife Service, in 2005 wolves killed 244 sheep in the state of Idaho. *Source: US Fish and Wildlife Service* . How does that compare with other causes of losses? In 2004 (the most recent year data is offered by NASS), not including sheep that were slaughtered at market, 22,000 sheep died from all causes in Idaho but only 270 sheep (less than 0.2 percent) were confirmed killed by wolves. Overall sheep deaths were reportedly due to:

- Digestive problems (1,600);
- Respiratory disease (1,300);
- Birthing problems (1,100);
- Misc. health problems (3,200);
- *Predators (all combined) (12,100)
- Harsh weather (600); and
- Poisoning (800).

Sheep deaths due to predators represented 55% of overall losses. These predation deaths included coyotes (7,100 sheep), dogs (1,400 sheep), bears (1000 sheep) mountain lions (400 sheep) and wolves (270). *Source: <http://usda.mannlib.cornell.edu/usda/current/sgdl/sgdl-05-06-2005.pdf>*

In 2006, wolves killed 173 sheep in Idaho. *Source: Steve Nadeau, Statewide Large Carnivore Manager, Idaho Fish and Game, 600 S. Walnut, Boise, ID 83707.*"

Similarly, for cattle, the internet site <http://www.idahowolves.org> reports the following figures: "According to the US Fish and Wildlife Service, in 2005 wolves killed 20 cattle in the state of Idaho. *Source: US Fish and Wildlife Service*. In 2005, not including cattle that were slaughtered at market, 105,000 cows and calves died from all causes in Idaho. These deaths were reportedly due to:

- Digestive problems (23,200);
- Respiratory disease (16,500);
- Birthing problems (9,200);
- Misc. health problems (7,900);
- Lameness and injuries (3,100);
- Predators (all combined) (2,500)
- Harsh weather (1,300);
- Poisoning (800); and
- Theft (100).

Cattle deaths due to predators represented less than 3% of overall losses. These predation deaths included coyotes (600 calves), mountain lions (200 calves), and dogs (100 calves). *Source: National Agricultural Statistics Service, USDA*. In 2006, wolves killed 24 cattle in Idaho.

Source: Steve Nadeau, *Statewide Large Carnivore Manager, Idaho Fish and Game, 600 S. Walnut, Boise, ID 83707.*”

The Draft Plan is deficient in its failure to provide accurate data on livestock mortality from all predators and other non-slaughterhouse causes in Idaho to allow the public to assess whether wolf depredation is as serious as the livestock industry alleges.

Likewise, under “Impacts on Big Game Population,” (Draft Plan p. 13), the example of the Lolo Elk Zone is provided with the statement that “wolf predation on cow elk is a significant factor in that population’s inability to stabilize or increase...” Sheer speculation follows that “wolf predation may be causing reductions in harvestable surplus in other areas, even if elk populations are not declining.” Again, IDF&G should provide facts to place its statements in context.

From the internet site <http://www.idahowolves.org>, again the following figures paint a different picture than is being presented: “Despite rumors that wolves are depleting elk and deer for game hunting, data from Idaho Department of Fish and Game shows that as the wolf population has steadily increased since 2003, so has the hunter harvest success rate. According to IDFG statistics, hunter harvest numbers for elk go up and down from year to year, but the overall success rate has remained relatively consistent since before wolves were reintroduced. For example, data shows that in 2005, the most recent year we have statistics for, hunter harvest numbers are higher than they were in 1993, two years before the wolves were ever reintroduced. Most importantly, IDFG statistics verify that elk and deer populations are at ecologically sustainable numbers, and wolves account for less than 10 percent of all elk and deer deaths in Idaho. *Source: Idaho Fish and Game PDF File.*

‘At the time wolves were released into Idaho, the elk herd in the Salmon Region numbered approximately 28,000 animals. The current estimate gained by aerial surveys and hunter harvest information is approximately 25,000. While this estimate is lower, it is important to note several facts: the estimate still exceeds the Elk Plan objective by about 1,000 animals; all elk zones in the Region have generally been meeting plan objectives; and some high population units have deliberately been reduced through cow harvest to reach objectives. In addition, data gathered from a new radio collaring study initiated in 2005 shows 85 percent deer survival and 82 percent elk survival in the Salmon Region and Units 50 and 60A in the Upper Snake Region. Biologists consider 80 percent doe survival and 85 percent cow elk survival normal and sustainable. Elk mortality factors included hunter harvest (52 percent), mountain lions (30 percent), wolves (7 percent), malnutrition (7 percent), and unknown predation (4 percent). Deer mortality resulted from lions (32 percent), hunter harvest (18 percent), accidents (14 percent), unknown causes (14 percent), wolves (9 percent), roadkill (9 percent), and malnutrition (4 percent). In addition, deer numbers are limited in the region by habitat condition and weather both of which can significantly impact deer populations.’ *Source: Lukens, Jim. "Idaho, eleven years with wolves what we've learned." News release, Idaho Department of Fish and Game, April 25, 2006.*”

Table 6.2 in the Draft Plan at p. 31 undercuts the “wolves are eating all the elk” slant provided under Issues, as it shows only high level of ungulate conflicts in the Lolo and Selway units, with the majority of the units being “low” and a few “moderate.”

Likewise, under "Economic Impact of Wolves" (pgs. 14-15), no meaningful analysis of wolf ecotourism opportunities outside the Greater Yellowstone area is provided. An example would be the International Wolf Center ("IWC") in the small town of Ely, Minnesota. In a study conducted using 1995 data, the IWC was estimated to generate approximately \$3,000,000 from both direct operations and related tourism expenditures, and to generate 66 jobs.⁴ Significantly, the IWC draws visitors year round for wolf tours and education, not just for a limited period in the fall as is true of hunting visits. A similar operation in McCall or another small Idaho town would provide a large boost to the economy and year-round jobs and revenues.

Under the section "Regulated Harvest" (p. 16), it is stated that wolves should be managed similarly to other big game animals such as black bears and mountain lions. However, unlike the solitary bear or mountain lion, wolves live in a family pack structure with a defined hierarchy. The impact of hunting on the pack structure of wolves should be researched and understood before approving any hunting plans. For example, the impact of killing the alpha wolves of the pack may actually increase surviving immature members of the pack seeking out livestock as prey, and generate additional conflicts.

6. Data Analysis Units. A number of deficiencies are present here and elsewhere that should be corrected. For example, no provision is made for corridors for wolves to interbreed and disperse into adjoining states or other areas not currently occupied.

Livestock Depredation Control (p. 34): the Draft Plan does not provide specifics on how wolf control will be implemented in the case of wolf depredations. A detailed procedure for implementing wolf control measures should be established such as is contained in the Minnesota Plan recommendations at Appendix V, which includes reporting procedures, confirmation processes, certification of control officers, etc.

Nowhere does the Draft Plan place any responsibility on livestock producers to manage their livestock in a prudent and responsible manner. In the case of livestock conflicts, on public lands, livestock producers should be required to use best management practices to avoid wolf conflicts, and on private lands, should be encouraged to do so. See e.g., Minnesota Plan at Appendix VIII for examples of "Best Management Practices" for livestock producers.

Wolf-viewing Areas (p. 33-34): the requirement to have outfitters agree and provide compensation for outfitters who claim to be negatively impacted is not based in any law, is essentially privatizing Idaho's wildlife, and is nothing but pure speculation. This portion should be summarily dropped.

Section 7, Public Survey. While denominated a "public" survey, a cursory examination of its methodology shows this is a complete misnomer. The U.S. Census Bureau estimates Idaho's population at 1,466,465 for Idaho in 2006.⁵ Females compose 49.8% of the population, or about 730,299 persons.

⁴ Schaller, David T. Professor of Geography at the University of Minnesota, *The Ecocenter as Tourist Attraction, Ely and the International Wolf Center*, at <http://www.eduweb.com/schaller/IWCSummary.html>.

⁵ <http://quickfacts.census.gov/qfd/states/16000.html>

According to the Draft Plan, the following groups were sent the survey: 1,000 randomly selected Idaho citizens according to population distribution; 1,000 randomly selected hunters who hunted deer or elk in 2006, and 1,000 livestock growers--cow-calf operators and cattle ranches but not feedlots or dairies--randomly selected by the Idaho Department of Agriculture/National Agricultural Statistics Service ("NASS").

Ranch operators compose less than 1% of Idaho's population, and are disproportionately male compared to the general population.⁶ Their median age is also significantly older than that of the general populace.

Deer and elk hunters constitute an estimated 14% of Idaho's population.⁷ Again, the gender breakdown of this group is disproportionately male compared to the general population. Both of these groups are far more rural than the general population. Consequently, it is unfair to give these groups equal weight in the survey to the results from the general population.

As the Draft Plan further notes at p. 38, the random survey itself is suspect, due to going only to "head of household" addresses with landline phones, creating a "preponderance of older males." The totality of the survey yielded skewed results in no way representative of Idaho's citizens by gender or age.

In summary, the Western Idaho Office of WWP is on record in opposing the Draft Plan as currently written due to its numerous and pervasive scientific and sociological flaws. We respectfully request that IDF&G develop a new wolf management plan based on the wolf's unique biology and the values of all Idaho citizens.

Sincerely,



Debra Ellers
Western Idaho Director

⁶ NASS gives the total number of beef cattle ranching and farming operators as 10,938 in 2002; of these, female operators were 3,227, or approximately 29%.

http://www.nass.usda.gov/census/census02/volume1/id/st16_1_059_059.pdf.

⁷ IDF&G Big Game Harvest Survey July 1, 2005 to June 30, 2006, p. 6 "Summary of Big Game Harvest Estimates" lists deer hunters at 124,900 and elk hunters at 86,200 for a total of 211,100. It is likely that combining these figures overstates the total, due to the probability that some hunters hunted both species.