

May 19th, 2008

Attention: Cal Groen, Director
Idaho Department of Fish and Game
600 South Walnut/P.O. Box 25
Boise, Idaho 83707

Re: Idaho Proposed 2008 Wolf Hunting Season Comments

Dear Director Groen:

Defenders of Wildlife (“Defenders”), the Lands Council, the Western Watersheds Project, the Wolf Education and Research Center, and the Wolf Recovery Foundation wish to express our very serious concerns with the proposed 2008 wolf hunting season that Idaho Department of Fish and Game (“IDFG”) released May 6th, 2008.

The current Idaho wolf population is estimated at approximately 800 wolves in 42 breeding pairs however, the wolf hunting season framework allows for 328 wolves to be killed this fall and winter. The framework allows, and in certain areas compels, 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 framework will allow the killing of a very large percentage of 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, these proposed seasons and regulations:

- 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;
- Fail to adequately integrate wolf behavior, conservation biology and traditional harvest strategies based on species population viability;
- Would significantly impair the dispersal of wolves from Idaho to unoccupied wolf habitat in Washington and Oregon.

Our organizations, which collectively represent more than 10,000 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 \$1,000,000 for livestock losses since the program was founded in 1987, and The Bailey Wildlife Foundation Carnivore Conservation Fund, which since 1999, has assisted 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.

The Lands Council is a non-profit conservation organization, based in Spokane, Washington. We have 1400 members, many in Idaho, 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.

State Wolf Conservation Objectives

The state wolf conservation objectives identify that the state plans to kill or allow the deaths of 328 wolves, based on conflict measures that are not clearly defined, which would place an unjustified and artificial limitation on the wolf population. While Idaho state officials claim they want to manage wolves like they manage other wildlife, the facts speak otherwise. 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. It

also lacks consistency with IDFG reported data. For example, IDFG determined the total mortality quota of 328 wolves on a population increase of 15%, which does not account for the fact that the state population increase was only 8% last year. With protections for wolves further lowered by Senate Bill No. 1374, it seems that there will be more wolves killed for molesting livestock this year and more wolves killed because Idaho state prosecutors are unwilling to seek prosecution for illegal killing under this new law. As IDFG has noted on their Wolf Weekly reports, more than double the number of wolves have been lethally controlled in the month since delisting then during the corresponding month last year. The high number of wolves already killed, the weakening of protections for wolves under Idaho law, along with the high wolf harvest quotas could result in a wolf population below 500, the minimum stated in the IDFG Wolf Population Management Plan. Couple this with the reduced monitoring of wolves due to reduced funds from FWS, and Idaho will be managing wolves at a low number without the ability to accurately detect in a timely manner if the population falls too low.

Under this proposed framework, hunting would be allowed across the entire state, without consideration for the public to enjoy wolf viewing areas where hunting will be excluded. These 'Watchable Wildlife Areas' are mentioned in the Idaho Wolf Population Management Plan that was adopted on March 6th, which states that '...managers could prescribe low or no harvest in some GMUs or subunits within that DAU to promote wolf viewing opportunity.' Unfortunately hunting is allowed in all of the DAUs and no mention of wolf viewing areas are found in the new hunting framework. Even in areas such as Sun Valley, Stanley and Bear Valley which should be developed as prime wolf watching areas, wolf hunting, and outfitting still have priority over wildlife watching. The IDFG has the Idaho Watchable Wildlife Program, which is guided by the Idaho Watchable Wildlife Committee. Watchable Wildlife refers to any activity where people are enjoying, but not consuming wildlife, such as the photography of animals, plants, landscapes. The aim of the committee fits in nicely with the aforementioned viewing areas, yet the IDFG needs to reinstate these areas into its final wolf population management plan. 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 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 to date there is no documentation of genetically relevant wolf dispersal between Central Idaho and the Greater Yellowstone Ecosystem. By allowing an unlimited hunting quota in the Southern Idaho DAU, and having the quota in the Upper Snake DAU set at 6, which could effectively wipe out the Biscuit Basin Pack and the suspected Bishop Mountain Pack, the only two packs in this unit, any chance of genetic connectivity will be removed. The wolf plan should seek to maintain genetic diversity. Therefore the hunting quotas in these two DAUs should be zero.

Northwest Montana is the other recovery area that needs to maintain genetic connectivity with the central Idaho population, yet the hunting quotas in the DAUs bordering Montana are among the highest of the state (Lolo DUA quota: 50, Salmon DUA quota: 37). Again

these aggressive quotas could seriously undermine the viability of the northern Rockies population.

While we oppose hunting of wolves at this time, if a hunting season does move forward, we favor Alternative 1, the shortest season possible. Alternative 3 would allow wolves to be hunted for seven months of the year, which one of the longest seasons for a big game animal. It would allow for four month old pups to be killed, or else left without adults to feed and protect them. It would also mean that hunters would still be out in March when the females are heavy with pups and found near their dens. The loss of alpha females would also result in the loss of newborn pups. As wolves are only to be killed for trophies, i.e. for their head and hide, then there is no reason to begin the hunting season until later in winter when their coats have begun to fill out, so there is no reason to start any hunting season before October. So as not to disrupt breeding or denning, the hunting season should end well before spring time.

One very worrying omission in the proposed hunting rules is that using telemetry to hunt wolves is not prohibited. It states in the rules that wolves with radio collars may be shot, and leaves it to the hunter's discretion as to whether they kill the collared wolf or not. We feel it is important to the 'fair chase' ethics of hunting in Idaho that using radio telemetry not be allowed when hunting wolves. It costs time, money and resources to collar a wolf, and these collars are beneficial to the continued monitoring of wolves in addition to concerns over hunting fair chase issues.

The Dworshak-Elk City and Lolo Zones

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). 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, 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. The premise that wolves are degrading hunter opportunity and success cannot be shown by IDF&G data, so there is no reason to have such high wolf quotas in these two zones (Lolo Zone: 50, Dworshak-Elk City:43). In these areas there are very few incidents of livestock conflicts, and if the wolf hunt plan is based on conflicts, then these quotas are unreasonably high. 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.

Summary

We support a number of rules in the proposal, such as prohibiting trapping seasons this year, electronic calls, baiting or the use of dogs to attract or pursue wolves. We feel these are all steps in the right direction. Yet in the face of all these good regulations, IDFG has put forth a wolf hunting plan with a goal of dramatically reducing Idaho's wolf population by having very high mortality quotas. There is no justification for killing so many wolves. While our preference remains that IDFG not adopt any hunting season for the first five years after delisting, if any of these options are chosen, we request that IDFG chose the shortest hunting season, i.e. Alternative 1, and reduce the quotas in all of the DAUs so as to support a healthy, thriving wolf population in numbers that maintain the integrity of the regional wolf meta-population.

We appreciate your consideration of these comments.

Sincerely yours,



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