

April 10, 2006

U.S. Fish and Wildlife Service
Western Gray Wolf Recovery Coordinator
585 Shepherd Way
Helena, Montana 59601

Re: RIN number 1018-RU53 Advance Notice of Proposed Rulemaking regarding gray wolves in the northern Rocky Mountains

On behalf of Defenders of Wildlife (“Defenders”), Oregon Natural Desert Association (“ONDA”), Klamath-Siskiyou Wildlands Center (“KS Wild”), Gifford Pinchot Task Force (“GP Task Force”), The California Wolf Center (“CWC”), Wolf Education and Research Center (“WERC”), Western Watersheds Project (“WWP”), Oregon Natural Resources Council (“ONRC”), Friends of the Clearwater, Wolf Recovery Foundation (“WRF”), Hells Canyon Preservation Council (“HCPC”), Boulder-White Clouds Council, (“BWWC”), and Cascadia Wildlands Project (“CWP”), we thank you for the opportunity to comment on the U.S. Fish and Wildlife Service’s (“Service”) advance notice of proposed rulemaking (“pre-proposal”) to designate the Northern Rocky Mountain (NRM) population of gray wolf as a distinct population segment (DPS) and remove the NRM DPS of gray wolf from the federal list of endangered and threatened wildlife.

Defenders is a national non-profit conservation organization with more than 490,000 members and supporters nationwide. Ours is a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend, and we have been involved in such efforts since our establishment in 1947.

ONDA is an Oregon non-profit public interest organization of approximately 1000 members. It is headquartered in Bend, Oregon and also has offices in Portland, Oregon. ONDA’s mission is to protect, defend, and restore forever the health of Oregon’s native deserts. ONDA has been actively involved in wolf recovery issues in Oregon, and the members and staff of ONDA use and enjoy the natural resources of eastern Oregon for many uses including wildlife watching.

KS Wild is a non-profit organization located in southern Oregon with more than 1,000 members. KS Wild has worked to protect the outstanding biological diversity, including extirpated species like the gray wolf, of the Klamath-Siskiyou and Southern Cascades regions since 1997.

GP Task Force is a non-profit organization with over 3,000 members. We work to preserve and restore the ecosystems and communities of southwestern Washington by promoting conservation of forest ecosystems and sustainable restoration-based employment.

CWC focuses on education, conservation and research relating to the intelligent recovery of gray wolves in the western United States as part of a broader effort to restore and maintain healthy north American ecosystems.

WERC is dedicated to providing public education and outreach concerning the gray wolf and its habitat in the Northern Rocky Mountains. It is our goal to provide the public the opportunity to observe and learn about wolves in their natural habitat. WERC's interpretive visitor center provides an opportunity for our visitors to interact with the staff and to experience some hands on education opportunities by way of pelts, bones and replicas of skulls and tracks.

WWP is an Idaho not-for-profit conservation organization with over 1,500 members. WWP owns and operates 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 and Utah. The mission of Western Watersheds Project is to protect and restore western watersheds and wildlife through education, public policy initiatives and litigation.

ONRC, headquartered in Portland, Oregon, is a non-profit corporation with approximately 5,000 members. ONRC's mission is to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy. ONRC's goals include protecting the state's remaining old-growth forests and roadless areas and restoring fully-functional terrestrial and aquatic ecosystems with a full complement of native species, including the gray wolf. ONRC works with a broad cross-section of citizens, charitable groups, businesses, and government agencies at all levels to incorporate environmental concerns into democratic and economic institutions.

Friends of the Clearwater is a Moscow-based conservation organization whose goal is education about and preservation of the biodiversity and wildness of the public land in the Clearwater Basin of north-central Idaho. Friends of the Clearwater's members are mainly in the region but many are also scattered throughout the United States. We have taken a keen interest in wolf recovery for the past decade.

WRF is a 501(c)(3) non-profit corporation incorporated in the state of Idaho. Our mission is to foster our heritage of wild wolf communities by advocating their presence forever in places where they have been extirpated. WRF advances its mission through efforts in public representation, information and outreach, networking with the agencies, organizations, tribes and universities, and through workshops, conferences, special events, and comments on important documents.

HCPC is a 501(c)(3) non-profit organization with a staff of 5 and 2,400 supporters. Our region of northeast Oregon includes the Hells Canyon-Wallowa Mountains and Blue Mountains Ecosystems and this region stretches well into the Payette National Forest in Idaho. We work collaboratively with a variety of local organizations and individuals, which lend credibility to our chosen work in La Grande. Being close to local interests and agency decision making processes is an advantage that other urban-bound organizations simply don't have. One of our three major programs is *Wolf Recovery in Oregon* and we have a significant legal interest in protecting wolves in the Hells Canyon National Recreation Area as well as in the surrounding land where they will likely recolonize from Idaho.

BWCC was formed in 1989 to gain permanent protection for the 500,000-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. Our mission includes providing accurate information on many issues to our supporters, the public at large, media, elected officials, and other conservation organizations in Idaho, the northern Rockies, the Northwest, and nationally, including Washington, D.C.

CWP is a non-profit conservation organization founded in 1997 with 600 members throughout the United States whose mission is to defend the forests, waters and wildlife of the bioregion by educating, organizing and agitating for a more compassionate and responsible relationship with the ecosystems of our bioregion.

We commend the Service for the remarkable achievement of restoring wolves to portions of their former range within the NRM region, and we encourage the Service to continue promoting the expansion of this species across the remaining suitable habitat within the western United States.

Our comments and questions are as follows:

I. WHETHER THE NORTHERN ROCKIES GRAY WOLF POPULATION QUALIFIES AS A LISTABLE ENTITY AS A DISTINCT POPULATION SEGMENT.

We acknowledge that the U.S. northern Rockies gray wolf population may constitute a Distinct Population Segment (DPS) as that term is defined by the FWS/NMFS DPS policy.

First, there is no doubt that this wolf population is discrete from the population in Canada based on an international boundary that demarcates differences in control of exploitation, conservation status and regulatory mechanisms, and we concur that morphological differences seem to distinguish the wolves of the northern Rockies from other wolf populations (e.g., higher percentage of wolves with black pelage, on average are larger in

size and weight than the Mexican gray wolf, etc.). We also agree that this population is separate from other wolf populations due to geographic and ecological factors.

Second, there can be no question that the northern Rockies gray wolf population is exceedingly significant to the taxon as a whole. Most importantly, as one of only three existing gray wolf populations in the coterminous U.S., the northern Rockies gray wolf population is absolutely critical to the species' conservation in the U.S. Moreover, this population persists in an ecological setting that is vastly different from the wolf populations in the western Great Lakes and southwest. For example, all three regions differ in climate, vegetation, topography and prey. Climate, vegetation, topography and major prey base are also different for wolves dispersing outside of the core northern Rockies wolf recovery area. Wolves traveling west from within the northern Rockies would encounter high desert and then a Pacific maritime ecology. To the south, wolves would encounter high desert and then rugged desert terrain. To the east, they would encounter a prairie regime. Wolves in the northern Rockies are thus significant not only for the gap their loss would cause but also for the unique ecological setting in which they reside.

However, because of the unique ecological setting of the northern Rockies and the distinctly different ecological setting wolves dispersing outside of the northern Rockies would encounter, the Service should not sweep up portions of neighboring states as part of a northern Rockies DPS merely to appease political concerns. Instead, the Service must utilize the best scientific and commercial evidence to ascertain appropriate boundaries within the northern Rockies ecosystem. This is discussed in more detail below.

II. WHETHER DELISTING IS WARRANTED FOR THE NORTHERN ROCKIES GRAY WOLF POPULATION.

At this time we strongly oppose delisting wolves in the northern Rockies for the following reasons:

In October of 2005, the Service published a positive 90-day finding in response to a petition filed by the state of Wyoming and the Friends of the Northern Yellowstone Elk herd requesting the establishment and delisting of a NRM DPS. During the ensuing public comment period, Defenders submitted comments regarding the merits of establishing a NRM DPS that included the states of Montana, Idaho and Wyoming, and whether delisting that DPS was appropriate. We stated then that we acknowledge that the northern Rockies gray wolf population may constitute a DPS but oppose delisting that population in light of Wyoming's inadequate wolf management plan. We continue to oppose delisting of a NRM DPS until Wyoming's wolf plan is modified to meet conservation standards. In addition, we continue to have significant concerns regarding Idaho's plan, which we expressed in comments submitted during a public comment period held in 2002 (a copy of our comment letter on Idaho's plan is attached). We remain deeply concerned by the vagueness of the Idaho wolf management plan and by the state's official position on wolves, set forth in the opening pages of the state wolf

plan: The 2001 House Joint Memorial 5 that calls for the removal of all wolves from Idaho by “whatever means necessary.” The Idaho state wolf plan also authorizes state management dependent on federal funding, which is not expected to be secured upon delisting. Beyond our ongoing concerns about the state wolf plan for Wyoming and Idaho, however, we also have strong concerns regarding the incorporation of portions of three additional states to create the proposed NRM DPS. These and other issues are discussed in more detail below.

A. Wyoming’s state wolf plan is insufficient.

The Service cannot delist the proposed NRM DPS until Wyoming’s state plan meets the regulatory requirements of the Endangered Species Act (ESA). Federal approval of Wyoming’s state wolf plan has not been given because the Service rightfully shares the concerns of conservation groups that Wyoming’s state wolf plan fails to provide adequate regulatory mechanisms to assure that the state’s wolf population would remain viable. On July 15, 2002, we submitted our comments to the Service regarding the inadequacy of Wyoming’s state plan. To date, the state has failed to make necessary changes (a copy of our comment letter on Wyoming’s plan is attached). The failure of Wyoming to prevail in its lawsuit challenging the federal government’s refusal to approve their wolf plan has not stimulated the necessary changes to the plan. Despite Wyoming’s intransigence, for a state wolf plan to be accepted by the Department of the Interior it must meet minimum federal statutory standards, specifically those required under the Endangered Species Act.

As the state has yet to remedy any of the concerns expressed in our comment letter and by the Service, we remain strongly opposed to Wyoming assuming primary management control of wolves within their borders. The only Service-approved state plans in the northern Rockies at this time are from Idaho and Montana. By its own repeated assertions in federal documents pertaining to wolf recovery in this region, the Service shall not delist wolves regionwide without Wyoming completing a state plan in compliance with the ESA. Should the Service consider a DPS designation or delisting of Idaho and Montana without Wyoming, our concerns regarding this potential option are set forth below.

B. Idaho’s State Wolf Plan is Insufficient and its Management Actions are Flawed.

We additionally have significant concerns regarding Idaho’s state wolf plan and expressed those concerns in our comments submitted to the Service in 2002. Idaho’s state wolf plan sets forth in its introductory pages the official position of that state which is to remove wolves “by any means necessary” and the state plan allows for removal of all wolves down to the 15-pack safety margin the state agreed to maintain. At current wolf population levels in Idaho, this would result in the allowable killing of two-thirds of Idaho’s current wolf population. Indeed, Idaho’s first proposed wolf management action upon assuming management authority in January 2006 under a Memorandum of Agreement with the Department of the Interior was to kill 75% of the wolves in the Clearwater National Forest to increase the resident elk population. This decision was made despite overwhelming scientific opinion that habitat conditions, not predation, have

been responsible for elk decline in that region. If Idaho (and/or Montana, whose state plan allows for a similar reduction in pack numbers but has a stronger pro-conservation wolf management plan) takes deliberate actions to remove significant numbers of wolves, long-term viability and success of the program would be jeopardized.

C. The Inclusion of Portions of Three Additional States That Were Not Included in the Original Recovery Plan for the Northern Rockies Requires Further Examination.

The proposed NRM DPS expands the region designated as the Northern Rockies Recovery Area to include the eastern one-third of Washington and Oregon and a small portion of north-central Utah. This was done despite repeated assertions by the Service over the years that wolf recovery in the northern Rockies does not require the inclusion of Washington or Oregon (USFWS 1980, USFWS 1987, USFWS 1994, USFWS 2003). Further, the Service has included portions of these states in the DPS while simultaneously stating they do not include suitable wolf habitat and would not contribute to the wolf's habitation of a significant portion of its range within the proposed NRM DPS. While the Service's intent in including the additional states may be to create a buffer for dispersal of wolves from the northern Rockies core population, instead their boundary placement arbitrarily severs a crucial travel corridor for wolf dispersal from the northern Rockies to the west. In the absence of federal safeguards, unless there are adequate state protections in place, wolves will likely be subject to high mortality levels jeopardizing population viability and dispersal.

The placement of the proposed boundaries for the DPS raises significant questions, not the least of which is whether the Service's expansion of the boundaries from the original northern Rockies recovery area requires a corresponding expansion of population recovery goals for the newly-included areas. Another key question is what the Service intends to do regarding federal protections outside the NRM DPS once that region is delisted. Other essential questions include the following:

- Will the Service insist that all states within the DPS have Service-approved wolf plans prior to downlisting?
- Will the Service require that wolves be present in all states that are part of the DPS prior to downlisting?

In addition to the above overarching questions, specific questions regarding the designated boundaries merit answers:

- Why does the Service use roads to set boundaries on the West side of the DPS in Oregon and Washington and on the South side where the boundary dips into Utah, and state lines on the East side?
- Is there a biological basis for using roads to demarcate DPS boundaries?
- Are there natural features that would better delineate the boundaries?

- Did the Service consider using the Snake and/or Columbia Rivers as boundaries?

Answers to these questions are needed before we can adequately comment on the proposed boundaries of the NRM DPS.

D. Changing goalposts, unstable populations in northwest Montana, and disease.

The foundation of population viability is representation, redundancy, and resiliency. While the number of wolves in the northern Rockies has grown significantly over the last decade, the original premise scientists used to establish recovery goals for the NRM wolf population has not yet been realized: the connectivity between the northern Rockies and southern Canadian wolf meta-population. In the 1994 Environmental Impact Statement (EIS) review, Dr. Steve Fritts, EIS Team Wolf Scientist and Northern Rocky Mountain Wolf Recovery Coordinator, bases the Service's population goals for wolves in the northern Rockies on a premise that this population "would be connected to the Canadian population via the Rocky Mountain chain northward from Glacier National Park [in Northwest Montana] to the Banff Jasper Parks in Alberta and B.C." (USFWS 1993). Dr. Fritts concludes "That corridor may be vital to the long term future of wolves in the Northern Rockies of the U.S." (USFWS 1994a). The Service also conducted a review by a "wide diversity of professional peer reviewers" who concluded that some minimum level of connectivity among the U.S. subpopulations and with the larger wolf population in Canada was *necessary* to guarantee long-term persistence" (USFWS 2003). Instead of guaranteeing this connectivity, the northwest Montana wolf population has lagged significantly behind the other wolf recovery areas (central Idaho and the Yellowstone ecosystem) due to heavier use of lethal control at low population levels and illegal killing.

While the Service's pre-proposal claims that there is connectivity with the Canadian wolf population, it only references two dated studies: Pletscher et al 1991 and Boyd and Pletscher 1997. However, Dr. Dan Pletscher has recently identified that there appears to be a troubling lack of connectivity between the Canadian wolf population and the NRM wolf population (D.Pletscher, personal communication, March 2006). In light of this more recent information, we believe that the lack of connectivity with the Canadian wolf population remains a critical issue as it relates to population viability and gene flow that the Service must adequately address before delisting the NRM wolf population.

The northern Rockies gray wolf recovery zone, designated as the two reintroduction areas of Yellowstone National Park and central Idaho, plus the naturally-recolonized region of northwestern Montana, were intended to achieve viable population status, with three discrete wolf populations reproducing, dispersing, and providing genetic flow between the three regions and the wolf population in Canada sufficient to meet scientific standards for a viable meta-population. While the reintroduced 10(j) populations in central Idaho and Yellowstone National Park have flourished, the fully endangered wolf population in northwestern Montana has stagnated, in part due to the heavy reliance by the Service on

lethal control of wolves in this region. As a result, the Service has not reached population goals outlined in the recovery plan of 10 breeding pairs for three consecutive years in each of these three regions nor has a reliable link to the Canadian wolf meta-population been established. Rather than amend its heavy reliance on lethal control of wolves, the Service instead changed the population goals to 30 breeding pairs across the three regions for three consecutive years.

Though the overall population of the northern Rockies recovery area has reached nearly 1000 wolves at the end of 2005, the population in northwestern Montana has not shown a constant upward trend but has instead, starting from a recorded population of 66 wolves in 1995, peaked at an estimated 108 wolves in 2002 and then declined again by 54 percent to only 59 wolves in 2004. The Service has thus relied on the two other regions within the northern Rockies recovery area to meet their new, redistributed goals. Yet, one of these other areas, Yellowstone National Park, has itself seen a downturn in the wolf population in the last year. Following the conservation biology principles of redundancy, representation and resiliency, a population decline in two of the three geographic areas within the recovery zone is of significant concern.

In Yellowstone National Park, the wolf population is down from 171 wolves in 16 packs in 2004 to only 113 wolves in 11 – 13 packs in 2005. Pup survival in Yellowstone this past year is at a low of 19 pups within the entire park, after a spring that saw the birth of 28 pups. According to National Park Service wolf biologists, a high incidence of disease, parvo, seems to be responsible for the high level of pup mortality this year.

In addition, mange has reportedly been recently discovered in wolves in the Payette National Forest in Idaho. Though the Service's NRM DPS pre-proposal included some discussion of the potential impacts of disease on the region's wolf population, this pre-proposal was issued prior to the discovery of mange in Idaho. A thorough analysis should be conducted regarding the status and severity of this new disease outbreak. With two distinctly different diseases (mange and parvo)-- each capable of negatively impacting the region's wolf population -- appearing in two separate areas of the recovery area, an analysis of their combined potential impact on the wolf population is warranted.

E. Insufficient elapsed time to judge genetic flow among the three regions.

Too little time (in wolf generations) has elapsed to accurately assess the genetics of the northern Rockies wolf population as reliable evidence for the existence or lack of connectivity among the three-state area and with Canada. Genetic researchers have recently characterized over 500 individuals from the 1995 reintroduced Canadian wolves through individuals sampled in 2005. They determined that Montana, Idaho and Yellowstone populations are "genetically distinct" and while some limited migration has occurred, "genetic exchange has been minimal and the populations remain effectively isolated from each other" (Von Holdt et al 2006).

F. Risk of state management plans becoming unfunded, and therefore unenforced, mandates.

Before the Service can seriously consider creating and delisting an NRM DPS, the Service must be assured that adequate funding will be available to implement and enforce the wolf conservation measures set forth in the Idaho, Montana and Wyoming state management plans. Moreover, because state-funding of wolf management programs are key to the long-term success of the recovery efforts, only the funded aspects of the state management plans can be properly considered in the Services' delisting calculus. In other words, the Service cannot rely on unfunded mandates or otherwise meaningless regulatory mechanisms to justify the delisting of an NRM DPS. Funding is necessary to assure appropriate monitoring of the wolf population as it changes over time. This need is especially apparent in light of Idaho's announced intention to reduce their state wolf population by two-thirds down to the minimum 15 breeding pairs their plan requires.

III. CREATING A NRM DPS THAT INCLUDES IDAHO AND MONTANA BUT ENTIRELY EXCLUDES WYOMING OR INCLUDES ONLY THOSE PORTIONS OF WYOMING THAT ARE SOLELY UNDER FEDERAL CONTROL.

The Service has consistently, throughout recovery planning, EIS's and subsequent scientists' peer reviews maintained the necessity of a tie among the states of Montana, Idaho and Wyoming, for constructing an interconnected metapopulation of wolves in the northern Rockies. Any attempt to parcel out a delisting for the states of Idaho and Montana simply because the state of Wyoming refuses to modify its state wolf plan and state laws to assure an adequate regulatory mechanism for wolf conservation and management would be politically motivated and is expressly outlawed by the ESA which requires that listing and delisting decisions be based only upon the best available scientific and commercial data.

IV. ADDITIONAL ISSUES REQUIRING CONSIDERATION BY THE SERVICE.

Placing the westernmost edge of the boundary for the proposed NRM DPS in an area the Service suggests is a wolf sink seems difficult to justify biologically. The Service is aware of several studies documenting suitable wolf habitat in western Oregon and western Washington (Carroll et al., 2001; Larsen, 2004; Carroll et al., 2006), and its placement of the western boundary line appears designed to operate as a moat to keep wolves from dispersing westward, rather than a bridge to aid in natural dispersal and recovery into the Cascades and beyond. As currently placed, the boundary cuts across critical wolf dispersal corridors in northeastern and southeastern Washington, and in northeastern Oregon. At the very least, the boundary placement should not act as a potential impediment to wolf dispersal westward.

Viewing the proposed boundaries from the perspective of state wildlife agencies in Oregon, Washington and Utah, additional significant concerns arise. The Service is well aware of the Oregon wolf plan's inclusion of a dividing line near the center of the state for management purposes under state law. Placing the NRM DPS boundary line within

the state of Oregon yet to the east of the state plan dividing line will create serious management difficulties for the Oregon Department of Fish and Wildlife, and extreme confusion for Oregon citizens, as it effectively results in three potentially differing management treatments. And, even with no state plan yet in place, the Washington Department of Fish & Wildlife opposes the Service creating two different management scenarios within the state by drawing the western boundary across the eastern one-third of Washington. Similar concerns are being raised by stakeholders in Utah. While it is correct that the states of Idaho and Montana have lived under management regimes that differ in different parts of those states, these states have always been part of the northern Rockies Recovery Area for wolves, with goals set for wolf populations and standards set for state wolf plans. This is not true of the adjacent states that are now under consideration for inclusion in the proposed NRM DPS and there is no biological or legal justification for imposing a split state management regime in these states.

V. SUMMARY.

We acknowledge that the Northern Rockies Recovery Area may qualify for designation as a DPS but is opposed to any reduction or removal of federal protections in the region prior to Wyoming adopting a state wolf plan that meets ESA standards to assure adequate regulatory mechanisms are in place and threats against the wolf have been addressed. In addition, Idaho must strengthen its wolf management plan to remove the House Joint Memorial 5 and clarify and enhance its conservation objectives

The boundaries proposed for the NRM DPS raise numerous significant questions that must be answered by the Service before the public can adequately comment on the area included within the boundaries.

The areas outside of the original northern Rockies recovery area should be viewed as potential areas for dispersal that must retain full federal protections for wolves that migrate beyond the northern Rockies core habitat and which provide the genesis for wolf recovery in the Pacific western states of Washington, Oregon and California, as well as Nevada and Utah.

We oppose any attempt to create a DPS that includes Idaho and Montana but which excludes any or all portions of Wyoming.

We recommend the Service create a NRM DPS that focuses on that area that is deemed necessary for the long-term success of northern Rockies wolf recovery efforts. To the extent possible by law, and justifiable biologically, the boundaries of the DPS should remain within the states of Idaho, Montana and Wyoming. In addition, the Service should require the development of wolf conservation and management plans in compliance with the ESA, prior to reduction or removal of federal protections for wolves in the NRM DPS. Should the Service include portions of adjacent states beyond those historically contemplated, it needs to recalibrate the population goals and occupation of the DPS landscape necessary to ensure long-term viability.

Thank you for the opportunity to provide comments on the Service's proposed designation of a NRM wolf DPS.

Sincerely,

Wm. Robert Irvin
Senior Vice-President Conservation Programs
Defenders of Wildlife
1130 Seventeenth Street, NW
Washington, DC 20036
202-682-9400
www.defenders.org

Kristin Ruether, Staff Attorney
Oregon Natural Desert Association
917 SW Oak Street, Suite 409
Portland, OR 97205
503-525-0193
www.onda.org

Joseph Vaile, Campaign Director
Klamath-Siskiyou Wildlands Center
P.O. Box 102
Ashland, OR 97520
541-488-5789
www.kswild.org

Ryan Hunter, Program Director
Gifford Pinchot Task Force
917 SW Oak St., Suite 410
Portland, OR 97205
503-221-2102 ext. 101
www.gptaskforce.org

Patrick Valentino, Executive Director
California Wolf Center
P.O. Box 1389
Julian, CA 92036
619-234-9653
www.californiawolfcenter.org

Roy Farrar, CEO
Wolf Education and Research Center
111 Main Street, Room 150
Lewiston, ID 83501
208-743-9554
www.wolfcenter.org

Jon Marvel, Executive Director
Western Watersheds Project
P.O. Box 1770
Hailey, ID 83333
208-788-2290
www.westernwatersheds.org

Doug Heiken, Field Representative
Oregon Natural Resources Council
5825 N. Greeley Ave.
Portland, OR 97217
503-283-6343
www.onrc.org

Gary Macfarlane, Ecosystem Defense Director
Friends of the Clearwater
PO Box 9241
Moscow, ID 83843
208-882-9755
www.wildrockies.org/foc/

Ralph Maughan, President
Wolf Recovery Foundation
PO Box 444
Pocatello, Idaho 83204

Mike Medberry, Executive Director
P.O. Box 2678
La Grande, Oregon 97850
541-963-3950
www.hellscanyon.org

Lynne K. Stone, Director
Boulder-White Clouds Council
Box 6313
Ketchum ID 83340
www.wildwhiteclouds.org

Josh Laughlin, Executive Director
Cascadia Wildlands Project
POB 10455
Eugene, OR 97440
541.434.1463
www.cascwild.org

Literature cited

Carroll C, Noss NF, Shumaker NF, and Paquet PC. 2001. Is the return of the wolf, wolverine and grizzly bear to Oregon and California biologically feasible? Pages 25 -46 in Maehr D, Noss NF, Larkin J, eds. Large Mammal Restoration: Ecological and Sociological Challenges in the 21st Century. Washington, DC. Island Press.

Carroll C, Phillips MK, Lopez-Gonzalez CA, and Schumaker NH. 2006. "Defining recovery goals and strategies for endangered species: The wolf as a case study." *BioScience* 56: 1 – 13.

Larsen T. 2004. Modeling gray wolf habitat in Oregon using a geographic information system. Masters Thesis, Oregon State University.

United States Fish and Wildlife Service. 1980. Northern Rocky Mountain Wolf Recovery Plan. USFWS. Denver, Colorado.

United States Fish and Wildlife Service. 1987. Northern Rocky Mountain Wolf Recovery Plan. USFWS. Denver, Colorado.

United States Fish and Wildlife Service. 1993. The reintroduction of gray wolves to Yellowstone National Park and Central Idaho: Draft Environmental Impact Statement. Helena (MT): USFWS.

United States Fish and Wildlife Service. 1994a. The reintroduction of gray wolves to Yellowstone National Park and Central Idaho: Final Environmental Impact Statement. Helena (MT): USFWS.

United States Fish and Wildlife Service. 2003. Final Rule to designate 3 District Population Segments and change the ESA status of the Gray Wolf throughout most of the lower 48 states. *Federal Register*, Vol. 68. No. 62, April 1, 2003.

Von Holdt B, Pollinger J and Wayne R. 2006. Who's your daddy? – Results from a genetic study of the Yellowstone, Idaho and Montana Wolf populations. Proceedings from the 2006 North American Wolf Conference. April 6, 2006. Pray, Montana.

- Addendums

Defenders' comments regarding the Idaho state wolf management plan

Defenders' comments regarding the Wyoming state wolf management plan