



February 16, 2006

Attention: Director Steve Huffaker
Idaho Department of Fish and Game
P.O. Box 25
Boise ID 83707

Comments re: IDFG wolf control proposal entitled "Effects of Wolf Predation on North Central Idaho Elk Populations."

On behalf of Defenders of Wildlife ("Defenders"), we thank you for the opportunity to comment regarding the Idaho Department of Fish and Game's (IDFG) proposal to take wolves in the Lolo District of the Clearwater National Forest. Defenders is a national non-profit conservation organization with more than 480,000 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. We have reviewed the proposal released by the IDFG on January 24, 2006 and vigorously oppose the agency's decision to kill wolves in the region based on the proposal's conclusions.

Overall, the proposal is based on weak assumptions and conclusions that are unsupported by existing data. For example, the elk population was already declining in the early to mid 1990's, prior to wolf restoration. On top of this decline, IDFG increased the cow harvest in order to increase calf recruitment, as a result of the agency's determination that elk decline was due to long-term **habitat** change caused by succession, that reduced elk habitat quality and carrying capacity. However, the elk population continued to decline. When wolves arrived in Idaho, the already declining elk population was subjected to a harsh winter and increased hunting pressure. Despite a decline that began in the early 1990's, IDFG did not eliminate controlled cow elk hunts until 1998, and some annual cow elk hunting is apparently still allowed to continue.

Compelling historic evidence points to the habitat limiting the carrying capacity of elk (as previously recognized by IDFG) due in large part to reforestation that has occurred since the wide-ranging fires of 1910 to 1934. According to the Clearwater Elk Initiative, an alliance of landowners, government agencies and wildlife organizations established in 1998 to address the significant declines in the Clearwater elk population, these fires opened up enormous shrub fields, which provide excellent habitat for elk. As a result of the fires and limited access to hunting, the elk population swelled to over 36,000 animals, becoming the largest herd in Idaho and one of the largest in the nation. In 1997, the elk population plummeted by as much as 50 percent as a result deep winter snows that year. Due to fire

National Headquarters
1130 Seventeenth Street, NW
Washington, DC 20036
Telephone: 202-682-9400
Fax: 202-682-1331
www.defenders.org

suppression, this habitat has since returned to a more densely forested landscape, which supports fewer elk, and which IDFG clearly acknowledges in the Question and Answer segment of the Clearwater Wolf Control Proposal:

“Q. The Clearwater Region once was considered some of the best elk habitat and hunting in the country, what happened?”

*A. Large fires from 1910 to 1930 improved elk habitat in the Clearwater Region. Human suppression of wildfire since 1939 has nearly eliminated large-scale wildfire in the area, allowing dead and downed timber to accumulate across the landscape, increased mid-seral forest stands, and **reduced early-seral and open forest conditions preferred by elk.**”*

Hunters since that time have also increased their ability to access remote areas through use of ATVs and liberalized hunting seasons. The Clearwater Elk Initiative has determined that **“It will likely take a decade or more of habitat treatments to make a detectable difference on a basin-wide (or herd) scale.”** Instead of recognizing the natural limiting factors that have influenced elk in this region, IDFG’s study has chosen to use wolves as a scapegoat by proposing to kill 75 percent within the Lolo district, which would be continued for five years. This is clearly a politically, not biologically, based decision.

The proposal lacks critical information, is based on weak or incorrect assumptions, and the conclusions violate the Endangered Species Act, the National Environmental Policy Act, and the U.S. Fish and Wildlife’s 10(j) rule for the experimental, nonessential wolf population within Idaho.

Specifically, our concerns are:

I. Research data lacks highly important information

- **Missing age-structure:** The proposal assumes that “wolf predation is, at a minimum, partly additive.” However it does not report any age-class data on elk in the sample that were killed by wolves (8 of 25 cow elk). **Without age structure data, it is impossible to know whether elk mortality is even partially additive or compensatory.** Yellowstone research shows that the average age of cow elk killed by wolves is 14 years old. If this is the case in the Lolo Zone, it suggests that elk mortality is more compensatory than additive because old elk are more likely to die during the winter than are younger elk.
- **Incomplete historical elk data:** The proposal presents elk population data since 1989 for GMU 10 (Fig. 1) and 1985 for GMU 12 (Fig. 2) instead of including the complete historic data set from this region. It appears that data are presented to emphasize elk populations at their peak, thereby skewing the graphics towards representation of a subsequent decrease. It is quite possible that in GMU 10 in 1988, the population was lower prior to when the graph in Fig. 2 begins displaying in 1989, **thereby giving the false impression that the population was high all along and only decreased around the time wolves appear.** As presented, the elk population data fails to provide an

appropriate historical perspective, including natural oscillations of the population over time.

- Alternative prey sources: The proposal does not include or address alternative prey sources used by wolves, which would constitute a more thorough analysis. Citing relative abundance of alternative prey would help readers decipher whether wolf diet might be chiefly composed of elk, or other species as well, particularly moose, white-tail or mule deer. A comprehensive study on wolf diet should be conducted to describe the extent of alternative prey sources. Ideally, GPS collars that are downloadable in the field would allow biologists to find kill sites. Technicians can go to such kill sites and determine the prey species.
- Age class and condition of cow elk: Yellowstone research indicates that wolves are inefficient predators, meaning that they cannot take just any healthy animal they want. Rather, they tend to take elk that are vulnerable, such as elk calves and older cow elk (average age 14-yrs). IDFG's data, however limited, show that wolves in GMU's 10 and 12 are rarely taking calves. If wolves are taking cow elk in the Clearwater National Forest of similar age to those in Yellowstone, the reproductive potential of the herd is less diminished than if younger cows were being taken.

II. Research is based on weak, vague or incorrect assumptions

- This proposal shows that the main proximate problem of low elk population numbers is due to low calf recruitment. However the data, albeit scant, show that wolves are rarely taking calves (see top of pg. 9: calf:cow ratio declines by 50% in GMU 12 from 2004-5, and 25% in GMU 17.) There were no radio-collared elk at all in GMU 17 to determine what killed those calves. Including a graph of declining elk and the reintroduction of wolves implies a relationship, which is not substantiated by data demonstrating the cause and effect of this relationship.

III. The research is poorly designed

- Poor short-cut to measure increases in cow elk survival: The proposal states that "Complete (aerial) surveys will be conducted every 3-5 years and composition surveys will be flown during intervening years" (pg.3, #6). A complete survey is an entire population count and a composition survey would gather calf/cow ratio and cow/spike/bull ratios. A composition survey is a short cut where an increase in calf/cow ratios would signify that the overall population is increasing. The authors state that composition surveys "do not provide the data needed for a population estimate (pg.8, #2)." This methodology is problematic for several reasons: If wolves are to be controlled for five years, this means that only one complete GMU-wide survey will be conducted during this interval. Whereas wolves would be killed for five years, the agency will only check once during this entire period to see if control is actually effective. No convincing trends could be derived from a sample size of one. **IDFG claims that wolves are reducing cow elk survival but the agency is not going to count the entire elk population every year while they are removing wolves.**
- Low sample size: Due to the low sample sizes reported in this proposal (64 collared cows out of 3,113 cow elk = 2%), studies of longer duration and with larger sample sizes for elk mortality are recommended. The proposal does not provide adequate

information regarding the location of the elk sampled in the study: was it biased toward elk in specific areas that were easy to catch due to terrain or other variables?

Overall the plan is seriously flawed, fails to meet the minimum standards of a valid research study, and completely ignores important data that contradicts the study's conclusions. According to Idaho ungulate expert Dr. Jim Peek, many elk populations across the Western states tended to peak in the late 1980s through the mid-1990s and declines since that time. He stated, "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."

Additionally, many of these areas experiencing declines contain no wolves, and some areas that are experiencing high elk populations also contain higher wolf numbers. Even the study's only two expert peer reviewers note that the proposal's conclusions are based on weak or unreliable assumptions and that the conclusions are unsupported by the data. We encourage IDFG to re-evaluate the data and its strong implication that habitat, not wolves, is the primary limiting factor influencing elk mortality in this Zone. If indeed the carrying capacity for elk in the Lolo Zone has decreased, current management objectives are inappropriate and should be lowered to reflect current habitat conditions.

Beyond the inherent weaknesses and failures of the IDFG proposal, it also violates the Endangered Species Act and the National Environmental Policy Act. On January 6, 2005, the US Fish and Wildlife Service revised the "10(j)" rule governing the "experimental, non-essential" Idaho wolf population. The rule allows states and tribes the authority to kill wolves that are causing *unacceptable* impacts to elk and other big game prey, which is defined as a "**State or tribally-determined decline in a wild herd or ungulate population, primarily caused by wolf predation...**" (70 Fed Reg. 4 at 1307). The data in this proposal fails to demonstrate that wolves are the primary cause of elk decline, but instead reinforces that habitat changes remain the primary cause of decline. Therefore, the proposal fails to meet the prerequisites established within the revised 10(j) rule.

In addition, the proposal does not indicate how the wolves will be removed, or by whom, or the estimated cost of such actions over a five year period. If USDA Wildlife Services, a federal agency, is contracted to kill these wolves, it will involve federal funding to support their actions. Any federal action significantly affecting the environment must go through an environmental analysis and public review process described in the National Environmental Policy Act. The proposal fails to ensure that this regulation will be followed.

As this was the first official action taken by the State of Idaho with its new management authority granted by the Department of Interior on January 5, 2006, it underlines the bigger problem: the Idaho Wolf Management Plan itself. The plan is severely flawed and cannot serve as an adequate mechanism to protect the long-term restoration of wolves in the state. With the support of the American people, wolves were restored to Idaho and the USA northern Rockies. Defenders of Wildlife stands to protect the restoration of these wolves and the species' long-term survival in the region.

Thank you for this opportunity to comment on this proposal. Please keep us informed regarding the public comments received and any decisions related to this proposal.

Sincerely,

Suzanne Asha Stone
Northern Rockies Representative
Defenders of Wildlife
P.O. Box 773
Boise, Idaho 83701
USA
Ph: 208.424.9385
Fax: 208.424.0169
Email: SStone@defenders.org

Cc: The Honorable Dirk Kempthorne, Governor
Mr. Jim Caswell, Director, Idaho Office of Species Conservation
Mr. H. Dale Hall, Director, U.S. Fish and Wildlife Service
Mr. Ed Bangs, Wolf Recovery Leader, U.S. Fish and Wildlife Service
Mr. Jeff Foss, Boise Office Supervisor, U.S. Fish and Wildlife Service