

January 27, 2000

Attention: Jack Lavin  
Committee Co-chair  
Idaho Legislature's Wolf Oversight Committee  
C/O Idaho Dept of Fish and Game  
Boise, ID 83707

Dear Mr. Lavin,

On behalf of Defenders of Wildlife's 380,000 members nationwide and nearly 2,500 Idaho members, we would like to thank you for the opportunity to comment on your draft Idaho Wolf Conservation and Management Plan. We have reviewed the document and offer the following concerns.

Overall, we were disappointed in the document for three major reasons. The first was that the document's thrust was towards managing wolves at minimum population levels rather than recognizing the social and economic value of the wolf and managing for continued recovery. Our second major concern is preferential deference was given the livestock industry even on lands owned by all Americans and even over perceived human safety. And lastly, we were concerned that the Nez Perce who have shouldered the state's role in recovery to date have been left out of the post-delisting management equations and not included as equal partners in the development of this plan. Our specific comments follow.

Section: Wolf Management Objectives

“After delisting, the criteria for keeping wolves from reverting to protection under the ESA requires maintaining a minimum of 10 reproducing pairs of wolves in each of the three recovery areas. IDFG will set management goals and objectives sufficient to ensure the wolf population will not fall below the criteria for delisting wolves in Idaho. However, it is the intention of the Department to dissolve those recovery area designations upon delisting and establish new wolf management zones that will allow flexibility to manage wolves more appropriately in concert with existing human values and resource uses. Wolf pack home range distribution will be managed to limit occurrence primarily to federally managed lands.

The actual number of packs is expected to be dynamic and may fluctuate within and around the stated objective for any individual zone at any given time. Regardless of this expected fluctuation, IDFG will manage wolf populations at a level sufficiently above the minimum of 10 breeding pairs of wolves within the state to ensure that a minimum of 10 litters are produced within the state annually.”

Defenders' Concerns:

We are concerned that even if one accepts the premise of maintaining wolves at or near the minimum recovery levels that this plan does not allow enough flexibility to ensure a minimum guarantee of ten breeding pairs within Idaho. With targeting only 11-17 packs as a ceiling number we feel it undercuts the number necessary to maintain a viable wolf population and maintain the guaranteed minimum.

As you may be aware, wolves are vulnerable to disease such as parvovirus that is wide spread through a number of species, both wild and domestic. Parvovirus has severely increased Yellowstone wolf pup mortality this year. A similar situation in Idaho could cause our population here to fall below the delisting criteria. We ask the committee to double this amount and remove restrictions in eastern Idaho and Southern Idaho to ensure long term viability as well as increase the likelihood of recolonization of areas outside of Idaho. We also want wolves and/or wolf packs to be allowed to use the Southern Range land - especially during winter months as the elk and deer will migrate there at that time. Restricting them from that area may adversely affect the southern ranging wolves from following the normal migration of their prey.

\*Section: Management

"IDFG's management philosophy will be to emphasize the use of sport-hunting and/or public trapping for purposes of wolf population control and management of wolf distribution in preference to agency-conducted control actions when possible."

Defenders' Concerns:

We believe that sport hunting and/or public trapping (SH/PT) is an inappropriate method for removing problem wolves as these are non-selective methods that cannot ensure only the problem wolf/wolves are removed. SH/PT would likely disrupt established packs and/or pack social structure. This latter phenomenon might aggravate existing problems and create new problems where none exist.

"Private landowners and ranchers on state or federal grazing leases may protect their stock by shooting any individual wolf witnessed in the act of attacking their livestock (including, but not limited to, cattle, horses, sheep, mules, goats, llamas, guard animals, hunting dogs, and pet dogs) when the act occurs on their own private land or state or federal land they lease. After wolf predation has been reported and confirmed by Wildlife Services, affected and adjacent livestock operators may be issued a permit to take wolves on their leased land. Such permits would be valid for a specified number of wolves."

Defenders Concerns:

It's interesting that "Any individual injuring or killing any wolf without reasonable evidence of an immediate and direct threat to human life may be prosecuted for illegal

take” in the Human Safety Section but then you didn’t include it within the livestock protection section. Are livestock more important than human lives? While we recognize wolves pose little to no risk to human safety, our position is if people are allowed to kill wolves at all they should have to provide “reasonable evidence of an immediate and direct threat” period. They also must be only targeting those wolves that are responsible for the depredation after nonlethal control methods have been unsuccessful.

“Licensed hunting outfitters, guides, or sportsmen may harass, haze, or kill if necessary, any individual wolf observed in the act of attacking stock they own. In any case in which a wolf is killed in the act of attacking stock or other domestic animals, the taker must report the event to IDFG within 10 days and surrender the carcass of the offending taken animal(s).

Any person may harass, injure, or kill a wolf in self-defense or in defense of others, provided that injuring or killing of any wolf is reported immediately (within 24 hours) to IDFG. Any individual injuring or killing any wolf without reasonable evidence of an immediate and direct threat to human life may be prosecuted for illegal take."

#### Defenders Concerns:

Again there is an issue here. Why the 24-hour reporting requirement for self-defense, while only a 10-day reporting requirement for stock depredation? These should be both a 24-hour reporting requirement unless the rancher can demonstrate just cause for not making the report promptly. Just cause would be only if it required undue hardship like being unable to leave a livestock herd in remote location with no telephone access.

Overall, we are highly concerned with the tone of this document. It appears more of a wolf control plan than a wolf management plan. At this time, wolves are not at levels necessary to control, beyond the occasional problem wolf, and yet there appears to be an immediate intent to classify them as a big game species and proposal for hunting them as soon as they are delisted. This plan will receive national attention and deep evaluation by the public. We ask that wolves be classified as a state "threatened" or "sensitive/species of special consideration" species listing and protected as such until they reach sufficient recovery status that will ensure the 10 breeding pair minimum.

We are also troubled with the lack of language within this document identifying the roles and responsibilities of the Nez Perce tribe. The tribe has done an outstanding job in Idaho wolf management and should be respected as a full partner in future management.

Again, we appreciate the opportunity to offer our comments. We understand the controversial nature of wolves and the difficulties in crafting a document like this.

However, the committee itself is weighed heavily in favor of those who are wolf opponents and this lack of balance is reflected in this document. We offer our assistance to help craft a stronger plan that will truly manage wolves and not just protect livestock interests. We feel that the current flaws in the draft plan that we have identified above reflect not the science and biology of the wolves themselves, but the continuing misperceptions and myths that paint wolves as immense threats instead of valuable keystone species in wild ecosystems.

Sincerely,

Robert Ferris  
Vice President  
Species Conservation  
Defenders of Wildlife

Suzanne Laverty  
Southern Rockies Representative  
Species Conservation  
Defenders of Wildlife