



Ed Bangs  
Gray Wolf EIS Project leader  
P.O. Box 8017  
Helena, Montana 59601

Dear Mr. Bangs:

The Idaho Chapter of The Wildlife Society (IC-TWS) is comprised of professional wildlife biologists primarily working in Idaho and dedicated to sound stewardship of wildlife resources. The IC-TWS is the Idaho state entity of The Wildlife Society (TWS) and is regionally involved through our Northwest Section. The IC-TWS has reviewed the Draft Environmental Impact Statement (DEIS) and wishes to respond with comments and concerns expressed by our Chapter membership with particular focus upon reintroduction of wolves into Idaho. We appreciate this opportunity to respond to the DEIS and commend the U.S. Fish and Wildlife Service for its role in the development of this excellent biological and socioeconomic assessment regarding this endangered species.

In concert with TWS and our Northwest Section, the IC-TWS endorses the concept of reintroduction of experimental non-essential populations of gray wolves to Yellowstone National Park and Central Idaho as is proposed in the DEIS. The IC-TWS understands that the Proposed Action (Alternative 1) has been forged from scientific study, public debate, contention and compromise. We believe that Alternative 1 offers a scientifically sound, feasible and legally defensible plan to restore wolves in the northern Rocky Mountain region, but we suggest modifications to the Proposed Action specifically regarding Idaho.

The IC-TWS considers the gray wolf to be an essential ecological component too long missing from Idaho. We are optimistic that wolf recovery in this State is not a matter of if, but rather when, and many factors promise inevitable success. We are encouraged by larger prey populations at present, especially of elk, than have existed in Idaho in this century. Technologically, we now have incredible tools to monitor wolf activity in the wild as never before. Public support for wolf restoration appears to increase steadily in Idaho. Finally, the presence of at least individual wolves in Idaho is confirmed.



Unfortunately, much of Idaho remains hostile to wolf recovery. In the field, wolves continue to be highly vulnerable to shooting and poisoning. In the state legislature, most proactive efforts toward wolves are suppressed or prohibited. In funding, little support is given from local or Federal sources for positive wolf recovery measures. These are the variables in Idaho that make wolf recovery uncertain, and make the IC-TWS most cautious about some aspects of experimental, non-essential reintroduction of wolves in this state.

The IC-TWS supports the adaptive management approach incorporated in Alternative 1 which outlines how natural resources and social objectives can be managed to achieve wolf recovery. Adaptive management must also include interim provisions to determine whether the action is succeeding, and suggest how it should be adapted if it is not. To be truly "experimental", a project plan should be reversible, and it must yield knowledge. The IC-TWS feels it is essential to learn from large scale interventions into populations and landscapes, and in this case, reintroduction of populations into landscapes.

In light of the concerns expressed above, the following specific comments are offered for your consideration:

1. The IC-TWS recommends that the USFWS initiate wolf reintroduction without land use restrictions while reserving certain land use restriction options if needed later. It is possible that future ESA Section 7 consultations in this state will highlight need for protection of active den sites and "rendezvous areas", and this option should be retained.
2. The IC-TWS believes that the reporting period for private land harassment of wolves to protect livestock should be shortened from 14 days to 24-48 hours to allow prompt investigation by wolf experts.
3. The IC-TWS agrees that livestock harmed by wolves on private lands can result in killing of wolves, but that compelling physical evidence must be confirmed by thorough investigation ensued under the ESA. However, the IC-TWS opposes the killing of wolves on federal lands by private grazing lessees. The IC-TWS is confident that ADC, state and tribal authorities can satisfactorily resolve conflicts with chronic problem wolves.
4. The IC-TWS believes that compensation to private livestock owners from public funds should be retained as a future option, should other sources of monetary compensation prove inadequate to cover depredations of livestock from wolves. This is another aspect of adaptive management that should be incorporated into the proposed action.
5. The IC-TWS suggests that DEIS terminology be clarified regarding "unacceptable impacts on ungulate populations" and "chronic problem wolves". The former should specify levels of depredation and ungulate density likely to be considered unacceptable. For chronic problem wolves, incident recurrence intervals and procedures for individual wolf identification must be specified.



6. The IC-TWS supports the concept of state control of wolf recovery operations, but believes strongly that state plans must be open to full public review before the USFWS transfers authority to state agencies. Additionally, after such transfer, the USFWS must assure the integrity and continuity of the wolf recovery program through both specified oversight and cooperative (Section 6) funding. The IC-TWS believes that USFWS funding to date has been insufficient to accomplish the provisions of the 1987 Northern Rocky Mountain Wolf Recovery Plan. A more focused commitment by the USFWS and cooperating agencies must be made to recover this endangered species.

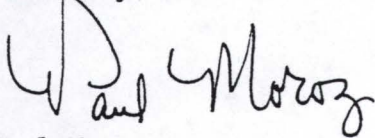
7. The IC-TWS encourages the USFWS, and states that receive authority to implement wolf recovery operations, to give high priority to public education about wolves. This education should include both existing knowledge and information learned from introducing experimental, non-essential wolves into Yellowstone National Park and Central Idaho. As stated before, experiments must yield knowledge so that public learning occurs and mid-course corrections can be made.

8. The IC-TWS is concerned about the broad expanse of the proposed experimental population area for central Idaho, and suggests more refined delineation than "south of Interstate 90 and west of Interstate 15." Wolves that become established in Idaho outside of any experimental reintroduction efforts should not automatically be considered experimental, non-essential wolves. The extent of the experimental area should be tailored to fit the level of reintroduction efforts planned for Idaho.

9. The IC-TWS suggests that the timing of reintroduction of wolves into Idaho be coordinated to insure the highest probability of success. It may be prudent to delay reintroduction until a thorough assessment of wolf presence in Idaho is ascertained and Yellowstone reintroduction efforts are evaluated.

The IC-TWS asks to remain informed and involved in this crucial issue of wolf reintroduction and recovery. The manuscript by Peek, J.M. et al. 1991, Restoration of Wolves in North America, Wildl. Soc. Tech. Rev. 91-1 remains our guiding document on this important matter. In conclusion, we reiterate the statement on page 10 of the technical review, "... that although agencies must respond to social and political considerations, they also need to be vigilant in avoiding undue external group influence, particularly "capture" by pressure groups motivated more by self-serving than by species-recovery objectives."

Sincerely,

A handwritten signature in cursive script that reads "Paul Moroz". The signature is written in dark ink and is positioned above the typed name.

Paul Moroz  
President, Idaho Chapter-The Wildlife Society