



IDAHO CHAPTER OF THE WILDLIFE SOCIETY
321 ADA STREET
BOISE, ID 83702

November 16, 2000

To the Idaho Wolf Oversight Committee:

The Idaho Chapter of The Wildlife Society (Society) is a nonprofit scientific and educational organization of about 250 professionals active in wildlife research, management, education, and administration. The Society is concerned with the scientific management of the earth's wildlife resources and their habitats. The principal objectives of the Society are: (1) to develop and promote sound stewardship of the wildlife resources and the environments upon which wildlife and humans depend; (2) to undertake an active role in preventing human-induced environmental degradation; (3) to increase awareness and appreciation of wildlife values; and (4) to seek the highest standards in all activities of the wildlife profession. We appreciate this opportunity to review and provide input on the Idaho Wolf Conservation and Management Plan (Plan), and we offer the following comments and recommendations.

The gray wolf is a native species that was historically abundant in Idaho. As a top predator, the wolf is an important ecological component of properly functioning ecosystems in Idaho. Widespread and programmatic trapping, poisoning, and shooting efforts brought about its elimination from Idaho. This elimination was not done in the context of today's professional wildlife management, but because the wolf was viewed as a competitor that inhibited optimal livestock production and big game harvest and presented a potential threat to human life. Based on current science, management, and public opinion, the intentional elimination of the wolf from Idaho required rectification through wolf reintroduction. Nowhere in the Plan are Idaho wolf reintroduction, recovery, conservation, and management discussed within this historical context. We recommend the Plan discuss and present wolf reintroduction, management, and recovery efforts both within the historical context under which this species was eliminated and modern day wildlife management under which wolf recovery efforts are proceeding.

The Plan outlines four broad aspects for Idaho wolf management direction. First the Plan intends to classify wolves as either big game or furbearers upon delisting by the U.S. Fish and Wildlife Service (USFWS). Second, the core wolf management zone is delineated as the U.S. Forest Service boundaries in northern and central Idaho. Third, the Plan calls for maintaining at least

10 wolf packs throughout this zone. Fourth, the goals of the Buffer and Southern Idaho Rangeland zones are to discourage wolf presence in these areas.

The Society does not believe this direction or the Plan's objectives promote the recovery or ecological function of wolves in Idaho, and therefore does not fulfill the obligations of a wolf conservation and management plan. We believe there is a conflict in the Plan between maintaining the minimum number of wolves required for delisting while allowing for the killing or moving of problem wolves, and the use of sport hunting or public trapping for purposes of controlling wolf distribution and predation. The Wolf Management Goal stated in the Plan is to "ensure at least 10 litters are successfully produced and reared annually." The Plan also allows for killing of wolves when there are only 6 breeding pairs in the state. Based on the USFWS wolf recovery plan, the USFWS would relist the wolves with any fewer than 10 breeding pairs. Therefore, the Plan does not appear to provide for a wolf population level that maintains state management responsibility. We do not support the direction in the Plan to limit wolves to the minimal numbers required for delisting, and the Society believes the Plan makes it impossible to conserve viable and non-threatened wolf populations in Idaho. The Society recommends that a **minimum** of 12-14 packs should be maintained at all times, and any lethal methods of control are eliminated when this minimum is approached.

The Society recommends one of two alternatives for delineating wolf population objectives within the Plan. We suggest the Plan either: (1) provides, in specific detail, viable and sustaining wolf management population objectives near the numbers provided above, or (2) the Plan supports population objectives developed by the Idaho Department of Fish and Game and Nez Perce Tribe. We recommend these specific population goals consider prey population abundance, potentially catastrophic diseases such as distemper, estimated levels of accidental and intentional shooting mortality, and necessary wolf control actions. The Society also recommends the goal of wolf population objectives be to maintain long-term sustainable and ecologically functional wolf populations above a level at which wolves may be federally listed. We also recommend these population objectives be developed and agreed upon in coordination with the states of Montana and Wyoming, whose neighboring wolf populations are important in maintaining and recovering wolves in the Northern Rocky Mountains and Intermountain west (or what may become part of the Western Gray Wolf Distinct Population Segment if the USFWS proposal to reclassify/delist the gray wolf is successful).

The Plan needs a more balanced approach to the effects of wolf predation. The tone and focus of the Plan is one of wolf control rather than wolf conservation. The Plan fails to realize the potential benefits to Idaho and Idaho's wildlife from wolf reintroduction, recovery, and conservation. The Outfitter and Guides Association is identified in the Plan as one which will incur potential economic harm because of wolf recovery and conservation. However, the Plan does not discuss the potential for the IOGA and Idaho to benefit from wolf recovery through increased tourism and interest in wolves (to wit Yellowstone and Grand Teton National Parks). Unless there is an economic analysis that includes the many potential benefits to Idaho and Idaho's recreation and tourism industry within the Plan, the Society does not support public funding of compensation payments as outlined in the Plan. Furthermore, the Plan should identify

the potential for wolf populations and wolf recovery to benefit ungulate population health and the potential effect wolves may have on other predator populations.

The Plan comes into effect upon delisting of wolves. Therefore, as with all non-listed Idaho wildlife, it becomes the responsibility of the people of Idaho and their appropriate management agencies to conserve and pay for wolf management. If the Idaho Department of Fish and Game is to manage the wolf as a big game species or furbearer, then it seems appropriate that Idahoans partially fund management and conservation of wolves. The Society is supportive of using Idaho State general funding as well as federal monies for Idaho wolf conservation. We also encourage the Committee provide for an integrated approach to funding and management responsibilities between the Idaho Department of Fish and Game and the Nez Perce Tribe.

The Plan as currently written is insufficient to support wolf conservation in Idaho. We strongly recommend the Oversight Committee revise the Plan using our recommendations and with consideration of wolves as part of Idaho's past and future wildlife legacy. The Society is supportive of delisting wolves and passing on the management responsibility of this species to the State, but only if the State has an effective and proactive Plan that protects wolf populations. The Plan does not currently achieve this goal. We look forward to its improvement.

Sincerely,

Charles E. Harris, Ph.D.
President

cc: USFWS Snake River Basin Field Office