

December 31, 2007

## General Comments on the Draft Idaho Wolf Population Management Plan

Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Tenino, Washington. We appreciate the opportunity to comment on Idaho's Draft Gray Wolf Management Plan (Plan) dated October 2007.

It is widely accepted, and Wolf Haven agrees, that the wolf population in the northern Rocky Mountains is ready to be taken off the list of threatened and endangered species. How de-listing is accomplished, however, continues to be an issue and is of major concern. We believe that the presence of state wolf management plans that guarantee a viable wolf population within the states of Montana, Idaho and Wyoming are absolutely necessary before federal de-listing occurs.

There are several issues in the Plan that are of major concern to us regarding the continued existence of a viable wolf population in the Rockies.

Under Idaho's draft Plan, the state commits to maintaining a minimum of 15 breeding pair of wolves statewide, through regulated hunting and lethal kill provisions proposed in the Plan. We appreciate that Idaho's Plan does not have any limit on the total number of wolves to be managed for, and that wolves will be distributed throughout the state. However, the Plan does not provide adequate protection of wolves to maintain viable numbers of wolves in the State due to a regulated harvest strategy based on the management of more numerous species such as black bears and mountain lions.

The Plan calls for managing wolves similarly to other big game animals such as black bears and mountain lions. Unfortunately, the numbers of black bears and mountain lions far exceed the numbers of wolves currently found in Idaho, and therefore, managing wolves similarly to these species is like mixing apples and oranges: it does not make sense. The breeding strategies of such managed game species in Idaho are not similar to wolves in that, for instance, if primarily alpha wolves are removed from the population due to depredations or to help wild ungulate populations, pack cohesion and breeding success could be significantly impacted within the pack.

We are also concerned that the presence of diseases such as parvo or canine distemper, and recently, mange, within the Rocky Mountain recovery area, needs to be analyzed to describe their combined potential impact on the wolf population in the region, should the population in Idaho potentially be reduced to only a few hundred wolves, as is allowed under the proposed Plan. Parvo and canine distemper has caused large wolf population fluctuations in Yellowstone National Park where, in 2005, 80 percent of that year's pups died from a suspected disease outbreak and wolf numbers plummeted within a year from 16 to 7 known breeding pairs. This becomes even more important when we consider that in addition to the regulated harvest framework presented in Idaho's Plan, the Plan is vague about how wolf hunting will occur, potentially including ALL methods, which in

the case of aerial hunting, could reduce wolf numbers quickly before we truly understand what the effects on the state wolf population are.

Finally, we are concerned that the Plan's framework is really more of a wolf control plan than a wolf management plan. The Plan states that "under the State Plan, IDFG has an obligation to producers to keep livestock conflicts with wolves and other large carnivores to a minimum," and, " Under the State Plan, IDFG has an obligation to assure that wolves in increasing numbers do not adversely affects big game populations." No where in the Plan does it state that the Idaho Plan also has an obligation to members of the public that find wolves "esthetically pleasing and believe they are an important keystone predator necessary for an ecologically intact natural system."

From a national perspective, Idaho's management of wolves is key to the maintenance of a viable wolf population in the Rockies. Without adequate protection to ensure that genetic exchange and expansion occurs, wolf numbers could be reduced to levels requiring re-listing under the ESA. Considering the resources that have been spent over the past decade to recover the wolf in the Rockies, we are concerned that those efforts could be in vain due to liberal regulated hunting and lethal control measures allowed in Idaho under its Plan.

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