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U.S. Fish and Wildlife Service
Chief
Endangered Species
Ecological Services
911 NE 11th Ave.
Portland, OR 97232-4181

February 6, 2006

RE: Proposal to Issue the State of Idaho a 10(a)1(A) Permit for the Management of Gray Wolves north of Interstate 90 within the State.
Idaho Fish and Game wolf permit number TE-114934

Thank you for the opportunity to comment. Wolf Haven International is a non-profit wolf conservation organization located in Tenino, Washington. We work for the conservation of wolves across the United States but, as our immediate neighbor and the most likely source for wolf recolonization into Washington, we are particularly interested in the status of wolves and wolf management in Idaho.

By all accounts, wolf recovery in the Northern Rockies has been an overwhelming success, particularly in Idaho. With a recovered population, the movement toward state management of wolves is appropriate. However, given that Idaho has been so openly opposed to wolf recovery in the past, concerns regarding the state's future adherence to conservation measures inherent to wolf recovery should not be discounted nor taken lightly. As the state will be following the guide-lines of the Interim Wolf Control Plan and will be a permittee of U.S. Fish and Wildlife Service (USFWS) should they be granted their 10(a)1(A) permit, any action the state may take will ultimately be the responsibility of USFWS.

Control actions in the Interim Wolf Control Plan are dictated by breeding pair numbers in the Idaho panhandle and the northwestern Montana regions outside the non-essential experimental zone. Assuming USFWS is still the lead agency in northwest Montana, where the vast majority of breeding pairs are located, any actions purposed by Idaho Department of Fish and Game (IDFG) would require the coordination of updated information with at least USFWS, and possibly Montana's Department of Fish, Wildlife and Parks (MFWP) as well.

Wolf Haven International's primary concern is that IDFG follow the Control Plan. We understand that "enhancing the recovery" of wolves includes control of depredating wolves. We also believe these actions have as much to do with placating the citizens most directly affected by the presence of wolves as they do with actually altering the behavior of local wolves. Wolf Haven strongly encourages meticulous investigation and documentation of any suspected depredation events as well as rigorous adherence to the rules of the Interim Wolf Control Plan. We would also encourage outreach and education for local residents in wolf territory, emphasizing how to avoid attracting large carnivores to private property.

Thank you for your consideration.

For Wolf Haven International,

Tami Williams
Director of Conservation
Wolf Haven International