

**Summary of the Comments
On the
Idaho Wolf Conservation and Management Plan**

Prepared by



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And
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Introduction

Reintroduction of wolves in Idaho has been very successful, from the standpoint of increasing wolf numbers. From 1995 when the first wolves were transplanted here, their numbers have grown to about 150, a population that at least allows the discussion to begin over whether and how to remove them from their protected status afforded by the federal Endangered Species Act. In anticipation of this change in the wolves' status, the Idaho Legislature in 1998 established the "Wolf Oversight Committee". The charge of this committee is to develop a plan for state management of wolves, once they are removed from the list of endangered or threatened species.

In June of 2000, the Wolf Oversight Committee released its draft plan for public review and comment. Since that time, a total of 112 separate comments were received on the draft plan. These include 20 comments from governmental agencies, the Nez Perce Tribe, elected officials and interest groups, 51 original comments from individuals and 41 virtually identical comments from individuals. This paper summarizes all the comments so that they can be addressed as the Wolf Oversight Committee completes Idaho's Wolf Conservation and Management Plan and submits it to the Legislature in January 2001.

Methodology

Wolf management is a controversial topic, with generally two divergent philosophies inherent in the debate. On one hand are those who have historically supported wolf reintroduction and now seek a stable and largely protected population of wolves in all areas of the state where the animals may choose to inhabit. On the other are people with more agrarian interests, have not traditionally supported wolf reintroduction and would like to see a small population restricted to backcountry areas and with a clear ability to control wolves when there are conflicts with human interests.

This difference in outlook is reflected in the comments on the draft plan. Those who support large, expansive and protected wolf populations believe the plan tends to favor keeping the animals at minimal numbers and limiting protection for the animals. Their comments on the plan and the process through which it was developed are largely negative. Meanwhile those who tend to favor limited populations kept in check through sport hunting and other controls tend to support the plan, often grudgingly and with suggestions for its improvement.

Such differences do not lend themselves to purely quantitative analysis of the comments received on the plan. "Negative" comments clearly far outweigh those in favor of the plan as written and they come from all the varying points of view on wolf management in Idaho. As such it would seem of little value to the Wolf Oversight Committee to simply categorize comments as "for" or "against". This group, if it is to produce a final plan that has broader support within the state, needs to attempt to reconcile differences and respond to the many constructive and insightful comments received in the preparation of a final plan. This summary will delve more deeply into the nature of the comments, with an eye toward areas of common ground upon which a final plan might be structured.

Virtually every comment on the plan included more than one concern from the person submitting it. It is, in fact, common for an individual commenter to voice an opinion on three to five separate aspects of the plan or on wolf management in general. While this further confounds the ability to quantitatively summarize or analyze the comments, the comments can be grouped into a number of “themes” which recur throughout all the comments. These themes and the number of opinions expressed within each of them are the basis for this summary.

The need for clear population goals

There were 26 agency or interest group comments and 53 comments from individuals on the need for the plan to clearly define population landmarks upon which a management plan is based. While the two basic wolf management camps differ on the “right” numbers, there is some unanimity of opinion on establishing such measures as the number of breeding pairs necessary for de-listing, for allowing sport hunting and other lethal control measures, and as a “floor” for halting or modifying control actions or other aspects of the implementation of the plan.

The need for clear criteria as a basis for control actions

Fifteen agency or interest group comments and 54 individual opinions centered on the need to carefully define the circumstances that would lead to specific control actions. On one extreme, a typical comment was, “There are no details describing the process or criteria established on how wolf/human conflicts will be resolved. There is instead too much latitude in permitting killing of wolves that may or may not have caused a problem with people.” Those who suggested language to make clear that, “Every person has the right to protect their person and property from wolves, countered this. Private landowners and/or ranchers on their state or federal grazing leases may protect their stock by shooting any individual wolf witnessed in the act of attacking or harassing their livestock.”

While there may not be much room for reconciling the points of view on this theme, there was a clear mandate for establishing the physical situations and biological conditions that would allow various control actions. This theme also tended to include concerns expressed in the following theme regarding the interaction of wolf with ungulate wildlife populations, with several commenters suggesting that changes in deer and elk populations become a trigger for varying control measures.

The need for a better understanding of wolf/deer and elk population dynamics

Interest group commenters, particularly, voiced a concern over the ability to accurately use changes in deer and elk populations as a basis for wolf management. One commenter noted, “The draft states that wolves will be managed at levels compatible with ungulate populations, habitat conditions, and the management objectives for their primary prey species (elk and deer)... The draft appears to be concerned with keeping ungulate numbers artificially high and the wolf population artificially low, rather than fulfilling the purpose of the document which is to assure the wolf population is protected.”

The Need for Specific Monitoring Plans and Protocols

Eight agency or interest group and 43 individual comments focused on the need for a strong monitoring component to the plan. There was nearly unanimity of opinion in the desire to learn more about the numbers of wolves, but also their prey base, the actual extent of livestock depredations and their preferred habitats. One commenter cited a study funded by a number of public and private entities currently underway to measure wolf/livestock interactions as the model for expanded efforts. At least two commenters cautioned against the harassment of wolves the accompanies trapping them in order to fit them with radio collars and suggested that, "...wolves should be allowed to be wild, especially in areas where interaction with livestock is limited..."

Concern over Management "Zones"

Many commenters (15 agencies and interest groups, 50 individuals) expressed concerns over the provision of the plan that calls for "management zones", although for generally different reasons. Nevertheless, there may be common ground between the commenter who asserted, "The concept of zone management is not scientifically or biologically supported. The zones in the plan are arbitrary political lines on the map..." and one from a different political and philosophical perspective who offered, "...almost all legislators want their area in the zone allowing maximum control and intense debate in general continues on where the zones should be located. Both commenters conclude that management zones should be eliminated.

Depredation Payments and Compensation for Other Losses

The plan's proposals for compensating not only ranchers but also outfitters and guides for economic losses due to wolves drew a large number of comments (19 from agencies and interest groups and 10 from individuals). Many questioned the validity of essentially compensating hunters for their inability to bag an elk or other animal because wolves had either reduced their numbers or driven them from the outfitter's area of operation. One commenter noted, "They don't deserve special treatment when it comes to wildlife management."

More substantive comments focus on the difficulty of identifying losses where there is no clear wolf kill and a dead animal with a market value that is owned by an individual. As one agency noted, "Although APHIS Wildlife Services program could be called upon to confirm actual wolf depredation on livestock, they would not be in any position to confirm any claims for losses due to decreased weaning or pregnancy rates, increased labor costs or other indirect forms of losses that might be attributed to wolves." In addition, the commenter suggested that the plans discussion of lost outfitter business opportunities, "...should probably also include additional explanation regarding how compensation amounts would be determined."

There is more support for compensating ranchers for direct livestock losses from wolves. While one commenter stopped short of supporting reimbursing for losses on public lands, he did note that the plan had proposed a \$100,000 account for livestock losses on private lands, and said, "I cannot disagree with this. I think it is fair for society to help them cover their losses to wolves if we want to have wolves in our midst."

There is a need for more public education on all aspects of wolf management

Several agency and interest groups (7) expressed support for more public education efforts, apparently based largely on the belief that the resultant public opinion would cut in their favor. Again, the kinds and focus of the educational effort varied according to the biases of the commenter. One urged that public education on wolves, “. be factual and true—not the usual nonsense spouted by the wolf advocacy groups with their reluctance to characterize the wolf as an efficient predator that kills to eat. We need facts, not some childish approach to make the wolf appear to be a loveable little fur ball who wants to socialize with mankind.”

One the other end of the spectrum, a commenter advocated that \$100,000 be devoted to, “an aggressive, proactive education campaign designed to assuage unfounded worries and fears about wolves, as well as to educate the citizenry on how they can best live peacefully them. We need to work toward enlightenment about wolves and ecological issues, not reinforce the darkness of ignorance.”

Concerns Over the Sources and Disposition of Funds to Implement the Plan

Eleven agencies and interest groups and three individuals offered comments on how to fund various aspects of the plan. Generally, there is a belief among most of the commenters that the federal government should bear the lion’s share of funding the implementation of the plan and compensation for losses from wolves, although the plan alludes to the possibility of state general funds being used for this purpose. As one commenter put it, “I am against the state of Idaho, or any other of the states affected, having to use state funds to the control the population of a species, we as a state, didn’t want in the first place.”

As to be expected, opinions varied on the issue. Another commenter noted, “.it seems appropriate that Idahoans partially fund management and conservation of wolves” and was “supportive of using Idaho State general funding as well as federal monies for Idaho wolf conservation.” In raising another aspect of the funding issue, one commenter noted that while the plan sought funds from the federal government and conservation organizations, that funding might be contingent on Idaho’s acceptance of a role for those entities in future wolf management, “If the State of Idaho wants outside funding for wolf management it will have to accept joint management authority of wolves, something it seems unwilling to do.”

Other commenters questioned the funding amounts called for in the plan and suggested that more would be needed for monitoring, management, education and compensation purposes, regardless of the source. One commented that, “I am a little concerned that there will not be sufficient funding to reimburse ranchers for their lost livestock, since they will no longer be receiving donations from the Defenders of Wildlife. However, I’m sure that the many supporters of the gray wolf, including myself would be willing to make generous donations to help that cause.

The Need for Cooperation Among Agencies, States and the Nez Perce Tribe

Many commented on the need for close coordination between federal and state agencies in the implementation of the plan. There was also a lot of concern expressed that the Nez Perce Tribe, which has played the lead role in managing wolves for the past five years, has no clear role in the draft state plan for the future management of wolves. Fifteen agencies and interest groups and 49 individuals commented on the need for state and federal agency and tribal cooperation. The comments seem to underscore the plan's call for cooperative agreements among the states (Idaho, Wyoming and Montana) where population goals for de-listing must be met. One commenter expressed the concern that without close coordination, Idaho might do what is necessary to de-list the wolf only to find that goal thwarted by the lack of effort in adjoining states.

Many comments centered on what they perceived as a lack of clear responsibilities for the relevant agencies and the Nez Perce Tribe in the plan. As expressed by one, "I ask that the Oversight Committee please include explicit detail as to the role of the Nez Perce Tribe in the future management of the Idaho population of gray wolves." This perceived lack of detail in the plan drew this response from an agency employee, "If both entities (the Idaho Dept. of Fish and Game and the Nez Perce Tribe) will be involved in wolf monitoring, the plan should probably specify how monitoring responsibilities would be divided or shared. If only one entity will be involved in wolf monitoring, that should be made clear in the plan."

Goals of the Plan, Its "Tone" and the Development of the Plan

Numerous agencies, interest groups and individuals commented on the overall goal of the plan, often noting that it gave the impression of having the objective of minimizing wolf numbers rather than assuring populations sufficient to assure its survival and its removal from the "endangered" or "threatened" list. Although the makeup of the Wolf Oversight Committee is mandated in law and is essentially a closed matter, approximately 50 commenters asserted that it is "dominated by livestock interests" and excludes the Nez Perce Tribe or wolf advocates.

Despite the fact that the committee has no latitude to modify its makeup, there were enough comments similar to the following that the Legislature may wish to review whether the credibility of the final plan will be compromised by effort to develop it that is judged to be biased. As one commenter expressed his concern, "The plan is so egregious, so totally out of touch with the intent of wolf reintroduction, so utterly biased against the wolf and toward livestock operators and outfitters and guides, that a detailed critique would require more text than the draft plan itself."

Additional Comments and Concerns

As to be expected, a number of individuals took the opportunity to comment on the plan as an opportunity to express a philosophical point of view as opposed to offer substantive comments on the draft plan. Accordingly, there were 13 individual comments that were clearly "pro-wolf", typified by the person who urged, "Please keep the wolves in Idaho safe and healthy. Wolves are magnificent and important animals to our wildlife and the balance of ecosystem. Thank you for supporting the wolves."

Others were less charitable, citing not only future livestock losses, but also concern over the future of big game herds. One gentleman observed that, in his view, “The best plan to manage wolves is to shoot every one of them. This will prevent them from killing the elk, deer, livestock, etc.” There were a few comments (perhaps six) where the reviewer felt the plan was acceptable as written.

There were also several comments suggesting that the plan should include a discussion of what livestock operators and others ought to do to minimize unwanted wolf/human or livestock incidences. Suggested efforts included the use of guard animals, herd management or proper disposal of dead animals.

Conclusions

Idahoans have longstanding philosophical differences regarding wolf reintroduction and management. The comments on this draft of the plan designed to allow the state to take over wolf management at some future date reflect that diversity of opinion. In fact, many of the comments were either “pro” or “anti” wolf or simply noted the commenter’s suspicions of the Wolf Oversight Committee’s motives and biases in preparing the plan, as opposed to offering substantive comments on it.

Despite these differences, there appears to be some areas in which progress in achieving some measure of consensus may be possible, if that is the desire of the Committee. These areas include the concept of wolf management “zones”, an educational effort, the role of the Nez Perce Tribe, and an appropriate monitoring program. In order to achieve whatever limited potential may exist for consensus, however, the Idaho Legislature, through the Wolf Oversight Committee, may need to explore these areas to find the best ways to narrow the differences.