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Idaho Conservation League

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January 15, 2014

RE: Elk Management and Predator Plans

Thank you for considering our comments on the Elk Management and Predator Plans. The Idaho Conservation League has a long history of involvement with wildlife management issues. Since 1973, the Idaho Conservation League has worked to preserve Idaho's clean water, wilderness, and quality of life. As Idaho's largest state-based conservation organization, we represent over 25,000 members who support science-based management of Idaho's wildlife. Our members hunt, fish, watch wildlife and support Fish and Game through the license plate program.

We have tremendous respect for the Idaho Department of Fish and Game and its staff and generally strongly support Fish and Game management actions. We want Fish and Game to be successful in its mission. However, we are deeply concerned about Fish and Game's recent actions approving the eradication of two packs of wolves in the Frank Church River of No Return Wilderness. We understand that this action was directed in part by the Elk and Predator Management Plans which we believe are still in draft form. Please consider our comments specifically with regard to these plans as well as to wolf, wilderness, predator and public involvement issues in general.

"Adaptive management" is a common term utilized for adjusting one's strategy according to new information. The Elk Management Plan is intended to be a living document. We believe that the unprecedented public outcry about this eradication decision should cause the Department to carefully reassess and modify the Elk Management and Predator Control plans to address these concerns.

ICL and wolves

This is the 40th Anniversary of the Endangered Species Act and the recovery of wolves is an amazing success story. Our organization helped negotiate Idaho's wolf management plan which the US Fish and Wildlife Service later deemed sufficient for delisting. We have also regularly reviewed and commented on wolf management and hunting plans. We have coordinated with the Idaho Department of Fish and Game on wolf education and tracking programs. We supported and still support state management. However, the

current situation continues to highlight the many ways in which wolves are not being managed like mountain lions and bears.

Under the delisting agreement, wolves were supposed to be allowed to persist where they are not having unacceptable impacts to humans. “Persist” didn’t mean an absence of hunting. It just meant that wolves were not going to be eradicated.

Fish and Game employees told me that ICL members should be ok with the aggressive wolf management in the front country where there is a high potential for conflict with livestock. Then we were told that wolves would also have to be aggressively targeted in backcountry areas where there were conflicts with sportsmen.

But all along the Department said that ICL members should be ok because there are parts Idaho deep in the wilderness so remote that sportsmen will rarely get there. These are the areas that we should direct our members to who want to have a “Yellowstone”-like experience. In March of 2009, I myself was lucky enough to spend several days in the Thomas Creek area of the Frank and see three wolves, as well as elk, mule deer, bighorn sheep, and bald eagles. This trip was one of the highlights of that year.

Wolves here may never even see a human their whole lives. But not any more it seems. In at least one area, Fish and Game has hired someone to eradicate these wolves that were too remote for sport hunters to get to. So now it seems that any wolf pack, anywhere, can be eradicated, if anyone determines that wolves are “unacceptable” to them.

While this recent effort may seem small and isolated, and other packs will move in, the draft elk management plan specifically calls for increased wolf control in this area for several years to come. What if there were a wolf-trapping cooperative set up to permanently depress or eradicate wolves in this area? If this remote area is a priority for Fish and Game to pursue this activity, then what isn’t? If this is not a priority, then why try? Idaho’s wildlife belong to all Idahoans. Other folks who value these wildlife should have been consulted in an open and transparent process.

Wilderness Values

Idaho’s wildlife belong to all Idahoans, but the Frank Church River of No Return Wilderness belongs to all Americans. This is the 50th Anniversary of the Wilderness Act. We support hunting, outfitting and active wildlife management in the Wilderness. But the Frank Church is more than the sum of Game Management Units 20a, 26 and 27.

This is one of the few remaining places in the lower 48 states where large predators such as mountain lions and wolves can truly fulfill their ecological role. Part of the adventure, thrill and challenge of being in the wilderness is the fact that humans are not the only key predator. Coming across fresh lion, bear or wolf tracks adds a dimension to your experience that is lacking in most places in the lower 48 states. This is what makes Idaho, Idaho.

Management here should seek to restore and maintain these processes and not upend them. Hunting in the wilderness should not require the eradication or near-eradication of other native species as called for in the draft elk plan. Fish and Game should not attempt to make the Frank Church Wilderness – or even one portion of it – a predator-free fiefdom for a local outfitter at the expense of others. This is what private game farms are for. This is not what the Frank Church Wilderness is about. This is not what Idaho is about.

One or two outfitters and their clients aren't the only entities that use this area. River outfitters, backpackers, floaters, folks who fly into the airstrips all value the Frank. Every year, approximately 10,000 people float the Middle Fork of the Salmon River. For many of these visitors, this float through the Frank Church Wilderness is the best chance they will ever have to see or hear wolves in the wild (outside of a traffic-jam filled Yellowstone National Park, that is). Idaho's wildlife belong to all Idahoans. Other folks who value these wildlife should have been consulted in an open and transparent process.

Fish and Game needs to work with the Forest Service on wildlife management that is consistent with wilderness values and wilderness management. As we saw with Fish and Game's proposal to collar wolves in the wilderness, some types of management actions are more complex and controversial than others and warrant additional public review. We invite the Department to coordinate with the Forest Service and the public on a 10-year plan of wildlife management activities in wilderness areas. Most of these activities will likely not be controversial. Others may need be modified somewhat to reflect wilderness values. Giving advanced notice for these projects will allow for sufficient time to resolve any issues so that projects can proceed in a timely manner. We believe that a Programmatic Environmental Assessment co-led by the Forest Service and Fish and Game will enable individual projects to be tiered off that analysis.

Predator management and transparency

The Idaho Conservation League supports predator control when warranted, such as in the case of pelican control in the Blackfoot Reservoir to help restore Yellowstone cutthroat trout to the Upper Blackfoot River. We believe that this plan in particular represents a good model from which to base other plans.

But predator management requires baseline information on the limiting factors such as habitat conditions, clearly articulated goals and timelines, a monitoring plan, and some degree of prioritization. The plans also need to be reviewed by the public.

In addition, Fish and Game needs to prioritize areas where studies confirm that prey would rebound, that the predator plan has broad support, and where the greatest number of sportsmen would benefit. The general demand in this area was so low that sportsmen weren't even using all the elk tags.

Public Trust and Transparency

During the Wildlife Summit, we were told that our input was important and that our opinions mattered. We don't expect to like all of Fish and Game's decisions, but we

would like to be engaged in the decision-making process and know that our concerns are being carefully considered.

Seemingly covert predator control actions like this erode the public trust and disenfranchise wildlife supporters who are critical to the Department's long-term success.

The fact that an issue may be controversial is not an excuse to make decisions behind closed doors. It makes it even more important for Fish and Game to seek out the input of all its constituents through a transparent and open public process. In the interim, we ask that the Commission put a hold on wilderness wolf eradication and allow for public comment on the draft predator management plans.

Pasted below is a list of additional recommendations on these issues.

- Suspend this wolf eradication efforts in wilderness areas until the Elk and Predator Management Plans are complete.
- Amend Elk Management and Predator Management Plans to prioritize predator control outside of wilderness areas.
- Work with the Forest Service on a 10-year programmatic Environmental Assessment on management activities.
- Work with a variety of experts on developing sound predator plans. We point to the pelican plan as one example. Fish and Game should establish yearly data before authorizing predator control and firm sideboards (baseline, goals, follow up, control area, etc). Predator management plans should require baseline information on the limiting factors such as habitat conditions, clearly articulated goals and timelines, a monitoring plan, and some degree of prioritization. The plans also need to be reviewed by the public.
- Establish a more humane trapping program by requiring trappers to check traps every 24-hours instead of every 72 hours.
- Establish a balanced education program as directed by the 2002 Wolf Management Plan: Fish and Game is supposed to establish a strong public education program that emphasizes wolf biology, management, conservation and presents a balanced view of the societal impacts and costs of wolf reintroduction.
- Update website to reflect wildlife viewing and feature wolves in Idaho Wildlife Viewing Guide.
- Establish wolf viewing areas as per ICL's earlier suggestions.
- Develop a comprehensive outreach program on releasing pets from traps and snares.

- Review the trapping and snaring program to ensure that incidental take of non-target species is adequately monitored and managed.

In closing

We have tremendous respect for the Idaho Department of Fish and Game and its staff and want Fish and Game to be successful in its mission. My members support 95% of Fish and Game's work, but actions like the recent control action in the wilderness and the way it was implemented undermine this support. I know that the commission wants the best thing for the Department, its constituents and the resource and I applaud the commissioner for their service and for taking on these difficult issues. The Idaho Conservation League and our members stand ready to be part of these important discussions.

Thank you very much.

A handwritten signature in cursive script that reads "John Robison".

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