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Sent: Tuesday, April 06, 2010 10:27 AM
To: Steve Alder
Cc: jon.rachael@idfg.idaho.gov; Sime, Carolyn; Mike_Jimenez@fws.gov
Subject: Re: Mr Bangs I have a question?

Steve- I've been out of the office so sorry it took so long to get back to you.

Wolves in Idaho are currently delisted so the state does not need permission from the USFWS. However we are in litigation right now so it is wise to take a cautious approach for the time being and to give everyone a chance to learn about the best ways to conduct wolf management. The hunts were a very well run program and set a great precedent for the future for state management - especially since the MF court reviewed the mand let them happen. Typically wolf predation accelerates declines primarily caused by other factors like poor habitat, deep winter snow summer drought, or overhunting but it also depresses/reduces the rate of increase when those other factors become favorable. There is little doubt that having wild predators reduces the potential harvest by people. That's the reason farmers spray for pests in corn fields - leaves more for people to use directly. If you wanted to manage elk like cattle you'd use standard AG practices like winter feeding reducing/eliminating predators, minimize wounding loss [mandatory strict hunter education & mandatory shooting skill testing guides/limited shooting maybe only from stands near feeding stations, no bowhunting hunting' penned elk, etc.], even vaccinating for parasites & diseases... All those practices are used in agricultural-like 'hunting' programs in some places. Again all related to different human values and why people hunt.

In 2006? IDFG gave the USFWS a proposal to remove wolves from the Lolo area to help an elk herd that they believed was lower than the habitat would support. The proposal made it clear that the herd's status was primarily related to poor habitat [forest maturation after huge wildfires in the 1930s?] but overharvest of cows and severe winter were involved too. But clearly IDFG data showed wolf predation was also one of the important factors. IDFG had already increased harvest of black bears [by far the primary predator on elk calves] and millions. IDFG was also working with many others to improve elk habitat [trying to increase the amount of early successional stage forest & openings by burning, logging, weed removal, etc.]. Reducing wolves would reduce predation pressure on female elk and in thereby help the elk herd recover faster although it will never be at historic levels again as those unique conditions can't be replicated. **The USFWS reviewed that IDFG proposal and would have approved it - except that some inadvertent wording in the 2005 10j regulation resulted in wolf predation having to be the 'primary' cause rather than an important cause of low ungulate populations. Wolf predation is never the primary cause of ungulate herd status.** So as soon as we found out about the wording problem the USFWS revised the 2005 rule to make it more realistic. In the 2008 rule wolves could be removed if wolf predation was an important cause of a depressed ungulate population. The numerous checks and balances in the 2005 rule remained unmodified. **We never got another proposal from IDFG under the new rule** [because wolves were delisted in 2008 and again in 2009, **and so no wolves were ever removed under**

the newer 10j provision Since wolves are delisted now the 10j rule no longer applies. **IDFG had also stated it preferred that hunters rather than agencies be used to manage wolf distribution and density to meet wolf as well as ungulate management objectives.** Ongoing research by IDFG continues to demonstrate that wolf predation [primarily on adult cows] is helping depress some elk herds. One of the reasons the Clearwater/Lolo area had higher wolf harvest quotas for hunting was to assist IDFG with elk management in that area by reducing the density of wolves there. I've cc'd Jon Rachael the IDFG wolf expert in case he has something to add.

I think the IDFG data were pretty convincing that wolf predation is affecting some but not all elk herds. While it is true elk in ID are doing fine state-wide, there are herds that are being impacted by wolf predation and as a result hunter harvest in some units has been lower than historic levels.

I think IDFG has been very proactive and professional in their management of wolves. But wolf management has very little to do with the science of it and mostly it is about human values and perceptions. Dealing with these human issues is very difficult and it takes time to balance out all the strong emotions and opinions on both sides. I think IDFG will do a great job and will continue to modify wolf management including hunting to reduce the overall ID wolf population to about 520 wolves state wide and that will assist the mt to increase hunter harvest of elk in some parts of ID and to reduce AG damage. They'll just need to learn as they go and just need a little patience and understanding from both sides.

Hope this answers your questions. It's just my professional opinion so take it for what that is worth- there are certainly others with different viewpoints and like all generalities there are certainly exceptions to the 'norms' I've talked about. You can learn more about our program at <http://westengraywolf.fs.gov>