

**Comments by The Idaho Department of Fish and Game and
The Idaho Office of Species Conservation
In Support of Removal
of the Northern Rocky Mountain Population of Gray Wolf
from the Endangered Species List**

INTRODUCTION

The Idaho Department of Fish and Game ("IDFG") and the Idaho Office of Species Conservation ("OSC") support the proposed rule delisting the meta-population of gray wolves in the Northern Rocky Mountains, or alternatively, those portions of the meta-population residing in Idaho, Montana, and the national parks within Wyoming. These comments are submitted primarily to demonstrate the adequacy of Idaho's regulatory mechanisms for gray wolf management after delisting.

The gray wolf population within Idaho is vigorous and healthy, and will remain so under state management. As Judge Molloy found in his preliminary injunction order in *Defenders of Wildlife v. Hall*, Idaho's commitment to maintain 15 breeding pairs of wolves will ensure the continued existence of wolves within Idaho. Idaho, however, will do far more than simply maintain the bare minimum necessary to fulfill recovery standards. Idaho's five-year management plan requires IDFG to maintain a minimum population of 518 wolves in Idaho – a level five times greater than that required in the recovery plan prepared by the United States Fish and Wildlife Service ("Service" or "FWS").

Idaho will implement stringent controls to limit mortality and assure wolves are distributed across all suitable habitats. Idaho's commitment to maintain population levels far exceeding those contemplated or required by FWS will ensure that wolves within Idaho never again fall to levels where ESA protections are necessary. Moreover, as described in detail below, Idaho will not manage its wolves in isolation, but will manage them as a key component of the three-part meta-population in Montana, Idaho and Wyoming. Idaho's management plans recognize the importance of genetic exchange among subpopulations and provide mechanisms to protect and encourage natural dispersal and, where necessary, actively assist in the exchange of genetic material.

In preparing a new delisting rule, the FWS should consider the latest management information available from Idaho that was not available at the time the initial delisting rule was published in February of 2008. Since that time:

- The Idaho Fish and Game Commission has finalized a Wolf Management Plan that governs wolf management for 2008-2012 (attached hereto as Exhibit 1);
- The Idaho Legislature has adopted statutory guidelines describing the circumstances under which private depredation control actions are permitted;

- IDFG has agreed in principle to the terms of a Memorandum of Understanding with Montana and FWS prescribing collaboration on natural and managed genetic exchange between subpopulations;
- The Idaho Fish and Game Commission has adopted a methodology for establishing annual mortality limits and hunting seasons;
- Idaho has issued a series of progress reports throughout the year (attached hereto as Exhibits 2 through 16); and
- IDFG has entered into a memorandum of understanding (MOU) with the Idaho State Animal Damage Control Board establishing protocols for agency depredation control actions (attached hereto as Exhibit 17).

Together, such materials affirm Idaho's commitment to not only meeting but far exceeding the recovery goals for that portion of the Northern Rocky Mountain gray wolf population that resides within Idaho.



Nathan A. Fisher
Administration
Idaho Office of Species Conservation



Cal Groen
Director
Idaho Department of Fish & Game