



March 3, 2023

Idaho Department of Fish and Game
600 S Walnut St, Boise, ID 83712

Regarding: 2023-2028 Idaho Gray Wolf Management Plan

On behalf of the Congressional Sportsmen's Foundation (CSF), I am submitting comments in support of the 2023-2028 Idaho Gray Wolf Management Plan as prepared by the Idaho Department of Fish and Game (IDFG) which takes a balanced approach to managing wolf populations well above recovery objectives as determined by the US Fish and Wildlife Service while taking into consideration both the states ecological and cultural carrying capacities.

Founded in 1989, CSF is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

State fish and wildlife agencies are the entities best equipped to address fish and wildlife management issues within their respective borders, and after 3 decades of successful wolf monitoring and management, IDFG is no exception. This is clearly demonstrated by the fact that an average of ~ 1300 wolves currently inhabit Idaho, which is above what the US Fish and Wildlife Service (USFWS) considers to be the management objective based on carrying capacity for the entire Northern Rocky Mountain population in Idaho, Montana, Wyoming, Oregon, and Washington combined.

As predicted by the USFWS 2009 delisting rule, the overpopulation of wolves in Idaho has resulted in reduced prey abundance as seen in areas with below objective ungulate populations (Panhandle, Lolo, Selway, Middle Fork, and Sawtooth) and chronic conflict with livestock. Since 2014, at least 299 livestock producers have experienced more than 1,291 verified losses to wolves. It is extremely likely that these verified losses represent only the minimum of total wolf depredations. Despite repeated adjustments to liberalize harvest in an attempt to mitigate conflict, Idaho's high abundance of wolves have remained extremely resilient and continue to cause conflict in many parts of the state, further reducing the public's acceptance of wolves on the landscape.

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According to the USFWS 2009 delisting rule, 500 wolves is the ideal carrying capacity for Idaho when taking into consideration suitable habitat, prey abundance, and human-wildlife conflict. The 2023-2028 Idaho Gray Wolf Management Plan as prepared by the IDFG is well poised to actively manage wolves in the state with a variety of tools and strategies to better align population numbers with what the USFWS identifies as an ideal population size for the state.

Despite being considered charismatic, wild, and mysterious to some people in our modern age, wolves are not fundamentally different from other wildlife species in Idaho. Wolves need to be managed within both ecological and social carrying capacity, just like elk, deer, moose, geese, mountain lions, bobcats, bears, and so many other species in Idaho. It is well within IDFG's capabilities to manage Idaho's wildlife species within the biological, ecological, economic, and social limitations of the state. CSF commends IDFG for not treating wolf management as the exception, but rather holding wolves and wolf management to the same science-based standards that have proven time and time again to be extremely successful in managing species in Idaho and throughout the U.S. under the North American Model of Wildlife Conservation.

CSF is confident in IDFG's commitment to maintaining and managing a viable, self-sustaining wolf population in a way that does not trigger relisting under the Endangered Species Act while factoring in social, economic, and biological challenges associated with effectively managing the species. Wolves are one of our nation's most iconic conservation success stories and Idaho is leading the way finding an equitable balance between the needs of wolves and the needs of people.

Sincerely,

Ellary TuckerWilliams
Assistant Manager, Rocky Mountain States and Predator and Furbearer Management Policy
etuckerwilliams@congressionalsportsmen.org, (202) 573-6079

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