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Wildlife Services
Idaho State Office
9134 W. Blackeagle Drive
Boise, ID 83709

To Whom It May Concern:

Republicans for Environmental Protection (REP), a national grassroots organization of stewardship-minded Republicans, offers the following comments on the draft Environmental Assessment for Wildlife Services' Gray Wolf Management Plan for Idaho.

REP strongly opposes Alternative 2, the preferred alternative. We have concluded that the extreme wolf control methods proposed in this alternative are highly disproportionate to the supposed benefits that such methods would achieve. In particular, we find the suggestions for aerial shooting, sterilization of alpha wolf pairs, and the use of carbon monoxide gas to destroy wolf pups in their dens to be wholly unjustified control methods that reflect outdated, irrational, and scientifically unsound thinking about the roles of wolves in natural ecosystems.

The draft EA itself is neither balanced nor scientifically sound. It reads largely as a one-sided argument in favor of reducing the wolf population in Idaho and does not seriously consider valid arguments against more aggressive wolf control. The EA was also written under the now invalid assumption that the gray wolf in Idaho is no longer listed as endangered.

We are **not** convinced that there is a need to institute wolf control methods for the sake of increasing ungulate populations.

First of all, decisions regarding the size of wildlife populations should be primarily based on ecological considerations, not dictated by hunting or any other recreational pursuit. Management bias towards game species is not consistent with the administration's commitment to scientifically sound policy.

Secondly, there is little basis for hunters' fears that wolf populations will decimate Idaho's elk population, nor is there any justification whatsoever for inflammatory,

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anthropomorphizing rhetoric asserting that wolves kill elks for pleasure. The facts are more complicated than overheated, simplistic rhetoric would suggest.

The Idaho Department of Fish and Game recently released a study showing that the population of female elks is at or above target levels in 23 of 29 zones statewide. In only three of 29 zones were wolves identified as the leading cause of elk mortality. In addition, other factors such as habitat degradation and harsh winters were in play in those zones where wolves were identified as the leading cause of elk mortality. In six zones, the study identified harvest as the leading cause of elk mortality.

The presence of wolves is beneficial to elk as a whole. Wolves cull sick or weak animals, improving the overall health of elk populations and producing greater numbers of trophy specimens that hunters prize. Studies at Yellowstone National Park indicate that wolves prey selectively on weaker animals and do not kill elk at random; otherwise, wolves would be at greater risk of death or severe injury.

It is also important to point out that in 10 zones, elk populations are above target levels, and in some cases have reached the point at which they have become a nuisance for local landowners.

The study's bottom line is that the impact of wolves on elk populations is far more nuanced and complex than is commonly believed. In another study released in 2009, for example, the Montana Department of Fish, Wildlife, and Parks and Montana State University found that wolves have a mixed impact on elk populations. In a seven-year study of the populations and behavior of elk populations, Montana researchers found that elk populations declined in the presence of wolves in some areas, but increased in others as a result of a complex interplay of many ecological factors. Studies at Yellowstone suggest that weather plays an important role governing elk-wolf interactions. As the Department of Fish, Wildlife, and Parks' chief wildlife researcher concluded, "one-size-fits-all explanations of wolf-elk interactions across large landscapes do not seem to exist."

A U.S. Geological Survey study in northern Minnesota that tracked wolf pack size and whitetail buck harvest by hunters from 1975 through 1997 found no significant relationship between wolf numbers and buck harvest.

Wildlife managers in the 21st century must strive for broader, more ecologically sensible goals than simply ensuring an adequate supply of ungulates for sport hunting. Wolves and other keystone predators have a vital role in regulating ecosystems within their historic ranges. Their re-introduction has resulted in greater biological diversity and healthier watersheds. The absence of wolves results in a cascade of undesirable impacts – overpopulation of ungulates, overgrazing, soil erosion, less wildlife diversity.

We are concerned that Wildlife Services' preferred alternative would result in unbalanced, ungulate-fixated management that would defeat the purpose of wolf re-introduction and in the long run result in harm to wildlife diversity and watersheds.

We urge Wildlife Services to withdraw this deeply flawed draft Environmental Assessment and conduct a full Environmental Impact Statement that examines the

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broader ecological issues associated with controlling wolves and other predators in the northern Rockies.

Thank you for considering our views on this matter.

Sincerely,



Jim DiPeso
Vice President, Policy & Communications