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What They Didn't Tell You About Wolf Recovery

by George Dovel



One of four wolves shot by USDA Wildlife Services personnel north of Mountain Home, Idaho in September 2006 after the wolves continued to kill cattle on a rancher's private land in July and August. This wolf, the alpha male of the newly formed "Danskin Pack", was not weighed but its weight was estimated at 120-130 pounds.

During spring of 2006 an Idaho rancher reported wolf activity on private land several miles north of Mountain Home, Idaho. The U.S. Fish and Wildlife Service (FWS) confirmed it was a new pack containing two adult wolves and three pups. During July and August

2006, USDA Wildlife Services (WS) examined four of the rancher's calves that were killed and confirmed that at least three and probably the fourth were killed by those wolves on the rancher's private land.

continued on page 2

What They Didn't Tell You... *continued from page 1*

In September 2006 the two adult wolves and two of the pups were killed by a Wildlife Services helicopter team and the other pup was not located again. An earlier study involving WS found that only one-in-six wolf-killed calves are discovered in time for FWS to determine the cause of death and enable compensation to be paid.

How Many Wolves are Enough?

By 2006 many people in the West were aware that minimum estimated fall wolf numbers in Idaho, Montana and Wyoming already exceeded the criteria for delisting wolves by several hundred percent. But few seem aware that the FWS agenda to allow this to happen was exposed by wildlife ecologist Dr. Charles Kay way back in 1993 – before any Canadian wolves were transplanted into the three Northern Rocky Mountain states.

In an article entitled, “Wolves in the West – What the government does not want you to know about wolf recovery” in the August 1993 issue of *Petersen's Hunting*, Dr. Kay asked the question, “If wolves are brought back how many are enough?” He pointed out that the federal government's recovery plan announced that when 10 breeding pairs (approximately 100 wolves) existed in each of the three recovery areas for three consecutive years, wolves would be declared recovered and removed from the Endangered Species list.

Then Dr. Kay also pointed out that to prevent harmful inbreeding and protect against random environmental changes, most scientists believed that a minimum population of 1,500 wolves must be achieved. When he attempted to find out why such a low number was being sought for recovery FWS could not produce evidence of any scientific research to justify such a low recovery number.

Kay reasoned that when recovery goals of 100 wolves in each area were achieved, wolf activists could rightfully claim that the goals were inadequate and win lawsuits to keep them protected. He wrote, “Needless to say, 1,500 to 2,000 wolves will have a much greater impact on ungulate numbers, hunting opportunities and livestock operations than that projected in government reports.”

In “Wolves in the West,” Dr. Kay cited abundant scientific studies and facts to disprove the government's claim that expanded wolf numbers would have limited impact on big game populations and harvests. He argued that with 50,000 wolves already occupying North America, wolves were not a biologically endangered species and their listing served personal agendas that had nothing to do with conservation.

Scientific Game Management Threatened

He urged readers to provide their input to the Wolf Environmental Impact Statement (EIS) with copies to their Congressmen and Senators demanding the government stop spreading misinformation and tell the public the true impacts of wolf recovery. He added, “It is also time for

sportsmen, livestock operators, and other concerned citizens to form a coalition and launch a national educational campaign or scientific game management will be only a memory.”

FWS Attacks Dr. Kay

Six years after the 10 breeding pairs per area was established as the criterion for delisting, Wolf Project Leader Ed Bangs included Appendix 9 in the draft EIS stating that a questionnaire had been mailed to 43 wolf biologists in Nov.-Dec. 1992 asking whether they agreed with the minimum criteria of 10 pairs established in 1987. The names of the 25 biologists who reportedly responded and the specific answers they provided were not included.

Meanwhile Bangs initiated a letter-writing campaign to discredit Dr. Kay among his peers and elsewhere. Instead Kay's scientific associates defended him and rebuked Bangs for his attempt to destroy Dr. Kay's scientific reputation while also attempting to suppress legitimate scientific opinion.

10 Breeding Pairs - an Elaborate Deception

In 1996 Dr. Kay wrote “Wolf Recovery, Political Ecology, And Endangered Species” in which he described a scenario where both environmentalists and FWS knew that people would refuse to accept 1500-2000 wolves yet also knew courts would insist on having that many or even more wolves to constitute a minimum viable population (MVP). Kay presented strong evidence, which has never been refuted, that the 10 breeding pairs per area or 300 wolves in the three states was simply an elaborate deception designed to establish core wolf breeding areas to populate the entire West with wolves.

Following the 2007 announcement by FWS of its intention to de-list the wolves in 2008, the agency issued a *minimum* estimated wolf population in the three states of ~1500. And on May 8, 2007, the nonprofit environmental law clinic, Earthjustice, sent FWS a documented 35-page objection to delisting wolves in the three states.

A major objection to de-listing was that wolves in all three states do not meet the MVP of **2,500-5000** that computer models indicate is necessary to insure survival of any species for the next 100 years. The Objection, filed on behalf of the Sierra Club, Natural Resources Defense Council, Jackson Hole Conservation Alliance and the Humane Society of the U.S., points out that the 1979 Minnesota population of 1,235 wolves in 138 packs did not qualify for delisting and asks how only 300 wolves in 30 packs in three states could possibly meet delisting criteria, which should be comparable to Minnesota.

The Prophet Was Ignored

In 1996 Dr. Kay cited the same example as well as a federal court ruling that approximately 4,500 spotted owls (2,180 breeding pairs) were needed to meet ESA requirements. Everything that he predicted has come to pass and the wildlife managers in at least two of the three states continue to promote higher wolf populations.

On January 14, 2008 Idaho F&G Director Cal Groen authored a News Release titled, "Wolves Are Here to Stay." He emphasized that wolves will be managed like deer and elk but with the following differences:

Allow Wilderness Packs to Increase

"The point of wolf management will be to stabilize numbers, not to cut wolves to an absolute minimum. In fact, the (wolf) plan recognizes wilderness area packs as 'core' populations and as 'source' areas for surrounding regions.

"One other thing we know: Our public surveys show that once wolf populations are delisted and managed, animosity toward wolves will substantially decline." Groen ended his press release with the comment, "the state of Idaho has promised the nation that wolves are here to stay and we will manage viable and healthy populations."

According to an *Idaho Statesman* article posted at 5:01 P.M. on January 15, retired IDFG Salmon Region Supervisor Gary Power, who is now F&G Commissioner from the Salmon Region, told Idaho House Resource Committee members that Idaho has more than 800 wolves in 72 documented packs and 41 breeding pairs. The Statesman quoted Power, "(The Governor) believes wolves are here to stay and our job is to balance between the main user groups*, and we intend to."

No F&G Plan to Reduce Wolf Population

The article continued, "Idaho's plan is to keep at least 15 breeding pairs, though there is no plan to actively try to reduce the population, currently at more than 40 (breeding) pairs, to that level. (emphasis added)

(* "the main user groups" are hunters who pay IDFG 33 million dollars annually to support game conservation and management, plus thousands of Idahoans who produce food, housing and other essentials from wise use of our natural resources, and environmental extremists who contribute little or nothing to wildlife conservation and management or to the rest of society but achieve their "user group" status with intimidation and threats).

By infiltrating every federal and state natural resource management agency and many universities during the past 35 years, these extremists have substituted their radical agenda for sound resource management. They have even hijacked the term "Conservation" – changing its meaning from "*the protection, planned management and wise use of natural resources*" (Gasaway et al.) to restoration of native plants and large meat-eating predators in a made-made wilderness that restricts human use.

Second only to Alaska in total wilderness acres, Idaho's wilderness areas provided a nucleus population of elk and deer 40 years ago when IDFG biologists had over-harvested elk everywhere else except in the Panhandle. Director Groen's announcement that surplus wilderness wolves will be used to populate surrounding regions reflects F&G's allegiance to the real FWS wolf recovery agenda.

The Real FWS Wolf Recovery Agenda

That agenda has been promoted in "Society for Conservation Biology" publications by federal biologists involved in wolf recovery since Canadian wolves were first transplanted. David Mech's "The Challenge and Opportunity of Recovering Wolf Populations" appeared in the 1995 Volume. 9(2) issue of "Conservation Biology."

In 2001, environmental groups, including The Nature Conservancy and the World Wildlife Fund, joined with the National Park Service in creating a more sophisticated magazine called "Conservation Magazine" designed to sell the wildlands/biodiversity agenda to academia. In 2004 FWS Wolf Team Leader Ed Bangs praised a BS thesis by a biology student concerning non-lethal wolf "control" (later published in *Conservation*) and announced he had hired her as a wolf "specialist".

Wildlife biologists in all three recovery states knew about the numbers deception but only Wyoming G&F, under pressure from its Governor, attempted to hold FWS to the original de-listing criteria. IDFG Director Groen's Jan. 14th News Release declared the Department's intention only to "stabilize" (halt the dramatic annual increase in) existing wolf populations in Idaho.

Because IDFG estimates Idaho had a *minimum* population of 732 wolves in the fall of 2007 that means F&G intended to maintain a minimum of at least **seven times** as many wolves in Idaho as we were told would exist after recovery. But pretending that the biologists' estimated *minimum fall* wolf population is near the actual wolf population is simply another deception misleading Idahoans and their elected officials as will be illustrated later in this article.

Public input on the Draft Wolf Plan was accepted by IDFG through December 31, 2007 and that input was scheduled to be provided to the Commission during its January 15-18, 2008 meeting. The Commission would then discuss and adopt a final wolf plan during a legally advertised meeting that was open to the public.

Wolf Plan Ignores Idaho Wildlife Policy

Instead, on January 14, 2008, without knowledge or approval of the full Commission in a public meeting, Director Groen issued the News Release advising how wolves will be managed and on the following day Commissioner Power told the House Resource Committee members how wolves will be managed. Although the full Commission did not adopt a wolf plan until March 6, 2008, F&G publicized its intent to maintain 500-700 wolves.

Meanwhile a closed-door Commission session was held in which the Commissioners were apparently informed of legal complications they might encounter if they managed wolves to benefit Idaho citizens. Whether or not that information is completely accurate, the Wolf Management Plan announced by Groen and Power clearly violates Idaho Wildlife Policy (I.C. Sec. 36-103).

continued on page 4

What They Didn't Tell You...*continued from page 3*

Not controlling wolves in Idaho wilderness just as they are not controlled in national parks will ultimately result in the same depletion of big game and other prey species and rapid turnover in wolf packs. It is important to remember that Idaho law requires F&G to manage wildlife to provide continued supplies for hunters, fishermen and trappers to pursue and harvest – but it is being ignored.

Pretending that limiting the number of hunters who can harvest wildlife is somehow providing continued supplies of wildlife for all hunters to harvest (sustained yields) is absurd. Limiting harvest opportunity for everyone is a last resort tool that must be used when all of the other wildlife management tools at the Commission's disposal have failed to halt population and harvest declines.

Conclusions From Denali Wolf Study

The ongoing study of wolves in Alaska's Denali National Park, initiated in 1986 by David Mech and Layne Adams, with Adams heading the study team since 1993, has revealed exactly what happens to wolves when their numbers are not controlled. Prior to 1980 Mount McKinley National Wildlife Refuge comprised about 2.2 million acres but in 1980 the name was changed to Denali National Park and the size was increased by 4 million acres.

Subsistence hunting and trapping by local area residents is still allowed in the newer 4 million acres, and the territories of several wolf packs in the original 2 million wilderness acres include land outside the Park where wolf hunting and trapping is also allowed. Yet despite the opportunity for humans to hunt and trap most of the wolves at some time during the year, only 3% of annual wolf deaths are caused by humans.

Of the remaining wolves dying from so-called "natural" causes, 60% are killed by wolves in other packs. The average pack lasts three years or less and wolf population declines ultimately follow prey declines.

The Denali Caribou herd, which numbered in the tens of thousands for many decades, declined to 10,000 by the 1960s and numbered only about 1,000 by the late 1970s. Studies from the late 1970's indicated that early calf survival was very poor even though adult cows were in good condition and had adequate food resources.

Predation on young calves was concluded to be the major factor in the population decline and, despite some gradual increases during a series of mild winters, the herd has remained well below 10% of its former long-term numbers and remains incapable of recovering from the predator pit without intensive wolf control.

Warnings from Experts to Congress

In the late 1980s 15 scientists were secretly selected to provide their expert input to Congress about Northern Rockies wolf recovery and several expressed serious concerns. Some group members were academic biologists with limited research experience but bona fide scientists included Dr. A.T. Bergerud whose published

research on the mortality impact of wolves on elk, moose, Dall sheep and caribou in northern British Columbia is supported by top Canadian wildlife scientists.

Dr. Bergerud reported that membership in the elite group was kept secret even from its members and they were not asked whether or not they supported wolf recovery. They were asked only to provide the impact of introducing wolves to maintain a population of approximately 10 breeding pairs in each of the three proposed recovery areas over a 10-20 year period.

Dr. Bergerud, Dr. Robert Taylor and others disagreed with reintroduction of any wolves unless wolf numbers were strictly managed from the beginning – including in Yellowstone National Park – to prevent severe declines in elk and moose populations. They also warned that 10 breeding pairs exceeded total wolf habitat in YNP and the surplus wolves would spill over into other areas, causing unacceptable increases in livestock predation.

In other words, regardless of how many wolves are considered necessary to maintain genetic diversity, there was not enough designated wilderness in the three recovery areas to support even the proposed 30 breeding pairs without excessively impacting existing prey species and ranchers' livestock. With Congress insisting that the impact of wolf reintroduction must be minimal, wolf biologists began providing false information regarding the number of prey animals the average wolf would kill each year and about how many prey animals actually existed.

Ignoring the studies indicating that wolves kill two to three times as many prey animals as they can consume, the wolf advocates promoted the lie that wolves kill only what they can eat. The Wolf EIS estimated the average wolf would kill only 12 big game animals per year in YNP* – including both elk and deer.

(* All subsequent studies in YNP found the elk kill per wolf per year has averaged between 18 and 36.)

Predicted Wolf Impact Based on False IDFG Data

IDFG biologists Kuck, Nelson, Rachael and Hanson provided the 1993 FWS Wolf EIS with highly inflated wild ungulate prey numbers for the 20,700 sq. mile Central Idaho Primary Analysis Area. The claimed average post-season elk and deer populations were **six times higher** than the numbers counted by helicopter and recorded by IDFG biologists in any unit in the PAA.

In a September 24, 1993 draft letter to Wolf Project Leader Ed Bangs, IDFG Director Jerry Conley admitted that IDFG personnel had provided the data and the analysis in the Wolf EIS concerning the impact of introducing 100 wolves into central Idaho. His letter claimed a recovering wolf population "will rarely cause unacceptable impacts" and stated, "We believe these analyses provide a realistic picture of the probable environmental consequences of a recovered wolf population (about 100 animals) in central Idaho based on the best available data." (emphasis added)

The fact that FWS allowed the state game agencies to provide unrealistic impacts based on inaccurate data does not excuse Bangs' failure to correct that misinformation once he knew it was false. On that same day, September 24, 1993, I provided Bangs with three pages of testimony, with exhibits documenting the gross exaggerations in the central Idaho ungulate prey base.

Because Idaho's Wolf Oversight Committee approved communications from Conley to Bangs, I urged them to correct the misinformation contained in the EIS and in Conley's draft letter. Instead they simply directed Conley to substitute the words "reasonable estimate" for "realistic picture" in the final version of his letter dated October 12, 1993 – thereby allowing F&G's false information and erroneous predictions to remain in the EIS.

“Nothing Wrong With Lying to the Public”

In a February 17 1994 meeting with Sandy Donley and me, Oversight Committee member Don Clower told us the Committee knew the prey population figures were highly inflated when they were given to FWS but said that was necessary to support the rapid build-up of wolves that would occur in the Nonessential Experimental recovery option. Then he said he saw nothing wrong with lying to the public to accomplish that goal.

In a March 9, 1994 letter to Bangs signed by its Co-Chairman Jack Lavin, the Idaho Wolf Oversight Committee formally supported the “Nonessential Experimental” recovery option over the “No Wolf Introduction” option. Although three of the seven voting Committee members, including Co-Chairman George Bennett, withdrew their support for that option in a letter to Bangs dated October 17, 1994, their letter was ignored.

The IDFG 1993 and, later, the 1994 big game census information I provided to Bangs indicated there were only about 40,000 total post-hunting-season ungulates in the central Idaho primary analysis area instead of the 241,400 claimed in the Wolf EIS. In a private conversation with me Bangs admitted that the claimed populations were “probably exaggerated” yet in the August 16, 1994 Federal Register he wrote, “Millions of acres of public lands contain hundreds of thousands of wild ungulates (Service 1994) and currently provide more than enough habitat to support a recovered wolf population in central Idaho.” (emphasis added).

Oversight Committee Bias

But even if FWS and IDFG were willing to lie about the declining prey base in central Idaho, the Wolf Oversight Committee was formed by the Legislature in 1993 to protect Idaho's interests in the formation of a wolf plan. Why did that Committee fail to do its job?

One answer is that four of the seven voting members on the Oversight Committee supported the FWS/IDFG plan to import Canadian wolves and protect and manage them as a new big game species. Jack Lavin and Don Clower were hand-picked by IDFG to support its

agenda and both Resource Committee chairmen had a history of supporting IDFG agendas that were unpopular with grassroots sportsmen and other natural resource users.

Senate Resources Committee Chairman. Laird Noh was also actively involved in The Nature Conservancy whose goal to restore wolves and grizzly bears in a network of core roadless areas was already being implemented. But regardless of its members' personal agendas, the Oversight Committee was required by law to develop a plan that included consideration of local economies, custom, culture and private property rights.

Instead it virtually copied the FWS Plan and several of its members publicly ridiculed county government efforts to include protection of domestic livestock and pets on private property. The October 17, 1994 letter signed by Bennett, Ted Hoffman, Stan Boyd and non-voting member Lois Van Hoover, listed multiple violations of the ESA in the proposed FWS Rule and declared those members' intent to recommend the Idaho Legislature refuse to approve the wolf plan approved by the Committee.

F&G Illegally Agreed To Canadian Transplants

I.C. Sec. 36-715(2) expressly prohibited IDFG from entering into any agreement with any entity of the U.S. Government concerning wolves unless expressly authorized by state statute but that law had already been brazenly violated by IDFG Director Jerry Conley. On September 27, 1994, without authorization from the Legislature or even the full Oversight Committee, Conley signed a letter to Bangs supporting the FWS Experimental Rule and agreeing to work with FWS to reintroduce wolves from British Columbia and Alberta into the Idaho experimental population area.

On that same day, Conley also delivered a Special Permit to Bangs in Boise, signed by IDFG Wildlife Bureau Chief Tom Reinecker, authorizing FWS to “release a maximum of 15 Canadian wolves in Central Idaho for up to five years or until 2 breeding pairs are each documented to produce 2 or more pups that survive until 31 December for two consecutive years.” The permit stated that the wolf releases would be conducted in accordance with the Idaho wolf management plan.

Idaho AG, Congress Ignore False EIS Info

Although the plan was soundly rejected by the Legislature, Bangs and FWS went ahead and conducted the wolf release – legally from their standpoint – with the signed agreement endorsing the Nonessential Experimental Option and Rules and the signed Wolf Release Permit both in their possession. On January 25, 1995, Idaho Attorney General Alan Lance was provided with documentation of the misinformation and Code violations but no action was taken against Conley or any of the Oversight Committee members who authorized illegal issuance of the agreements.

continued on page 6

What They Didn't Tell You...*continued from page 5*

Un-refuted evidence of IDFG and FWS providing the erroneous information to Congress to justify wolf reintroduction was included in the hearing record of a Congressional Investigative Committee. Also included was an Aug. 12, 1994 letter from Bangs to FWS's Charles Lobdell insisting that he de-emphasize the wolves that already existed in Idaho and thus show unanimous FWS support for reintroducing Canadian wolves.

Bangs Ignored ESA Subspecies Criteria

In that letter Bangs changed the definition of a confirmed wild wolf to be protected under the ESA to any animal that looks and acts like a wolf and has either survived in the wild or reproduced in the wild. He boldly asserted that neither domesticated wolves nor wolf-dog hybrids can survive in the wild and said any animal that has been observed to survive is "confirmed" as a wild wolf.

By providing that new definition, Bangs ignored 20 years of scientific deliberation during which the FWS Deputy Solicitor ultimately determined that only the distinct subspecies known to have inhabited an area could be reintroduced to satisfy ESA requirements. Bangs paved the way to protect and propagate assorted wolf-dog, wolf-coyote and wolf-wolf hybrids in the Western Great Lakes and Northern Rocky Mountains Wolf Recovery Areas.

Minnesota's wolf population has exceeded the 1,250-1,400 delisting goal since the late 1970s and the Michigan/Wisconsin delisting goal of 100 has been exceeded since the winter of 1993-94. Thirteen years later on January 29, 2007, with an estimated minimum population of 4,000 wolves in the three states, FWS finally delisted the Western Great Lakes DPS of Gray Wolves.

Another FWS Deception Exposed

But during a recently completed 2-year study, evolutionary biologists Leonard and Wayne genetically tested 68 of those wolves and found that **none** of them were the Eastern Timber Wolf (*Canis lupus lycaon*) that existed when they were listed as "threatened" in Minnesota. They found the wolves were crossbred with local coyotes (*Canis latrans*) and Eastern Canadian Wolves (*Canis lycaon*) or combinations from crossbred offspring.

Only 31% of the wolves tested had any Eastern Timber Wolf genes and none were purebred. Yet all of the genetic samples taken and preserved from Eastern Timber Wolves from the early 20th century tested purebred with no evidence of crossbreeding with coyotes or other wolves.

When confronted with this information by the news media in November 2007, FWS Eastern Gray Wolf Recovery Team Leader Rolph Peterson (Bangs' Great Lakes counterpart) admitted they had known all along that the wolves were crossbreeding with coyotes. When one of the evolutionary biologists suggested the wolves should be re-listed, FWS Wolf guru David Mech responded, "It is not clear what would be gained by keeping the Midwestern wolf population on the endangered species list."

"If It Looks and Acts Like A Wolf"

Mech continued, "Whatever their genetic identity, there are over 4,000 wolves in the population, they are increasing rapidly, and are legally protected by the states." From the statements by Bangs in Aug. 1994 and Peterson and Mech in Nov. 2007, the willingness of FWS wolf biologists to ignore the intent of the ESA and deceive Congress and the American public cannot be denied.

Residents of the three Great Lakes states are forced to protect thousands of "super coyote" hybrids that have become far more efficient killers because they are part wolf. And because all surviving wolf hybrids, including wolf/dog, are treated as endangered wild wolves in the Northern Rocky Mountains, it appears that a similar situation may be developing in the NRM.

In the recent Outdoorsman article entitled, "The Big Bad Wolf...How Bad Is He?", the author reported that wolf damage claims from two Montana sheep ranchers totaling more than \$40,000 were rejected because genetic testing showed the wolf that did the killing was a wolf/dog hybrid. Hard evidence supporting the existence of wolf-dog hybrids in the wild exists in all three wolf recovery areas and that will be documented in a future Outdoorsman article.

Pen-Raised Wolves Released In SW U.S.

The FWS Mexican Wolf Recovery Program in the Southwest U.S. claims to use "mostly" purebred Mexican wolves with genes from five wolves caught in Mexico from 1977-1980 and kept in a zoo. Their offspring are bred, born and raised in ~50 pens scattered across the U.S. and Mexico and, after being released briefly in one of three larger facilities, including Wolf Haven International in Tenino, Washington and Ted Turner's Ladder Ranch, they are released into the wild in Arizona or New Mexico.

Yet FWS recently killed a litter of wolf-dog hybrid pups in that recovery area and other crossbred wolf-dog adults have been documented and photographed in the area. Contrary to Bangs' 1994 claims, a large percentage of the pen-reared wolves survive in the wild and, despite their alleged "conditioning" before they are released, show little fear of humans as they kill their livestock and pets.

Freeing Large Pen-raised Carnivores Is Dangerous

During his highly publicized cougar study in the Central Idaho Wilderness, biologist Maurice Hornocker learned how dangerous it can be to release a pen-reared large predator into the wild. He raised two cougar kittens in a large chain-link fenced enclosure near the Taylor Ranch on Big Creek and killed mule deer and even his lion hunter's horse to feed them.

When the young lions were nearly full-grown, they were quietly removed from the pen and were next spotted by loggers near a North Idaho campground. Several days later, one of them attacked pre-schooler Sally Carlson in that same campground while her mother, holding her hand, accompanied her to a restroom.

The youngster's father struck the lion repeatedly with a shovel until it released its grip on his daughter's head. His quick action undoubtedly saved the little girl's life as a newspaper account reported more than 90 stitches were required to close the wounds in her head, face and neck.

Children At Risk From Mexican Wolf Attacks

Citizens living in the Mexican Wolf Recovery Area report living in constant fear that a similar attack on their children will occur from the pen-raised wolves turned loose in their midst by FWS. Recently one resident contacted Canadian wildlife behavioral scientist Valerius Geist for indicators revealing when pen-reared wolves may be expected to attack humans.

Dr. Geist responded that, unlike wild wolves whose actions predict the degree of danger to humans, pen-raised wolves released into the wild attack humans for very different reasons and the timing of their attack is highly unpredictable. He explained that the pen-raised wolves may continue to kill cattle and pets yet not attack humans for an extended period but if an attack happens it will almost certainly be aimed at a child.

Dr. Geist also warned, "No matter what the origin of wolves in a settled landscape, be they wild or captivity raised, ultimately a (habituated) pack will attack a human. From that there is no escape, unless the offending wolves are shot as they start on their aberrant behavior."

He explained that wolves are plentiful where he lives but when they begin to be a nuisance they are quickly killed by licensed hunters who are allowed to kill three in a long annual season – or by landowners who do not need a license. In New Mexico and Arizona concerned residents cannot be sure whether the wolves they see were pen-raised and transplanted – or born in the wild either recently or several generations ago – which makes their situation more dangerous and unpredictable.

"Ignore All But Known Breeding Pairs and Packs"

In his 1984 letter to Lobdell, Bangs listed the "key recovery issues that will be consistently presented to the public." Issue number 6 stated, "Only breeding pairs of wolves that have successfully raised young are important to the recovery of viable wolf populations.

"At this time there is no such thing as a truly 'confirmed' wolf" until it has been determined to have successfully raised young in the wild or has been captured, examined, and monitored with radio telemetry. (F)rom this day forward we (will) use the strictest definition of confirmed wolf activity (i.e. individual wolves or members of packs that have been examined, radiocollared and monitored in the wild).

"We should be comfortable with this definition in all phases of wolf recovery such as when discussing the criteria for use of an experimental rule or for delisting the species because the population viability criteria have been reached." (emphasis added)

Existence of Many Wolves Ignored

Bangs also explained that it was too difficult to locate individual wolves or small groups of wolves that were not packs and emphasized that the existence of these wolves was not important to recovery. Once the transplanted wolves began pairing and successfully raising young, the Nez Perce and FWS recovery teams declined to investigate sightings of individual wolves or groups of wolves unless they involved livestock killing.

But even then, if the livestock was moved to a different location and/or the wolf predation stopped, any investigation abruptly ceased. In some parts of Idaho where wolf populations are excessive, including the county we live in, local citizens report frustration over the Wolf Teams' refusal to investigate reports of apparent pack activity unless there is evidence of at least two pups.

The excuse used by the FWS/NezPerce Team for its failure to investigate such activity is that it is too expensive but it also is not interested in recording wolves unless they meet the confirmed wolf criteria agreed upon by Bangs, Ted Koch and Steve Fritts in 1994. The exception is the need to radio-collar one or more wolves to facilitate removal of one or more members of a pack that continues to kill livestock.

Wolf Numbers Underestimated

There are so many variables involved in attempting to estimate the total number of wolves in a state that any such estimate is prone to large errors even with the best information available. But when the existence of every wolf that has not been part of a "collared" pack is ignored, any such estimate is suspect.

For example, local residents reported several wolf packs in Boise County yet FWS had documented only two. When the Team finally documented the existence of three more packs there were 2-1/2 times as many wolf packs as had been recorded and a similar increase in the number of breeding pairs – indicated both by pups and by yearlings that were born in the prior year and survived.

Although FWS goes back and adjusts the number of breeding pairs for the prior year when this evidence is documented, this system always results in initially underestimating both total wolves and breeding pairs. Recovery goals in all three states were met at least 2-3 years before then current FWS estimates said they were, yet the actual number of breeding pairs was not admitted and recorded until after the fact.

In the future the policy of including only the wolves in currently documented packs in the "minimum estimate" could result in wolves being declared below the recovery minimum of 10 breeding pairs in any of the three areas when the actual number of breeding pairs could be 2-3 times what is estimated. Theoretically this could result in wolves being declared threatened in one or all three states and an end to state wolf management,

continued on page 8

What They Didn't Tell You...continued from page 7

Alaska Underestimated Wolf Numbers By 50%

In Denali Park an intensive two-year study was conducted to determine how accurate their wolf population estimates had been for nearly two decades. The National Park Service/FWS researchers found that despite recording all of the known wolf packs and sightings, they had been underestimating total wolf numbers by about **50%**.

If one similarly doubles IDFG's 2007 *minimum fall* estimate of 732 wolves in Idaho, it would reflect a total of 1,464 wolves in just one state – not counting the new crop of pups. Instead of managing for the 512 wolves (2005 population estimate) unanimously approved by the F&G Commission on March 6, 2008, Idaho may be perpetuating up to 1,000 wolves – or even more.

That is **10** times as many wolves as Idahoans were led to believe would exist following wolf recovery. Yet these numbers still do not include wolves in most of the **16** wolf packs recorded along the Idaho-Montana border in 2007.

Most Border Packs Given To Montana

According to the 2006 Interagency Wolf Report, Montana only had an estimated 316 wolves and 21 breeding pairs at the end of 2006 compared to Idaho's estimated 673 wolves and 40 breeding pairs. Although the 16 border packs recorded in 2007 reportedly originated in Idaho and hunt in both states, it was decided that Montana would claim all of the wolves in **12** of the 16 packs.

This paper transfer of wolves resulted in a **33%** increase in Montana's "minimum estimated" wolf population in 2007 and an **86%** increase in the number of Montana breeding pairs! This resulted in Idaho showing only a **9%** increase in "estimated" wolf numbers and an **8%** increase in "estimated" breeding pairs in 2007.

But this is not the only way wolf biologists influence estimated wolf numbers and breeding pairs. If a wolf pack with pups is killing livestock the specific wolves biologists direct Wildlife Services to kill determines whether or not the pack continues to be counted as a breeding pair.

Low Estimates Hide Extent of Impact

But regardless of the number of breeding pairs counted, central Idaho is saturated with wolves. Other wolf packs and breeding pairs are constantly forming and dispersing to saturate adjacent areas – yet an unknown number of them are never included in the current year's minimum estimated wolf population.

It can be argued that most of these undocumented wolves will probably be documented sooner or later if they remain in the area, since 17 new packs were reportedly documented in 2007. But by pretending that the minimum estimate reflects the actual number of wolves, officials and the media downplay their negative impact.

A refreshing exception was a March 16, 2008 *Coeur d' Alene Press* article by Sean Garmire in which he

stated, "Game managers have produced an estimate of 753 wolves in Idaho and 1,500 in the three-state region. But those figures represent the minimum, and the real number could be closer to 1,000 in Idaho alone."

"Wolf Advocates Give Low Estimates"

"Because the animals often live in remote areas, the number 'is extremely difficult to produce,' said Idaho Fish and Game (Panhandle Region wolf) biologist Dave Spicer. 'Groups tend to skew the number, with wolf advocates giving low estimates, and some anti-wolf advocates giving higher figures,' Spicer said.

"Wolves, like mountain lions, bears and other predators, often kill more animals than they eat. Spicer said while overkill has been documented in North Idaho, hunter harvest rates have been similar over the past 15 years. 'Have we seen a level of predation that indicates we have a significant problem? Data indicates that's not the case, our elk and deer herds are healthy,' he said."

Yet a March 7, 2008 Idaho Statesman article by Roger Phillips reported, "Elk hunters will see a more restrictive season in 2008 because of shrinking elk herds. Hunters killed more than 19,000 elk in 2007, which is the first time in four years the statewide harvest has dropped below 20,000 animals. Factors contributing to the decline include poor habitat and calf production and wolves."

Panhandle Region Managed Differently

So which article is accurate? The short answer is that parts of both of them are through the fall of 2007. For years the Panhandle Region has operated like a separate entity from the rest of IDFG, generally obeying the law and, with a few notable exceptions, managing its wildlife to provide continued supplies for Idaho citizens to harvest.

Years ago it recognized that telephone harvest surveys are unreliable at the unit and regional level and implemented its own mandatory report for elk hunters. Despite all the wolves north of Highway 90 receiving full protection rather than the Non-essential Experimental classification, it reports far fewer wolves and lower wolf densities than are found throughout Central Idaho.

Few Wolves Counted in Panhandle

Whether this is due to the "shoot, shovel and shut up" wolf policy of some independent north Idaho residents or a combination of factors, in 2007 Panhandle Region biologists counted only **37** wolves in 8 resident packs. This compares with **148** wolves counted in the Clearwater, **169** in the full SW Region and **116** in the Salmon Region.

The eight resident wolf packs in the Panhandle produced only 5 *documented* pups and one breeding pair in 2007. The nearly 5,000 square miles north of Highway 90 shares its 3 wolf packs with British Columbia and Montana and includes three of the four highest producing deer and elk units in the Region (Units 1, 3 and 4).

Detecting only 32 adult wolves and five pups in the 7,409 square miles of the Panhandle Region reflects an *observed* fall 2007 wolf density of only 2 per 400 sq. miles.

By comparison the 148 *observed* wolves in the 11,954 sq. miles of the Clearwater Region reflects an *observed* fall 2007 wolf density of 5 wolves per 400 square miles – 2-1/2 times as high as the Panhandle.

Min. Wolf Density 3X Density in Denali Park

The current formula used to estimate the *minimum* number of wolves in the Clearwater puts that minimum number at 258 – reflecting a *minimum* wolf density of 9 wolves per 400 square miles with the potential for an *actual* wolf density of 13-18 or more wolves per 400 square miles.

When the size of the Clearwater Region is adjusted to the two-thirds that contains documented wolf packs or is considered wolf habitat, the minimum estimated wolf density is **13 wolves** for each 400 square miles. To put that *minimum* Clearwater wolf density in proper perspective, the published minimum 2005 wolf density in the 69% of Denali Park that is considered wolf habitat is only **4.64 wolves** per 400 square miles! (Meier et al 2006).

Wolves in Most Known Packs No Longer Counted

Beginning in 2006 Idaho wolf biologists stopped trying to count all of the wolves in known packs and assumed they were the same as the average number counted in a sample. For example in 2007, the average was 7.7 wolves per pack in the packs they actually counted so they multiplied 7.7 times the known 83 packs that existed at the end of the year which totaled 639 *estimated* wolves in 83 *documented* packs.

They also included 12 radio-collared wolves that existed in 8 groups too small to qualify as packs and added them to the 639 wolves in packs – but did not include wolves that were not collared. Then, based on studies and papers reporting an average of one lone wolf for every eight found in packs or groups (Mech 2003) they multiplied the 651 wolves by 1.125 and came up with a “minimum estimate” of 732 “documented” wolves.

New Estimation Technique Also Ignores Undocumented Wolves

Although their 2007 report and maps include seven “suspected” packs and 382 reported sightings of single or multiple* wolves (*either packs or groups of less than four wolves), these were counted as “zero” wolves and/or assumed to be part of a documented pack or group.

The information in the three preceding paragraphs is found in Idaho’s 2007 Annual Wolf Report – Appendix A, titled, “Population Estimation Technique Used to Determine Wolf Population Numbers in Idaho,” but the title is grossly misleading.

The “Estimation Technique” described has nothing to do with determining total wolf populations in Idaho but is being used to estimate the number of actual wolves in *confirmed* packs rather than spend additional time and money trying to count them. During 2007 Idaho wolf biologists spent weeks unsuccessfully trying to capture and radio-collar even one wolf in a wilderness pack.

F&G Ignores Legislative Wolf Plan

By allowing wolves to multiply without interference, except for the few dozen that are killed each year after attacking livestock, a growing number of uncollared wolves will be overlooked. With admittedly inadequate resources to continue to document, count and radio-collar 1 or 2 wolves each in the rapidly increasing number of packs, accurate estimates of total wolf numbers will be impossible to obtain. (see admission in Appendix A that the actual number of wolves is likely more than the 732 estimated due to failure to include the [seven] suspected packs in the estimator.)

“Appendix B” describes how FWS will allow all three states to estimate rather than continue to document the number of breeding pairs as they assume management. With the requirement for accurate wolf counts waived, it becomes increasingly important for state wildlife managers to admit the impact of excessive wolf populations and reduce wolf numbers dramatically where it is indicated.

Instead, on March 6, 2008 the Idaho F&G Commission ignored the wolf plan approved by the Idaho Legislature and FWS to manage for 15 breeding pairs, and unanimously endorsed a plan to maintain at least 500 wolves – the equivalent of 50 breeding pairs!

Excuses For Not Controlling Wolves

In January 2008, FWS Wolf Project Leader Ed Bangs told the media, “Wolves are never the primary cause (of failure to achieve elk population objectives). The primary cause is always habitat.”

In a February 20, 2008 article in the *St. Maries Gazette-Record*, IDFG Wolf Biologist Dave Spicer told Editor Ralph Bartholdt that deep snow in the Coeur d’Alene and St. Joe River drainages was preventing normal movement of deer and elk. Spicer predicted a high winter mortality for elk, especially elk calves, and said in addition to floundering in the deep snow, game herds must contend with predators that can walk on the snow’s crust

The article quoted Spicer, “Predators from cats to wolves have an easier time killing their prey when the snow piles up – it’s like a kid in a candy shop, they are out there doing their thing. The health of game herds, though, is driven by weather not predators,” he added.

Lacking fact or science to justify their failure to control excessive wolf numbers, the federal biologist used the magic word “habitat” and the state biologist blamed unhealthy game herds on “the weather.” Yet the vast majority of wolf-big game research concludes that wolves – not habitat or weather – prevent big game species from recovering once their numbers are temporarily reduced by either natural or man-caused disasters.

(NOTE: Unless Idaho citizens or their legislators overrule the F&G Commission plan to perpetuate unhealthy wolf populations, it appears that delisting may be a case of jumping out of the frying pan into the fire for Idaho elk hunters and livestock owners.-ED)