



IDAHO DEPARTMENT OF FISH AND GAME

600 South Walnut / P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Cal Groen / Director

September 24, 2010

Robyn Thorson, Regional Director
Pacific Region, U.S. Fish and Wildlife Service
911 NE 11th Ave
Portland, Oregon 97232

Re: Submission of Proposal For 10j Take of Wolves in Lolo Elk Management Zone

Dear Ms. Thorson:

The Idaho Department of Fish and Game (IDFG) hereby submits its request for the take of wolves in response to wild ungulate impacts in the Lolo Elk Management Zone under Section 10j of the Endangered Species Act and 50 C.F.R. §17.84(n)(4)(v). Consistent with federal regulations, IDFG has prepared a scientific-based document that describes:

- The basis of ungulate management objectives,
- The data indicating the ungulate population is below objective,
- The data indicating that wolves are a major cause of the unacceptable impact to the ungulate population,
- Why wolf removal is warranted to help restore the ungulate population to state management objectives,
- How ungulate population response will be measured and control actions will be adjusted for effectiveness,
- Efforts to address other identified major causes of ungulate population declines,
- The conduct of peer review of the proposal, and
- Public comment received and agency response.

As IDFG and the Idaho Fish and Game Commission previously discussed with you and other federal representatives, there is a strong feeling in Idaho that the federal government committed to ensuring that the reintroduction of wolves not harm the health of our elk herds and other wildlife so important to our state. The recent re-listing of wolves based on a legal technicality, and not related to biological factors or the adequacy of state regulatory mechanisms, has also called many to question the federal government's ability to address the conflicts that wolf reintroduction has created. The Service's prompt consideration of this proposal in accordance with the 10j rule is an important step in responding to this difficult situation.

Keeping Idaho's Wildlife Heritage

Ms. Robyn Thorson
September 24, 2010
Page 2

Please contact Deputy Director Jim Unsworth should any issues arise in the Service's review of the proposal.

Sincerely,

A handwritten signature in black ink that reads "Cal Groen" followed by a stylized flourish.

Cal Groen
Director

CG:JG:clc
cc: Brian Kelley, Idaho State Supervisor, USFWS
Bonnie Butler, Office of the Governor
Enclosures