



IDAHO FISH AND GAME COMMISSION

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NOTICE OF PUBLIC MEETING & AGENDA June 2021

Brad Little
Governor

Ed Schriever
Director

Commissioners:

Brad Corkill
Panhandle Region
Cataldo, Idaho

Don Ebert
Clearwater Region
Weippe, Idaho

Tim Murphy
Southwest Region
Boise, Idaho

Greg Cameron
Magic Valley Region
Rupert, Idaho

Lane Clezie
Southeast Region
Pocatello, Idaho

Derick Attebury
Upper Snake Region
Idaho Falls, Idaho

Ron Davies
Salmon Region
Clayton, Idaho

Special Meeting

Meeting Date & Time: June 17, 2021, 9:00 am MDT

Location: Teleconference

In-person Host Location: Idaho Department of Fish and Game
Southwest Regional Office
15950 North Gate Blvd.
Nampa, Idaho

Meeting Agenda:

1. Season-Setting:
Changes to 2021-2022 Wolf Season Proclamation (**Action Item**)
--Toby Boudreau, Wildlife Bureau Chief
(staff presentation to include overview of items related to the July 1 effective date of Senate Bill 1211)

Individuals with disabilities may request meeting accommodations by contacting the Director's office at the Idaho Department of Fish and Game directly at 208-334-5159 or through the Idaho Relay Service at 1-800-377-2529 (TDD).

Keeping Idaho's Wildlife Heritage

Meeting Date: June 17, 2021

Agenda Item No. 1

Agenda Item: Changes to 2021-2022 Wolf Season Proclamation (Action)

Bureau Chief Approval: TB

Prepared by: Toby Boudreau, Wildlife Bureau Chief

Background: Idaho Senate Bill (SB) 1211 (related to wolf management) will become law effective July 1, 2021. The legislation involves changes to some aspects of: recreational hunting and trapping (seasons generally set by Commission proclamation); agency control actions (conducted/contracted by the state under IDFG authorization), and control actions by private individuals (IDFG permit, with exceptions for wolves attacking or molesting livestock/domestic animals).

SB 1211 states that wolf trapping seasons will be open year-round on private land and authorizes methods available for any other wild canines (coyotes and foxes) for the taking of wolves. The law also addresses the use of wolf tags for hunting and trapping.

Staff are aware of some confusion about the distinction between agency/private control actions and recreational hunting/trapping seasons. The Commission's 2021/2022 big game season proclamation addresses only recreational hunting and trapping seasons by gray wolf tag-holders. The agency makes decisions for control actions separately from season-setting. Although overall wolf management objectives for seasons and control actions are related, the decision frameworks differ. This agenda action item is specific to amending wolf hunting and trapping seasons in response to SB 1211

Statutory Authority and/or Policy Issues: Changes adopted through the passage of SB 1211 will take effect July 1, 2021. Changes that affect recreational wolf hunting and trapping include amendments to Idaho Code 36-201 (trapping seasons and methods of take), Idaho Code 36-408 (wolf tags).

Under temporary administrative rule (IDAPA 13.01.08.413) that will take effect July 1, 2021 in conjunction with SB 1211, the Commission may set seasons identifying units in which method of take restrictions for game animals do not apply, where such restrictions do not apply to coyotes or fox: these seasons are noted as "expanded methods of take allowed" in the draft amended proclamation. IDAPA 13.01.08.413 provides for the ability to hunt outside of official shooting hours in such units during "expanded method of take" seasons, so long as the hunter obtains written permission (on private land) or an IDFG permit (on government-owned land). This rule is patterned after Idaho Code 36-1101(b)(6), which provides for use of artificial light for hunting coyote by similar permission.

Public Involvement Process: After review with the Commission on the June 3, 2021 conference call, IDFG posted draft amended 2021-2022 wolf season proposals on its website for public review and feedback through June 13, 2021. Individuals also sent emails or letters to provide input. (Summary of public comment provided separately)

Staff Recommendation:

After reviewing public comment, staff recommend the Commission adopt amended 2021/2022 trapping and hunting seasons (as provided separately).

Sample Motion:

I move the Commission adopt an amended proclamation for the 2021-2022 and 2022-2023 wolf seasons as presented by staff.

Limits

There is not a daily or season limit on wolves. No person may take more wolves than the number of legal tags they possess. Either sex may be taken.

Wolf Tags

Tag Valid Dates: Wolf tags bought with a hunting license are valid for the calendar year. Wolf tags bought with a trapping license are valid for the trapping year (July 1- June 30).

Nonresident Deer or Elk tags: Hunters may use an unfilled nonresident deer or elk tag to take a gray wolf during the open season corresponding to the deer or elk tag hunt area or unit when gray wolf season is also open. See page 112.

Tag Use for Wolf Hunting (wolves not restrained by traps): Persons with valid hunting licenses may use valid wolf tags bought under either hunting licenses or trapping licenses to take wolves in compliance with hunting seasons and rules.

Tag Use for Wolf Trapping: Persons trapping for wolves must possess a valid trapping license, with a Wolf Trapper Education course validation. Trappers meeting these requirements may use valid wolf tags bought under either hunting licenses or trapping licenses to take wolves by trapping in compliance with trapping seasons and rules.

General Rules for Hunting and Trapping

Tags: Tags must be validated and securely attached immediately upon killing a wolf.

Mandatory Check and Report: Any hunter or trapper killing a gray wolf must, **within 10 days of date of kill:**

- Present skull and portion of the hide with evidence of sex attached to an Idaho Fish and Game office or Fish and Game conservation officer (for removal/retention of premolar tooth and tagging of the hide with an official state export tag). No person may possess any raw gray wolf pelt, except during the time period after lawful harvest allowed for mandatory check, without an official state export tag attached, unless that person possesses a furbuyer or taxidermist license or appropriate import documentation.
- A hunter or trapper may authorize another person to comply with the mandatory report, provided that person has enough information to accurately complete the necessary form. Proxy statement required, see page 102.
- **Please thaw your gray wolf hide and skull before bringing it in for tagging. Staff members may not be able to check a frozen hide or skull.**

Wolves with Radio Collars: Return any radio collars on harvested wolves at the time of mandatory check.

Evidence of Sex: External evidence of sex (scrotum, penis, or testicles for males, or udder or vulva for females) must be left naturally attached to the hide, or portion of the hide, until the mandatory check requirement has been satisfied.

Retrieving Meat: There is no requirement to retrieve meat from a harvested wolf.

Big Game Feeding Sites: It is illegal to hunt, trap or pursue wolves within one-half mile of any active Idaho Fish and Game big game feeding site.

Weapons Restrictions: Same as for other big game animals, see page 100. Except it is legal to dispatch a trapped gray wolf with any rifle or handgun.

Electronic Calls: E-calls may be used to attract wolves.

Telemetry: It is illegal to take wolves using radio telemetry.

Dogs: It is illegal to use dogs to pursue wolves.

Bait: Hunting big game over bait is illegal, except for black bears. Wolves may be taken incidentally to bear baiting. See pages 71-72 (definition of bait for hunting, etc.).

Hunting with Aircraft: The Federal Airborne Hunting Act prohibits recreational hunting from aircraft.

Poison: It is illegal for hunters or trappers to use poison to take wolves. Federal law restricts use of poison for killing animals.

Sanitary Landfill or Designated Dump: It is illegal to hunt wolves within 200 yards of the perimeter of any designated dump or sanitary landfill.

Hunting Hours: Hunting hours are from one-half hour before sunrise to one-half hour after sunset.

Special Wolf Hunting Seasons Allowing Expanded Methods of Take

During **only** those hunting seasons designated on page 82 as "Expanded methods of take allowed":

- **Weapons:** Weapons restrictions (page 100) do not apply.
- **Bait:** Bait for wolf hunting is allowed on private lands. It is not legal to use edible meat portions of any game bird or animal, except legally salvaged road kill. For more information and to complete the required form to legally salvage road kill visit idfg.idaho.gov/species/roadkill or call a Fish and Game office, see page 4. Except for wolf hunting incidental to legal baiting with a black bear bait permit or incidental to legal trapping, placing bait on federal land for hunting wolves is subject to federal prosecution (as illegal dumping). Hunting over carcasses or animal parts that have not been placed as bait for hunting is legal.
- **Hunting Hours:** A hunter may take wolves outside of hunting hours, only if:
 - On private land, the hunter is the landowner or has written permission from the landowner to hunt outside of hunting hours.
 - On public land (government-owned land), the hunter has obtained a permit from IDFG to hunt outside of hunting hours. IDFG permits may be obtained from Regional Offices. See Page 98 for public land closures.
- **Motorized Vehicles:** Motorized vehicle restrictions for hunting do not apply (see pages 104-106); however, government or private landowner motorized access restrictions may still apply. It is also still illegal to shoot from or across any public highway (the traveled portion

of, and the shoulders on each side of, any road maintained by any government entity for public travel, including all bridges, culverts, overpasses, fills, and other structures within the right-of-way limits of any suchroad).

- **Dogs:** Hunters may use dogs to pursue wolves. No houndhunter permit is required.

Wolf Trapping Rules

A person must attend a wolf trapper education class and have a valid trapping license before trapping for wolves. Information on Wolf trapper classes is posted on the Fish and Game at idfg.idaho.gov/hunt/education.

Methods of take: Ground sets are the only legal set allowed for trapping gray wolves. Ground sets are defined as any foothold trap or snare originally set in or on the land, including any traps elevated up to a maximum of 36 inches above the natural ground level. (Size restrictions on body-gripping traps mean they are not allowed for wolves.)

It is illegal:

- To use any set within 30 feet of any visible bait.
- To use a dirt hole set with bait unless the bait remains covered at all times to protect raptors and other meat-eating birds from being caught accidentally.
- To place any ground set on, across, or within ten (10) feet of the edge of any maintained unpaved public trail designated by any city, county, state, or federal transportation or land management agency on the most current official map of the agency.
- To place any ground set on, across, or within any public highway; EXCEPT ground sets may be placed underneath bridges and within and at culverts that are part of a public highway right-of-way. Public highway is defined as the traveled portion of, and shoulders on each side of, any road maintained by any governmental entity for public travel, and includes all bridges, culverts, overpasses, fills, and other structures within limits of the right-of-way of any such road.
- To place any ground set incorporating snare, trap, or attached materials within three hundred (300) feet of any designated public campground, trailhead, paved trail, or picnic area. Cage or box live traps are permitted within three hundred (300) feet of designated public campgrounds, trailheads, paved trails, or picnic areas as allowed by city, county, state, and federal law.
- To place any ground set snare without a break-away device OR cable stop incorporated within the snare loop.
- To place any foot-hold trap with an inside jaw spread greater than nine (9) inches.
- To place any ground set body-gripping trap that has a maximum jaw opening when set, of greater than seven and one-half inches measured from the inside edges of the bodygripping portions of the jaws, within thirty (30) feet of any bait, lure or other attractant.
- To trap wolves within 200 yards of the perimeter of any designated dump or sanitary landfill, or within ½ mile of any active Department big game feeding site.
- To use the edible portions (meat) of a domestic or wild origin game bird, big game, upland game, game fish or

any part of protected nongame wildlife, or to use live animals as bait or an attractant. See the following exceptions.

Except it is legal:

- To trap wolves beyond 30 feet of a naturally killed big game species as long as the carcass is left undisturbed.
- To trap wolves beyond 30 feet of a legally-salvaged roadkill. For more information and to complete the required form to legally-salvage road kill visit our website at idfg.idaho.gov/species/roadkill or call a Fish and Game office, see page 4.

Dispatch: Trapped gray wolves may be dispatched any time of day or night with any rifle or handgun.

Bait: Bait for trapping is any animal parts; except bleached bones or liquid scent.

Incidental Wolf Take: Trappers who do not have wolf tags, but capture a wolf while targeting other species, should contact the nearest Fish and Game Office immediately. If trappers are unable to contact Fish and Game, they should release the wolf and report the capture to the nearest Fish and Game Office as soon as possible.

Caution about Non-Target Catch of Endangered Species: Non-target capture of endangered species (such as grizzly bear and lynx) or other federally protected animals is not authorized for trappers targeting wolves, and non-target captures are subject to federal prosecution. Wolf trappers should avoid locations (such as the Panhandle and Greater Yellowstone Area) at times when endangered species may be captured (such as when grizzly bears are out of dens). Trappers who capture endangered species should contact the nearest Fish and Game Office for help with safe release of the animal or other assistance, see page 4.

Release of Non-Target Catches: Non-target species are defined as any species caught for which the season is closed or is in excess of the trappers limit. **All non-target species caught alive shall be released immediately.** If difficulty is encountered releasing a trapped fisher, wolverine, lynx, mountain lion, or wolf please contact Fish and Game immediately for assistance, see page 4.

Any trapper who catches a non-target species that is dead shall:

- Promptly record the date and species of the animal caught.
- Report the catch on the mandatory furtaker harvest report form.
- Remove the animal from the trap and take it into possession.
- Notify Fish and Game through the local conservation officer or the nearest Fish and Game Office within 72 hours to make arrangements, see page 4.
- Fish and Game will reimburse trappers \$10 for each lynx, wolverine, bobcat, or fisher caught accidentally and turned in. A \$10 reward will also be paid for otters accidentally taken after the regional quota has been met.

Closed Statewide: There is no open season for fisher, kit fox, lynx or wolverine.

Traps

Checking Traps: Wolf trappers must visit every trap or snare at least once every 72 hours and remove any catch therein.

Removing Trapped Wolves of Another: No person may remove a wolf from the trap or snare of another except licensed trappers with a valid wolf tag issued to the individual removing the wolf, wolf trapper certification and written permission from the owner of the trap or snare.

Tags for Traps

All traps or snares set for wolves must have attached to the snare or the chain of every trap, a metal tag bearing in legible English the name and current address of the trapper; or a six- digit number assigned by Fish and Game as it appears on your trapping license adjacent to “TRAPPER ID.”

For additional trapping rules, see the current Upland Game, Furbearer & Turkey Seasons and Rules.

Private Land (see Note below)- Wolf Hunting Seasons July 2021 - June 2022		
Units	Season Dates	Notes
Statewide	July 1 - June 30	Expanded methods of take allowed, See page 80

Note: Hunter use of private land must comply with trespass laws. Private property owners may have specific restrictions for hunting on their property. Please check with the private landowner. For restrictions that may apply to private lands under IDFG Access Programs (Large Tracts or Access Yes), please check IDFG’s website at: [Hunting and Fishing Access | Idaho Fish and Game](#)

Public Land - Wolf Hunting Seasons July 2021 - June 2022		
Units	Season Dates	Notes
1, 2, 3, 5, 8, 8A, 11, 11A, 13, 19A, 25, 48, 60, 60A, 61, 62A, 63, 63A, 68, 68A, 71, 73A, 74	Aug 1 - June 30	General hunting rules apply (Expanded methods of take not allowed)
4, 4A, 6, 7, 9, 10, 10A, 12, 14, 15, 16, 16A, 17, 18, 19, 20, 20A, 22, 23, 24, 26, 27, 28, 31, 33, 34, 35, 36, 36B, 39, 43, 44, 62, 64, 65, 67	Apr 1 - Nov 14	General hunting rules apply (Expanded methods of take not allowed)
	Nov 15 - Mar 31	Expanded methods of take allowed, See page 80
21, 21A, 38, 40, 41, 42, 46, 54, 55, 57	July 1 - June 30	General hunting rules apply (Expanded methods of take not allowed)
29, 32, 32A, 36A, 37, 49, 50	Apr 1 - Nov 14	General hunting rules apply (Expanded methods of take not allowed), Motorized Hunting Rule Applies August 30 - November 14 only , See Pages 104 - 106
	Nov 15 - Mar 31	Expanded methods of take allowed, See page 80
30, 30A, 37A, 47, 53, 56	July 1 - June 30	General hunting rules apply (Expanded methods of take not allowed), Motorized Hunting Rule Applies, See Pages 104 - 106
45, 51, 52, 52A, 58, 59, 59A, 66, 66A, 69, 70, 72, 73, 75, 76, 77, 78	Aug 1 - June 30	General hunting rules apply (Expanded methods of take not allowed), Motorized Hunting Rule Applies, See Pages 104 - 106

Private Land (See Note below) - Wolf Trapping Seasons July 2021 - June 2022 For legal methods of take see page 81			
Units	Season Dates	Foothold Traps Allowed	Snares Allowed
1, 2, 3, 4, 4A, 5, 6, 7, 8, 8A, 9, 10A, 11, 11A, 13, 14, 15, 16, 18, 19A, 20A, 21, 21A, 22, 23, 24, 25, 26, 27, 28, 29, 30, 30A, 31, 32, 32A, 33, 34, 35, 36, 36A, 36B, 37, 37A, 38, 39, 40, 41, 42, 43, 44, 46, 47, 50, 51, 54, 55, 56, 57, 58, 59, 59A, 60, 60A, 61, 62, 62A, 64, 65, 66, 67, 69	Apr 1 - Nov 14	Yes	No
	Nov 15 - Mar 31	Yes	Yes
10, 12, 16A, 17, 19, 20, 45, 52, 52A, 53, 63, 63A, 66A, 68, 68A, 70, 71, 72, 73, 73A, 74, 75, 76, 77, 78	April 1 – Oct 9	Yes	No
	Oct 10 - Mar 31	Yes	Yes
48, 49	July 1 - June 30	Yes	No

Note: Trapper use of private land must comply with trespass laws. Private property owners may have specific restrictions for trapping on their property. Please check with the private landowner. For restrictions that may apply to private lands under IDFG Access Programs (Large Tracts or Access Yes), please check IDFG's website at: [Hunting and Fishing Access | Idaho Fish and Game](#)

Public Land - Wolf Trapping Seasons July 2021 - June 2022 For legal methods of take see page 81			
Units	Season Dates	Foothold Traps Allowed	Snares Allowed
1	Nov 15 - Mar 31	Yes	Yes
2	Oct 10 - Nov 14	Yes	No
		See note 1, Page 84	
	Nov 15 - Mar 31	Yes	Yes
		See note 1, Page 84	
3	Oct 10 - Nov 14	Yes	No
		See note 2, Page 84	
	Nov 15 - Mar 31	Yes	Yes
		See note 2, Page 84	
4, 4A, 7, 9, 15, 18, 20A, 21, 21A, 22, 23, 24, 26, 27, 28, 29, 30, 30A, 31, 32, 32A, 33, 34, 35, 36, 36A, 36B, 37, 37A, 43, 44, 50, 65	Sep 10 - Nov 14	Yes	No
	Nov 15 - Mar 31	Yes	Yes

Draft Proclamation & Brochure -- Staff Recommendation for Amended Wolf Seasons

Public Land - Wolf Trapping Seasons July 2021 - June 2022			
For legal methods of take see page 81			
Units	Season Dates	Foothold Traps Allowed	Snares Allowed
5, 8, 8A, 10A, 11, 11A, 13, 14, 16, 19A, 25, 40, 41, 42, 45, 46, 47, 51, 52, 52A, 53, 54, 55, 56, 57, 58, 59, 59A, 60A, 63, 63A, 64, 66, 66A, 67, 68, 68A, 69, 70, 71, 72, 73, 73A, 74, 75, 76, 77, 78	Oct 10 - Nov 14	Yes	No
	Nov 15 - Mar 31	Yes	Yes
6	Sep 10 - Oct 9	Yes	No
	<i>See note 3, Page 84</i>		
	Oct 10 - Nov 14	Yes	No
	Nov 15 - Mar 31	Yes	Yes
10, 12, 16A, 17, 19, 20	Sep 10 - Oct 9	Yes	No
	Oct 10 - Mar 31	Yes	Yes
38	Oct 10 - Nov 14	Yes	No
	<i>See note 4, Page 84</i>		
	Nov 15 - Mar 31	Yes	Yes
	<i>See note 4, Page 84</i>		
39	Sep 10 - Nov 14	Yes	No
	<i>See note 5, Page 84</i>		
	Nov 15 - Mar 31	Yes	Yes
	<i>See note 5, Page 84</i>		
60, 61, 62, 62A	Nov 15 - Mar 31	Yes	No
48, 49	None	No	No

Notes:

1. Only that portion of Unit 2 north of Highway 53 is open.
2. Only that portion of Unit 3 within the Little North Fork Coeur d'Alene River drainage is open.
3. Only that portion of Unit 6 within the North Fork of the St Joe River drainage is open.
4. That portion of Unit 38 within Ada County **closed**.
5. That portion of Unit 39 within Ada County is **closed**. Trapping open in that portion of Unit 39 within Boise and Elmore Counties **only**.

Appendix: Wolf Season Public Scoping Summary

Input via Website Scoping Questionnaire

The proposals for changes to the current 2021-2022 and upcoming 2022 – 2023 wolf hunting and trapping seasons were posted for public information/scoping on the Department's website from June 4 through June 13. A webform asked "Do you support?" with an opportunity for yes or no answer. IDFG accepted late comments through around noon on June 14.

- During the comment period, 18,892 unique users accessed the website input form; 12,388 individuals submitted input.
- Of these commenters, 5,255 (~42%) identified themselves as Idaho residents and 7,133 (~57%) identified themselves as nonresidents. Top 3 states of residence of non-resident users accessing the web input form: California, Colorado, and New York.
- Of the Idaho residents, 3,074 (~58.5%) did not support the proposal and 2,181 (~41.5%) supported the proposal.
- In general, ~23% supported the scoped hunting and trapping proposals and ~77% opposed.

Other Comments: Form-based Emails Opposing Expansion of Wolf Seasons

During the public input period IDFG/Commissioners also received 7,682 emailed comments on the proposed changes to the wolf hunting and trapping seasons. Most of these comments were submitted via automated response form or otherwise using a template form opposing expanding wolf hunting/trapping.

- Idaho Residents: 71 emails (1%)
- Non Residents (including people living outside the U.S.) (98%)
- Unknown Residency: 71 (1%)

Some of these emails were framed as opposition to Senate Bill 1211 (e.g., "stop Senate Bill 1211"), which indicated a lack of understanding of the respective roles of the Legislature and Commission.

The form emails also included the following perspectives as reasons for opposition:

- Concern for public safety from more hunting during summer recreation months.
- Seasons should end when wolves are breeding and rearing their young.
- Livestock loss from wolf depredation is minimal compared to losses due to other causes.
- Night hunting and expanded methods (spotlights, thermal imaging, motorized vehicles, no weapons restrictions) violate fair chase and ethical hunting principles.
- Using dogs to hunt wolves is unsporting and endangers domestic dogs.
- Hunting wolves over bait increases the chances of conflict, disease transmission and violates fair chase.
- Expanded trapping endangers increases risk to ESA-listed/imperiled species, including Canada lynx and grizzly bears.
- Wolves do not pose a danger to the elk population (referring to statements that elk population estimates are at least 120,000, Idaho is enjoying the "second golden era of elk hunting" for the last six years or more, etc.)
- Live wolves are value to Idaho, including ecosystem services and tourism dollars.
- Killing wolves at a higher rate will support decisions for relisting under the ESA.

Other Comments: Emails/letters

A small number of emails and letters did not follow the form/templates and raised other issues.

A few commenters were critical of the lack of an opportunity on the website questionnaire to provide feedback in addition to the structured question. An aspect of the criticism was that a “no” would be unclear as to whether the commenter felt the proposals were too aggressive or were not aggressive enough.

Feedback via letter or email from Idaho residents included the following perspectives:

- The proposed expansion did not go far enough; wolves should be classified as a predator.
- The legislature and governor’s actions were an overstep; biology by ballot box is a huge risk as seen in other states.
- Even if I don't always agree with IDFG rules, I believe IDFG can manage wildlife better than politicians and special interest groups.
- I'd rather hunters have more opportunities with fewer restrictions than hiring out aerial gunners to do it.
- I don't think livestock kills are that large of a number as it relates to total livestock losses.
- I’m concerned with actions that may increase federal involvement in wolf management, which will be a disaster.
- Wolves are hard to find and kill, so I'm not sure what the impact will be on the populations with the new rules.

Feedback via letter from representatives of organizations (Idaho Conservation League, Greater Yellowstone Coalition, Friends of the Clearwater, Humane Society of the United States, and Center for Biological Diversity) opposed expansion of wolf seasons and included the following perspectives.

- Lack of justification (relative to wolf predation on livestock or elk) for expanding seasons, and assertion that excessive killing of wolves exacerbates livestock conflict.
- Safety concern about night hunting, particularly on public land.
- Potential to increase non-target catches from expanding trapping to all private lands.
- An absence of limit on number of wolves taken is not sound wildlife management.
- Concern with non-target trapping of species like fish, lynx, grizzly and wolverine, and request for trapping restriction in habitat for these species.
- Inconsistency with purpose of Pittman-Robertson Act funding (Center for Biological Diversity referred to its request to federal agencies to determine Idaho as ineligible to receive PR funding because of overly aggressive wolf management).
- Instead of expanding take methods/practices for wolves to match current ones for coyotes and foxes, IDFG should increase restrictions for coyotes and foxes (*e.g.*, prohibit night hunting, use of dogs, and hunting over bait; adopt weapons and motorized vehicle hunting restrictions).
- Conflict with statutory wildlife policy via legislative override of IDFG.
- Excessive killing of wolves, coyotes and foxes casts doubt over Idaho’s ability to act a responsible steward of wildlife.
- Motor vehicle restrictions on public land still apply; IDFG cannot permit hunters to violate travel restrictions on public land.

The Kootenai Tribe of Idaho provided feedback via letter including the following perspectives:

- Concern with reduction in management oversight and potential inconsistency with the 2002 Idaho Wolf Conservation and Management Plan, which the Tribe believes should continue to be the basis for wolf management.
- Lack of take limit, potential take of nursing females and pups, allowance for night-time hunting and chase by snowmobiles are counter to science-based management and fair-chase principles.
- IDFG has reported an uptrend in the statewide elk population in recent years, and reported cattle and sheep losses due to wolves are respectively less than 1% and 3%.

Appendix: Staff Review of Public Comment

Scoping of Amended Wolf Seasons for SB1211

After a review of public feedback, staff recommend the Commission adopt the hunting and trapping seasons scoped with the public for implementing SB1211. The staff recommendation includes some revisions to season table formatting and accompanying brochure text for clarity (e.g., clarification of gear restrictions for trapping; clarifying that landowners may restrict motorized access or other activities, regardless of Commission allowances for hunting or trapping).

Some issues raised in comments are outside the scope of the Commission's proposed action or authority. The passage of SB1211 was a legislative action and not an action of the Department or the Commission. Although the Commission took a position to not support SB1211, the Legislature ultimately passed it, and it will become law effective July 1, 2021.

Wolf Population Objectives & Monitoring

Many of the comments opposing changes to wolf trapping and hunting seasons refer incorrectly to the Commission's proposals as a plan to exterminate 90% of Idaho's wolves. This mischaracterization implies that the Commission's objective is to manage the wolf population downward from an approximate 1,500 to one of the federal minimum recovery criterion of a population size of 150.

The Commission has previously directed the Department to manage for a lower population size than 1,500, because conflict (livestock depredations on predation impacts on elk populations in backcountry units) has been unacceptable at that level, noting that a population size of 1,500 is more than 10 times federal recovery criteria for population size. However, Commission direction to the Department has also underscored the importance of maintaining a recovered wolf population and keeping state management authority (*i.e.*, keeping wolves in Idaho from being placed back under federal protection under the Endangered Species Act).

Idaho's and other wolf populations have demonstrated resiliency, as widely documented in peer-reviewed studies and as observed through the Department's monitoring of Idaho's wolf population. The Department does not anticipate that take of wolves with expanded seasons will threaten the recovered population, and the Commission and Department will continue to monitor population size and mortality through mandatory reporting of harvest and control actions, radiocollaring, remote cameras, and other methods.

Wolf Management Considerations for Elk Populations

Comments focused on Idaho's elk population on a statewide basis do not appear to account for the size and diversity of the state of Idaho. While some areas in Idaho have robust elk populations, others are below management objectives for bulls, cows, or both. Staff season recommendations for expanded methods of take on public land for elk management considerations relate to those units where elk herds are below objective.

Wolf Management Considerations to Reduce Depredation on Domestic Animals/Livestock

Comments focused on livestock/domestic cattle depredations on a statewide basis do not appear to account for the size and diversity of the state of Idaho. While the vast majority of Idaho

livestock have not been harmed by wolves, the financial impacts of depredations are not distributed evenly. While there are cattle and sheep producers in Idaho who have not been affected by wolf depredations, there are others for whom losses (cattle/sheep/guard dogs) to wolf depredation are significant and persistent. Staff season recommendations for expanded methods of take for livestock protection considerations relate to those units where wolf depredations are chronic (at least 4 of the last 5 years).

Value of Species

Commenters refer to the value that wolves bring to Idaho for tourism and ecosystem services. Elk, deer, and moose also bring significant dollars in the form of wildlife viewing and hunting, and they are an important food source for many Idahoans. The Commission considers a wide array of competing values, both monetary and otherwise, in establishing wildlife management direction and objectives.

Ethics of Expanded Methods of Take:

Ethics are subjective and reflective of the values of the commenters. We understand and appreciate the differing perspectives of what constitutes ethical hunting and trapping. The Legislature has addressed some ethical matters in statute as to allowances or restrictions (such as in Idaho Code 36-1101), while the Commission has addressed others within its area of authority.

Idaho Code 36-1101 makes some distinctions among methods of take as between game animals, furbearing animals, unprotected or predatory wildlife (such as coyotes), and these are within the scope of SB1211 amendments to Idaho Code 36-201. Idaho Code 36-1101(b)(6) provides for use of artificial light for hunting of coyotes by permission. The Commission has adopted temporary rule to provide a similar permission structure for hunting outside of big game shooting hours in conjunction with seasons in which expanded methods of take are authorized.

Staff recommendations are an effort to implement SB1211, recognizing hunters and trappers may still make their own ethical decisions as to how, when and where they conduct their activities.

Mandatory Check Times (harvest reporting)

At least one comment reflected misunderstanding about times for harvest reporting and mandatory check. SB1211 extended the minimum check time for wolves taken in defense of livestock or domestic animals to 30 days. SB1211 did not change check times for hunting and trapping, and the Commission rule for a 10-day check time for wolves remains in effect.

Risks of Non-Target Trapping & Other Trapping Considerations

Commenters express concern for non-target species captured in wolf traps. The Commission and Department implement measures to reduce the potential for non-target capture, including seasons setting and administrative rules. These measures include mandatory trapper education and wolf-specific trapper education to trap for wolves. The mandatory education includes instruction on reducing non-target capture. Foothold traps most often result in animals being captured alive. As stated in the season brochure, non-target species captured alive must be released immediately, and mandatory trap check times apply. With the proposed season changes, staff have proposed advisory language for trappers targeting wolves to make sure they

are aware they are not authorized to capture endangered species, such as Grizzly Bear and Lynx, and anyone doing so may be subject to federal prosecution.

A few comments discussed issues related to trapping reporting and practices and general. These issues are outside the scope of this season-setting action. Negotiated rulemaking to review the Commission's administrative rules for trapping is scheduled for 2022 as part of the Governor's Executive Order for Zero-based Regulation (with legislative review envisioned for 2023).