

Idaho Wildlife Federation  
PO Box 6426  
Boise, Idaho 83707

July 26, 2017

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

**Re: Comments on Proposed Rule Changes to “Allow use of bait for purpose of hunting wolves”**



To the Idaho Department Fish and Game Commission,

On behalf of the Idaho Wildlife Federation, our organization's membership, and our supporting affiliate clubs across Idaho, we offer our support for the proposed rule to allow for use of baiting to harvest wolves. We fully acknowledge that the topic of wolf management is a polarizing issue, which is why we offer our support for the baiting of wolves with a few pragmatic stipulations that address social and ecologic concerns.

We understand that passing this rule will not simply allow the baiting of wolves in every hunting unit across the state, but instead gives the Commission the discretion to decide where the practice may be necessary to cull regional wolf populations that have surged above the socially and ecologically desired population target range. In areas where wolf populations are below the desired target range baiting may not be appropriate.

IWF also understands that managing game populations, including predators, often necessitates the employment of the Idaho Department of Fish and Game (IDFG) and the U.S. Fish and Wildlife Service to cull certain populations. By allowing hunters to bait wolves in certain regions, and therefore increase harvest success rates, we can limit the spending of sportsman and tax dollars paid to those agencies for those services.

Furthermore, this rule will provide clarity to a controversial situation when wolves have moved in to feed on the carcass of an animal shot by a hunter. For example, a hunter shoots an elk miles away from a road in the Frank Church Wilderness. After two trips hiking meat back to the vehicle the hunter returns for the third time to hike out the horns and ribs to find a wolf feeding on the carcass. In this scenario, if the hunting season for wolves overlaps with elk season, does this constitute baiting if the hunter also takes the wolf? We feel this rule will eliminate this problem that previously could turn a hunter into a criminal.

However, baiting wolves needs to be done responsibly and sustainably. IWF advocates that baiting wolves needs to be done far enough away from human establishment and activity as to not habituate the animals to enter human conflict zones. Baiting out in the woods far away from humans we agree is a cost efficient and effective way to manage the species. Setting up a bait station on grounds near towns, public recreation areas, high traffic areas, etc., IWF does not

advocate for. IWF represents a broad swath of sportsmen and recreationists. Bird hunters may cringe at the idea that wolves are being drawn to sagebrush foothills hunted with their dogs, which could become prey targets. Baiting should not draw wolves from remote areas to popular recreation areas, trails, and roads where children and adults, dogs, and even wolves are placed unnecessarily in harm's way. The essential point is that we do not create "problem" animals. We advise IDFG create "buffer areas" surrounding human activity zones where wolf baiting is not allowed.

The people of Idaho, the IDFG, sportsmen, all have a personal stake in not seeing the gray wolf return to the Endangered Species List along with the controversial issues necessary to recover endangered species. Along with the continued practice of wolf population surveying, we believe baiting can be done in a sustainable way to control populations that would otherwise be controlled by wildlife agencies regardless. If the rule passes, IWF urges IDFG to adopt a plan that does not allow wolf baiting within miles of human activity- exact distance should be determined by your wolf biologists.

Thank you for the opportunity to comment on this proposed rule change. Please consider our comments carefully and be sure to contact the Idaho Wildlife Federation should you have any questions or clarifications,

Sincerely,

Brian Brooks  
Executive Director  
Idaho Wildlife Federation