MULE DEER FOUNDATION POSITION ON WOLVES ADOPTED FEBRUARY 4, 2009

POSITION

It is the position of the MDF that the gray wolf in the northern Rocky Mountains is delisted as soon as possible and their management is transferred to the State Fish and Wildlife agencies.

We believe that the current population levels which greatly exceed the original recovery objectives and the widespread distribution of wolves are factors necessitating such an immediate action. Further, we believe that such an action would provide managers with the flexibility necessary for managing wolves. We believe that the states can more effectively balance the management of wolves with the management of other resident wildlife such as mule deer.

State wildlife agencies should classify the wolf as a "game species." States would be able to set season and bag limits on wolves which would be part of an overall strategy of balancing big game populations and wolf populations.

MDF supports the current approved Gray Wolf Management Plans in Montana, Idaho and Wyoming. We believe that these plans have adequate safeguards to ensure the long term sustainability of the Rocky Mountain Gray Wolf population in balance with the big game populations. We believe that this strategy will also maintain the genetic diversity of the wolf population which has been an issue raised in the delisting process.

BACKGROUND

The introduction and subsequent management of wolves is a hotly debated issue across the western United States. Habitat for the northern gray wolf includes Idaho, Wyoming, and Montana, the eastern third of Oregon and Washington, and north-central Utah. The northern gray wolf was formally listed as a federal endangered species in 1974 in accordance with provisions contained within the Endangered Species Act.

Wolves were re-introduced into Yellowstone National Park 1995 and in central Idaho in 1996. These areas were selected due to their relatively high elk populations and remote public lands that include

classified Wilderness and backcountry thus minimizing potential impacts with existing management activities. Wolves dispersed naturally from Canada and became established in Montana sometime in the 1980's thus precluding the need for a wolf transplant in that area. The United States Fish & Wildlife Service (FWS) determined that recovery of the northern gray wolf was dependent on the establishment of 30 or more well distributed breeding pairs and 300 individual wolves in western Montana, central Idaho and in Wyoming for three successive years.

Wolf population estimates in 2008 indicate a population of 1500 animals and approximately 100 breeding pairs. This marks the ninth consecutive year that the northern gray wolf population has exceeded the original recovery goal. In addition, the FWS believes that the genetic diversity of this metapopulation is very high.

The population growth and expansion of wolves following the 1995-96 transplants have been highly successful. The reintroduction has been so successful that the elk populations in and around Yellowstone and parts of central Idaho has shown a sharp decline in total numbers. In 2007, the FWS delisted the northern gray wolf population after the states of Wyoming, Montana and Idaho had in place approved wolf management plans. In February of 2008, the management responsibility was transferred to those respective states. Several parties filed a lawsuit challenging that final rule delisting the wolf. As a result, on July 18, 2008, the US District Court in Missoula, Montana, issued an order immediately reinstating Endangered Species Act protections for wolves. In September 2008, the FWS requested the court vacate and remand the final delisting rule back to the FWS. The court granted the FWS's request on October 13, 2008. Since that ruling the FWS has reopened the public comment period on its proposal to delist the gray wolf.

The overall mission of the Mule Deer Foundation (MDF) is to ensure the conservation of mule deer and black-tailed deer and their habitat. Presently, mule deer populations across the western states are well below their objectives; in fact, they are the only western big game species with a declining population trend. Several years ago the Directors of the western state fish and wildlife agencies organized a committee of professional wildlife biologists to study the reasons for this decline. They determined that there were many contributing factors including predation. While the MDF recognizes the positive role of predators in naturally functioning ecosystems, we are concerned about the impact that an additional predator could have on the ability of mule deer populations to recover. Several studies on wolf-big game relationships have been where the principal prey is elk, except in western Montana where whitetail deer are important to wolves. In places like southern and central

Idaho, southwestern Wyoming, parts of Montana and Utah, mule deer are more prevalent and could be quite vulnerable to wolves.

Further, MDF is disappointed and concerned that many of the organizations that filed the lawsuit challenging the February 2008 delisting of the gray wolf in the north Rockies agreed with the recovery objectives when they were established. Their decision to take legal action to prevent delisting, even though the wolf has greatly exceeded everyone's expectations regarding their population levels and their distribution, will further polarize interest groups, eliminate trust and make it almost impossible to build consensus on future wildlife issues.