Petition for Rulemaking: Protection of Gray Wolf Pups and Denning Wolves

November 17, 2026

Attention: Idaho Fish and Game Commission

Idaho Department of Fish and Game, 600 S. Walnut Street, Boise, ID 83712

Re: Petition for rulemaking under Idaho Code § 67-5230 — protection of gray wolf pups and denning wolves

Dear Chairman Cheirrett and Commissioners:

The undersigned groups submit the enclosed petition asking the Commission to prohibit take of gray wolf pups and wolves at active dens. Idaho protects the young of black bears, mountain lions, mountain goats, and grizzly bears.

Idaho's 2002 Wolf Conservation and Management Plan, approved by the Legislature, commits the state to manage wolves similarly to black bears and mountain lions. Idaho's rules protect the young of both species. However, taking of wolf pups is not currently prohibited. This petition asks the Commission to close that gap.

Under Idaho Code § 67-5230, we ask the Commission to initiate rulemaking at its first regular meeting held seven or more days after this submission. We would welcome the chance to present the petition and answer questions at that meeting. Additionally, at least two weeks before the January 2027 meeting, we request a meeting with relevant IDFG staff to review this petition and any concerns or suggestions they may have.

Petitioner and request

Petitioner: International Wildlife Coexistence Network (IWCN), a 501(c)(3) nonprofit. Contact: Suzanne Asha Stone, Executive Director. 9169 W. State Street, Suite #1014, Garden City, Idaho 83714. 208-861-5177, Suzanne@wildlifecoexistence.org

Co-petitioners:

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Chris Gertschen, Concerned Idaho Citizen, cgertschen@cox.net

Petitioners ask the Commission to:

1. Amend IDAPA 13.01.08.300.01 to protect wolf pups of the year, and female wolves accompanied by young, before September 1; Idaho applies a similar standard to mountain lions and black bears.
2. Amend IDAPA 13.01.08.410 to prohibit take of wolves in or at an occupied den or rendezvous site and disturbing an occupied den or rendezvous site.
3. Apply the same take regulation to wolf trapping and bar the Department from publishing den or rendezvous site locations.
4. Prohibit any payment or reimbursement for killing wolf pups or lactating female wolves, and require the Department to record, with photo documentation, age class and lactation status when wolves are checked.
5. Close wolf hunting and trapping seasons from April 1 through July 31 by proclamation until the new rule takes effect, so pups are protected in the 2027 denning season.

Proposed rule language

New text is in bold. Existing text of IDAPA 13.01.08.300.01 is shown for context.

IDAPA 13.01.08.300 — Identification of Animals That Legally May Be Taken

01. Big Game Animals of Either Sex. Unless a season is restricted, big game animals of either sex may be taken, except the following may not be taken:

a. Mountain Goat. Females accompanied by young.

b. Black Bear. Females accompanied by young.

c. Mountain Lion. Spotted young or females accompanied by spotted young.

d. Grizzly Bear. Adult grizzly bears accompanied by young, or young accompanied by adult grizzly bear(s).

e. Gray Wolf. Young of the year or females accompanied by young, prior to September 1.

IDAPA 13.01.08.410 — Unlawful Methods of Take (new subsection)
It is unlawful to take any gray wolf in or at a den or rendezvous site, or to excavate, gas, smoke, flood, block, or otherwise disturb a den or rendezvous site, that the person knows or reasonably should know is occupied by gray wolf pups.

Trapping rules (parallel amendment)
The protections in 13.01.08.300.01.e and 13.01.08.410 apply to the take of gray wolves by trapping and snaring. No trap or snare may be set at or near a den or rendezvous site that the trapper knows or reasonably should know is occupied by gray wolf pups.

Confidentiality of den locations (new)
The Department shall not publish or otherwise disclose the location of any gray wolf den or rendezvous site.

No payment for pups or lactating females (new)
No funds administered by the Department or the Commission, including Commission Challenge Grant funds, and no funds provided through any agreement, grant, or partnership with the Department or the Commission, may be used to pay or reimburse any person for taking a gray wolf pup of the year or a lactating female gray wolf. The Department shall not enter into or renew any such agreement unless it includes this condition.

At the mandatory check of any gray wolf taken from April 1 through August 31, the Department shall record, with photographs, whether the wolf is a pup of the year and, for females, whether it is lactating.

Statement of reasons

1. Idaho committed to manage wolves like black bears and mountain lions
The Idaho Wolf Conservation and Management Plan, approved by the Legislature in 2002, states that wolves can in most instances be managed similarly to how black bears and mountain lions are traditionally managed (SCR 134, 2002). The Department still describes wolf management this way: as big game, similar to black bears and mountain lions (IDFG wolf management history). When Idaho assumed wolf management, the Department's director publicly pledged that Fish and Game would manage wolves in much the same way as bears and mountain lions (IDFG, “Idaho is Ready and Able to Manage Wolves”). The Commission itself has called the 2002 plan the agency’s foundation for wolf management in Idaho (IDFG, 2010). The Department's 2023–2028 Wolf Management Plan does nothing to contradict that position.

2. Idaho protects the young of every comparable species except wolves
IDAPA 13.01.08.300.01 bars the take of female black bears with young, spotted mountain lion kittens and females with spotted young, mountain goat females with young, and grizzly bears with young (IDAPA 13.01.08.300). Gray wolves are the only large predator managed as big game with no such protection. This petition asks only that wolves receive the treatment the state's own plan promised.

3. Newborn pups are being killed at dens

State mortality records show three hunters killed 12 wolf pups in northern Idaho on April 25, 2026: six in game unit 6 in the Panhandle Region, and six in game unit 10A in the Clearwater Region. The pups were likely one to three weeks old, and each kill qualified for up to $2,000 in payments through the Foundation for Wildlife Management. Those payments are partly funded by the State of Idaho (Public Domain). Petitioners consulted with several wolf experts who concluded the hunters likely located dens and removed the pups, though records list a different method. In 2024, the Department's wolf biologist confirmed three pups shot on April 25 that year were likely under one month old (Coeur d'Alene Press / Idaho Statesman).

IDFG Big Game Mortality Reports for January through August 2026, obtained by Petitioners through multiple public records requests, confirm those two litters were killed on a single day. Additional records show young-of-the-year wolves were also killed in May.

The practice is not new, and public money has paid for these killings. On April 12, 2021, one hunter killed eight wolf pups in a single day at Johnson Creek in Bonner County, game unit 4A. Six were reimbursed at $1,000 each: $500 from the Foundation for Wildlife Management and $500 from IDFG Commission Challenge Grant funds, according to the Foundation's reimbursement records submitted to the Department. The other two pups were taken without tags. The Department issued a warning (W01279), not a citation, after the hunter said he believed he could buy tags afterward.

Under the proposed rule, payments for these types of kills would end. A hunter in the field may not be able to tell whether a female is nursing, but check-in staff can examine a carcass for age and lactation. That makes a payment ban enforceable even where a field rule would not be. No public dollars, and no program that partners with the Department, should reward removal of entire wolf litters or the mothers that pups depend upon.

Two days after juvenile harvest records were publicly reported, owners of a Facebook page with nearly 300,000 followers posted a photo of six dead pups, their eyes still closed, lined up on a log. The caption indicated the pups were in the page owners' possession: "Since the cats out of the bag on these little guys I figured it's time to get them out of my freezer to make room for elk meat. They have pelt tags attached. Pm me." When a commenter who described himself as pro-hunting objected that killing pups was wrong, the page replied, "these are roaches.." The post, since removed, drew more than 3,000 comments and was shared widely. Several commenters asked to buy the pups. The image and that reply show how far Idaho's policy has normalized the killing of newborn wolves.

4. Killing pups at dens is not fair chase

Newborn and young pups cannot leave the den, flee, or survive on their own. Taking them offers no hunting opportunity and violates the fair-chase ethic and the North American Model of Wildlife Conservation that the Commission upholds for other big-game species. Many hunters and trappers have publicly objected to the practice for this reason.

5. The rule does not limit population management
The proposed rule leaves wolf seasons, harvest limits, and depredation control outside the denning and early pup-rearing period in place. It simply prohibits take of dependent young and denning wolves, as Idaho already does for bears and lions.

Interim protection for the 2027 denning season

Requested Commission action

Petitioners respectfully ask the Commission to:

1. Initiate rulemaking to adopt the proposed amendments, including negotiated rulemaking with tribes and conservation groups; and
2. Provide interim protection for the 2027 denning season as described above.

Submitted November 17, 2026.

Sources

- Idaho Code § 67-5230
- SCR 134 (2002), Idaho Wolf Conservation and Management Plan
- IDFG wolf management history
- IDFG: Idaho is Ready and Able to Manage Wolves
- IDFG: Commission suspends 2008 wolf plan, 2002 plan remains in effect
- IDAPA 13.01.08.300
- Public Domain: Idaho paid hunters to kill wolf pups
- Coeur d'Alene Press / Idaho Statesman, December 2024
- Foundation for Wildlife Management, 2026–27 wolf reimbursement rates
- IDFG Big Game Mortality Reports for wolves, January–August 2026 and 2010–August 2026, obtained by Chris Gertschen and Suzanne Asha Stone of IWCN through public records requests
- IDFG Warning of Violation W01279, Bonner County, issued May 6, 2021
- Foundation for Wildlife Management, IDFG Commission Challenge Grant reimbursement records and extension request, June 8, 2021
- “Out West” Facebook post of November 8, 2026 (since removed): screenshots of the image, caption, and the page’s reply “these are roaches..”, and an export of the post’s comments, captured by Suzanne Asha Stone of IWCN, November 9–10, 2026. Attached as an addendum and on file with IWCN.