



Kettle Range

CONSERVATION GROUP

Protecting Columbia Highlands forests and wildlife since 1976

November 8, 2019

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Protection Division
P.O. Box 43200, Olympia, WA 98504-3200

Via <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/post-recovery-planning>

Dear Ms. Wood;

I submit the following comments on behalf of the Kettle Range Conservation Group membership and Board of Directors. KRCG was formed in 1976 and have actively participated in federal and state land & wildlife management during our 43 years. We have a deep understanding of the landscapes in northeast Washington, its ideological and political differences. We hold firmly a conviction that public lands terrestrial and aquatic ecosystems belong to all Washingtonians – not just a privileged few who buy logs or lease grazing rights from our lands.

Comments submitted herein are in addition to earlier comments submitted to Washington Department of Fish & Wildlife (WDFW) and to those made during Wolf Advisory Group meetings in which I participate as a WAG member.

HUNTING GRAY WOLF HUNTING MUST NOT BE ALLOWED

Without regard to all other considerations, KRCG opposes a state-sanctioned wolf hunt. WDFW has made it clear the hunting wolves is part of its long-term wolf management strategy. Wolves are unlike other wildlife species, relying on family unit structure for its very survival. Hunting wolves would be indiscriminate and likely create more problems that it attempts to resolve. Hunting, trapping and poisoning coyotes has not worked to control this species which has now adapted to human aggression such that it can survive even in our larger cities.

Washington's wolves should not be hunted and it's inappropriate for the Department even to consider hunting at this time when wolf populations are still at unsustainable levels and the state's recovery goals are unmet.

WDFW had proposed including gray wolf in the Game Management Plan that guides huntable species – even though wolf recovery has yet to be achieved. I believe this proposal if WDFW / F&W Commission were to approve it would result in a public backlash both would regret. Hunting is indiscriminate and would likely lead to loss of an alpha wolf member of a pack. Even the loss of one member of a wolf family can send the entire family into disarray. Wolves are successful hunters only 5 to 10 percent of the time and in order to survive must live in family groups. Even the loss of one member of a wolf family can send the entire family into disarray.

Wolves are not like deer, elk, grouse, snowshoe hare or other huntable species. They should not be listed with other hunted species. Even more stunning, Department of Fish & Wildlife include in their online survey for the 2015-2017 hunting regulations a category for wolves!

STATES DEEMED TO HAVE RECOVERED WOLF POPULATIONS ARE NOT MODELS FOR WASHINGTON STATE

Comparing other states so-called “recovered” wolf populations as a basis for post-recovery plan revisions must be fairhanded regarding social concerns, number of wolves, geographical distribution, geography/impediments to migration and long term population viability. Compare these various states that WDFW has stated are potential models for its post-recovery wolf plan:

Oregon’s wolf population is not “biologically recovered” -- the state commission decided the wolf population met its state ESA criteria for delisting, when the public process was underway to make that determination. Two dozen scientists disagreed and wrote to say so. Two experts in population viability found that ODFW’s PVA was fundamentally flawed. The state’s decision to prematurely delist has been legally challenged and that lawsuit is still pending.

Wolves in Oregon have not recovered to functionally effective levels. Habitat studies show Oregon could support up to 1400 wolves; right now there are fewer than 140 confirmed wolves and they occupy around 12-15% of currently available identified suitable wolf habitat there.

Montana, Wyoming and Idaho— combined those three states have about 1500 wolves combined and under minimum population viability analysis theories, for an isolated population, you need around 3,000-5,000 animals in order to have an effective population of around 500 breeders. Although, if Northern Rocky Mountain wolf population includes wolves in Canada, that’s close to a biologically recovered population.

Minnesota, Michigan, Wisconsin -- combined stand at around 4,000 wolves so are more representative of a biologically recovered population.

State wolf management plans for ID, MT, WY, MN, MI and WI are terribly retrograde. All allow hunting and/or trapping seasons on wolves. In Idaho there is always being hunted or trapped somewhere in the state — i.e., there is never any time of the year where wolves are completely safe. WY law allows people to run wolves over with snowmobiles. MT refuses to enact buffer zones in the areas immediately adjacent to Yellowstone NP to prevent the killing of park wolves who wander outside the protective boundaries of the park. In WI, hounds are allowed to run in wolf territory and so far the state has paid around \$800,000 compensation for hounds killed by wolves. In MI, the state legislature several times overrode citizen initiatives to prohibit wolf hunting. In MN when tribes refused to hunt wolves, whom they consider their brothers, the state gave away the tribe’s allotted quota to non-tribal members so that wolves would be killed anyway.

None of these states provide wolf management that should be emulated or is appropriate for Washington. Washington’s wolf population estimated at about 126 animals falls far short of a scientifically credible recovery level. Page 67 of the Wolf Plan notes “there is little empirical data from wolves in Washington to include in population persistence modeling.” The geospatial complexities in this state are dissimilar to other states discussed herein, viable population / persistence is guesswork. *NE WA, source gray wolf abundance is not a rational threshold for achieving state recovery goals.*

ADDITIONAL SPECIFIC CONCERNS

1. This so-called “recovery plan” appears to be a wolf delisting plan. Washington wolves are currently listed as endangered. WDFW most recent population estimates were only 126 wolves, a 3% yearly growth rate over the prior year.
2. This is all about Politics – not science. Politicians bowing to pressure from the Livestock Industry is attempting to smother and confuse science and public opinion about wolf recovery.
3. Wolves in Washington are NOT even close to being recovered. The State’s existing *Wolf Conservation and Management Plan*, page 64, #3, sets recovery objectives for “delisting” at 4 successfully breeding pair of wolves in each of the three recovery regions (Eastern WA, North Cascades, Southern Cascades) for three years *and* 3 successful breeding pairs anywhere else in the state.
4. Only one region that currently meets the state’s delisting objectives – Eastern Washington.
5. Washington’s current wolf population falls far short of a scientifically credible recovery level. Page 67 of the *Wolf Plan* notes “there is little empirical data from wolves in Washington to include in population persistence modeling.”
6. WDFW is relying on inappropriate data from other states to support delisting wolves. Of those states, Montana, Idaho and Wyoming has about 1500 wolves; Minnesota, Wisconsin and Michigan has about 4,000. Washington’s wolf population is 126.
7. Public Opinion is against it! The WDFW Wolf Conservation and Management Plan cites four public opinion and attitude surveys conducted in Washington from 2007 to 2009. All reported overwhelming support for the presence of wolves, including the most recent, which noted; “Among respondents living in eastern Washington, most preferred a situation in which wolves become reestablished in many, most, or all eastern Washington counties (68.4%) vs. in no or fewer eastern Washington counties (27.8%).”

CONCLUSION

It is premature to prepare a post-recovery plan when Washington’s wolves are not fully recovered to levels in the Wolf Conservation and Management Plan nor a scientifically credible metric for a viable wolf population, statewide.

The vast majority of Washington residents and including many hunters fully support the Department and Commissioner Susewind resisting political pressure from a small group of special interests to delist wolves. In 2014, the public voiced opposition to WDFW’s proposal to move wolf management into their Game Management Plan that guides huntable game species. Please take note.

I appreciate this opportunity to comment.

Sincerely,



Timothy J. Coleman
Executive Director