October 16, 2019

Fish and Wildlife Commission
600 Capitol Way North
Olympia, WA 98501

Dear Commissioners:

The following comments were submitted on-line regarding the post recovery wolf management plan. I have sent letters as well to Director Susewind, Donny Martorello, and Julia Smith. I feel very strongly about this issue and want to ensure that they aren't lost in the morass of public input. I am a wildlife biologist and have years of experience on predator and prey issues. I have been a long term member of the Game Advisory Council and have tried to provide a balance between wildlife biology and hunting in this role.

First of all, I'm appalled by the questionnaire method of providing comment. You seek to compartmentalize the individual based on their gender, age, and residential location. Thus, linking their comments to a particular "type" of person. Additionally, you provide choices for the individual's relationship to the outdoors. Is it not possible for a hunter to also be environmentally conscious or enjoy outdoor recreation without carrying a gun? Your methodology on this campaign is deplorable as it seeks to place people in one camp or another, much like the polarization that exists on the national political stage currently.

The post recovery wolf management plan must be a flexible and well thought out policy document that balances the needs of wolves, their prey, livestock producers, the people that utilize wildlife for hunting or depend on hunting generated revenues, and other recreational wildlife purposes. Single species management, such as the current status of wolf management in Washington, to the detriment of all other species and interests is unacceptable.

The existing wolf management plan is an extremely flawed document that places an inordinate burden on livestock producers, the hunting community, and the ungulate populations in NE Washington. The conservation community and their allies ensured that wolf population growth to achieve statewide distribution was allowed to the detriment of the rural communities that have been substantially impacted. Livestock producers have suffered, rural businesses that count on hunting generated revenue have been impacted, and ungulate populations appear to have been diminished. The existing wolf management plan had unrealistic measures applied to detect declining ungulate populations. The percent drop per year (ungulate population metric) required to implement wolf reductions was unrealistic and doesn't provide an indication of prolonged slow declines that add up to large percentage changes over a longer term scale. Additionally, relying on harvest data to detect population changes is an unreliable metric. Montana found that "routine ungulate monitoring programs may only be powerful enough to detect large changes in ungulate numbers over a series of years, and power will be even lower in areas where harvest indices are used to monitor populations instead of aerial surveys" (Hamlin and Cunningham

2009, Monitoring and Assessment of Wolf-Ungulate Interactions and Population Trends within the Greater Yellowstone Area, Southwestern Montana, and Montana Statewide).

Predation in general is most pronounced on young of the year, which form the future for ungulate populations. Studies of adult ungulates typically report little variation across large geographic scales. Washington's reliance on harvest data alone, does not measure this important metric and it severely hampers their ability to discern effects of predation or possible population declines. The risk of predation also has an insidious indirect effect of changing habitat use by ungulates where they rely on sub-par habitats to reduce predation risk, with negative effects on pregnancy/productivity. Not to mention the impacts of ungulates moving to private lands where risk from wolves is lower but then in turn increase depredation on crops or move toward major highways where human/ungulate encounters can result in deadly consequences. The bottom line is there is no free lunch, wolves are undoubtedly affecting the ecosystems where they are present, and declines in ungulates may be severe in some areas while not as pronounced in others. The lessons of research in Yellowstone and in Banff have clearly shown that wolves have a cascading effect on the ecosystem and ungulate numbers dropped dramatically over time. To assume (and publicly state) that wolf predation has no effect on their prey in Washington is wrong and misleading to the general public.

Washington is not Idaho, Montana, or Wyoming. We simply do not have the large expanses of wilderness/land with little human influence to accommodate a large wolf population statewide. Wolves in Washington more than any of the aforementioned states need to have their population carefully balanced with other interests. Hunting needs to be an important management tool for WDFW post recovery. Idaho and Montana have implemented wolf hunting as a tool and with proper regulation it has not resulted in major declines. Rather the populations remain strong. Not to mention it provides hunters with a feeling of participating in management and would help heal the divide between the hunting community and WDFW that currently exists. Similarly, strong management tools for dealing with livestock depredation need to be established, including using USDA Wildlife Services. Wolves should not be allowed to establish or persist in high risk environments for livestock producers. Modeling of sub-par habitats (e.g. significant livestock use) should be implemented to identify areas of zero tolerance. WDFW already does this in many areas of the State where they don't want elk or other ungulates to establish or be present at higher density due to conflicts with crops or human safety. These areas typically have very liberal hunting controls allowing either sex to be taken during general hunting seasons and depredation permits for affected landowners.

Finally, in your analysis and decision making in the past and I fear the future, the excuse of habitat to solely explain declines in ungulate populations is growing tiresome. There is no doubt that habitat influences ungulates and plays a factor in population success. At times this theme is overplayed. For example, I live and have worked as a biologist on the western Olympic Peninsula in Washington for 20 years. It is well known that the habitat in this particular region has low digestible energy that results in lower pregnancy rates and productivity for elk as an example. This limiting factor of the habitat is intrinsic to the area due to the heavy rainfall and associated mineral leaching and acidity of soils. Yet the elk persist here as they have since before European influence. My years of research with elk have more than illustrated that predation plays a role in lowering elk production (mountain lion was the exclusive predator over

2 cohorts of calves, accounting for 75% of deaths). Mountain lion populations have been allowed to grow to their maximum potential due to the moratorium on hound hunting. Hunting without hounds in a heavily timbered and gated landscape results in very little year over year harvest. Mountain lions are not causing population declines, but their heavy use of calf elk throughout the first year of life limits population growth significantly. I admit that if the habitat was intrinsically more robust and calf production was higher it would swamp the predation effect. However, the habitat is never going to change to a degree that allows it and this story plays out in many ecosystems across the state. My fear is that wolves on the Olympic Peninsula will tip the balance towards the predator to the detriment of our ungulate populations. Particularly, if management does not balance predator numbers with prey by using hunting as a tool and when necessary contracted control using USDA Wildlife Services.

In conclusion, I urge WDFW to develop a post recovery wolf management plan than manages wolves in conjunction with their prey and other large predators on the landscape. Includes the proper ungulate monitoring methodology that is more robust in detecting population declines. Includes a zero tolerance policy for wolves in areas of livestock production. Includes hunting as a management tool and where not efficient employs USDA Animal Control to meet desired reductions. Accounts for the limiting suitable habitat for wolves in setting wolf population objectives statewide (habitat where wolves can exist without significant human interaction). Finally, that it recognizes that habitat while important, is beyond our financial ability to significantly change or any many instances is intrinsically limited or human altered beyond feasible change. Wolves and their prey must be balanced with these habitat limitations.

Sincerely,

Rob McCoy
13223 Highway 112
Sekiu, WA 98381
360-640-8030
rob.mccoy@makah.com