

Wolf Conservation Center

Thank you for inviting the public to comment on the scope of a post-recovery plan for wolves in Washington. Please accept the following comments on behalf of the Wolf Conservation Center.

The Wolf Conservation Center (WCC) is a 501(c)(3) not-for-profit environmental education organization working to protect and preserve wolves in North America through science-based education, advocacy, and participation in the federal recovery and release programs for two critically endangered wolf species - the Mexican gray wolf and red wolf. The WCC uses the most current peer reviewed science to raise awareness and increase public understanding about wolves.

Respectfully submitted,

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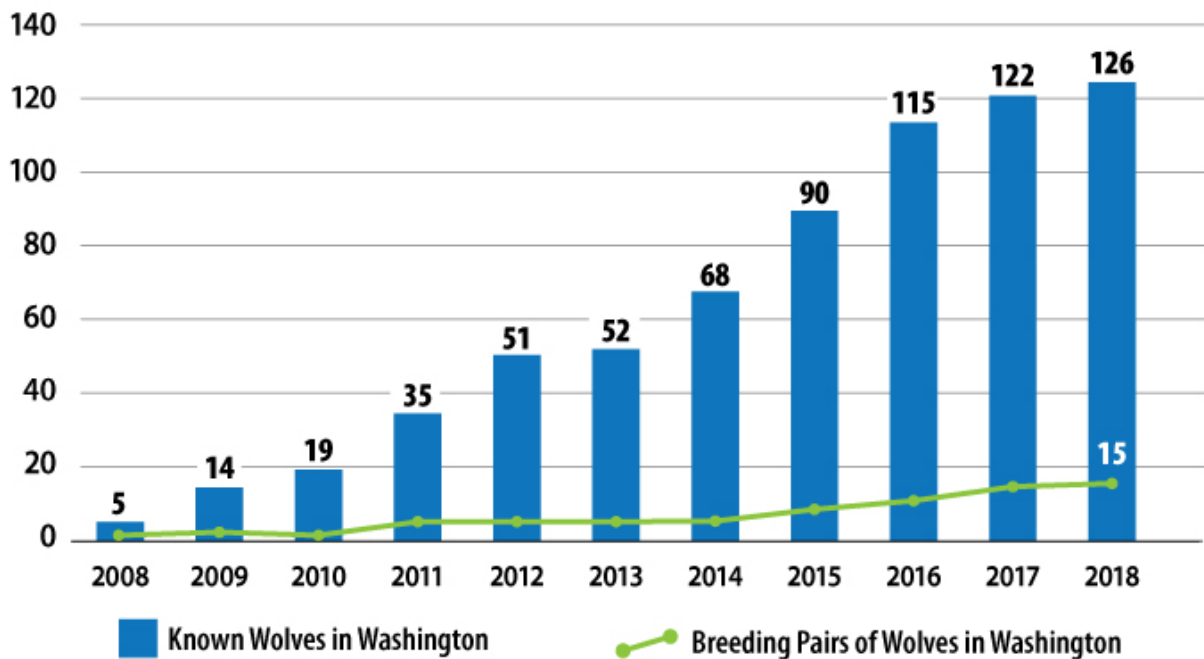
It Is Pre-mature to Write a Post-recovery Plan for Wolves in Washington

Washington’s wolves were driven to extinction in the early 1900s by a government-sponsored eradication program on behalf of livestock owners. Since the early 2000s, under the aegis of the federal Endangered Species Act, the animals have started to make a slow comeback by dispersing into Washington from neighboring Idaho and British Columbia.

The successful start to natural recolonization of wolves in Washington was possible due to federal and state protection afforded to them. Gray wolves remain fully protected under the federal Endangered Species Act in the western two-thirds of Washington, and throughout the state under state endangered species law.

In recent years, Washington Department of Fish and Wildlife (WDFW) data reflects that the annual wolf population growth is stagnating.

Washington Wolf Survey Data



Washington Department of Fish and Wildlife

At the close of 2018, according to WDFW’s annual year-end report, Washington was home to only 126 confirmed individual wolves, 27 packs, and 15 breeding pairs – male and female adults who have raised at least two pups that survived through the end of the year. In 2017, those numbers were 122, 22, and 14, respectively.

Moreover, wolves have yet to begin recovery in the third zone. Based upon the department’s own data, recovery remains far off.

Lethal Control is Not the Solution

Instead of racing to create a post-delisting plan, the WDFW must instead focus its attention on current wolf-management needs.

Washington's Ongoing Killing of Wolves to Stop Conflicts with Cattle has Demonstrably Failed

Over the past seven years, WDFW has killed 31 state-endangered wolves for conflicts with livestock, killing 26 of those for the same livestock producer. Most killings occur on public lands, including the killing of the Old Profanity Territory (OPT) wolf family this summer. The killing of this family was particularly egregious.

On August 26, a judge ruled to temporarily block the killing of this wolf family, but not before WDFW sharpshooters gunned down the last four remaining wolves. The court decision was in response to a lawsuit that alleged that WDFW broke the law and the policies outlined by the state Wolf Advisory Group by reauthorizing a lethal removal order on the OPT pack in late July. The judge ruled that the cattle producers in the OPT area and WDFW didn't do their "due diligence on non-lethal methods" according to the Spokesman Review.

This year's war on the OPT pack began in July, when the agency killed a radio-collared adult male, but only to have additional livestock attacks. Thus, in accordance with the WDFW's Wolf Plan and 2017 wolf-livestock interaction protocol, your agency reauthorized staff to kill some more wolves, which you did as on August 26 as mentioned above.

This region of the Kettle range has been the site of repeated wolf-livestock conflicts. The OPT pack is the second wolf family to be obliterated by WDFW in the past three years. The region's rugged federal forest land is core wolf habitat; it's rich with wildlife and draws animals like wolves in. Thus, killing off one wolf family only invites another to move in. It's a vicious cycle in which nobody wins.

Moreover, science shows that killing wolves can *create* conflicts, reduce social tolerance for wolves, and increase poaching. (Wielgus, 2014)

Keeping cattle away from core wolf territories on public lands is the solution.

Based upon the department's own count, the number of wolves in the state increased by four individuals last year from 122 to 126. Yet in 2019, WDFW has already killed nine wolves with additional lethal removal orders still outstanding.

Washington Governor Directs WDFD to curb wolf killing.

In response to WDFW's controversial actions, on September 30 Gov. Jay Inslee shared his concerns regarding the state's controversial policies in a letter to the WDFW.

The letter reads, in part, "I share the public's concern and am troubled that the Wolf Plan does not appear to be working as intended in this particular area in Northeastern Washington. I believe we cannot continue using the same management approach on this particular landscape. We must look for other strategies that address the unique nature of this particular geographical area, an area which has been characterized as prime gray wolf habitat. We must find new methods to better support co-existence between Washington's livestock industry and gray wolves in our state. The status quo of annual lethal removal is simply unacceptable."

The governor asked WDFW to provide him with an update to his requests and recommendations for additional action by December 1.

It's essential to conduct a full SEPA analysis to develop wolf-livestock protocol based on science, public input, and rule-making.

Focus on Resolving, Through Nonlethal Means, Conflicts Between Livestock and Wolves

The science shows that non-lethal measures are the best means for protecting cattle, sheep and other domestic animals from depredation. Such methods include sanitary carcass removal, fladry, synchronizing birthing seasons with native ungulates, changing livestock types or breeds, spot lights, airhorns, guard animals, range riders, electric fencing and Foxlights. (HSUS, 2019)

Moreover, there is broader public support for these methods of predator control than for lethal methods. Killing wolves is also expensive to taxpayers. (HSUS, 2019)

No State-Sanctioned Hunting or Trapping of Wolves

When given management authority, legal and liberal wolf control and hunting programs often become the predominant management strategy, with little consideration for the wolf's ecological importance.

The Ethics of Wolf hunting and Predator Control

As states sanction hunts of wolves, there remains a fact: People will eat little of those animals that they kill.

John Vucetich and Michael P. Nelson (2014) apply "argument analysis", a basic tool of scholarly ethics, to the controversial concern about the appropriateness of hunting wolves. Advocates of wolf hunting offer a variety of reasons that it is appropriate – for example, the simplistic argument advanced by fish and game departments that selling hunting tags generates revenue. Vucetich and Nelson inspected the quality of these reasons using the principles of argument analysis. In their scientific analysis, "Wolf Hunting and the Ethics of Predator Control," they asked whether there is an underlying moral – and compelling biological – justification for killing predators. They considered the spectrum of societal attitudes toward predator hunting as expressed by trophy hunters, government wildlife managers, those who hunt for food, those who eat no meat and animal rights advocates.

Ultimately, Vucetich and Nelson conclude that killing predators for sport isn't justified biologically or on moral and ethical grounds. Their application of this technique indicated that wolf hunting in the coterminous United States is inappropriate.

Something else to consider, a 2014 study found evidence that people's attitudes towards wolves became more negative when killing was legalized. (Olson et al, 2014)

Undertake Public Education Campaign on the Threat of Chronic Wasting Disease and Value of Predators

Beyond wolves, perhaps no issue is as controversial in the hunting community right now as chronic wasting disease (CWD), a degenerative neurological illness that is similar to mad cow disease, among elk, deer and moose.

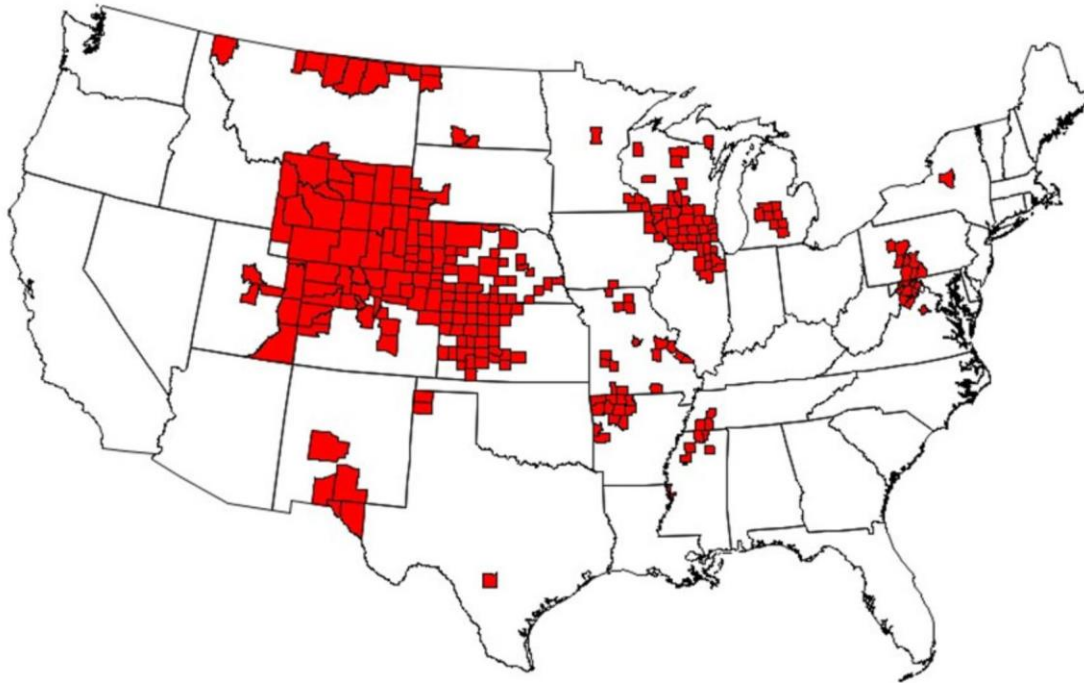
According to the WDFW website, to date, CWD has not been detected in Washington. However, the disease can be brought to new locations through the movement of infected animals or animal parts such as bone, organs, and bodily fluids. Once present in the environment, the prions can persist for many years and are very difficult to deactivate.

Predators—particularly coursing predators such as wolves—focus on animals vulnerable due to odd behavior or compromised body condition (Temple, 1987; Mech et al., 1991). The preponderance of scientific evidence supports the view that wolves generally kill prey that are vulnerable, such as weak, sick, old, or young animals. By killing sick prey individuals, wolves remove infectious agents from the environment, reducing transmission to other prey. The scientific community argues that in this manner, wolves help reduce the spread of CWD, with scientific simulations in support of the idea that predation could drive decreases in CWD prevalence.

For example, Wild et al. (2011) modeled wolf predation on deer and suggested "that predation, particularly wolf predation, may be a useful tool for management of CWD." The simulation noted that wolves could prevent CWD from emerging at the population level and proliferating. Crucial is allowing predators to perform their role in the early stages of the disease's arrival. "Thus far, control strategies relying on hunting or culling by humans to lower deer numbers and subsequently CWD prevalence have not yielded demonstrable effects," they wrote, explaining that human hunters only remove sick deer randomly while predators actively seek out the infirmed. In a similar study, Hobbs (2006) used CWD and elk (*Cervus elaphus nelsoni*) population data from Rocky Mountain National Park to model the impact on CWD that may be achieved through maintaining a pack of wolves in the park. "Study results suggest that predation by wolves could have potent effects

on disease prevalence under certain conditions. Although non-selective predation, as might occur with culling, for example, may also be effective in eradicating the disease in a closed population, our results suggest that natural predation could substantially reduce the time required to eliminate the disease.” Hobbs (2006).

Chronic Wasting Disease Among Free-Ranging Cervids by County, United States



As of June 7, 2019, there were 274 counties in 24 states with reported CWD in free-ranging cervids. *This map is based on the best-available information from multiple sources, including state wildlife agencies and the United States Geological Survey (USGS).*

According to the Centers for Disease Control (CDC) and Prevention, CWD was first identified in captive deer in a Colorado research facility in the late 1960s, and in wild deer in 1981. By the 1990s, it had been reported in surrounding areas in northern Colorado and southern Wyoming. Since 2000, the area known to be affected by CWD in free-ranging animals has increased to at least 24 states, including states in the Midwest, Southwest, and limited areas on the East Coast. It is possible that CWD may also occur in other states without strong animal surveillance systems, but that cases haven't been detected yet. Once CWD is established in an area, the risk can remain for a long time in the environment. The affected areas are likely to continue to expand.

As of June 7, 2019, CWD in free-ranging deer, elk and/or moose has been reported in at least 24 states in the continental United States, as well as two provinces in Canada. The disease has also been found in farmed deer and elk. (See CDC map based on the best-available information from multiple sources, including state wildlife agencies and the United States Geological Survey (USGS).

If hunters and livestock operators were better informed that wolves are an ally in protecting America's most popular big game animals, individuals and groups who have long opposed the predators could become more tolerant of wolves.

Thank you for considering our comments.

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Literature Cited:

Conner, M.M., M.W. Miller, M.R. Ebinger, and K.P. Burnham. 2007. A Meta-BACI Approach for Evaluating Management Intervention on Chronic Wasting Disease in Mule Deer. *Ecological Applications* 17: 140–153.

Czub, 2017. "CWD Transmission into non-human Primates" presented by Stefanie Czub of the Alberta Prion Research Institute at the University of Calgary at the Prion 2017 conference in Edinburgh, Scotland. May 25, 2017.

<https://www.youtube.com/embed/Vtt1kAVDhDQ>

Farnsworth, M.L., L.L. Wolfe, N.T. Hobbs, K.P. Burnham, E.S. Williams, D.M Theobald, M.M. Conner, and M.W. Miller. 2005. Human Land Use Influences Chronic Wasting Disease Prevalence in Mule Deer. *Ecological Applications* 15: 119–126.

HSUS. 2019. Government data confirm that wolves have a negligible effect on U.S. cattle & sheep industries.

https://www.humanesociety.org/sites/default/files/docs/HSUS-Wolf-Livestock-6.Mar_.19Final.pdf

Inslee, Gov. J., September 2019. Letter to Washington Department of Fish and Wildlife.

https://www.governor.wa.gov/sites/default/files/Letter%20to%20Director%20Susewind.pdf?utm_medium=email&utm_source=govdelivery

Olson, E.R., Stenglein, J.R., Shelley, V., Rissman, A.R., Browne-Nuñez, C., Voyles, Z., Wydeven, A.P., and Van Deelen, T. 2014. Pendulum Swings in Wolf Management Led to Conflict, Illegal Kills, and a Legislated Wolf Hunt. *Society for Conservation Biology*

Spokesman Review, August, 2019) Judge blocks killing of wolf pack's last surviving member in NE Washington,

<https://www.spokesman.com/stories/2019/aug/16/judge-temporarily-blocks-killing-of-sole-surviving/>

USGS. 2018. Distribution of Chronic Wasting Disease in North America. February 2018.

<https://www.usgs.gov/media/images/distribution-chronic-wasting-disease-north-america-february-2018>.

Vucetich, et al. 2014. Wolf Hunting and the Ethics of Predator Control. *Oxford Handbooks*.

Wielgus, R, Peebles, K. 2014. Effects of Wolf Mortality on Livestock Depredations. *PLoS ONE* 9(12): e113505.

doi:10.1371/journal.pone. 0113505

Wild, Margaret A., N. Thompson Hobbs, Mark S. Graham, and Michael W. Miller. 2011. The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal on Prion Disease Dynamics in Deer. *Journal of Wildlife Diseases*, 47(1):78–93.

Wilkinson, Todd. 2017. The Undeniable Value of Wolves, Bears, Lions And Coyotes In Battling Disease. *Mountain Journal*. December 11, 2017. <https://mountainjournal.org/predators-and-chronic-wasting-disease>