

# Washington Farm Bureau

RE: Comments on scoping of the state's post-recovery plan for wolves

This comment letter is a joint effort between the Washington Cattlemen's Association, the Washington Farm Bureau, Washingtonians for Wildlife Conservation and the Northeast Washington Wildlife Group. It should not be overlooked that these four groups represent over 100,000 people in our state. The purpose of this letter is to provide the department with details of what we collectively believe must be included in the ongoing scoping effort that the department will use to develop the post-recovery plan for wolves in Washington.

We would also like to note that the online survey method being used by the department for this scoping effort is far too simplistic and does not provide the level of meaningful input the public deserves on such an important work effort, especially in light of the public meetings that were canceled due to public safety concerns. Please also note that relying on web-based meetings doesn't work adequately in many of our rural communities due to poor broadband coverage.

You will find in the attached file the key elements we collectively agree must be included in the first step of the SEPA process and the draft EIS. Please note that these were developed under the assumption that wolves will be delisted by the state under WAC 220-610-110 and removed from listing under the federal Endangered Species Act.

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You will find below the key elements we collectively agree must be included in the first step of the SEPA process and the draft EIS. Please note that these were developed under the assumption that wolves will be delisted by the state under WAC 220-610-110 and removed from listing under the federal Endangered Species Act.

| Element                    | Preferred Alternative  | Additional Comments  |
|----------------------------|--|--|
| Depredation Investigations | WDFW should contract with a third party (e.g. USDA Wildlife Services) for all wolf/livestock depredation investigations.   | Due to the lack of trust by livestock producers in WDFW staff.                                       |
| Contracted Range Riding    | Range riders should be used, when practicable, to protect, guard, remove, and move livestock away from wolves to minimize depredations. <ul style="list-style-type: none"> <li>• They must also be used to deter wolves from approaching livestock by implementing harassing tools.</li> <li>• Distinction must be made between requirements and restrictions placed on contracted range riders and range riders who are hired by the livestock producer.</li> </ul> | Proactive range riding is an essential tool for conflict management and changing wolf pack behavior. |
| Use of collars             | <ul style="list-style-type: none"> <li>• All packs should have at least two collared wolves.</li> <li>• Department should deploy the best collar technology available.</li> </ul>  |  |
| Sensitive Data sharing     | <ul style="list-style-type: none"> <li>• Sensitive data must be shared year around with livestock producers who have signed agreements with the department.</li> <li>• Collar data must be made available in real time.</li> <li>• Collar data must also be available to producer, range riders, and employees.</li> </ul>   |  |
| Interstate Data Sharing    | <ul style="list-style-type: none"> <li>• We support timely, effective data sharing with livestock producers of collar data from Idaho and Oregon.</li> <li>• USDA Wildlife Services should facilitate data sharing across state lines.</li> </ul>  |  |

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| Conflict Management                                     | <ul style="list-style-type: none"> <li>• An emphasis must be placed on deploying any and all tools that have a negative stimulus on wolves that prevent wolves from attacking livestock by changing wolf pack behavior and prevent habituation.</li> <li>• The department must provide livestock protection tools to livestock producers for conflict management and to change wolf pack behavior. This includes, but is not limited to, fladry, fox lights, propane cannons, etc.</li> </ul>  | We need these tools for conflict management and changing wolf behavior.   |
| Scat Monitoring   | <p>Expand the use of third-party scat monitoring to:</p> <ul style="list-style-type: none"> <li>• Determine the prey species being eaten by predators.</li> <li>• Better define wolf populations to improve adaptive management practices.</li> </ul>  |   |
| Immediate response to depredations                      | All efforts must be made to control known depredating wolves within 48 hours of discovery of livestock killed by wolves after the second confirmed depredation in 12 months.   |   |
| Wolf Population   | Maintain wolf populations at a self-sustaining level that can be properly managed by the department, that achieves healthy ungulate populations, and that does not negatively impact livestock producers.  | Have not yet met distribution recovery goal but department already can't meet the management requirements of the Wolf Plan. |
| Caught in the Act to protect livestock and human safety | Continue implementation of WAC 220-440-080.  | This has proven to be a key tool for producers in protecting their livestock  |
| Lethal Control  | <ul style="list-style-type: none"> <li>• The goal of lethal control is to modify pack behavior and protect livestock.</li> <li>• Lethal control must be implemented when two depredation events have occurred during a trailing 12-month window, with at least one depredation resulting in a dead livestock.</li> <li>• WDFW should contract with a third party (e.g. USDA Wildlife Services) for lethal control and investigation that is similar to the used in Idaho.</li> <li>• Livestock producers are not required to implement non-lethal protection tools in order to initiate lethal control.</li> <li>• We support incremental removal of problem wolves that could result in the eventual elimination of an entire pack if wolves repeatedly depredate livestock.</li> </ul> |   |

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| Ungulate Populations Management    | <ul style="list-style-type: none"> <li>• It must be a priority of the department to maintain healthy and robust ungulate populations to provides abundant prey for wolves and other predators, as well as ample harvest opportunities for hunters.</li> <li>• To accomplish this, the department must adaptively manage using an integrated predator/prey management policy with the goal of achieving robust prey populations for both wolves and hunters.</li> <li>• Predators, including wolves, must not be managed in isolation or as a single species. This approach does not result in robust prey populations</li> </ul> |  |
| Manage Wolf-Livestock Interactions | Minimize livestock depredation caused by wolves.   |  |
| Translocation                      | Must be restricted to non-depredating wolves.  |  |
| Outreach and Education             | Educate state residents as to the management practices that are needed for a sustainable wolf population on the landscape.   |  |
| Compensation                       | A compensation plan is needed that includes both direct and indirect losses experienced by livestock producers from wolves. A permanent funding source should be secured to pay for approved losses and an independent organization should be created to manage claims.  |  |
| Hunting                            | Hunting of wolves should be authorized in this plan as a tool to control wolf populations, as part of a multi-species management approach that maintains viable populations of all wildlife species.   |  |