

Graham Taylor

Please see the attached comment on behalf of the Sierra Club's Washington State Chapter.

Thank you.

Graham Taylor
Wildlife Committee Chair
Sierra Club, Washington State Chapter



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Wolf Management Plan: Scoping Comments November 15th, 2019

Director Susewind,

Thank you for the opportunity to provide comment on the scope of the Washington State Department of Fish and Wildlife's (WDFW) Wolf Post-Recovery Planning. The Sierra Club is dedicated to the long-term recovery of wolves and hopes to work with your office to help strike the right management balances to ensure the species continues to contribute to the health of Washington's public lands. Broadly, we hope recovery will continue, management will lead to additional population dispersal, and the agency will work with stakeholders to consider reasonable solutions to potential livestock-wolf conflicts. Wolves are a valued natural species, important to our wild lands, and contribute to the overall well-being of our natural systems.

About Us

The Washington State Chapter of the Sierra Club includes over 100,000 members and supporters, working to protect communities and the planet. With over 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots organization in the United States.

Background

Wolves are currently listed as an endangered species in Washington State. In 2011, three recovery regions were delineated: Eastern Washington, Northern Cascades, and the Southern Cascades/Northwest Coast. Wolves in the western two-thirds of Washington remain under federal protection as an endangered species; wolves have been removed from federal listing in the eastern third of the state.

Wolves are Important to the Sierra Club, and the General Public

The Washington State Chapter of the Sierra Club recognizes the varied values wolves represent in our ecosystems; the majority of state residents and Sierra Club members share a significant interest in and



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passion for wolves. Wolves are a uniquely social species with distinct pack cultures. Their social hierarchy drives pack behavior and must be considered when making management decisions that facilitate their presence on the landscape. While we have more to learn about wolf ecology, we know that wolves have a powerful impact on the natural environment, influencing riparian vegetation while stimulating fish and wildlife populations and their movement on the ecological landscape. As a native keystone species, wolves belong in our public lands and are critical to the overall structure and function of these lands.

Wolf Hunting is Mostly Inappropriate

The Sierra Club supports hunting and fishing on populations that have sufficient abundance as a legitimate outdoor activity. The Sierra Club opposes trophy hunting and recreational hunting or trapping of wolves. We oppose classification of wolves as game animals in post-recovery wolf management. We do not support hunting and trapping in this EIS - either as one of the goals or as part of any of the alternatives. We fear labeling wolves as a game species will endanger their recovery; recovery benchmarks must be met, and significantly surpassed before considering management actions that could jeopardize taxpayer investments in wolf recovery. Full dispersal of wolves into all their native strongholds is unlikely if hunting or trapping is allowed, and dispersal is key to ensure all suitable landscapes benefit from wolf populations.

We recognize wolf hunting by tribes is a tribal justice issue and important to tribal culture, identity, and ceremony. We trust tribes not to hunt wolves to extirpation; the sensitive wolf population numbers in our state will require the WDFW and other land managers to mitigate tribal harvest and take additional precautions to conserve wolves. WDFW must continue investments in monitoring wolf populations to ensure wolves continue to recover and disperse, and do not decline. Wolf populations and dispersal are fluid and difficult to determine; WDFW sanctioned killing of wolves, poaching, and legal takings negatively impacts wolf pack populations and makes accurate wolf counts difficult.

Wolf Recovery Must Continue

If wolf numbers decrease below either of the two benchmarks established in the recovery plan, wolf recovery must then be re-instituted. This situation will harm wolves and needlessly cost taxpayers and WDFW. A constantly shifting management strategy will be extremely difficult for WDFW to enforce and be challenging for the public to understand and support. The Sierra Club believes wolf recovery must be stable in all areas of the state, so management strategies do not lead to population decline or failures to meet dispersal goals.

Management Must be Based on the Best Available Science

Wolf recovery must be science-based, using robust scientific literature, especially in the following areas:

- Individual pack social structure and dynamics
- Value of wolves in natural ecosystems
- Predator control
- Recreational hunting of wolves
- Impact of predator control on wolf pack viability and social structure
- Wolf translocation



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Public Meetings are Necessary

While the Sierra Club empathizes with agency staff over the conflicts regarding wolf management, public officials must not shy away from public meetings. If the agency, other partners or the public are threatened, those threats must be reported to the police. If laws are broken at public meetings, then the perpetrators must be brought to justice. Public meetings and in-person discussions are the bedrock of our democratic system. Public meetings provide some of the best venues for Washington state residents to see and understand one another. Public advocacy groups rely on public meetings for advocacy; the Washington State Chapter of the Sierra Club opposes the agencies recent elimination public hearings and in-person public comment. Walling off the agency will not deliver quality and accountable management taxpayers pay for and expect.

Please address the following questions and suggestions:

1. Please consider specific ways the agency can use partnerships to recruit more funding for its work. We are confident the public would be supportive of agency funding and programs. The agency should remember that many non-use members of the public appreciate and support programs like wolf recovery. We have great respect for the management and law enforcement activities the agency is responsible for and realize that traditional funding streams are unlikely to provide enough money for the agency to carry out its mission. We would like the agency to recognize that its stakeholders include non-hunters and urban/suburban residents, including photographers, wildlife watchers and birdwatchers and should work to engage them.
2. Wolves have not dispersed to the other required regions of the state. What are the variables negatively impacting the lack of geographic dispersal, such as poaching, road density, corridors, decreasing numbers of wolves dispersing from Idaho and British Columbia due to high levels of hunting and predator control in those areas, etc.? The management plan should consider ways to accommodate geographic dispersal, without preventing us from reaching wolf dispersal goals set out in the recovery plan. Please examine opportunities to translocate wolves to meet geographic dispersal goals.
3. Please consider alternative sources of funding to monetize the economic value of wolves without instituting a hunting season for wolves. Consider solutions other land and wildlife managers are using to raise money from wildlife watchers and recreationists who benefit from experiencing a wild landscape and wildlife.
4. Any management alternative continuing the agency's policies of eliminating wolves must consider the full body of science regarding whether or not lethal removal is effective in preventing depredation. In our view, wolves are opportunistic and adaptable hunters that will prey on what is most available and easiest to kill and provide enough food. To survive wolves must retain this adaptability. What science supports that indiscriminate predator control, such as that used by the agency in northeast Washington is effective? What science supports the agency's claim that killing wolves changes pack behavior or that reducing pack size will reduce attacks on livestock?



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5. What non-lethal deterrents will become part of long-term wolf management? How can the agency reward private land managers for using these deterrents to increase acceptance of wolf recovery on the landscape? How can the agency and conservation partners continue to support compensation programs for lost livestock? What would that compensation cost over time with various levels of wolf recovery? What are the costs of lethal removal (on wolves, ecosystem, the public) compared to the cost of non-lethal deterrents and compensation for injured and dead livestock?
6. How can long-term wolf management eliminate, minimize or mitigate geographic and ecological variables that create the conditions for wolf depredations?
7. Please consider how WDFW work with other land management agencies, like the US Forest Service, to consider what grazing allotments are appropriate on a dynamic landscape. Some historic grazing allotments are likely inappropriate for recovering wolf populations in places where dispersal is needed. Additionally, work is needed with these land managers and others to consider alternative sites for grazing that would not result in conflict with wolves.
8. What does the agency forecast for wolf population growth and dispersal over time? How is that forecast determined? What is the anticipated impact of hunting on wolf reproduction within wolf packs? Considering the likelihood of hunting by tribes, how will that impact wolf populations over time? What other factors limit population growth, like prey availability, and how do those additional factors determine how many wolves will be on the landscape?
9. What plans does the WDFW have to monitor all wolf takings, including hunting, poaching, depredation wolf removals, and tribal hunting in post-recovery? When and how often will this information be made available to the public?
10. How will the WDFW be able to determine whether wolves are in a recovery or management phase? The management plan must have clear language regarding what happens if wolves decline below management phase benchmarks.
11. Ensure and document how recovery and management models consider inter and intra pack aggression, livestock density, prey density, disease, climate change, legal takings, and poaching of wolves. How do these factors contribute to total carrying capacity? How will the agency monitor and allow for elk and deer density in areas frequented by wolves and deer and elk hunters? How will models allow for reduction or elimination of (human) hunting for elk and deer in some areas?
12. Document how WDFW killing of wolves for depredation has made hunters and ranchers more tolerant of wolves.



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13. Determine and document how ranchers are utilizing non-lethal deterrents prior to WDFW implementing kill orders. Determine and document how the appropriate level of non-lethal deterrents is determined. Document the policy to review the non-lethal deterrents utilized prior to kill orders being implemented. Document the policy to determine best use of non-lethal deterrents that are peer reviewed or otherwise scientifically reviewed in each area prior to wolf-livestock conflicts or expected conflicts. Ensure these best uses are peer reviewed or otherwise scientifically reviewed and the results made public.
14. The scoping document should determine ways WDFW can prevent wolf rendezvous and den sites from intersecting with cattle and ranchers.
15. Where else have wolves been translocated? What were the results of wolves being translocated? Are moving wolves an effective method for dispersal? How successful were the translocations and how was it measured? Is translocation to areas without ranching operations a viable solution for wolves that kill cattle and sheep? Will translocated wolves have increased risk of poaching, death, and depredation on livestock? How will translocation impact the social structure of wolf packs? Is WDFW planning to translocate wolves as part of post-recovery plan? If yes, please explain the public process that would precede this action.
16. What are the most recent and accurate models used for "population viability/persistence?"
17. The agency should work with other land managers to protect corridors for wolf dispersal. We know corridors will be required for healthy movement of wolves between regions. Document how this work could be done.
18. What research is needed on the impact of natural or human barriers for dispersal, prior to implement post-recovery goals?
19. What are the barriers to natural dispersal to other regions of the state?
20. Citizen advisory groups are powerful organizations that help advance wolf recovery and collaboration between various communities. What citizen advisory group will be formed for post-recovery? How will the group be balanced between stakeholders, including conservationists, hunters, and ranchers? What power will the group have on management decisions?
21. Determine how facilities, like a wolf education visitor site could be constructed to enhance wolf ecotourism and increase wolf education.



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The Sierra Club appreciates the opportunity to participate in the WDFW post-recovery wolf planning process. We look forward to continued advocacy for the sustained recovery and management of the wolf population in Washington State.

Sincerely,

Graham Taylor
Wildlife Committee Chair

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