

# Gary Ott

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## Comment 1.

The formulation of a post-recovery Wolf Conservation and Management Plan should first of all address issues that have been WDFW failures under the existing Wolf Conservation and Management Plan.

Failure #1. It is a stated purpose of the Washington State Wolf Conservation and Management Plan (WCMP) (page 123) to promote public acceptance and understanding of wolves. "Addressing public safety concerns and providing information on wolf behavior are important steps in achieving conservation and tolerance of wolves by citizens."

The incidents cited below, illustrate the need for WDFW (Washington Department of Fish and Wildlife) to provide educational material about wolves to people who are most likely to encounter wolves. While some information is available on the WDFW websites, it is inadequate in its scope and available only to persons that seek out information on-line.

November 2011 (Methow Valley News (November 8, 2011): It was reported that a young deer hunter had an encounter with two wolves and that over the course of about an hour and a half, the wolves followed her at a distance, occasionally coming within 55 yards. The article indicated that she had screamed and thrown rocks at the wolves.

September 2013 (Methow Valley News October 2, 2013): Near Harts Pass a hunter killed a wolf he claimed to have shot in self defense. The follow-up investigation and report by Washington Department of Fish and Wildlife (WDFW) stated that based on their interview, they did not believe the hunter was in danger and that his lack of experience and familiarity with wolf biology led him to kill the wolf.

August 2018 (Spokesman-Review August 28, 2018): A Ferry County rancher said he shot a adult wolf in self-defense. The rancher said he saw pups and heard barking and growling. The rancher said he shot at the wolf as it barked and approached him. Four days later a WDFW wolf biologist reports that he "...got within approximately 20 yards of the injured wolf and saw that its left rear leg appeared to be broken below the knee...".

July 2018 (The Methow Valley News, July 18, 2018): A salmon researcher first heard wolves yipping and barking before encountering two wolves. She attempted to scare them away by yelling and using bear spray. After communicating with her supervisor she climbed a tree. Initial reports claimed she had been chased up the tree, however in later interviews she corrected the misinformation and stated that the wolves were approximately fifty yards away. A helicopter was summoned with a team of Okanogan County Sheriff's officers on board with orders to shoot the wolves on sight. When they arrived at the scene the pilot observed two wolves that quickly disappeared. Acting director of WDFW Joe Stohr said it is common for wolves to bark, howl, and approach people or other animals when protecting their young. According to WDFW "...Vocalizations by wolves are not uncommon when people approach wolf pups, and adult wolves often attempt to escort perceived intruders away from areas where pups are present...". "While these behaviors are not necessarily predatory in nature, they can feel threatening."

It is not surprising that people encountering wolves misinterpret wolf behavior and sometimes find it intimidating, however wolf biologist commonly encounter barking wolves when investigating wolf dens. At this time, more than 30 years after wolf re-introduction into Yellowstone Park and Idaho, there have been no credible claims of wolf (non-captive) attacks against humans in the states where wolves have re-established. On the other hand, misconceptions and fear of wolves have been fueled by a rich tradition of European and American fiction, folklore and fairy tales that demonize wolves. Since the re-introduction of wolves into Yellowstone National Park and Idaho, public misinformation has been further augmented by an abundance of deliberately false information that exaggerates the threat of wolves to humans, their impacts on livestock, and their effect upon prey species. A more balanced and realistic point of view about the danger of wolves to humans is available in both the WCMP and, A Case History of Wolf-Human Encounters in Alaska and Canada ( 2002, State of Alaska Department of Fish and Game, Technical Bulletin #13). Information about the effects of wolves on other wildlife species is available on-line from wildlife management agencies in every western state with wolves. On-line information does not adequately target those persons most likely to encounter wolves but only but only those that have chosen to seek information from state agencies.

Although wolf attacks against humans are rare occurrences, claims of attacks and the subsequent claims of the necessity of shooting wolves in self defense have been made only by persons with firearms. This is an unlikely coincidence and leads to suspicion that the claims are untrue. It is understandable that some encounters with wolves can be disconcerting, especially without prior knowledge about the possible behavior of wolves in some encounters with humans.

From pages 149 and 150, chapter 12, of Washington State Wolf Conservation and Management Plan:

Manage wolf-human interactions to reduce human safety concerns, prevent habituation of wild wolves, decrease the risk of conflicts between domestic dogs and wolves, and to build awareness of the risks posed by wolf hybrids and pet wolves.

#### 6.1. Respond to human safety concerns.

Attacks on humans by healthy wild wolves are extremely rare events. However, when necessary, WDFW or a cooperating agency will take action if the continued presence of a wolf or wolves poses concerns for human safety, consistent with existing policy for black bears and cougars.

6.1.1. Provide information to the public on the low risk of attacks on humans by wolves, how to prevent and react to wolf attacks, and other concerns. In particular, provide information to people who might encounter wolves, including hunters, trappers, rural landowners, outdoor recreationists, outfitters and guides, forest workers and contractors, other natural resource workers, and utility workers.

This list (para. 6.1.1.) should also include officers of law enforcement agencies. This necessity is defined by the 4th account above (The Methow Valley News, July 18, 2018) that incorporated the help of the Okanogan Sheriffs office.

At this time WDFW has not adequately fulfilled their commitment to provide public information as it is defined by the WCMP . One necessary step to accomplish the goal of providing educational information to the public, and especially those most likely to encounter wolves, would be to create and disseminate informational pamphlets in multiple ways. It is especially important that hunters are provided required reading information with their hunting license. Informational pamphlets should be available and at hand to all hikers, hunters, WDFW and U.S. Forest Service employees in

the field, at trail-heads, and to county and state law enforcement agents that may be called upon, and may encounter wolves.

From the Washington State Wolf Conservation and Management Plan (page 133):

A well-informed public is essential to gray wolf conservation and some authorities consider outreach efforts to be the highest priority in restoring the species (Fritts et al. 1995, 2003). It is crucial that wolves and wolf management issues be portrayed in an objective and unbiased manner, and that the public receives accurate information on the species. Conflicts with wolves and the solutions and compromises needed to resolve those conflicts must be discussed fairly (Fritts et al. 2003).

Without adequate public information the incidents cited are commonly misrepresented by news media and further exacerbate misconceptions that anti-wolf propaganda promote.

Failure #2. The WDFW has killed multiple packs of wolves mostly to benefit one particular rancher whom is not only uncooperative, but has made public statements that he is at war with wolves. While there is a pretense to using non-lethal methods to avoid conflicts between wolves and livestock this rancher has used salt licks and located his cattle in the proximity of the known locations of wolf activities. This deliberately caused conflict has been encouraged by WDFW's removal of wolf packs. The tax payers and citizens of Washington State should not be paying for or participating in further efforts to help a rancher that is against the best management of wildlife. The WDFW should be encouraging public land management agencies to remove his grazing permits. It has been determined that the killing of wolves increases wolf depredation and livestock conflict (Robert Wielgus <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0113505> ) and yet WDFW has continued to "incrementally" reduce depredating wolf packs based on the assumption that this will alter wolf pack behavior. There is no science to support this assumption.

Comment 2.

Besides these failure to fulfill the mandates of the existing WCMP it has been made clear by WDFW that wolf hunting will be allowed under a new management plan. It has not been established that hunting wolves would be approved by the citizens of Washington State. It also cannot be assumed that public comments to this scoping stage of determining a Post-recovery Wolf Conservation and Management Plan would represent public intentions or preferred management options.

From the Washington State Wolf Conservation and Management Plan (page 133):

Two-way communication depends on a public that is informed about wolves and ongoing management activities and agency staff who are well informed and willing to listen to the real and perceived concerns of residents about wolves. An outreach campaign that is active, rather than passive, in reaching specific groups will best benefit wolf conservation. Information and education strategies must be adaptive, reflecting the adaptive wolf conservation and management strategies described in the overall plan. Communication tools and education methods should be flexible and based on ongoing conservation and management activities, feedback from public attitude surveys, and available funding.

It has been demonstrated by a long term study performed by WDFW and Washington State University that the killing of wolves increases wolf depredation and livestock conflict (Robert Wielgus <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0113505>).

With the re-introduction of wolves to Yellowstone and Idaho a theory was believed by leading wolf biologists that allowing hunting of wolves would increase public acceptance of the presence of wolves. Decades later there is no evidence to support this belief. According to the WCMP Washington State Wolf Management Plan the re-establishment of wolves was approved by 75% of Washington residents.

All indications are that prey species populations are not adversely effected by the presence of wolves; and that wolves, by selecting the injured, weak, diseased and old are important to the overall health of ungulate herds. With the spread of hoof-rot disease in Washington among elk herds and the spread of chronic wasting disease in deer and elk herds across much of North America, healthy wolf populations may help to limit the risk of disease to ungulate herds. It is unknown what effect wolves may have on the the spread of chronic wasting disease but it seems quite likely that wolves would quickly learn to recognize the scent of elk with hoof rot disease and selectively prey upon those individuals and eliminate its spread. Chronic wasting disease has only recently been recognized and is little understood, but the rapid increase of its occurrence in other states should be of concern to Washington wildlife biologist.

The existing Wolf Conservation and Management Plan allows for the possible hunting of wolves if it has been estimated that "at risk populations" of ungulates or "any ungulate population that falls 25% below its population objective for two consecutive years and/or if the harvest decreases by 25% below the 10-year average rate for two consecutive years". Fluctuations of ungulate populations are normal. A failure of ungulate populations to meet the expectations of wildlife biologist may be the result of unrealistic expectations, over-hunting, or climate/weather conditions or habitat changes that are not related to the presence of wolves. Reductions in ungulate populations that are caused by climate, severe winter weather, over-hunting, disease, or other causes cannot, in the long term, be remedied by the elimination or reduction of wolf populations. Biological processes will adjust wolf populations to changing prey availability. Wolf hunting will increase conflict with livestock.

The management of wildlife in Washington State should be driven by decisions that are based on scientific knowledge that is most beneficial to wildlife and not based on providing WDFW with revenue, or prioritized to benefit specific interest groups that may be influenced by their misinformation and conflicts of interest. Wolves and all wildlife in Washington are not a commodity to be used by WDFW for revenue generation.

Respectfully, Gary Ott

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