

# Steve Busch

Policies protecting gray wolves currently enacted by the Washington Department of Fish and Wildlife are flawed and run contrary to the intent of the Federal Endangered Species Act.

FACT: The gray wolf is not, and never has been, an endangered species. Gray wolves currently enjoy the most extensive circum-polar range of any large terrestrial predator on earth. The International Union for the Conservation of Nature (IUCN) lists the gray wolf as a "Species of LEAST Concern".

FACT: The gray wolf does NOT meet ANY of the five federal requirements necessary to receive legal protection under the Endangered Species Act. According to the ESA, a species must be listed if its existence is threatened or endangered due to any of the following factors:

1. present or threatened destruction, modification, or curtailment of its habitat or range;
2. over-utilization for commercial, recreational, scientific, or educational purposes;
3. disease or predation;
4. inadequacy of existing regulatory mechanisms;
5. other natural or manmade factors affecting its continued existence.

The legal definition of "threatened or endangered" under Washington State law is based on political boundaries and arbitrary lines on a map. The enacting of legal protections for any species, let alone one as impactful as the gray wolf, should not rely on estimates of "historic range", but on factors that are actually relevant to the "continued existence" of the species.

The Washington state legal definition of "endangered species" should be amended to adopt the same scientific definitions as outlined by the federal ESA. State endangered species policies and actions should rely on a sober scientific assessment of the overall health of the species, global population trends, population estimates, an assessment of real threats, with a primary emphasis on a species ENTIRE range.

The ESA requires that threats to a "significant portion" of a species range must be "so important that, without the members in that portion, the species would be in danger of extinction, or likely to become so in the foreseeable future, throughout ALL OF ITS RANGE." (Federal Register, Vol. 79, No. 126, Tuesday July 1, 2014/ Rules and Regulations page 37579). Under the federal definition of "significant range", a population of wolves in Washington state is not necessary to insure the species survival.

To elaborate on that point, as is again clearly stated in the Federal Register, "Congress intended that an analysis based on consideration of the entire range should receive primary focus." (Ibid, Federal Register page 37580). Considering that the total available gray wolf habitat in Washington state represents less than .001% of the species entire range, any actions promoting gray wolf expansion across the state are clearly unnecessary to insure the species "continued existence".

Any gray wolf "recovery plan" for Washington state, which is home to over 7 million people, will be extremely expensive to manage. Gray wolves pose a serious threat to private property rights and endanger public health and safety. Gray wolf proliferation has already taken a serious toll on existing wildlife populations in neighboring states while negatively impacting legally enacted

multiple-use policies on public lands.

Regardless of their popularity among some extremist environmental groups, it is a verifiable scientific fact that gray wolves do not need special legal protections in Washington state in order to survive as a species. Current state wolf proliferation plans actually increase the threat to the integrity of the species due to the inevitable hybridization that has already been documented as having occurred, and will continue to occur, between wild wolves and our region's domestic dogs and/or coyote populations.

The Washington state wolf plan, (like most of the wolf plans in neighboring states), is an abject failure and should be discarded entirely, or at the very least amended to reflect basic biologic scientific facts in order to preserve the integrity of the species and insure that our state continues to be managed for the benefit of current and future generations.