

Laura Welp

What is your gender?

Female

Age?

57

County (or Counties) of Primary Residence?

Grays Harbor

Residential setting:

Rural

WDFW has identified a list of impact topics to include in the Plan/EIS. Impact topics are a means of organizing the discussion of issues and analysis of impacts. Impact topics can be thought of as chapter or section headings in the Plan/EIS.

Please review this list and add other topics, or items that fit under these headings.

Please check the topics you view as most important.

Wolf conservation and monitoring

Wolf-livestock conflicts

Wolf hunting

Land management

Habitat connectivity

Economic analysis

Please list other topics here. The next page provides space for general comments on the scope of the plan.

Lethal Control, Allotment buy-backs, Poaching regulations,

Do you have general comments about the scope of Washington's updated wolf conservation and management plan?

Laura Welp
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11/14/19

RE: Wolf Post-Recovery Planning

Dear Washington Department of Fish and Wildlife,

Thank you for the opportunity to submit scoping comments on your development of a post-recovery plan for wolves. I place a high value on wild, undeveloped landscapes that are protected from consumptive uses. I am in favor of the WDRW actively protecting and recovering populations of gray wolves and the habitat on which they depend.

The purpose of this scoping process is to develop a plan for when wolves are de-listed. However, Washington wolves are a long way from recovery at this time and are still facing challenges with regard to wolf recovery. WDFW says that Washington's average annual growth is 28% to justify imminent de-listing but that is misleading. There is a high degree of annual variability in population growth rate. It was high in the beginning when wolves first arrived in the state but it has gotten low at present. There are no wolves yet in all recovery zones, annual growth is stagnating, number of packs is low.

In addition, there are still large areas of unoccupied suitable habitat that are important for redundancy and resilience in populations. More populations add more genetic diversity to a species, which can be important in adapting to new environmental conditions. This is an important consideration as the climate changes and habitats for wolves are altered directly and indirectly by anthropogenic activities such as habitat loss, hunting and predator control, and alteration of prey species populations and habitats. More populations also means more management flexibility.

Planning for post-recovery management seems a little premature because conditions may have changed by the time wolves are fully recovered. In that case WDFW may have to update this post-recovery management plan before it even gets a chance to use it. That said, I request that WDFW analyze the following issues in the draft plan:

SCOPING ISSUES

* The WDFW should maintain population viability by establishing science-based minimum viable population thresholds above which wolf numbers must be maintained.

* WDFW should use the best available science

Please do a widespread literature review of research into the efficacy of lethal control. Some of it indicates that killing wolves is not an effective way to reduce cattle depredations. Under what conditions is lethal control successful? When is it not? Can a wide variety of non-lethal methods accomplish the same thing? The controversy over killing wolves mandates taking a thorough look at the research.

Another research question that needs a thorough answer is the degree to which wolves are “decimating” game populations. This assertion is not supported in the literature. Please also consider early indications that predators like wolves might be a tool in controlling chronic wasting disease, which is spreading in game species throughout the west.

* Develop a wolf-livestock conflict protocol

Resolving conflicts between wolves and livestock is the primary problem facing managers. This problem is values-based, with those valuing wolves and wildlife on one side and producers on the other. WDFW has the unenviable task of balancing those competing needs. Wolf advocates values, however, suffer greater loss when their values are subsumed to ranchers. A dead wolf is a zero-sum game. Ranching, on the other hand, can be managed to allow it to continue. Currently ranchers are always favored in any conflict. Their needs always come first. However, moving livestock to another location in cases of conflict, while inconvenient and expensive, can also solve the problem. Remember that the number of people against lethal control far outnumber the number of people who stand to benefit financially from it.

WDFW needs to develop a stringent protocol to give wolves every chance. Require multiple methods of non-lethal control, including range riders. This protocol should be analyzed under SEPA to promote transparency and public involvement.

* Resist giving wolves game status

Wolves should not be considered a game animal to be hunted after recovery goals are achieved. Most Washingtonians value wolves for their intrinsic value as wild animals and they should be managed as such. Sport hunting should not be assumed to have a negligible impact on wolf populations and breeding pairs.

* Remove lethal control as a management option

I support WDFW's proposal to develop protocols for removing livestock from areas of conflict rather than terminate wolves. I feel it is never appropriate to kill wolves to protect livestock. Slaughtering terrified animals from the air, sometimes subjecting them to lingering deaths and leaving pups to starve, is inhumane. It's particularly egregious because it is done for the benefit of a small number of ranchers. Ranchers should be required to provide evidence of use of non-lethal control attempts (fencing, guard dogs, fladry, lights, range riders). If these become ineffective, livestock may need to be moved. The efficacy of lethal control is questionable and in any case is always a short-term solution that will have to be repeated. The department must develop non-lethal solutions that will be effective in the long term.

Since 2011, 90% of all wolves killed in Washington were on public land, and most for the same livestock producer. Raising livestock is a privilege, not a right. Ranchers who fail to comply with permit terms and conditions and whose allotments are in poor resource condition should not be supported with lethal control.

* Develop a system for permit buyouts

There are some allotments that are simply inappropriate for raising livestock. They are too rugged and remote to adequately monitor and husband livestock appropriately, and these areas are often where conflicts between wolves and livestock develop. These allotments should not be available for ranching. Remote, unmanipulated areas of wilderness will become more important as species adjust to climate change by migrating to new habitats. Instead, WDFW could develop a program that would allow producers to "sell" their permits to conservation buyers who would then allow these allotments to be retired from grazing and used for conservation purposes such as watershed restoration or preservation of ecosystem processes. The process that federal land managers use could be used as a model.

* Toughen penalties for poaching wolves

Retributive "extrajudicial" killings of wolves can be expected to rise as wolves expand and society learns to adjust to their presence. This works against WDFW's management strategy and should be firmly countered. Enhanced criminal penalties for wolf poaching (including seizure of any firearm, vehicle, or real property used in connection with such a crime) are indicated as a check on this criminal activity.

Thank you for your time.

Respectfully,

Laura Welp
McCleary, WA