

To: Harriet Allen, Endangered and Threatened Species Manager

Date: June 23, 2011

From: Minority Group

RE: Minority Group Comments on WDFW Draft Wolf Plan

These comments are presented on behalf of the Minority Group. By definition the DRAFT Wolf Plan is supposed to be a Draft Conservation and Management Plan for Washington. It is written like a recovery document for an ESA species such as the Desert Tortoise not an apex predator like the Wolf. As most recovery plans do not consider long term management objectives this document does not either. However when dealing with an apex predator like the wolf it is essential to have the support of impacted stakeholders and the only way to achieve this is by discussing long term management plans. The WDFW could have attempted in the Wolf Working Group process to address concerns and effects of the Plan by both sides if they would have allowed a discussion on management objectives instead of focusing on the number of Breeding Pairs (BP's) to delist. In order for the Wolf Working Group, WDFW Commission and the public to fully understand the *effects* of this plan long term they must consider the following:

Sec #1. Projection of Wolf numbers based upon the DRAFT Plan.

- A. The Wolf Plan on page 62 line 10 states that 15 BPs = *"210 total wolves or 14 wolves per BP or an average of 30 packs"*.
- B. Using data from the NRM on page 71 of the wolf plan it only took *"ID 7 years to go from 14 to 251 wolves and WY 9 years to go from 21 to 234 wolves"*. Therefore Washington with approximately 30 wolves today should be at 210 wolves in 8 years.
- C. With 15 BPs, (210 individual wolves), This is an example of what the wolf population could look like in 11 years ($210 \times 1.24 \times 1.24 \times 1.24 = 400$ wolves)(*Federal Register/Vol. 74, No. 62/ Thursday, April 2, 2009/Rules & Regulations page 15166 average population growth of wolves in the NRM (24%/yr per Federal Register)*).
- D. Then the state will need to conduct the SEPA/NEPA process for de-listing which would take a year or more and thus another 24% growth resulting in **496** wolves according to page 62 of the wolf plan this would mean there were as many as 71 different packs this is what the wolf population could look like in 12 years.
- E. This is what would happen if the delisting process was held up for 2 years with litigation $496 \times 1.24 = 620$ **wolves** $620 \times 1.24 = 775$ **wolves**. This is what Washington could look like in 14 years.

One solution, eliminate the 3 year waiting period, go with immediate de-listing at the target number (this process will take a year) with ability to re-list if population falls below the de-listing target. The elimination of the 3 year waiting period would only take a WAC change from the Commission. There is no Federal requirement for a 3 year waiting period with 15 Breeding Pairs. Immediate de-listing would result in a population of 262 wolves instead of 496 when delisted without a lawsuit.

Sec. # 2. In order to understand the impacts of Wolf populations on Ungulates in Washington State you must consider the following:

- A. Page 94 line 33, *"In some areas and situations, wolves select adult bull elk disproportionately"*.
 - o In Game Management Units (GMUs) within the Clockum and Blue Mountain Herds, hunters have gone to spike only seasons to preserve the large bull elk for breeding and to maintain the bull to cow ratios. There is a very limited draw for tags, raffle tags and Governor's tags for branch antler bulls that generates the WDFW \$200,000+ per year. In these GMUs most of the mature bull elk winter by themselves or in groups at fairly high altitudes and in deep snow not with the cows and young bulls in the lowlands. These bulls will be the first animals taken by the wolf in winter and will dramatically affect the management goals as to bull to cow ratios plus revenue.
- B. See page 113 lines 10-18 of Wolf Plan – projected number of deer and elk killed annually by wolf populations. The chart from page 113 for *"300 wolves used a low 2,550 elk, average 3,165 elk and high 3,780 elk for annual kill rates by wolves"*. We utilized the average or 10.55 elk killed/year/wolf as per the WDFW Draft Wolf Plan. The available NRM science shows figures of 11-30 elk killed/year/wolf plus deer kill. Using the average from above of 10.55 elk/killed/wolf/year (or the lowest number possible) should eliminate the arguments that this number is cumulative. The same logic has been applied to deer kill.
- C. Current Hunter Harvest including Olympic Peninsula (Elk) **7,390** (pg 180 ln 16-36)
- D. Current Hunter Harvest including Olympic Peninsula (Deer) **40,375** (pg 180 ln 16-36)
- D. Deer kill by 300 wolves 5,250/yr. ave
- E. If the delisting process is held up for 2 years with litigation $496 \times 1.24 = 620$ **wolves**
 $620 \times 1.24 = 775$ **wolves** (see **Sec 1 sub E** of this document).
- F. In 1992 the NRM reached its de-listing target number. It took 19 years of litigation and an Act of Congress to de-list.
- G.

# of wolves	210	300	400	500	600	775	Hunter Harvest
# elk killed by wolves	2215	3165	4220	5275	6330	8176	7390
% Hunter Harvest	30%	43%	51%	71%	86%	110%	
# deer killed by wolves	3,675	5250	7000	8750	10550	14000	40375
	9%	13%	17%	22%	26%	35%	

Sec 3. “At Risk ungulate populations” see preferred alternative. *“If the WDFW determines that Wolf predation is a limiting factor for “at risk ungulate populations” and the population within that recovery region is healthy it could consider moving of wolves, lethal control or other control techniques in localized areas. The definition of a healthy wolf population is one that exceeds recovery objectives and that management objectives would not push the population below those objectives and put it at risk”.*

- A. Sportsman and the WDFW have invested a large amount of dollars into the introduction and recovery of various *at risk* ungulate species
- B. There is a considerable amount of revenue generated into the WDFW to support “*at risk species*” on an annual basis.

Wolves depredating on “at risk species” should be removed or killed regardless of listing status. If this action results in a reduction in BP’s it is still much cheaper to re-locate a breeding pair within that recovery region but not back into the at risk ungulate habitat, rather than sustaining losses to the ungulates.

Sec 4. In the Preferred Alternative under Ungulate Management *“the WDFW is going to manage for healthy ungulate populations through habitat improvement, harvest management and reduction of illegal hunting consistent with game management plans. Harvest objectives may need to be adjusted if overall predation levels increase. Harvest level need to be compatible with long-term sustainable populations of predators and prey”.*

With the plan lacking a targeted maximum population on wolf numbers the WDFW is sending a clear message that they intend to adjust hunter harvest levels to provide for wolf consumption first and hunters second. We believe that if WDFW intends to have a sustainable wolf plan then they must conduct a Population Viability Analysis on prey species by Game Management Areas and include hunter harvest and wolf harvest.

Sec 5. The plan adds a statement in chapter 12 task 5.4 “that the ecological roles of predators and prey should be integrated into game management plans for ungulate and carnivore species”. **Does this mean the WDFW intends to manage ungulates and carnivores with Sigmoid Curves? If the WDFW intends to manage on the ecological roles and not manage on Sigmoid Curves there must be a targeted maximum population of predators in the WDFW Game Management Plans. Does the WDFW intend to include or exclude hunter harvest, if so at what level?**

Sec. #6. Wolf Control – See page 71. The bottom line is that USFWS/USDA “killed 1,517 problem wolves themselves in order to recover 1,614 wolves in the ID, MT, WY (NRM)”. **This recovery was 3.5 times the updated listing of 450 wolves for these three states. This did not include wolves killed illegally or on highways etc.**

- A. Currently the Wolf Plan does not convey a will to kill *problem wolves* at a rate of 10-25% annually. (see page 71 wolf plan).
- B. The WDFW stated to the Wolf Working Group throughout the 3+ years the Group met that the WDFW would use lethal take to address livestock depredations by wolves.

However, the WDFW Draft Wolf Plan established additional criteria that will be very difficult to meet. *“They suggested that lethal control be limited to solitary individuals or territorial pairs whenever possible, and that removals from reproductive packs should not occur until pups are more than six months old, the packs contain six or more members (including three or more adults or yearlings), neighboring packs exist nearby, and the population totals 75 or more wolves. Consideration should also be given to minimizing lethal control around or between any core recovery areas that are identified, especially during the denning and pup rearing periods (April to September) (E. Bangs, pers. comm.)(page 136 lines 32-39)”*.

- C. The WDFW Commission has not begun discussions around authorization of lethal take on wolves in Washington and as a result this is not a tool that is available in the foreseeable future. The Wolf Plan states *“that in establishing the limitations and conditions related to wolves, the Commission “shall take into consideration the recommendations of the Washington state wolf conservation and management plan.””(page 86 lines 40-42)*. The Director has the authority to adopt emergency Rules. Has the Director made the decision to authorize lethal take of wolves that have depredated upon livestock or at risk ungulate species or will the Commission decide?
- D. Ensuring that **Animal Welfare** is protected has always been a top priority amongst livestock producers and pet owners. Livestock producers and pet owners are very concerned that the establishment of wolves in their area will negatively impact their livestock/pet welfare. As livestock producers and pet owners it is very difficult to see animals that have been attacked by wolves and have suffered horrific injuries. Our traditional belief is that it is our duty and obligation as stewards to our livestock and pets to prevent such attacks from occurring in the first place instead of simply relying upon “compensation” for wolf related losses. It is unconscionable to us to simply stand by and allow such trauma to be inflicted upon defenseless livestock and pets.

Problem wolves should be killed not “moved or translocated”. All problem wolves need to be killed in order to prevent against social intolerance of wolves. This plan will never be successful without Management +Control=Social Tolerance

Sec 7 # Habitat

- A. Washington’s Population of 6,724,540 people and a population density of 100.5 people/sq mi. This is 6 to 18 times the human population density of the 3 principle states in the NRM area, MT, ID, and WY. (WA, WY, ID, and MT state web sites). According to the Federal Register, Feb.8, 2007, Vol.72, “number 26 Washington State has only 297 square miles of suitable wolf habitat in the eastern third of the state” (p.6117 Federal Register). This same report indicates that if the 3 major states (ID, MT, and WY) “can support 10 BP’s for 3 years that the species can be considered to be fully recovered and can be considered for delisting” (p.6107 Federal Register). That criteria was met in 2002 (p.6111 Federal Register).
- B. The Carroll model determined that 28% of the NRM DPS could be ranked as suitable wolf habitat (p.6117, Federal Register). On the same page they also stated “We believe that the Carroll (et al. 2006 pg 31-34) model tended to be more liberal in identifying suitable wolf habitat than either the Oakleaf (et al 2006 pp 558-560) model or our field

observations indicate is realistic, but Carroll's model provided a valuable relative measure across the western United States upon which comparisons could be made."

- C. The Oakleaf model indicates that 65,725 sq. mi. (p6117, Federal Register) or 19.8% of the states of WY, MT, and ID is suitable habitat. We also believe that the habitat modeling done by the WDFW, that finds a larger percentage of WA, the smallest, in land area, of the western states with more than twice the population of the states of MT, WY, and ID to be flawed at best or intentional at worst.
- D. On page 52 of Alternative 2 of the Draft Wolf Conservation and Management Plan for Washington, the WDFW using the Carroll model shows a high of 41,500 sq. mi. or 61% of the state, to a low of 16,900 sq. mi. or 23% of the state as suitable habitat. The USFWS as previously mentioned using the same Carroll model could only find 297 sq. mi. of suitable habitat in the eastern third of the state. This report didn't cover the western two thirds.
- E. Furthermore, WDFW on the same page using the Oakleaf model compiled by Dr. Maletzke found that the state had 26,700 sq. mi. of suitable wolf habitat or 40% of the state. This compares with 19.8% that Oakleaf found to be suitable habitat in WY, MT, and ID. This discrepancy could be due to the fact that Dr. Maletzke (pg. 49) only used *"four parameters (i.e. prey density, forest cover, human density, and presence of sheep allotments) to determine suitable habitat"*. Oakleaf (pg.6117, Federal Register) *"used roads accessible to two-wheeled and four-wheeled vehicles, topography (slope and elevation), land ownership, relative ungulate density (based on state harvest statistics), cattle (Bos sp) and sheep density, vegetation characteristics (eco region and land cover), and human density..."*.
- F. Also WDFW used Larsen and Ripple to determine suitable habitat. We honestly don't know where the Department found these folks. A Google search indicated that their area of expertise was populations of Aspens in the Yellowstone area and to a lesser degree the indirect effect of wolves on the growth pattern of these trees.

We don't want to think that the discrepancies between the modeling work done by the WDFW and USFWS are due to the WDFW's desire to justify a larger population of wolves than the state can support, but it appears this may be the case especially in view of the fact that the latest version of the WDFW Wolf Plan reads more as a justification for the recovery of wolves than a conservation and management plan.

Sec. #8 Prey availability

- A. Page 99 lines 44-46, *"Elk are a highly valued resource in Washington. Ten major herds are recognized in the state (Figure 13) and range in size from estimates of 900 to over 13,000 animals (Table 11). These total over 57,000 animals statewide, of which about 59% occur west of the Cascade crest"*.
- B. Page 101 line 5, *"The total state population of elk is 57,865; The Northwest Coast has an elk population of 16,220"* leaving a population of 41,645 in the Eastern Region, Northern Cascades and Southern Cascades.

- C. The elk population in the Eastern Region, Northern Cascades and Southern Cascades (wolf zones 1,2&3) is 41,645 elk, Idaho's elk population is 100,000, Montana's elk population is 117,880 and Wyoming's elk population is 120,000

It is inconceivable considering the vast differences in habitat, prey availability and human population between Washington and the NRM that we (Washington State) should have 15 BP's + 3 years to de-list when the NRM was required to only have 10 BP's per state plus 3 years to de-list but arbitrarily agreed to 15 BP's with no waiting period per state to de-list.

The USFWS has found that the 3 major states in the NRM can maintain a viable population of Wolves with 10 BP. Common sense would dictate that Washington would be able to do then same. The states within the NRM have proven that they can maintain a healthy population over a 3 year period, there is no reason that we couldn't do the same. Therefore, we insist that the WDFW eliminate the 3 year waiting period. Also, if Wolves were delisted at 10 BP to a Big Game status the WDFW could begin to derive income off of the species by offering limited Hunting. We would agree with 10 BPs as long as there was a targeted maximum population not to exceed 200 wolves and the major items within this document are addressed.

Sec #9 Private Lands vs. Winter Habitat

- A. Page 100 line 5, *"Many herds display distinct seasonal movements, which also influence distribution. Animals generally occupy higher elevations in the summer and lower elevations in the winter (usually November to April)"*. Page 101 line 5, this is typical of the *Blue Mountain, Clockum and Yakima Herds which equal 21,300 elk* and the majority winter on or within 10 miles of private ground. Winter wolf activities will be detrimental to the long term sustainability of these populations.
- B. These three herds already pose great management challenges to the WDFW as they attempt to prevent elk depredation on private ground. These efforts will be challenged with the presence of wolves. Page 145, 5.3.1 of the Wolf Plan; *"these situations will be evaluated on a case-specific basis to determine if management responses are needed and, if so, what the responses should be. In some cases, it may be desirable to develop a response plan in advance to address an anticipated conflict"*.

Given that 50% of the elk available to wolves statewide are in these three herds and the economic value of the elk resource, it is unacceptable that the WDFW take a wait and see approach on ungulate/wolf conflict. This problem could be the most expensive line item in the plan and needs to be addressed in the Costs and Funding section of the Plan. Where the prey resides so do the predators.

Sec #10 Zonal Management

- A. We strongly recommend that the WDFW allow for zonal management to down-list and de-list. Due to habitat and prey availability the Eastern region should have fewer BP's as a requirement for down-listing and de-listing than the other recovery regions.
- B. We recommend translocation. Our preferred location for translocation of wolves is the Northwest Coast. This region contains a large amount of habitat and prey. The excuse of translocation not being politically acceptable by effected people in this region is unacceptable. The absence of translocation and wolves to the Northwest Coast is discrimination against the effected people in the other three existing wolf recovery zones.
- C. We strongly believe that wolves that den outside of the Washington State recovery area but utilize a percentage of WA habitat and prey should be counted towards WA State's final de-listing target proportionally (such as wolves denning in the pan handle of ID or Southern BC but ranging throughout Pend Oreille -Stevens Counties utilizing both prey and habitat).

Sec #11 Costs, Revenues & Budgets related to Management and Control

- A. The WDFW has been operating on the assumption that currently there are only 25-30 wolves in Washington; as a result, the WDFW assumes they can monitor wolf distribution and abundance through existing resources. This assumption is unacceptable considering the fact that this plan calls for 210 wolves at the beginning of the delisting process and very well could grow to 496 at the time of de-listing.
- B. The WDFW has not even attempted to calculate the expense and liability that this Wolf Plan will bring upon the WDFW and State just for management and control. According to Sec. 1 sub B of this document, it took an average of 8 years to get to an average 243 wolves in ID-WY.

Control (Investigation & Removal)

- C. The Wolf Plan includes a 6 year budget that averages \$55,000/yr to control wolf/livestock conflicts.
 - The USDA/APHIS 2009 ID report shows a total spent of \$517,000/yr or \$4,850 per wolf killed. Excluding payments for depredation paid to livestock producers. Even with this control 40% of the packs were still depredating on livestock 23% of the packs were classified as chronic depredating packs, 65% of the claims were on private lands.
 - Congress has not allocated any funding to conduct investigation and removal of problem wolves in Washington State (*U.S. Fish and Wildlife Service Northern Rocky Mountain Recovery Program Update 2010*). As a result this burden will lie solely on the WDFW and the State.

Management

- According to page 161 of the plan, "WDFW intends to allocate \$192,000/yr for management, monitoring of BP's, wolf distribution and abundance". This is not an adequate level of funding for six years (see Sec #1 of this document and the red line text in this section.).

- Please check with Oregon Department of Fish and Wildlife as to their costs to monitor and manage the three packs in Northeast OR.
 - According to (*U.S. Fish and Wildlife Service Northern Rocky Mountain Recovery Program Update 2010*) in FY10, USFWS R-1 and R-6 provided the states of WA and OR with **about \$10,000** each to assist them with their wolf monitoring and management efforts.
 - All of the above leads to distrust of the WDFW's ability to be transparent with their accountability in monitoring BP's, abundance and distribution.
- D. In the budget conversations on page 160-161 it appears that 7% of the existing budget for wildlife biologist is being used in this Wolf Plan, how many dollars of Pitman/Robison funds does this represent?

In the NRM, Wolf recovery has been almost entirely funded by federal appropriations and some private donations. In FY10 about \$4,565,000 in federal taxpayer funding was spent on wolf recovery and management in the NRM. Wolf recovery and management in the NRM from 1974, when wolves became listed, through 2010 cost approximately \$40,296,000 in federal funding (rounded to nearest \$1,000, with no adjustments for inflation and not including USDA Wildlife Services (WS) costs for investigating reports of suspected wolf damage and problem wolf control beyond the \$100,000/year provided by the USFWS to WS from 1992-2004). Incidentally, in 1996 "*The cost of wolf recovery in the U.S. northern Rockies was projected to be \$12 million over a 30 year period*" (p. 299, *Wolves Behavior, Ecology, and Conservation* by Mech and Boitani). The USFWS has already exceeded that estimate by 3.3 times and we are only half way through the 30 year period. Also on that same page "*cost was the main reason people gave for opposition*". Wolf management in the NRM in FY11 will cost federal taxpayers an estimated \$4,765,000. These annual cost estimates do not include the substantial resources provided from the Department of the Interior Solicitors Office nor the Department of Justice for legal assistance and defense during litigation (*U.S. Fish and Wildlife Service Northern Rocky Mountain Recovery Program Update 2010*). After de-listing the never ending cost to Washington State could be $\$4,765,000/3 = \$1,588,333(\text{management}) + \$517,000(\text{control}) = \$2,105,333 + \text{compensation} + \text{legal fees to defend the Plan}$.

Sec #12 Compensation for depredation

- A. "*In 2009 Defenders of Wildlife and the State of Montana paid livestock producers \$144,996 for 370 livestock killed by wolves*" (*U.S. Fish and Wildlife Service Northern Rocky Mountain Recovery Program Update 2010*). We used Montana as an example because it is most similar to Washington due to habitat. Montana had a wolf population of 524 wolves at this time. Since de-listing Defenders of Wildlife have ceased their livestock compensation program. We insist that the WDFW ensure that there is a permanent funding source for livestock depredations. For the reason above we do not want Non-Government Organizations funding the compensation program. We are also concerned that if this is allowed there may be additional criteria created that livestock producers cannot meet to be eligible for payment for wolf kills.

- B. In FY10 a new federal grant program for states and tribes with resident wolf packs was funded. That program is administered by the USFWS, with assistance from USDA WS, to enact the 2009 Wolf Loss Demonstration Project Bill, Public Law 111-11. That law provides up to \$1,000,000/yr for 5 years (FY10-FY14) to states and tribes in the lower 48 states that have resident wolf packs and documented livestock damage caused by wolves. The funding was allocated as follows: MT, ID, and WY \$140,000 each and WA and OR \$15,000 each (*U.S. Fish and Wildlife Service Northern Rocky Mountain Recovery Program Update 2010*).
- C. As described above the USFWS has allocated a one-time grant \$15,000 (less the 18-20% state administrative fees) for depredation compensation to Washington State. The Wolf Working Group was told that a portion of this funding has already been used to purchase collars and fladry (these expenses should have been paid out of the management section of the budget). The Wolf Working Group was told that there was \$15,000 available for livestock compensation. The inaccuracy of this statement does not build fiduciary trust amongst livestock producers. The Wolf Plan budget only allocates \$2,000/yr for payments of livestock losses. Currently the average value of a 600 lb. calf is \$700 and a bred cow is worth \$1400 the Wolf Plan only allocates enough funding for 2.8 calves/yr or 1.4 cows/yr.

This Wolf Compensation Program is a slap in the face to livestock producers. The livestock producers in the Wolf Working Group have said since the beginning “no long term funding for compensation, no support of any plan”.

Sec #13 Legislative Funding

- A. The WDFW continues to tell stakeholders to be patient and understand that they first must adopt a plan before they (WDFW) can secure a solid funding source. We believe that this approach is unacceptable and is unlikely to be funded in the current economic environment. We are concerned that the Legislature will not prioritize wolf compensation ahead of K-12 education and healthcare. As a result we believe this plan makes some rather large assumptions that are not realistic. Such as the likelihood of receiving \$381,000 (this is the 6 year average cost of the WDFW Wolf Plan page 161) to implement a Wolf Plan or the escalating costs that are found in Sec.#11 of this document.
- B. The net result of this proposed budget in the Wolf Plan will be that all other wildlife species must suffer reduced management due to economics contained in the Wolf Plan.
- C. Sub G Sec 2 of this document; with 775 wolves the kill would be 8175 or 110% of Hunter Harvest this would represent a possible worst case scenario that would require the closure of elk season to achieve ungulate management goals, and displays the lost revenue to the state that elk hunters represent annually.
- “100,000 elk tags are sold annually” @ \$45.20 each = **\$4.5 Million** in revenue to the WDFW (page 181 line 4). There will also be additional revenue lost because many of these people will not purchase a hunting license.
 - “The average amount spent by each elk hunter annually equals \$1,598” or **\$159,800,000** (page 186 line 4 Wolf Plan)

- \$159,800,000 in sales equals approximately **\$11,000,000 in sales tax revenue** to the state because not all items purchased are subject to sales tax.
- The above bullets equal lost revenue to the State of **\$15,500,000** plus reduced Pittman/Robison funding.

How is the WDFW going to fund this experiment now and into the future?

Sec #14 Costs associated with Wolf Depredation to Livestock Producers

- Revise Section B of Chapter 14 of the Wolf Plan as follows; strike everything starting on page 164 line 38 through the end of page 172. Then strike everything on page 173 lines 26 through page 177 line 10. Then strike everything on page 178 line 28 through page 179 line 32. These economic impacts are already included in every livestock producer's business plan and have no bearing on the additive costs of wolf depredation; this chapter represents unnecessary spin and fluff on the part of the WDFW to sell wolf recovery to livestock producers. The net result of this effort has further polarized livestock producers and not garnered their support.
- Wolf depredations and wolf caused losses; body conditioning, range utilization, reproductive efficiency, animal handling and reduced performance will all come out of the **net profits** of livestock producers.
- The Summary beginning on page 190 line 33 contains more fluff and spin from the WDFW. The best science available from the NRM, displays the outcomes that can be expected in a prey rich environment early on, when dealing with an apex predator (see Sec 1. A-E of this document).
- Trust is built on truthfulness not spin.

We are concerned that livestock producers are going bear most of the burden associated with living with wolves, even with depredation paid. In 2009 ranchers in MT suffered an estimated \$1.5 Million in wolf related losses, according to the Montana Livestock Loss Reduction and Mitigation Board. (Losses include the following Wolf depredations and wolf caused losses; body conditioning, reduced range utilization, reduced reproductive efficiency, changes in animal behavior when handling animals, animals injured when running through fences, reduced performance and lost or missing animals).

Sec #15 Wildlife Tourism

- Page 192 lines 11 through page 197 line 3 Wildlife Tourism contains a lot wishful thinking and conjecture with little or no supporting evidence for the possibilities of wolf related tourism in Washington. How will the WDFW convert this to revenue?
 - Page 196 lines 25-34, *"To achieve this potential, Washington will need to have some areas where wolves are safe from harassment, and are therefore less afraid of people and more likely to use open terrain. The state has at least two locations that could potentially offer good wolf viewing. Mt. St. Helens National Volcanic Monument features a large open volcanic plain created by the 1980 eruption of Mt. St. Helens".* How does this generate revenue for the WDFW? While we agree that the Mt. St. Helens area may be a suitable location for this activity we also want it understood that in order for this activity to be socially tolerated all wolves would need to be

“managed” outside the Mt. St. Helens viewing area to minimize impacts to livestock producers and other impacted stakeholders.

- Page 196 lines 31-32 “*The Methow Valley in Okanogan County supports large wintering deer herds in open habitats on both public and private lands, and could attract wolves at that time of the year*”. This is private property and the WDFW has not even contacted the Okanogan county Commissioners about this proposal. There will be little support amongst private property owners for this concept.

Sec #16 Legal

- A. We question the legality of protecting the *Canis lupus* (Rocky Mountain Distinct Population Segment (DPS)) a species that is not native to Washington State under the existing State ESA listing. The Washington State ESA listing for wolves in 1980 was made based upon an extirpated species according to the Wolf Plan. This extirpation was financially supported by both State and Federal Governments and had Tribal participation. In 1995 a non-essential experimental population was introduced from Northern Canada into the NRM. This group is now its own DPS and is now a Federally de-listed species. This non-native invasive DPS species has invaded and begun colonizing in Washington State.
- B. The Wolf Plan must recognize the Wolf as an Apex Predator.
- C. The actions of the WDFW promoting colonization of this invasive non-native species will negatively impact private property rights and property values.
- D. Geographical Discrimination of impacted stakeholders.
- E. We question the legality of the SEPA/EIS of this document.

In closing, remember the definition of sustainable is: “Sustainable” is a three legged stool. The three legs are; that the Wolf Plan is Biologically Sound, Economically Sound and Socially Acceptable.

All parties are fully aware of the successes, failures, tools & application, outcomes, conflicts and costs associated with Wolf Recovery in the NRM. If Wolf recovery and sustainability is truly the goal of the WDFW, why has the WDFW ignored this science and knowledge, and not taken a more common sense approach to this plan? The proposed Wolf Plan will not create trust between the effected people (rural residents, cattlemen, sportsman and hunters) and the WDFW. Social acceptance of this Plan and the Wolf amongst effected people is needed to achieve success. The proposed Wolf Plan has the potential to criminalize effected people. The Wolf Plan as proposed will preclude de-listing (targeted maximum population). The WDFW needs to completely re-vise the Draft Wolf Plan and not ignore the comments from effected people and the comments contained within this Minority Opinion if they truly wish to create a document that

does not deceive the public and thereby ensures for a sustainable wolf population.

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