



# Washington for Wildlife

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## News Release

### September 13, 2011 - Commission Should Reject Washington Wolf Plan

Washington for Wildlife (WFW) members have attended the two recent meetings regarding Washington's Wolf Conservation and Management Plan. The plan addresses recovery objectives and strategies for down listing and de-listing wolves, and management strategies to reduce and address wolf-livestock conflicts. Credit is due to the Commissioners who have not hesitated to question every aspect of the science and logic used in formulating this very complex and questionable wolf plan. After much consideration, WFW has determined that the wolf plan is greatly lacking in many ways.

First the use of the Oakleaf model for determining suitable & sustainable wolf habitat in Washington and the fact that WDFW chose to use only 4 indicators out of 8 with this model. Cattle grazing areas have been proven to be poor areas for recovering wolf packs in other states. No explanation was offered for the existence of wolves in cattle grazing areas in Washington. Why was it decided to not use cattle as an indicator? It is already known that wolves are inhabiting traditional cattle grazing areas, is that why cattle were not used as an indicator? It is already known that cattle are a much larger livestock industry in Washington than Sheep which were used in the model, is that why cattle were not used in the model? WFW believes that both cattle and sheep should be used in the model since Washington has so many sheep and cattle ranching operations? WFW believes this clearly indicates a biased and unscientific use of the Oakleaf model in determining suitable wolf habitat and pack numbers.

Next, the recovery plan is just that, it addresses recovery and very little about managing wolf populations or wolf conflicts until after de-listing has occurred. According to WAC 232-12-297 "**Recovery and management of listed species**"

**11.1.3** *An implementation plan for reaching population objectives which will promote cooperative management and be sensitive to landowner needs and property rights. The plan will specify resources needed from and impacts to the department, other agencies (including federal, state, and local), tribes, landowners, and other interest groups. The plan shall consider various approaches to meeting recovery objectives including, but not limited to regulation, mitigation, acquisition, incentive, and compensation mechanisms.*

WFW finds it very difficult to see how WDFW is meeting these requirements and would like to remind the WDFW and the Commission of two other major commitments:

1. Mission: To preserve, protect and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.
2. To meet the requirements of the Federal Endangered Species Act. Which requires the Management of endangered species using Science & Scientific Data?

Science has proven there are thresholds at which predation is additive, simply put, excessive predator populations will reduce prey populations. Science has also proven that a reduction of prey numbers can result in a decline in predator numbers due to the availability of prey to support the predator population. Several herds of deer and elk in Washington are already below population objective. While WFW understands that the welfare of other species is not a concern of the ESA, the ESA does require that sound science is used in the wolf plan. WFW contends that the addition of another predator without reductions of other competing predators will likely have an additive effect on prey species in many areas resulting in further declines of prey species and will result in the ultimate decline of predators as a result. WFW suggests that this is not sound science and further study and consideration needs to occur in establishing a sound plan to maintain prey numbers and predator numbers. WFW would suggest that a goal of 8 BP's without a 3 year waiting period is more responsible and predictable over the long term and better satisfies the need for sound science and long term sustainability.

Washington for Wildlife strongly recommends that the Commission reject the current Wolf Conservation & Management Plan and direct WDFW managers to consult experienced big game managers in Idaho, Wyoming, and Montana regarding the sustainability of prey and predator numbers. A New Plan should be developed that includes specific language describing sound scientific constraints, controls and processes that will ensure rapid and successful de-listing and population growth control in such a manner that maintains sustainable prey and predator numbers that satisfies the needs of the ESA, Viewers, Listeners, Cattlemen, and Hunters as well as meeting the Departments primary responsibilities to the People of Washington State outlined in its Mission.