



Washington Department of Fish and Wildlife  
[SEPAdesk2@dfw.wa.gov](mailto:SEPAdesk2@dfw.wa.gov)

Dear Sir or Madam:

Safari Club International and Safari Club International Foundation (SCI and SCIF) appreciate the opportunity to comment on the Draft Wolf Conservation and Management Plan for Washington (Draft Plan).

SCI and SCIF support the State of Washington's attempt to devise a conservation and management scheme for its wolf population. We also support Washington's decision to establish target breeding pair numbers to trigger listing decisions and changes in management strategies. We do, however, have some concerns with the way that the Draft Plan generally and the preferred alternative specifically address the impact that wolves will have on game species and hunting opportunities in the state. In addition, the Draft Plan fails to address the question of how the state wildlife management authority will deal with the population of wolves once they exceed the delisting target threshold.

#### **Safari Club International and Safari Club International Foundation**

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 53,000 members worldwide, including many who live and/or hunt in Washington State. SCI has six chapters in Washington and these chapters are extremely active in the proper conservation and management of Washington's wildlife resources. SCI's missions, in Washington, and throughout the world, include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool.

Safari Club International Foundation is a nonprofit IRC § 501(c)(3) corporation. Its missions include the conservation of wildlife, education of the public concerning hunting and its use as a conservation tool, and humanitarian services. More specifically, the conservation mission of SCIF is: (a) to support the conservation of the various species and populations of game animals and other wildlife and the habitats on which they depend; and (b) to demonstrate the importance of hunting as a conservation and management tool in the development, funding and operation of wildlife conservation programs.

SCI and SCIF have participated on multiple occasions in litigation in federal court concerning the delisting of the wolves of the Northern Rocky Mountains. We are currently participating as intervenors in the suit in U.S. District Court in Montana over the delisting of the Northern Rocky Mountain distinct population segment of wolves, which includes those in Washington. We have worked with and supported the delisting and management efforts of Montana and Idaho and are more than familiar with many of the struggles that the states have encountered in their attempt to regain management authority over their wolves. It is

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our hope that Washington can learn a great deal from the experiences of the states whose management plans have already been and are currently being scrutinized by the federal courts. There is also much to learn from specific organizations, such as SCI and SCIF, and the hunting community generally who are on the front lines when it comes to co-existing with wolf populations and defending the management authority of the states as they deal with those wolf populations.

**The Draft Plan Requires Enhanced Consideration of the Impact of Wolves on  
Hunting Opportunities**

SCI and SCIF request that the drafters of the Draft Plan revisit the proposed strategy to deal with the impact that wolves will have on ungulate abundance and behavior. The Draft Plan offers a detailed discussion of the significance of hunting, and particularly the ungulate populations that are the subject of that hunting, to Washington. For example, the Draft Plan notes both the recreational and economic interests served by hunting. “[H]ealthy and abundant prey populations are important for maintaining hunting opportunities that contribute to many local economies in Washington, especially in more rural regions.” Draft Plan at 56. The availability of healthy, sustainable large ungulate populations is of great significance to the almost 200,000 individuals who hunt in the state:

An estimated 182,000 hunters hunted in Washington in 2006, with an estimated 179,000 residents and 3,000 non-residents participating. Hunters spent nearly 2.13 million days hunting for all species in the state in 2006. *Big game hunting represents some of the most highly valued hunting in Washington*, with an estimated 90% of hunters hunting ungulates in 2006 (USFWS and USCB 2008).

*Id.* (emphasis added). Despite the significance of large game hunting in the state, the preferred alternative expresses the state’s plan to reduce hunting opportunities in the event that the growth of wolf populations has a detrimental impact on the wild ungulate species that are the focus of the state’s hunters. Alternative 2 states:

Alternative 2 would manage for healthy ungulate prey populations through standard practices, and would also allow for consideration of some adjustment of recreational harvest levels, if needed, to benefit wolf conservation in certain limited situations. Both scenarios could result in some management restrictions being placed on harvest levels (e.g., reductions in antlerless take, shortened hunting seasons, and reduced availability of special permits) in localized areas.

Draft Plan at 25. The Draft Plan passively makes recreational hunting, including the businesses and communities that currently depend on those ungulate populations for hunting, an accepted casualty of wolf conservation. Although the Draft Plan does

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contemplate wolf reduction and/or relocation to respond to profound ungulate population declines, such strategies will not be implemented until the ungulate populations are found to be “at-risk” and only after hunting opportunities have significantly declined or have been mandatorily restricted. In other words, the Draft Plan allows wolf populations to grow and spread until they cause a problem to the ungulates, the hunting community, and ultimately the wolves that depend on the presence of healthy ungulate populations.

Under this alternative, management of at-risk ungulate populations could consider removal of wolves under certain limited circumstances after delisting occurs. Although hunting of at-risk populations would likely already be prohibited or tightly restricted, removal of wolves could enhance future hunting opportunities.

Draft Plan at 58. The preferred alternative plans to follow a scenario that will first allow the problem to occur and only after there is a problem will the wildlife management authority take action to alleviate that situation. SCI and SCIF strongly recommend that the Draft Plan be revised to avoid problems, rather than to create and react to them.

The Draft Plan attempts to obscure this obvious flaw by suggesting that there is insufficient evidence to demonstrate that wolf predation is causing a decline in large ungulate populations. However, numerous references in the Draft Plan dispute that supposition. For example, although the Draft Plan disputes statewide ungulate declines, it admits the likelihood of “localized impacts on ungulate abundance or habitat use.” Draft Plan at 8. The Draft Plan also acknowledges that wolves choose to prey on young ungulates. Those preyed-upon young ungulates are not making it to adulthood to help sustain population numbers. Draft Plan at 46. Similarly, the Draft Plan acknowledges evidence that elk, in responding to wolf presence, are spending less time feeding and are moving to safer habitats with poorer nutritional quality, and that the resultant lower calf production will have a detrimental impact on ungulate numbers. [Creel et al. (2009)] Draft Plan at 46.

The Draft Plan also suggests that where ungulate populations are in decline, wolves may only be one of multiple factors contributing to that decline. Whether wolves are the exclusive cause of elk and other ungulate species decline, or whether they are one of several factors contributing to declining herd numbers is irrelevant. If the fish and game agency has the power to control one or more factors that are harming the state’s wildlife populations, then the agency should exercise that authority. And if ungulate populations are already suffering due to habitat decline, severe winter weather and increasing populations of other predators, it would be poor management practice for the fish and game agency to introduce another cause of decline, namely wolves, and then to fail to aggressively prevent that additional factor from further harming the game species. Draft Plan at 29.

Though a challenging task, the drafters of the Draft Plan should find better means of addressing the impact of wolves on ungulate population health, behavior and numbers and

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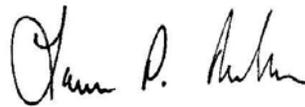
on the hunting opportunities that depend on those ungulates. It is irresponsible to force the hunting community to bear the brunt of the impacts of wolf conservation and to allow the state's ungulate populations to reach an "at-risk" state before controlling or removing an acknowledged source of that risk. An approach that will work and garner the support of the hunting community must be pro-active and must conserve not just the wolves but the ungulates and the interests of hunting at the same time.

**SCI and SCIF Recommend the Development of Targeted Maximums**

The Draft Plan is open-ended. It declares breeding pair target numbers for reclassifying and delisting wolves, but stops there. The Draft Plan includes no maximum or target numbers for long-term sustainability. If Washington's wolf conservation efforts are successful, wolf numbers will increase and Washington will face the same problem currently being experienced by Montana, Idaho and Wyoming – namely how many wolves is too many. This issue is not adequately addressed by a delisting threshold of 15 breeding pair. Although delisting allows more aggressive management strategies, it does not address the question of the number of wolves that the state wishes to manage and maintain on a long term basis. There is a difference between the minimum number necessary for removing federal or state protections, and the number that can be managed in balance with the conservation of the state's wild game populations, domestic species, public perception and the health of the hunting industry. SCI and SCIF recommend that the state fish and game agency analyze this issue and confront this question before finalizing the plan.

Thank you for this opportunity to comment on Washington's efforts to manage its wolves. If you have any further questions, please contact Anna M. Seidman, Director of Litigation for Safari Club International at 202-543-8733 or [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Sincerely,



Lawrence Rudolph  
President,  
Safari Club International  
Safari Club International Foundation