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July 25, 2019

Kelly Susewind, Director
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RE: Lethal Removal of OPT Pack Wolves

Director Susewind,

We respectfully urge you to change your position authorizing the lethal removal of wolves from the OPT Pack for preying on livestock in Ferry County. This producer and these allotments have been historically problematic. It is time to take a different approach. The area in question has been the site of multiple livestock wolf conflicts in the last three years and the producer in question has been the responsible party that resulted in wolves being removed from the Wedge Pack in 2012, the Profanity Peak Pack in 2016, the Sherman Pack in 2017, the Sherman and Togo Packs in 2018 and now the OPT Pack in 2019. Science works with variables and constants. It would seem the constant here is the producer.

Listed as non lethal wolf deterrents in the July 23, 2019 Wolf Update:

“WDFW-contracted range riders were in the area for two days before pausing activity during lethal removal efforts. The WDFW-contracted range riders did not resume riding because the livestock producer prefers that contracted range riders not work with their cattle at this time.

The producer is continuing to remove or secure livestock carcasses (when discovered) to avoid attracting wolves to the rest of the herd, and remove sick and injured livestock (when discovered) from the grazing area until they are healed. WDFW and county staff are continuing to coordinate patrols of the grazing area to increase human presence and use Fox lights at salting and watering locations to deter wolves. Other livestock producers with cattle on federal grazing allotments in the OPT pack territory have deployed range riders.”¹

¹<https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/updates/opt-pack-update-7-23-19>

The parenthetical “(when discovered),” raises questions. Last winter cattle were discovered in January, which indicates the producer has not been able to keep track of his livestock.² But what raises more questions is the use of range riding as the primary non lethal deterrent. First, this area would never be categorized as “range.” Rangeland is defined as an open region for the grazing of livestock. This area is far from open. The effectiveness of this tool needs to be assessed. Second, the producer that is losing the livestock is quoted in the Capital Press (23 July 2019) stating; “...range riders “sound romantic,” but they can’t guard cattle on a rugged range that stretches 30 miles,”³ effectively attesting the ineffectiveness of the practice.

Mr. McIrvin’s historic disdain for wolves is evident in his statements to the press:

“Wolves have never been compatible with raising livestock.” From that, the rancher in Stevens County concludes that wolves should be done away with,...⁴

“Wolves do what wolves do,” McIrvin said. *“They have always been killers.”*⁵

*McIrvin says killing the wolves is the only solution. He believes the calf carcass should have been laced with poison to get the “culprits.”*⁶

“Until somebody gets serious about opening season on these wolves, I don’t know that there is any answer,” he said.⁷

*“Our ancestors knew what had to happen — you get poison and you kill the wolves.”*⁸

Are we destined to employ the same “solution” year after year in the face of a recurrent problem? It is evident at this point grazing in an area of prime wolf habitat is folly. Livestock will continue to fall prey to wolves. Will the State continue to kill wolves in the same area for the same producer year after year? The answer should be a resounding, “No!” We need to find effective collaborative solutions. We cannot kill our way out of the problem in the Profanity area. The name OPT, Old Profanity Territory, should make that evident. Will the next pack be the OOPT Pack? Let’s not let that be the case.

² “Three More Depredations by OPT Pack Confirmed in Ferry County.” *Washington Department of Fish & Wildlife*, wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/updates/three-more-depredations-opt-pack.

³ DON JENKINS Capital Press. “Rancher: Non-lethal Measures Not Working Against Wolves.” *Capitalpress.com*, 23 July 2019, www.capitalpress.com/ag_sectors/livestock/rancher-non-lethal-measures-not-working-against-wolves/article_8a34de6e-ad60-11e9-a4c6-4f56582cb838.html?utm_source=Capital+Press&utm_campaign=bd63532b70-EMAIL_CAMPAIGN_2019_07_24_05_35&utm_medium=email&utm_term=0_3bfe2c1612-bd63532b70-244674129.

⁴ Saul, J. B. (2012, September 10). Wolves in the wild: Room for livestock, too? *Seattle Times* [Seattle].

⁵ Geranios, N. K. (2012, October 7). State learns sad lesson with Wedge Pack wolf hunt. *Seattle Times* [Seattle].

⁶ Weaver, M. (2013, September 9). Another calf found dead as ranchers question state wolf investigations - Ag Sectors - Capital Press. Retrieved from <http://www.capitalpress.com/content/mw-Wolves-071713>

⁷ Weaver, M. (2013, September 9). Another calf found dead as ranchers question state wolf investigations - Ag Sectors - Capital Press. Retrieved from <http://www.capitalpress.com/content/mw-Wolves-071713>

⁸ Welch, C. (2014, October 4). As wolves return, so do tensions with ranchers. *Seattle Times* [Seattle].

Mr. McIrvin is also quoted in the Seattle Times in July of 2017, regarding range riders stating, “*We call them cattle coroners; all they can help you do is find the dead ones.*”⁹ When the rancher has this outlook, why are range riders considered a non-lethal deterrent on this terrain?

Landscape evaluations need to be conducted in partnership with the United States Forest Service to determine the suitability of allotments for grazing, not just vegetatively, but evaluations that assess the risk of predation on grazing livestock. This can only be completed in a joint partnership between the two agencies. The time has come. Wolves are here to stay. We need to work collaboratively to mitigate risk to livestock and livelihoods.

We actively participated in the CNF Land Management Plan Revision process. Following the Objectors Resolution Meeting, Reviewing Officer Allen Rowley instructed the USFS staff on the CNF to re-evaluate how they determined grazing suitability. He also ended his letter with the following statement:

*“I would like to acknowledge there were a number of conversations during the objection resolution meeting (i.e. wolf management, stubble height management, social/economic) that do not translate directly in Forest Plan direction or decisions. There are issues I would like to encourage continued conversation around at the local level. **For example, the Forest can use the existing flexibility in adjusting livestock grazing to reduce conflicts with wolves; and share these actions with the public.**”¹⁰*

The Forest is being directed to be part of the solution. We strongly urge you take advantage of this situation to find a lasting solution to this problem.

We recommend a change in position that removes the lethal order on the OPT Pack until evaluations on the suitability of the area for public lands grazing can be assessed. There are some areas where we should not be grazing livestock and where we should allow wildlife to thrive. If additional range is needed for relocation, we have opened conversations that may well help solve that problem.

We stand by to assist,



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Cc: Mike Petersen, Tim Coleman, Donny Martorello, Ben Maletzke, Steve Pozzanghera

⁹ Mapes, L. V. (2017, July 28). State's wolf kill turns cup the heat n Washington cattle country. Seattle Times [Seattle].

¹⁰ *US Forest Service*, www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd641545.pdf.