



Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage
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July 26, 2022

Director Dan Eichinger
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909
Via Electronic Mail

RE: Michigan United Conservation Clubs Draft Wolf Management Plan Comments

Dear Director Eichinger,

On behalf of Michigan United Conservation Clubs (MUCC) 40,000 members and 200 affiliated clubs, we would like to offer the following comments on the 2022 Draft Wolf Management Plan.

There are four stated goals of the draft wolf management plan:

- 1) Maintain a viable Michigan wolf population above a level that would warrant its classification as threatened or endangered;
- 2) Facilitate wolf-related benefits;
- 3) Minimize wolf-related conflicts;
- 4) Conduct science-based wolf management with socially responsible methods.

Strike Term Socially Responsible

The term socially responsible appears in the draft numerous times. This term should be struck from the document in every occurrence. The term is ambiguous, subjective, and is already better addressed in current, long-standing rules on methods of take.

Wildlife Conservation Order 2.1 states: "Unless otherwise specified in this order, a person shall not do any of the following: (1) Make use of a pit, pitfall, deadfall, scaffold, raised platform, tree, cage, snare, trap, net, baited hook, or similar device, or a drug, poison, anti-coagulant, smoke, gas, explosive, weasel, ferret, fitchew, arbalest, spear, or mechanical device, for the purpose of taking an animal or driving an animal out of their

hole or home. For the purpose of this order, a mechanical device shall not be construed to mean a firearm, crossbow, slingshot, or bow and arrow.”

These prohibitions have already contemplated an extensive list of what may be perceived as NOT socially responsible methods. There is no need to further obfuscate wolf management with a loaded, leading and subjective term like “socially responsible.”

Specifically, where “socially responsible” is referenced in the current document, the DNR must only state the simple term “legal methods.” The plan nor the WMAC’s recommendation does not provide, propose, or entertain methods of management that are not already legal and acceptable.

As it relates to “socially responsible levels” in the document, MUCC prefers the term “socially responsive” which indicates that the DNR is responding more to an outcome (positive or negative) rather than implying a lens of moral or ethical judgment.

Amend Term “Recreation”

Similarly, the use of “recreation” in terms of wolf management is objectionable for similar reasons as above. The term recreational is another use of a subjective term in what should be a science-based management plan. MUCC’s strongest objection to the term lies in section 6.12.2. of the draft that refers to a potential public harvest of wolves for “*recreational and utilitarian purposes;*” however, the plan’s action items would be better suited if it instead read: “management and utilitarian purposes.”

Section Specific Amendments and Recommendations

Section 6.2

Over the course of the WMAC meetings, the public again and again, particularly UP residents, voiced frustration for the way the wolf count is communicated and questioned the methodology used. DNR, stakeholder and media communications continue to give the impression that the population number is a flat and verifiable 695. Failure to acknowledge the confidence intervals or the fact that it is a minimum wolf population at their lowest level in a given year, and the fact that other states communicate different numbers using different methodology is confusing for the general public’s understanding of the wolf population and undermines the trust in DNR biologists. The WMAC made it very clear that there was a desire to ensure that Michigan’s methodology was regularly evaluated and if, as the DNR’s own response implies, this is something that DNR is doing already as a course of scientifically based management there should be an action item in the plan to indicate this

MUCC strongly urges the DNR to document the practice of evaluating methodologies within the plan and include an action item in response to the WMAC recommendation (#2) that the: “Department pursue a third-party evaluation of the methodology of the wolf survey on a regular basis.”

Section 6.3

Hunters and conservationists have done significant legislative outreach to increase the penalties and restitution required for the illegal killing and possession of game species, including supporting Public Act 175 of 2013 and P.A. 187 of 2015. During that legislative process, the status of wolves was in flux due to two different Public Acts and their subsequent referendums, a citizen-initiated law, NRC actions, at least one state court and multiple federal court challenges, and a final public act in 2016 (Public Act 382 of 2016) which restored most of the initiated law. This 2016 law should likely be referenced in the plan (page 36 and page 69 among others) as the most recent legislative action because it came after the court decisions regarding the 2014 initiated law. Based on the WMAC public testimony, there is little public support from hunters and conservationists to enhance penalties when wolf conflicts cannot be managed legally, even when attacking dogs or livestock. The Action under 6.3.3 could be amended to support a triggered higher penalty, at a similar level to other big game species, that only goes into effect during the time wolves are not classified as an federal or state endangered species and are managed as a game species.

Section 6.7 and 6.10

The 2022 Draft Plan fails to acknowledge a recommendation from the WMAC for a dedicated 24-hour phone service for reporting wolf encounters (#3) or a rapid public awareness system for verified depredation events (#22). Public input to the WMAC would indicate that the current system is NOT working for the members of the public as the DNR might assume. An easy mechanism to report experiences, even when no human safety or depredation event occurred, would be helpful in increasing public tolerance of wolves. To that same end, having accurate and timely reporting sent out to those who opt in to receive the information on verified depredation events would decrease the opportunity for misinformation to spread in other forums. Simply enacting the same email notification system as Wisconsin, as the WMAC recommended (#22), would be free as it relies on the same system for all other DNR notifications. Updating a map is a passive form of notification, no one will know that it has been updated if the DNR does not tell people, especially if they are already in the field.

Section 6.8

One benefit of wolves on the landscape that was not present in the plan is the potential for a hunting and trapping season. While proposals for a hunt are referenced in later sections of the draft plan, it should also be mentioned as a benefit of having a resident wolf population in the state. This opportunity would bring tourism dollars to local communities and license dollars to the state. During the 2014 season, with a quota of only 43 wolves, 1,200 people purchased a license, and the harvest total was 23 wolves. The benefits of a hunting and trapping season for management and utilitarian purposes also falls within the goals of sections 5.2-5.4. According to MUCC's 2019 Economic Impact Study, hunting brings \$8.9 billion to Michigan annually, and a robust management and utilitarian hunting and trapping season would only cause that figure to grow.

The value of a wolf season could also be measured in a survey to assess the impact of wolves on tourism and recreation. However, the DNR ignored this recommendation of the WMAC (#27)

completely. The only way that the DNR can adequately inform the public as to the benefits is if there are quantifiable metrics and there is nothing in the plan to attempt to quantify those benefits. MUCC requests that this recommendation be reconsidered for inclusion.

Additionally, it is acknowledged within the plan that the Native American cultural beliefs outlined in 6.8 is only one example. The DNR should strive to include additional cultural perspectives of Michigan residents.

Section 6.12

The WMAC passed a recommendation that read: “recommend the Department prepare a recommendation for a wolf hunting and trapping season across the UP.” MUCC believes that the actions listed in the draft plan do not adequately reflect this recommendation.

On page three of the draft plan it is stated:

“Regardless of changes in legal status, this updated management plan acknowledges that wolves in Michigan have surpassed State and Federal population recovery goals for 22 years.”

There is no sound argument to be made that the population is not well above recovery goals. However, there is data to suggest that an authorized hunt would need to exceed a harvest of 29% of the population to affect growth rates as stated on page 72 of the draft plan:

“A meta-analysis of wolf population growth rates in North America suggested that rates of human-caused mortality (including harvest) less than 29% did not importantly influence growth rates (Adams et al. 2008).”

The creation of a hunting and trapping season would also be obligated to abide by the NRC’s charge to use the best science available when making their decisions, also satisfying section 5.4 of the draft plan.

The draft plan also brings up the term “*socially responsible*” in action 3 again, and again this term is misguided, subjective, and is already better addressed in current, long-standing rules on legal methods of take. Neither the plan nor the WMAC’s recommendation provide, propose, or entertain methods of management that are not already legal and acceptable.

Since the February 10th re-listing of wolves under the ESA, the idea of a wolf hunt in the near term is moot. But as experience tells us, court cases can be appealed and overturned, judicial appointments may change and it is MUCC’s desire to see statutory changes to the ESA to fix the delisting process. It is important that the DNR and NRC be ready to act on a recommendation within 90 days of delisting rather than drawing out another year or more long process.

Action 3 should be changed to remove concerning language and insinuation that the population cannot sustain a hunt and read instead as:

In preparation for a durable delisting of wolves, develop recommendations to the NRC to offer opportunities for the public to harvest wolves for management and utilitarian purposes while sustaining a biologically viable wolf population.

MUCC thanks the department staff for facilitating the WMAC meetings, working with researchers to gather the best available science, preparing the draft plan, and accepting the public's comments. MUCC stands ready to provide the department with guidance as we all strive to ensure that the wolf management plan is implemented in a way that first and foremost protects the sustainability of the wolves on the landscape, but also ensures that Michigan residents have the tools and information they need to prevent or address any challenges they experience.

Sincerely,

A handwritten signature in blue ink that reads "Amy Trotter". The signature is written in a cursive, flowing style.

Amy Trotter
Executive Director