

# **Summary of Comments Received and Responses to the Draft Updated Michigan Wolf Management Plan**

May 3, 2015

On March 3<sup>rd</sup> 2015, the DNR released a draft of the updated Michigan Wolf Management Plan for public review and comment. During the 30-day comment period agencies, organizations and individuals submitted 1464 emails and 17 hard-copy letters that offered comments on the draft updated plan. Based on those comments, the DNR modified the plan, as deemed appropriate, prior to its final approval.

The purpose of this document is to provide to the public a meaningful summary of the comments received on the draft update to the plan; and to provide a response to those who requested specific plan changes. In order to accomplish this task, DNR staff had to interpret each letter submitted. Interpretation and summarization of the diverse set of comments in each letter and determining if there are changes requested in the management plan was a difficult challenge. We did our best to summarize a large number of comments into a more concise set of concerns that could be addressed efficiently while maintaining consistency in our interpretations.

## **Interpreting the comments**

As the DNR received the 1,481 letters over the 30-day period, each letter, from an individual or organization, was read and classified into one or more of the following categories in order to respond to a more concise set of comments and concerns raised by commenters. The number in parenthesis indicates the number letter that expressed this concern or comment.

1. Supports wolf hunting (36)
2. No hunting of wolves (21)
3. Supports wolf population control (54)
4. Control problem wolves only (1322)
5. No wolves at all (6)
6. Recommend changes in the plan (1350)
7. Supports plan (1,352)
8. General comment on wolves not related to the other categories (105)

Although the vast majority of commenters relayed their preferences on wolf population control and, in some cases, the circumstances under which specific control methods should be exercised; they did not make specific recommendations for changes to the plan. In most cases, these comments were simply identifying an individual or organizations preferences for specific management techniques to mitigate conflicts resulting from having a viable wolf population in Michigan. Sections 5.1, 5.2, 5.3, 6.7, 6.8 6.9, 6.10 and 6.12 speak most directly on strategic management of the number of wolves in Michigan.

For those commenters that would like wolves to be completely removed from Michigan, it is not an option in the plan. The plan identifies maintaining a viable population as one of its principal goals (See section 5.1). This goal has been supported by the majority of Michigan citizens in every public opinion poll.

Most commenters who mentioned specific items in the plan usually supported the plan overall, even if they asked for a few changes. Many comments lauded the DNR for the strategic direction on specific issues indicated in the plan and at the same time argued for specific implementation details that fit their desires for wolf management in the State. Only one commenter did not support the plan; but did not provide recommendations for change.

The general comments on wolves usually revolved around the commenters' perceptions of wolves or sighting of a wolf and their response to that interaction. Many criticisms were of plan implementation since 2008, the right to vote by all citizens on statewide referendums, outcomes of referendums, citizen initiated legislation, or just general criticism of wolf management.

### **Use of Supporting Information in the Plan**

A few individuals and some groups requested the plan cite additional literature sources pertinent to specific management topics. If the requested literature citation added significant support for, or significantly reduced support for strategic direction expressed in the plan, then we included it. Many of these same individuals or groups requested that the plan provide additional data captured as part of implementing wolf management since the release of the 2008 plan. The plan is a strategic guidance document for wolf management in Michigan. The plan was never intended or designed to provide complete documentation of all aspects of implementing year-to-year wolf management in Michigan. By sticking to the intent of the plan, the DNR is able to keep a large document from becoming even larger and seeming out-of-date with each passing year.

### **Specific Requested Plan Changes and Responses**

The vast majority of commenters who requested specific plan changes used one of a few form letters to request a relatively small number of changes to the plan. One form letter accounted for 1,316 of the 1,481 letters received. In Table 1 we provide responses to requests for specific changes in the plan. If a similar request was made by multiple individuals or groups but used different language, we only responded one time (used as a representative of multiple similar request) in this document in order to spare the reader of significant redundancy. The table below lists the requested changes and the DNR's responses to those requests.

Table 1. Representative specific plan change requests and the DNR responses.

Request	Response
<p>I'm writing to let you know that I support wolf recovery in Michigan and oppose any changes to the management plan that'd lead to a reduction in the state's wolves. I applaud your emphasis thus far on science-based management and appreciate that you don't identify an artificial cap or "target" wolf population. But, that said, I have a few concerns:</p>	<p>No plan change</p> <p>As noted the Plan does not set a cap on the number of wolves in Michigan. The management goal is to have a viable wolf population that maximizes benefits and reduces conflict. Under implementation of the plan the number of wolves could be lower or higher than the current population.</p>
<p>I'm concerned with how the plan presents data on wolf depredations. Specifically, the plan should make clear that only a very small percentage of farms experience conflict with wolves. In fact, in 2014 only 14 farms -- about 1.5 percent of all those in Michigan -- suffered depredations. And over the years about 30 percent of the depredations have occurred on just one mismanaged farm</p>	<p>No plan change.</p> <p>Reporting on the detailed operational data on depredations is not appropriate in the plan if it does not change the already existing strategic direction for managing depredations.</p>
<p>I want to make sure the new plan includes measures to protect key wolf habitats, such as den and rendezvous sites. Hunters should be prohibited from hunting with dogs in these areas to avoid wolf disturbance and the deaths of the hunting dogs.</p>	<p>No plan change</p> <p>Section 6.5 actions commits to minimizing disturbance at den sites on DNR land and working with management partners. However, there is no evidence that disturbance at rendezvous sites has limited wolf recovery in Michigan. Furthermore den and rendezvous sites are difficult to locate.</p>
<p>I'm frustrated that the draft plan presents the biased results of an unscientific "push poll" designed to elicit anti-wolf responses based on inaccurate information. Any reference to that poll needs to be removed from the final plan (see section 6.12.1, page 57).</p>	<p>No plan change.</p> <p>This survey does not meet the definition of a push poll (small sample size which is adequate for a survey but does not meet the needs of a push poll). Supporters of public act 520 have expressed similar concerns regarding bias of the messaging (i.e., designed to elicit a desired result) used to support the referendums. We are simply presenting both sides of a contentious issue in wolf management.</p>

Request	Response
<p>Page 58 – Section 6.12.2 – In November 2014, statewide voters rejected Proposal 1 (Public Act 520) and Proposal 2 (Public Act 21). The results for Proposal 1 were analyzed but not Proposal 2. The Scientific Fish &amp; Wildlife Conservation Act approved by the Legislature August 2014 is a mirror image of Public Act 21 (with the exception of an added appropriation) that was rejected by voters.</p>	<p>No plan change.</p> <p>Proposal 1 was specific to the question of a wolf harvest which is the topic of this section. In this section we are contrasting Peyton’s survey results with the results of Proposal 1. Proposal 2 was about who gets to designate game species.</p>
<p>Page 29 - Section 6.3.3 – The 2008 plan states, “Penalties for wolf-related violations could be elevated in similar ways regardless of whether wolves are designated as endangered, threatened, game or protected. Penalties are established by the State Legislature.” This statement has been omitted from the draft plan. There is no mention of the penalties for illegally killing a wolf. The penalty for most game is \$100-\$1000 plus restitution \$100-500 for most game and \$100 for most protected species. An action item should be to work with State Legislators to elevate the penalties to that of valued animals such as trophy deer, moose, elk etc.</p>	<p>Plan change.</p> <p>An additional strategic action was added to section 6.3.3</p>
<p>Page 28 – Section 6.3.1 – While true that Michigan wolves have surpassed population goals for 15 years, it should be noted that there is other criteria that must be met under the ESA (such as threats and the fact that Michigan wolves do not exist in isolation). The reference to coyote hunting during firearm season was removed. It should be noted that this was a change made by the NRC that could lead to mistaken identity. (Also illustrates another threat to wolves and the NRC’s lack of concern for wolf protection).</p>	<p>No plan change.</p> <p>The statement is specific to Michigan, not the range-wide discussion.</p> <p>Re: coyote hunting: In this context, threat is related to threatened or endangered status. There is no evidence that allowing hunters to take coyotes during the firearm deer season is a threat to wolf population viability nor does it constitute evidence of the NRC’s lack of concern for wolf conservation.</p>
<p>Page 14 – Section 4.2 – Suggest including a statement about prevalence of “coywolves” in the state. Has DNA established that any of the wolves in the U.P. are “coywolves”?</p>	<p>No plan change.</p> <p>Wolf taxonomy is discussed in section 3.1; since this is a wolf plan and “coywolves” are coyotes, a discussion of coyote genetics is not appropriate.</p>

Request	Response
<p>The Natural Resources Commission's (NRC) role in wolf management needs to be better defined and prescribed. Determining what authority the NRC exercises over the plan and the plan's execution is difficult to determine. The NRC appears to be focused on economics and commerce. The wolf plan goals do not align with the NRC goals.</p>	<p>No plan change.</p> <p>NRC's role is covered in section 1.1 and section 6.12; Although the DNR has communicated with and received input on the plan from the NRC, this is a DNR strategic plan, not an NRC plan.</p>
<p>The recovery goals are modest at best. There is little evidence in the plan that indicates that a viable population of wolves should result in the classification of wolves as game animals. The issue of game animal classification needs to be referenced if not clearly defined in the plan.</p>	<p>No plan change.</p> <p>Game species designation is under the authority of the legislature and NRC and is not the purview of the strategic plan.</p>
<p>The plan notes illegal killing of radio collared wolves without reference to steps/plans to reduce or eliminate illegal killing.</p>	<p>No plan change.</p> <p>Section 6.3 of the plan outlines the strategic actions necessary to maintain adequate protections of wolves.</p>
<p>The plan and the pre-plan studies/documents on which the plan was based, carefully details the problems associated with habituation. The plan lacks approaches to reduce habituation. Given the data on wolf related conflicts the following issues need to be addressed:</p> <ul style="list-style-type: none"> <li>- baiting and/or feeding prey animals such as deer</li> <li>- the use of uncontrolled hunting dogs in wolf territory</li> <li>- expansion of wolf deterrence efforts in livestock feeding areas.</li> </ul>	<p>No plan change.</p> <p>Section 6.9.5 has strategic guidance on providing the public information to prevent wolf habituation, the details suggested would be an operational element of implementing this action.</p> <p>Section 6.10.2 covers the risk of running hunting dogs in areas occupied by wolves.</p> <p>Section 6.10.3 covers the strategies to minimize wolf conflicts with livestock.</p>
<p>On page 17 and in other locations you reference a public-attitude survey on wolves carried out in 2006. This was performed when wolf numbers were much lower than they are currently and wolf interactions/conflicts were much lower as well. This survey should be repeated in 2015 and results should be reported separately for the UP and LP. I am sure you would find that support for wolves has decreased dramatically among UP residents who must deal with wolves on a regular basis.</p>	<p>No plan change</p> <p>A more current public attitude survey would be useful in determining if a public attitude shift has occurred on multiple wolf management issues. A strategic action in the plan under section 6.2.3 is intended to accomplish this.</p>

Request	Response
<p>Page 50 – Section 6.10.2 continued – Action: Suggest developing a system that would allow those who hunt with dogs to receive a text alerting them of areas to avoid; Investigate why hunters continually release dogs in areas of known prior attacks on dogs.</p>	<p>No plan change.</p> <p>There is a strategic action in section 6.10.2 on sharing information on locations with conflicts. Suggestion is an operational detail.</p>
<p>Page 33 – Wolf dens should receive no greater protection than any other species that dens such as bears.</p> <p>Page 35 – Section 6.6.2 – There should not be any attempts to protect wolves from diseases. They should be treated the same as any other species.</p>	<p>No plan change.</p> <p>DNR protects the nesting and home sites of many species (e.g., raptor nests, Kirtland’s warblers, restrictions on running dogs during typical young rearing time).</p> <p>DNR is concerned about and manages disease in many species.</p>
<p><b>FREE RANGE HUNTING DOGS:</b> In Section 6.10.3 of the Draft Plan, in the second paragraph of page 51, the following statement is included: “Similarly, lethal control will be a management option in specific areas where wolf attacks on free-ranging hunting dogs have been documented, but...”</p> <p>Since wolves normally defend their territory against other canids, including wolves, <u>it does not seem reasonable to target wolf packs for lethal control when the wolves are only exhibiting normal wolf behavior</u> by attacking free ranging hunting dogs within their home territory. DNR efforts should instead be focused on encouraging hunters using free range hunting dogs to utilize existing DNR resources to identify and avoid hunting in areas with known active wolf packs.</p>	<p>No plan change.</p> <p>Application of lethal control was based on recommendations provided by the Wolf Roundtable, see Appendix 10. The DNR has implemented the guidance in section 6.10.2, action item 3 (re: identifying areas where wolf-dog conflicts have occurred).</p>

Request	Response
<p>1.2 and 6.3.1 The citizen-initiated law, the Scientific Fish and Wildlife Conservation Act, is now effective. This not only gives authority to the NRC to name game species, but also again classifies wolves as a game species in Michigan statute. This law is currently being challenged in the Court of Claims. Because wolves are simultaneously a game species according to state law and endangered according to federal law, I'm not sure what the Wildlife Conservation Order should reflect? There may be a need to update that they are a "protected" game animal similar to moose, until the federal designation can be overturned.</p>	<p>No plan change.</p> <p>Federally endangered species are protected under the State's endangered species protection act.</p>
<p>6.4.1 We do not agree with the statement "the deer herd in the UP of Michigan exceeds the size required to support a viable wolf population as well as to provide for abundant deer hunting opportunities." Regardless of whether wolves are a primary factor in the deer population decline, it is not accurate to suggest that the deer herd "exceeds" the demand for deer hunting opportunities and prey for wolves.</p>	<p>Plan change.</p> <p>Updated text in in section 6.4.1; was not necessary to add requested references.</p>
<p>6.12.2 The graphic of the vote on Proposal 1 is somewhat confusing with the colors and the percentages indicating different things. I would suggest adding text to point out that it was the high populations of the urban counties that voted no, which ultimately lead to the statewide results. Clearly, the low populations of the UP (where wolves are present) were fully in favor of Proposal 1 and there was a majority of yes votes in XX of 82 counties</p>	<p>Plan change.</p> <p>Text describing the graphic in section 6.12.2 was reworked to reduce confusion.</p>

Request	Response
<p>5.5.1 (Also mentioned in 6.7.3, 6.8, 6.9 and 6.10) It should be made clear that conflict avoidance is a major element in conflict management. Humans bear the responsibility to learn about wolf, as well as other large predator, behavior, how to conduct themselves in their presence in order to prevent an attack and how to keep their domestic animals safe. Humans who either live or frequent areas where encounters with wolves or other large predators are possible, bear the responsibility to keep their domestic animals safe from conflict.</p>	<p>No plan change.</p> <p>Conflict avoidance is a component of the operational management that is guided by the strategic actions identified in the plan, see sections 6.9 and 6.10.</p>
<p>P. 2 - “Wolf population size and distribution have expanded”. This statement needs clarification. Size has clearly expanded, but wolves were considered to be fully occupying the available UP range at the time of the 2008 Plan. How has distribution expanded? This should be explained.</p> <p>P. 2 - “Understanding of wolf biology has improved significantly”. This statement needs supporting information. How has this understanding improved, and in particular how has this “improved understanding” changed management considerations? This is not described in Section 2.5, “Review of Science Relevant to Wolf Management in Michigan”, which would be the appropriate place.</p>	<p>No plan change.</p> <p>These statements refer to the period of 1997 to 2015, not as suggested since 2008.</p>
<p>P. 26 - Section 6.2.1 - Action 1 - There is a change from annual monitoring of wolf abundance after de-listing to bi-annual. The reason for this change should be explained.</p>	<p>Plan change</p> <p>Text was modified to provide reason for change.</p>
<p>OLD Section 6.4.2 - why was this Section removed? (p. 31) - In particular, what happened to “wolves do not pose a significant threat to the sustainability of prey populations in Michigan, nor are they expected to significantly reduce the number of deer and other prey available for public harvest or other human uses”? (P. 38 of 2008 Plan). Was this incorrect at the time?</p>	<p>No plan change.</p> <p>The statement in the 2008 plan was correct at the time. In the updated plan, we combined sections 6.4.1 and 6.4.2 to better reflect the intersection of deer management for a variety of social values and wolf management.</p>

Request	Response
<p>Section 6.10.6 - We would support a change as follows: “Get captive cervids re-classified as not livestock”.</p>	<p>No plan change.</p> <p>At this time, the DNR does not consider the classification of captive cervids as livestock as a significant issue in wolf management.</p>
<p>P. 56-57 Section 6.12.1 - “Some situations may warrant consideration of reducing wolf numbers in localized areas as a means to reduce the risk of negative interactions. Such consideration could be necessary if a high density of wolves in an area, rather than behavior of individual wolves, was determined to be responsible for problems that could not be otherwise addressed through non-lethal or individually directed lethal methods”. The current draft removes the statement “As of this writing, a situation of this type has not occurred in Michigan”.</p> <p>Was the removed statement wrong at the time? Has this been determined to have changed since 2008?</p>	<p>No plan change.</p> <p>This statement was correct in 2008. It is no longer correct because the situation did change. We had 3 areas in the UP where significant case-by-case management (non-lethal and targeted lethal) did not resolve the wolf-human conflicts and a hunt was held in 2013.</p>
<p>P. 59 Section 6.12.2 - Figure 6.1. County breakdown of voting is irrelevant, and simply gives the appearance of a politically motivated attempt to write de-legitimizing the vote into the Plan. Regardless of feelings about the vote, the Plan is not the place to argue about who voted where for what reason.</p>	<p>No plan change.</p> <p>Social science research has clearly shown that attitudes towards wolves and their management is significantly influenced by whether or not the person lives in an area occupied by wolves. As an adaptive impact management plan it is important to show that all stakeholders don’t experience positive and negative impacts of wolves equally. The outcome of the vote on Proposal 1 lends some support to this idea.</p>
<p>The public is still very confused over the legal status for wolves. It would be helpful to include a summary of the December 2014 Federal Court decision along with a summary of Federal and Threatened status.</p>	<p>No plan change.</p> <p>While we agree that the changes in Federal legal status of wolves are confusing to the public, the plan is not an appropriate place to have a detailed accounting of all the changes and associated litigation.</p>

Request	Response
<p>Michigan voters rejected Public Act 520 (55%), which designated the wolf as a game species. Voters also rejected Public Act 21 (64%), granting the NRC the authority to designate species as game. It is clear; Michigan voters do not support the hunting of wolves. Yet, on page 60 of the draft update, it states, “Given the absence of a strong public preference....regarding a general wolf harvest.” This section should be rewritten to reflect that the majority of the voting public does not accept the hunting of wolves for recreational purposes.</p>	<p>No plan change.</p> <p>Public opinion surveys and election results are not consistent on public views towards wolf hunting. We presented all the available information.</p>