

PROJECT COYOTE

F O S T E R I N G C O E X I S T E N C E



Minnesota Wolf Management Plan Commenting Guide

Comments on the Minnesota Department of Natural Resources (DNR) wolf management plan can be submitted via questionnaire or email. We recommend submitting comments via email at wolfplan.dnr@state.mn.us.

- Craft your comments in your own words using the Talking Points below:

Overall comments - *Dissatisfied*

- The plan omits much recent best-available science (BAS) directly relevant to: mitigating conflicts, impact of protection levels on anthropogenic mortality, and the effectiveness and impacts of lethal and non-lethal methods (last section provides literature). Omission of this crucial information will harm trust, public education and coexistence.
- The plan does not reflect broad public values consistent with stricter protections and low support for hunting.
- The plan always seeks the lowest rather than strictest possible protections for wolves contingent on population levels.
- The plan enshrines and promotes the instrumentalization of wolves as opposed to their intrinsic value, including through words such as ‘depredation’ which implies ill intent, and ‘destroy’ as an euphemism for killing.
- Intrinsic value is misconstrued as a socio/cultural ‘benefit’ wolves provide humans, which is disrespectful to Tribes and all others who consider wolves relatives/persons. Intrinsic value means wolves are valuable for their own sake as individuals, and their claims should be explicitly considered (but are instead dismissed).
- Omission of essential BAS betrays DNR’s ‘Science’ guiding principle in Appendix 2C given huge information gaps in the studies included in the plan.
- Wolves should never be hunted. If the DNR insists on ignoring diverse values, including those of the majority of Minnesotans, and considers a hunt, certain methods should be strictly prohibited, such as night hunting (& lights), baiting, trapping, hounding, use of ATVs, etc.
- Collaborate with wolf advocates on on-the-ground monitoring, which will increase coverage while disincentivizing illegal activities.
- New research questions the level of human-caused mortality cited as ‘sustainable’ and promoting wolf ‘health’, especially given systematic underestimates of poaching that may overestimate survival and therefore also population. Poaching is hardly recognized in the plan, despite ample scientific evidence of it occurring. Moreover, recent studies have linked anthropogenic mortality to lower physical, mental and social health for wolves. Such information is not included, and therefore the tradeoffs are not acknowledged.

Vision

- 'Health' should be defined as including complete physical, mental and social wellbeing, not just the absence of disease or infirmity, and should therefore include measures of social stability, pack continuity, and impact of exposure to lethal methods on individual and collective mental and social health.
- The plan does not recognize the intrinsic value of wolves, and instead promotes their trivial instrumentalization (e.g., through hunts).

Introductory content

- The plan shows a problematic lack of best-available science (BAS) on critical issues (see Overall comments)
- The plan reveals widespread, biased consideration of private interest groups in research and management, as opposed to focusing on key issues such as researching nonharmful interventions, including education, that improve human attitudes and mitigate conflicts, and holistic aspects of wolf health.
- The plan still considers legitimate claims that are contrary to science via inclusion of misconceptions regarding wolves reducing game numbers, claims that hunting reduces conflicts, etc.
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- The plan is missing research directly relevant to 'key conservation and management decisions, with research results transparently conveyed to the public' (p. 21).

Goals (Rate *Very satisfied* to *Very dissatisfied*)

1. Maintain a well-connected and resilient wolf population (population numbers) - *Dissatisfied*

- This goal requires considering wolves' social/individual health, including physical, mental and social health (e.g., pack stability, continuity, inter-strife, effect of exploitation on behavior/hormones).
- Multi-year declines in wolf populations, especially due to anthropogenic mortality, should trigger full protections as per the precautionary principle.
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- Wolves self-regulate populations when socially stable, and lethal control disrupts this social stability and self-regulation; i.e., unexploited wolf populations are undoubtedly healthier.
- The plan dismisses anthropogenic mortality as the main influence on wolf populations, occupied range and health.

2. Collaborate with diverse partners to collectively support wolf plan implementation - *Very dissatisfied*

- The plan should not limit 'affected stakeholders' to producers. Tribes and wolf advocates who acknowledge the intrinsic value of wolves are undoubtedly affected by wolf killing.
- The plan should include collaboration with wildlife/conservation NGOs in identifying/researching non-lethal methods, wolf monitoring and patrolling (to mitigate poaching).

- The goal currently caters to narrow, consumptive interests, and enshrines protection of private rather than broad public interests (e.g., wolves can be killed for predation on domesticated animals even at low population levels trending downwards).
- Much of the recent science omitted from the plan links reduced protections and use of lethals with more complaints, conflicts, negative attitudes and more legal/illegal killing.
- There is no mention of poaching despite lethal management being linked to increased rates of illegal killing and disappearances of monitored wolves.

3. Minimize and address human-wolf conflicts while recognizing diverse wolf values – *Very dissatisfied*

- The plan is missing critical best-available science associating management policies, interventions, policies, attitudes and poaching, which points to full protections and non-lethal interventions as the best approaches to mitigate conflicts, promote coexistence and improve attitudes.
- The plan should require adequate implementation of non-lethals (multiple) prior to any implementation of lethal methods and as a prerequisite for any compensation.
- lacks scientific and ethical scrutiny of unsubstantiated claims: e.g., wolves affecting wild prey populations, the ‘effectiveness’ of lethal methods, reducing protections increasing tolerance, public support for recreational hunts.

4. Inform and engage the public about wolves in Minnesota and their conservation - *Dissatisfied*

- This goal will be negatively affected by the critical omission of best-available science previously noted. Without correction, this will provide for an inappropriate and biased (towards exploitation) education that prioritizes private, narrow interests and promotes less effective lethal management that will increase harms to all.

5. Conduct research to inform wolf management - *Dissatisfied*

- Research on improving attitudes towards wolves, use of non-lethal tools and mitigating anthropogenic mortality should be prioritized given those are main sources of conflict about wolves and anthropogenic mortality is the main cause of death for wolves. The omitted BAS addressing such questions suggest strict protections along with no hunting to effectively mitigate conflicts and improve coexistence.

Identified missing/omitted, relevant and recent scientific literature (most if not all compiled in <https://www.endangered.org/assets/uploads/2021/06/A-Complete-index-for-wolf-conservation-planning.pdf#page=71>)

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