Re: Protecting wolves from the effects of the coyote bounty program

Dear Mr. Styler and Mr. Sheehan,

Newly-released documents reveal that the Division of Wildlife Resources was aware of the presence of an endangered gray wolf in southwestern Utah for over a month, since at least Nov. 25, 2014, before the female adult wolf originally from Wyoming was shot and killed on Dec. 28, 2014 by someone who, reportedly, mistook her for a coyote.

Although it is not clear whether or not the shooter was enrolled in Utah’s coyote bounty program, your department and division bear significant culpability for encouraging the wanton killing of coyotes when division staff were aware an endangered wolf was present. The killing of this wolf was a violation of the Endangered Species Act, notwithstanding that no charges were brought.

There is a strong scientific and moral foundation that underlies our belief that the coyote bounty program should be abolished. We recognize, however, that Utah’s misguided Mule Deer Protection Act provides authority for the Division of Wildlife Resources to pay bounties. We appreciate the division’s candid on-line acknowledgment of the futility of killing coyotes to boost deer numbers:

“The severity of weather and the amount of forage available are usually the most important factors that limit deer numbers. If the weather is mild and the habitat is good, then removing predators could increase the number of fawns that survive. More fawns could help to stimulate an increase in mule deer numbers. If there is not enough good habitat or there is a harsh winter, then fawns may die from other causes besides coyotes, and predator removal won’t help deer populations to grow.”

It is within the division’s authority, however, to include strong protections for other wolves that may exist or come into Utah. We believe that is the division’s responsibility to do so. Please enact rules that accomplish the following:

- Educate enrollees in the coyote bounty program, and all other licensed hunters as well, in how to differentiate coyotes from wolves and the fact that wolves throughout most of Utah are protected by federal law and should not be shot.
• Request of all coyote bounty enrollees and other hunters to report all sightings or other evidence of wolves.
• Provide a $1,000 reward for anyone providing evidence that turns out to be true, of a live wolf in Utah, so long as such person or others associated with him or her do not in any way harm that wolf.
• Suspend bounty hunting within a 200-mile radius of the location of any credible reports of wolves.
• Create a system to notify bounty enrollees and others of the possible presence of a wolf, when a report seems credible, and suspend the bounty program within the 200-mile radius of a wolf’s likely location. In the alternate, require bounty enrollees to check with the division prior to embarking on any coyote hunt and even prior to opportunistic killing of coyotes, to ensure there have been no wolf sightings within 200 miles.

The wolf killed last year was not only the sole member of her still-endangered species to have traveled so far south in over three-quarters of a century – she was also a beloved animal seen repeatedly on the North Rim of the Grand Canyon. Her shooting saddened many people throughout the United States and the world, including the school children who submitted names, including “Echo,” which was chosen to evoke both her return to previously occupied habitat and the acoustics of wolf howls in the Grand Canyon.

We believe that even within the constraints of the Mule Deer Protection Act -- a law rooted in a repugnant and discredited 19th century mentality -- the Division of Wildlife Resources can and must take robust measures to ensure that future wolves in the state of Utah are not unlawfully killed through a division program.

Thank you.

Sincerely,

Michael J. Robinson
Conservation Advocate