

David Linn

I think that is premature to begin this scoping process for a post-recovery wolf management plan because wolf recovery in Washington State is far from complete. The initial goals of recovery were too modest and even if those goals were to be accomplished, it would not truly indicate recovery of this important apex predator. It would be better to re-visit the current recovery plan and update it to provide for a successful recovery that is not at the mercy of the ongoing lethal removal of our wolves. The current Wolf-Livestock Interaction Protocol has led to WDFW killing far more wolves than can be morally justified. Certain ranchers are actively resisting wolf recovery and their actions are contributing to the current conflict issues. There must be measures in the plan to hold them accountable.

Any new plan by the Department, be it a revised recovery plan or a post-recovery plan, should contain certain key factors:

- There will be no killing of wolves on public land
- There will be no killing of pups or either member of the breeding pair in each pack
- There will be no wolf sport hunting - ever

The grazing leases on public lands that are entered into by ranchers are priced at about 10% of market rates. Arguably, this large discount is given to compensate ranchers for expected losses that occur in those allotments, such as injuries and predator attacks. Therefore, those losses are priced into the lease rate and the supposed financial rationale for killing wolves disappears. If there are too many losses, the rancher can simply remove his livestock to safer areas. In addition, ranchers are compensated by the state for their losses to predators – sometimes even twice the amount of the loss. In the Kettle River Range, we continue to have conflict year after year and repeatedly killing entire wolf packs has proven not to be the answer. The ranchers must implement more non-lethal deterrents or remove their livestock from the area. We cannot continue killing wolves that return to this area to find a home. This is not a sustainable strategy.

Each area of public land (state and federal) should be determined to be most suitable for wolf habitat or for livestock grazing and then allocated as such. The Department should work with the US Forest Service to terminate grazing leases in those areas best suited for wolf habitat.

Ranchers turning their livestock onto public lands must be required to tag each of their animals with gps, or similar devices, so that they can track all of their livestock in real time. The ranchers must have all of their livestock off of public lands by October 15th of each year or have them considered to be abandoned and become property of the state.

The plan must explicitly take into account all of the positive and negative effects that it will have on the entire population of the state. Under the current plan, the financial impact on commercial interests seems to be the only factor that is considered, completely ignoring the ecological value of maintaining a healthy ecosystem. There needs to be a better balance among all of the stakeholders in the state.

The plan should consider the effects of climate change on our wildlife and their habitat. It should examine predator/prey interaction and how that relationship helps improve the health of both populations. It should consider the public's interest in promoting a healthy ecosystem through a return to more sustainable management of our common environment by reducing human pressures on our wild nature.

The plan must abandon the current Wolf-Livestock Interaction Protocol which is not working and is irredeemably defective. The numerical measures used to implement lethal control are too easily triggered and too quickly acted upon. That a "suspected" wolf depredation can be counted on the same level as a "confirmed" depredation makes no logical sense. Three incidents within a thirty-day

period should require a change in ranching activity, not in wolf killing. And four incidents in a ten-month period has no meaningful connection in time among the events that lead to lethal action. The Department should consider only research done by independent scientists and not that promoted by commercial interests. It should not consider industry-sponsored research that is biased toward a specific result. Research conducted by representatives of the UDSA Wildlife Services should be viewed as particularly suspect as their mission is to kill wildlife.

The WDFW Director should not have unilateral discretion to order wolf killing – that action should also require approval by the governor. We have seen a long history of WDFW directors who, each in their own turn, yield to political pressures to kill our wolves in acts of vengeance.

Thank you for giving me the opportunity to express my views on the scoping project. I hope that they will have some positive impact upon the final result.