

## Mark Blitzer

Thank you for the opportunity to comment on the future conservation and management of Washington's wolves. I value and welcome the return of the wolf to quality habitat across our state (of which there are many), and appreciate efforts supporting the long-term recovery and public acceptance of wolves alongside thriving local communities. There is room for both. Wolves are reclaiming their historic lands, some of which are now populated by people and their animals. Managing wolf populations must continue even after Washington's wolves meet state and federal recovery goals. Our state must maintain a healthy wolf population above recovery thresholds sufficient to conserve this iconic native species into the future. Note that wolves have not reached the required threshold in the third recovery zone (Southern Cascades and Northwest Coast).

The Draft Environmental Impact Statement (EIS) for a post-recovery management plan for Washington's wolves should include the following:

A scientific literature review on the role that wolf pack structure and social dynamics play in maintaining resilient populations, especially with respect to climate change and human pressures but also the unique and complex nature of suitable wolf habitat in Washington.

Alternatives that take into account the role of wolf social structure in maintaining a resilient population and minimizing conflict with livestock and humans, as well as management methods that seek to protect the integrity of wolf packs wherever feasible, especially those not involved in livestock conflicts. We know, for instance, that wolf packs which lose major members can deteriorate and cause more conflict than if the pack are kept intact and other preventive methods are used instead.

A literature review of predator-prey dynamics and how wolves fit into a multi-predator, multi-prey ecosystem along with human impacts. This should include evaluation of predator-prey interactions considering the state and trends of ungulate populations in Washington, particularly in the Cascade and Kettle mountains.

Alternatives that take into account the role of habitat modification, climate factors, wild predation and human-caused mortality on ungulate population trends and how these factors can be managed to restore and maintain healthy ungulate populations for both predators and people.

Address approaches for maintaining a strong program of preventive measures to limit livestock conflicts, including methods that are adaptive to the diverse types of livestock production that occur in Washington, from public lands grazing of cattle to small sheep and goat hobby farms. There are many proven methods which have been developed which go far to prevent conflicts between wolves and livestock. These include the use of range riders, fladry which deter wolves from entering an area in which livestock are located, keeping livestock away from known wolf denning sites.

One or more alternatives that do not use general sport hunting to manage the wolf population. Research has shown that general public hunting is not an effective means of preventing or reducing wolf conflicts with livestock. And I think the vast majority of Washington residents would oppose including wolves as game animals to be hunted. Wolves should not be under the purview of the Department of Fish and Wildlife's game management staff.

A strong adaptive management component so the plan can be updated as we learn more about wolf

ecology, ungulate population response, effectiveness of deterrence measures for preventing livestock depredations, and human social dynamics around wolf presence in Washington.

A strong public outreach and education component to support coexistence as wolves establish packs in new parts of the state, including on wolf behavior and what to do during a wolf encounter.

Assessment of methods to support healthy and respectful dialogue among citizens of Washington, both with each other and with WDFW staff on wolf management over time.

Thank you for developing a new, science-based Wolf Conservation and Management Plan, and for working towards long-term wolf recovery and coexistence in Washington.

Sincerely,