

## Kim Pearson

The plan, as it is now, reinforces the delusion that the taxpaying public ought to be ever apologetic for the presence of native wildlife/wolves, and willing to cover producers' responsibilities and losses while being held hostage with the continual threat of, "kill management" of native wildlife.

The plan should not measure wolf conservation merely by individual wolf numbers; the plan should protect the ecological importance and value of enduring wolf packs as dynamic, functioning family units.

A primary factor that influences depredation is the scavenging of deceased livestock on public and private lands. Producers failing to comply with timely attractant removal (vulnerable, sick, dying, or dead livestock), prior to scavenging, should be penalized/fined, temporarily lose depredation filing status, and fulfill the penalty/fine before accruing additional depredation filing consideration.

The plan should require the simultaneous, consistent use of four/multiple non-lethal deterrents on all properties (private and public) – two of which deemed most effective non-lethal deterrence measures, one of which should be consistent producer presence/range riders with livestock. Producers failing to comply with consistent, simultaneous use of multiple non-lethal deterrence measures should be penalized/fined, temporarily lose depredation filing status, and fulfill the penalty/fine before future depredation filing consideration.

Depredation events should be correlated with producer awareness of depredation and prevention response to further depredation. Under the current plan, several depredations may be filed for what is essentially unaddressed livestock mismanagement. By the time a producer realizes there have been depredations, the number may already be 2 or more without producer intervention, presence, carcass/attractant removal, multiple non-lethal deterrence measures, etc. The current depredation qualification rewards producer absence/lack of vigilance/irresponsibility. The definition of separate qualifying depredation events should be marked when the producer has reported the depredation to WDFW, and taken documented, consistent, multiple, most effective non-lethal deterrent measures to actively deter further depredation. Producers that feed wildlife private business inventory should be penalized, not rewarded.

The plan should acknowledge and address the illogical grazing (incongruent with the goal of minimizing wolf – livestock conflict) of livestock within 7 miles of suspected, or known wolf den, rendezvous sites, or if unknown, center of most recent pack territory. Recent data from the Rocky Mountain Recovery Area suggest that individual wolves do not automatically prey on livestock, but members of wolf packs encountering livestock on a regular basis are likely to depredate sporadically (Bangs and Shivik 2001,

<https://www.californiawolfcenter.org/downloads/wolf-livestock-conflict-NW-US-Bangs-and-Shivik.pdf>).

WDFW should not kill wolves to accommodate private livestock businesses; private businesses can insure their inventory and be responsible for inventory wellbeing and security.

WDFW should increase the penalties for the illegal take, trapping, and poaching of wolves.