

# Ben Rall

## Conservation Northwest

Thank you for the opportunity to weigh-in on the future conservation and management of Washington's wolves. I value the return of the wolf to quality habitat across our state, and appreciate efforts supporting the long-term recovery and public acceptance of wolves alongside thriving local communities. This work 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.

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.

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 preventative 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.

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.

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.