

Rebecca Caulfield

“Of all the native biological constituents of a northern wilderness scene, I should say that the wolves present the greatest test of human wisdom and good intentions.” - Paul L. Errington, *Of Predation and Life Since 2008*, Washington state has experienced something promising and exciting: a wolf comeback. At the end of 2018, 126 wolves and 27 families (packs) re-established their home here. This, however, is not even close to the several thousand wolves that used to live in WA. Just two percent of the lower 48 states is still wilderness – most of our land has been industrialized, urbanized, or converted for agricultural and livestock use. Wolves typically travel great distances for prey; shrinking habitat that is prioritized for human use leaves them with very limited choices. In addition, wolves need an expansive range to disperse into separate families to increase genetic diversity and survive as a species. Even with this knowledge, the U.S. Forest Service continues to permit cattle grazing on WA public lands, some of which are prime wolf habitat. Wolves prefer wild prey, such as elk, deer, and other ungulates. However, cattle, a non-native species in our forests, are displacing such natural prey. From 2012 to the present, 31 wolves, including entire families, have been killed by WDFW, 90% of which were on public lands. 26 of these wolves were killed at the behest of the same livestock producer who uses public lands for cattle grazing. For years now, WDFW has claimed that they are attempting to change wolf behavior by killing wolves that hunt livestock. Yet, there is no scientific study that supports this claim. Instead, shooting and trapping wolves disrupts the social structure of the family and has shown to increase depredation of livestock. Established hunting roles become disoriented. If the older, breeding alpha male or female is killed, the family can fracture, creating more breeding pairs as a means of survival. Younger, more inexperienced wolves tend to go for easier prey. Cattle are a viable alternative to elk and deer for wolves that have not had the opportunity to learn advanced hunting skills from their elders. Ultimately, such actions by WDFW equate to a quick fix that in the long-term, produces more dire results for both wolves and livestock producers. There are several actions WDFW needs to consider for wolf recovery in our state: (1) It is premature to consider a post-state de-listing plan at this time. There are no wolves in WA's third zone and annual population growth has been fairly small. (2) Truly teach and enforce non-lethal methods for deterring wolf depredation of livestock. (3) Ramp up public education about wolves and their true nature across the state based on science. There is a lot of misinformation out there about wolves, especially when it comes to the perceived number of livestock lost to wolf depredation, impacts to wild ungulate numbers, and danger to humans. (4) Public lands are owned by and paid for by the public. There is overwhelming support by the general public for wolf recovery and protection. With a severe shortage of wild lands for wolves to live on, WA and U.S.F.S. need to reexamine cattle grazing allowance on public lands, especially those that are prime wolf habitat. Otherwise, losses due to wolf depredation should not result in wolf killing. Livestock producers are choosing to raise cattle on these lands for private business ventures and must accept the associated risks. (5) There should be no allowance of trophy hunting and trapping seasons on wolves and no designation of wolves as game mammals. Wolf populations in WA are still recovering and they have been persecuted for far too long. Thank you for taking the time to review my comments. I hope that WDFW develops a plan for wolves that allows them thrive in WA.