

## SCOPING COMMENTS FOR WOLF RECOVERY/DELISTING PLANS

MY BACKGROUND - I am an 82 year old woman who has had a primary interest in observing wildlife and wilderness recreation my entire life. I have spent considerable time backpacking, camping, hiking, and photographing wildlife. I have also taught classes at the college level on wilderness values and leadership. Since wolves began to move into Washington State, I have been avidly interested in their recolonization. I have been involved in the resulting politics and have tried to educate myself about the many details of wolf behavior and management policy. Much of my outdoor experiences have occurred in the North Cascades, and I have long looked for wolves crossing the border into our state. Wolves matter a great deal to me.

(1) INDIVIDUALS MATTER - Contrary to most Fish and Wildlife Departments who deal in populations and random lethal removal actions, INDIVIDUALS MATTER. Pack structure and differing roles of individuals forms the basis of wolf culture and survival. When random wolves are killed, chaos reigns and often results in INCREASED LIVESTOCK PREDATION activity. Science repeatedly confirms this fact. Hunting results in the same problem. When individuals are randomly exploited, packs are unable to mature into balanced and stable groups.

(2). LETHAL REMOVAL IS NOT AN EFFECTIVE MANAGEMENT TOOL for resolving wolf/livestock conflict. Science repeatedly confirms this fact. Even when total packs are killed, a void is created for more wolves to claim the unoccupied territory and start the conflict all over again. It also does not promote social tolerance. Science shows that it actually DECREASES social tolerance and opens the door to poaching and hostility.

(3) THE CURRENT "WOLF-LIVESTOCK INTERACTION PROTOCOL" is an ill-conceived policy that demands replacement with a plan that is developed with wide public input and based on science. Neither of these criteria is reflected in the current protocol of 4 predations in 10 months or 3 predations in 30 days and 2 non-lethal deterrents required by a producer. Underweight calves ARE turned out, many carcasses are not found or removed resulting in baiting, range riders that are not present 24-7 and cannot protect or even locate scattered livestock in the Kettles. There is a lot of science available regarding the intricacies of non-lethal deterrent measures. The minute details of what is effective matters, and to simply say fladry or lites, sound, or other disruptive stimuli has been used does not address effectiveness. Since the current protocol has been adopted, four times as many wolves have been killed.

The public had no opportunity to participate in development of the current protocol, there was no peer review, and balanced science was not used. WAG was not an appropriate entity to have approved the policy, and WAG is not a truly representative group (as claimed). Members who are selected often know little about wolves, science, or the issues involved, and many of them do not represent any constituents.

(4) ONGOING EDUCATION of the public and of the stakeholders is essential. People who do not understand wolf behavior and how to best co-exist with wolves, remain

rooted in fear and misinformation. Education must be an essential part of effective wolf recovery policy. And it must inform various stakeholders of the science behind good wolf management to include such things as counteracting mis-information like the belief by some hunters that wolves decimate ungulate populations. In reality wolves can actually help to maintain healthy ungulate populations by removing sick animals displaying conditions such as chronic wasting syndrome.

(5) SANCTIONED POACHING must stop. Claiming fear as an acceptable reason to shoot an encountered wolf is unacceptable. Bear spray is a far better alternative and needs to be encouraged for those who fear wolves (generally wolves are no threat to humans, and this fact must be an essential part of the education needed).

“In the Act” shooting of wolves must be clearly defined and not provide an easily available action. Such steps as warning shots must occur first, and a citizen or producer must not be able to easily claim that shooting or killing a wolf is an acceptable alternative.

We have seen clear abuses of both “fear” and “in the act” killing of wolves that amounts to “sanctioned poaching” that reduces “social tolerance” and encourages lawlessness.

(6) HUNTING AND TRAPPING must not become a management tool after “wolf recovery” is achieved. WOLVES MUST NOT BE MANAGED AS A GAME ANIMAL TO BE HUNTED. Wolves regulate themselves thru prey availability and inter-pack strife to protect territory. Wolves must be held in the “public trust” and belong to all citizens of our state and not just hunters and producers. When Wolf Management was unfortunately moved from the Endangered Species Division to the Game Management Division, hunting was clearly on the table as an end-game management tool. THIS IS UNACCEPTABLE. Wolves do not belong under the Game Management Division. This assignment needs to be re-configured.

(7) INTER-AGENCY communication and cooperation is important for wolf recovery and stability. But regardless of grazing allotments administered by the USFS or other land managers, it is the WDFW who is responsible for managing wolves regardless of what policies land managers adopt. The public holds WDFW ultimately accountable for policies that place the welfare of wildlife first. And it is WDFW who decides to kill wolves for unsubstantiated and unscientific reasons. WDFW can do better, and it is not producers or hunters or uninformed citizens who are responsible when wolves are inappropriately killed. WDFW must step up and do better. Much of the Kettle Range is more appropriate for wildlife than for grazing, and it remains the mandate of WDFW to administer wolf policy there. Wolves must not be killed on public land to accommodate livestock producers. If various land managers and producers choose to graze livestock in areas that are more appropriate for wildlife than for grazing, they must also adhere to the concept of ACCEPTABLE LOSS. With the current ratio of livestock to wolves in these indefensible areas, the losses currently sustained are actually quite reasonable.

(8) TRANSPARENCY - WDFW has often not been truthful and open about what it says regarding the effectiveness of employed non-lethal deterrents, lethal removal actions,

and the actual findings of science. Such withholding and deception destroys public trust and confidence. It also contributes to division and polarization.

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