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## Re: Opposition to Colorado's Request for Washington Wolves

Esteemed Commissioners,

The undersigned organizations respectfully submit the following comments in **strong opposition to the request from Colorado to translocate wolves from Washington State**. Granting this request would endanger Washington's own fragile wolf population, contravene sound science and ethical wildlife stewardship, and undermine the Commission's duty to safeguard a state-endangered species.

### Washington's wolf population remains endangered, with long odds of recovery

Washington's wolves have only begun to recover after near-extirpation in the early 20th century, and their future remains deeply uncertain. The Washington Department of Fish and Wildlife's (WDFW) **2024 Annual Wolf Report** documented the first population decline since wolves naturally recolonized the state in 2008—a **9% drop in total wolves** and a **25% drop in breeding pairs** from the prior year.<sup>1</sup> The 2024 report also confirmed that there are no wolves in the state's third recovery region, the Southern Cascades and Northwest Coast region, which is the region with the most suitable habitat in the state.

Last year's setback followed significant and sustained increases in human-caused mortality, which has averaged ~15% of the population for the past four years. At this point, we are unable to **estimate the true extent of 2025 mortality**. WDFW has documented 10 wolf mortalities so far this year,<sup>2</sup> but that count is incomplete. Tribal hunting data is not yet available, and **tribal hunting has been the largest source of**

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<sup>1</sup> See Washington Department of Fish and Wildlife, Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, Yakama Nation, Swinomish Indian Tribal Community, and U.S. Fish and Wildlife Service. 2025. Washington Gray Wolf Conservation and Management 2024 Annual Report. Washington Department of Fish and Wildlife, Ellensburg, WA, USA.

<sup>2</sup> See Washington Department of Fish and Wildlife. (2024). Monthly wolf report – October 2024. Olympia, WA. (Nov 5, 2024). Retrieved from: <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/updates/monthlywolf-report-october-2024>.

**wolf mortality over the past four years, averaging 19 wolves killed each year.** It is still unknown whether WDFW will engage in additional lethal removals this year, including renewing the lethal removal order against the Sherman wolf pack, which may jeopardize the lives of 6-8 more wolves.

Earlier this year, researchers published a peer-reviewed version of the Department-funded population model you reviewed last year in its preprint format, Petracca *et al.* (2025). That study projects that at current mortality rates, there is only a **minuscule probability** (1–4%, according to evaluated scenarios) that Washington’s wolf population will achieve statewide recovery *within 50 years*.<sup>3</sup> These findings further underscore that our wolf population is **extremely sensitive to human-caused mortality**—each individual, pack, and breeding pair plays an outsized role in long-term persistence. Moreover, this human-caused mortality is heavily concentrated in Northeast Washington, disrupting demographic processes that would improve pair bonding, reproduction, recruitment, and dispersal to other recovery regions. To remove even one wolf from such a population would risk compounding a trajectory of decline.

The Commission’s first and highest duty is to **preserve and perpetuate Washington’s endangered wolf population**, not the success of Colorado’s effort, and entertaining the idea of translocation now would further imperil the chances of recovery here.

### **Colorado’s reintroduction program is faltering and politically compromised**

Recent reports make clear that Colorado is unable to safeguard the wolves it has already relocated and released. According to [Colorado Politics](#), **12 of the 25 wolves translocated to Colorado have died**, including 6 of the 15 wolves brought from British Columbia earlier this year. Half of those deaths were attributed to gunshots or are still under investigation, and even those mortalities attributed to natural causes have also found [evidence of gunshot wounds](#).

Late last month, the U.S. Fish and Wildlife Service (USFWS) attempted to further undermine Colorado’s effort by issuing a directive ordering Colorado to cease importing wolves from Canada, claiming the state’s 10(j) rule limited sourcing to the Northern Rockies. **This directive is scientifically unfounded and legally invalid.** [Legal experts](#) at Earthjustice, the Western Environmental Law Center, and Defenders of Wildlife have explained that the 10(j) rule designates the Northern Rockies only as a *preferred* donor source—not an exclusive one—and governs post-release management, not capture locations. Colorado should not be bullied; it should challenge USFWS’s interpretation and continue to explore the possibility of acquiring wolves from other jurisdictions with robust populations, including British Columbia.

Yet rather than challenging this illegal directive, Colorado has **capitulated to political pressure**, accepting an unfounded restriction that undermines its own (and our) recovery goals. This retreat illustrates how misinformation and politics are distorting wolf restoration efforts. **Washington must not**

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<sup>3</sup> Petracca, L. S., Converse, S. J., Maletzke, B. T., & Gardner, B. (2025). Forecasting Dynamics of a Recolonizing Wolf Population Under Different Management Strategies. *Zoological Society of London*, 0, 1–13.

**follow suit or sacrifice its endangered wolves to prop up a program mired in confusion and compromised by avoidable mortality.**

### **Translocation inflicts harm on individual wolves and disrupts family groups**

Beyond the biological and legal concerns, **translocation itself imposes severe harm on wolves.** Capture and transport break apart family units, cause intense stress, and frequently lead to injury or death post-release. Studies of translocated carnivores show elevated mortality, including from government removals, and lower pair/pack formation, as individuals attempt to navigate unfamiliar landscapes.<sup>4</sup> Wolves are highly social animals with complex relationships; tearing them from their family groups and societies for human projects inflicts severe psychological trauma.

While we support the goal of wolf recovery throughout the West, **Colorado's current sociopolitical environment renders the state unsafe for wolves.** The mounting death toll of translocated wolves, coupled with persistent hostility and weak enforcement of protections, makes clear that wolves placed there face high risk of persecution. Exporting Washington's wolves under such conditions would betray the principle of precaution and ignore our moral responsibility to consider the well-being of individual animals and family groups.

### **The Commission should reject Colorado's request**

Washington's wolves remain in an extremely fragile state—endangered, declining in numbers and breeding pairs, and facing ongoing high levels of human-caused mortality. Colorado's request to remove wolves from Washington is inconsistent with sound science, ethical stewardship, and the Commission's obligation to protect species at risk and prioritize their recovery in the state.

We urge the Commission to:

- **Reject Colorado's translocation request in its entirety.**
- **Refuse to export wolves** *at least* until statewide recovery criteria are met, human-caused mortality is mitigated, and every region of Washington supports a thriving, breeding population.

Washington's wolves are still fighting for their survival. It would be unconscionable, unscientific, and a violation of the commission's trustee responsibilities for it to jeopardize state wolf recovery for the sake of another state's politically compromised and unstable experiment.

Thank you for your consideration and for your ongoing service to the people and wildlife of Washington.

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<sup>4</sup> See, e.g., Bradley, E. H., Pletscher, D. H., Bangs, E. E., Kunkel, K. E., Smith, D. W., Mack, C. M., Meier, T. J., Fontaine, J. A., Niemeyer, C. C., & Jimenez, M. D. (2005). Evaluating wolf translocation as a nonlethal method to reduce livestock conflicts in the northwestern United States. *Conservation Biology*, 19, 1498–1508.

Respectfully submitted,

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