

Washington Department of Fish and Wildlife

Post-recovery Wolf Conservation and Management Plan – Scoping Comments Summary

Introduction

On August 1, 2019, the Washington Department of Fish and Wildlife (WDFW) invited the public to comment on the scope of a post-recovery plan for wolves in Washington.

A post-recovery conservation and management plan for wolves will guide long-term wolf conservation and management where wolves are managed under state authority once the wolf population in Washington is considered recovered and is no longer designated as state or federally endangered.

WDFW is following the State Environmental Policy Act (SEPA) process to develop the plan. The first step of the SEPA process was scoping. Scoping helps to determine proposed actions, alternatives, and impacts to be discussed in the impact statement. Scoping improves decisions and encourages collaboration, cooperation, and early resolution of potential conflicts. It is intended to narrow the impact statement to only the relevant issues.

Described below is a summary of comments from people who chose to send in scoping comments and/or respond to the online scoping questionnaire. These comments do not necessarily represent the sentiments of the entire public. In addition, the comments may not reflect actual existing conditions on the ground or WDFW management policies or positions. The public comment process does not serve as a voting mechanism; instead, emphasis is placed on the content of the comments rather than the number of times a comment is received. WDFW considers the content of all comments equally. Commenters were not given specific questions to address in their correspondences.

Public scoping comment process

On August 1, 2019, WDFW released a notice requesting comments on the scope of a post-recovery plan for wolves in Washington. The letter provided a description and background of the proposal as well as information on how to comment, including a public scoping open house schedule. The public was invited to submit comments on the scope of the planning process through November 1, 2019 (the deadline was extended to November 15, 2019, for a comment period of 107 days).

On August 27, 2019, WDFW opted to cancel the in-person wolf post-recovery planning open houses based on threats of meeting disruption and concern for staff and public safety. In lieu of the public open houses, WDFW held three live webinars (September 17, September 25, and October 15, 2019) where participants received information, participated in a question and answer session, and learned how to provide input. A total of 387 live viewers participated in the digital open houses. WDFW also met with stakeholders around the state (with a focus on rural communities with restricted internet access) to distribute hard copies of informational materials and comment forms.

The public was invited to submit comments using any of the following methods:

- electronically through the WDFW website;
- by mailing comments to WDFW; or
- by e-mailing comments to WDFW.

Nature of correspondence received

During the scoping period, 7,798 pieces of individual correspondence were received. WDFW received correspondence from people in every county in Washington as well as all 50 states. WDFW also heard from

government agencies and representatives (including tribal, federal, state, and county) and non-governmental organizations and stakeholder groups. Approximately 47 percent came from within Washington state and another three percent came from Idaho, Montana, and Oregon, states that also have wolf populations to which Washington wolves are connected. About 13 percent of the comments from within Washington came from areas where wolves are known to occur. Not all respondents identified a location.

Types of correspondence	Number of correspondences
WDFW website (questionnaire option)	2,102
WDFW website (open-ended option)	415
Letters and hand-written comments	55
E-mails	14
Non-governmental organization websites	5,212
Total	7,798

WDFW received comments from all Washington counties. Comments per capita (number of comments by the population of each county) were highest in Stevens, Garfield, Pend Oreille, Ferry, and Jefferson counties, all of which currently have wolf populations except Jefferson.

Counties ranked by comments per capita	Comment count	Population (2019)
Stevens	218	45,570
Garfield	6	2,220
Pend Oreille	32	13,740
Ferry	18	7,830
Jefferson	55	31,900
San Juan	26	17,150
Kittitas	69	46,570
Okanogan	61	42,730
Lincoln	13	10,960
Skagit	127	129,200
Asotin	21	22,520
Chelan	73	78,420
Skamania	11	12,060
Klickitat	19	22,430
Whatcom	187	225,300
Walla Walla	47	62,200
Clallam	55	76,010
Thurston	204	285,800
Island	53	84,820
Grays Harbor	40	74,160
Spokane	273	515,250
Douglas	22	42,820
Lewis	40	79,480
Columbia	2	4,160
Wahkiakum	2	4,190
Mason	31	64,980
Kitsap	115	270,100
Cowlitz	45	108,950

King	917	2,226,300
Whitman	20	50,130
Snohomish	301	818,700
Adams	7	20,150
Grant	32	98,740
Pacific	7	21,640
Pierce	257	888,300
Clark	141	488,500
Yakima	61	255,950
Benton	47	201,800
Franklin	13	94,680

Comment topics and summary

The content of each comment was grouped under one of 14 general topic headings listed below. Most of these contain numerous sub-topics and ideas.

- *Collaborative process*
 - WDFW received comments on the need for continued collaboration in post-recovery wolf management among stakeholder groups in addition to tribal and interagency coordination. Other commenters expressed concerns with the Wolf Advisory Group and whether or not it is representative of stakeholders in Washington.
- *Compensation*
 - WDFW received comments stating livestock producers should continue to be compensated for livestock losses to wolves, while others felt that livestock killed by wolves, particularly on public lands, should be the financial responsibility of the business owner. Other comments addressed ongoing funding sources for compensation.
- *Conservation and monitoring*
 - Commenters expressed their desire to see wolf populations managed for abundance and occupation of all suitable habitat or based on population viability analyses/effective population sizes. Commenters touched on the importance of maintaining wolf social structures for population stability. Others felt wolf populations should be limited by thresholds in numbers or impacts to people and ungulates. Many requested emphasis on limiting illegal taking of wolves and enforcing associated laws and penalties.
- *Diseases in wolves*
 - Some commenters stated that testing wolves and wolf scat for various diseases (hydatid disease, rabies, Chronic Wasting Disease, etc.) is important for human health and safety.
- *Ecotourism*
 - WDFW received comments about emphasizing wolf ecotourism (the ability to see or hear a wolf in the wild) in Washington and highlighting the positive economic benefits wolves have in other places where tourists travel from around the world to see them.
- *Education and outreach*

- Commenters wrote about the ongoing importance of outreach and education about wolves, focusing on coexisting with wolves, conflict avoidance, and the role wolves play in ecosystems.
- *Funding and economic impacts*
 - Comments focused on sources of funding for specific wolf management activities (e.g., not allowing taxpayer dollars to be spent on lethal removal of wolves or compensation for livestock loss, not allowing funding for wolf conservation to come from hunter/angler license fees). Others requested full analysis of both positive and negative economic impacts of wolves.
- *Land management*
 - Comments in this category focused on protection of dispersal corridors and connecting suitable habitat, reevaluating grazing opportunities in areas occupied by wolves, the appropriateness of grazing on public land in general, and supporting active forest management to bolster ungulate populations.
- *Legal status, protections, and hunting*
 - Commenters suggested that wolves should be designated as a protected species/not be listed as a game species or that wolves be designated as game. WDFW received comments of those who did not want to see wolf hunting considered in the post-recovery plan and felt that there is no legitimate purpose for hunting wolves. Those in favor of hunting wolves wanted to do so for reasons including controlling populations, balancing wolves with ungulates, mitigating conflict with people and livestock, raising funds for conservation, and aligning wolf management with bear and cougar management.
- *Plan development process*
 - WDFW received many comments on the process for developing the post-recovery plan. Some stated that development of an updated wolf plan is premature at this stage. Others emphasized the need for peer-review of the plan and the importance of holding public meetings.
- *Predator-prey relations*
 - Interactions between wolves and their prey were a significant topic in scoping comments. There was particular interest in developing conservation and management guidelines for predators and ungulates in concert. There was also concern for making sure wolves did not adversely affect ungulate numbers (particularly at-risk ungulate populations) and hunter opportunity.
- *Research*
 - Some commenters felt ongoing research was important and raised concerns about who would conduct and fund future research.
- *Translocation*
 - Commenters suggested translocating wolves to meet 2011 recovery objectives, with emphasis on translocating wolves to the Olympic Peninsula. Others suggested translocating wolves involved in conflict with livestock, while others opposed this idea. There were commenters with concerns about translocation and preferred that wolves naturally recolonize suitable habitat rather than being moved.
- *Wolf-livestock conflict*
 - Comments about this topic focused on emphasizing, requiring, and assisting livestock producers with non-lethal tools for conflict mitigation. Another significant topic was the prioritization of

wolves and other wildlife over livestock on public land and acceptance of the inherent risk of grazing livestock on public land. Opposition to lethal removal of wolves was expressed, particularly on public lands. Some requested a literature review on the efficacy of lethal removal for conflict mitigation and an evaluation of the process for implementing lethal control. Those in favor of lethal removal felt it was an important tool for wolf-livestock conflict mitigation and some felt it should occur more quickly and/or by issuing depredation permits in conflict scenarios.

The topics and comments summarized below are intended to be representative of the spectrum of comments received in total. This summary does not encompass the full text or content of all comments received. To view all scoping comments received in their original format, please visit wdfw.wa.gov/wolves-post-recovery-comments.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Collaborative process	Collaborating with diverse stakeholder groups	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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. ▪ The state should also be working closely with ranchers and hunting organizations to find a consensus on ongoing management policy. ▪ WDFW should continue to work with all stakeholder groups, including conservationists, hunters, livestock producers, and outdoor recreationists/wildlife enthusiasts. ▪ The plan should highlight the responsibility of WDFW to work with diverse partners to educate the public on the importance and methods of coexisting with wolves, and to facilitate dialogue among stakeholders with differing viewpoints on wolf conservation and management. These efforts must be in addition to the Wolf Advisory Group.
	Government-to-government/interagency/cross-boundary collaboration	<ul style="list-style-type: none"> ▪ As co-managers, local tribes should be consulted before changes are made to wolf management. Increased communication regarding research projects, monitoring data, and long-term management objectives will only benefit wildlife and the inhabitants of Washington. ▪ Washington should continue its successful recovery by establishing a new, better standard for post-recovery wolf conservation and management in a way that influences and improves wolf conservation and management for other western states. Coalition building amongst states is important to ensuring the long-term health of western U.S. ecosystems, and wolves are critical to the health of those ecosystems. ▪ The plan should call for greater coordination and discussion between WDFW and other local, state, and federal public land agencies, especially in decisions of land parcel goals and purposes. Wolf recovery and long-term viability in Washington will require a broad coalition of land managers working together; WDFW ought to lead this effort to the full extent allowed by law. ▪ WDFW should defer to national park land managers when it comes to wolf management on National Park System lands. These lands include the North Cascades National Park, Ross Lake National Recreation Area, Lake Chelan National Recreation Area, Mount Rainier National Park, Olympic National Park, Lake Roosevelt National Recreation Area, and any other units that may see wolf populations. National Park System land managers are likely the best deciders in wildlife management on these special federal lands that Congress has set aside “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>enjoyment of future generations.”</p> <ul style="list-style-type: none"> ▪ I am familiar with some of Canada’s successful wolf conservation policies. I suggest you confer with fellow wildlife managers across the line to see if they can offer useful insights and strategies. ▪ Washington should take a close look at Idaho’s wolf management plan.
	Stakeholders living in wolf country	<ul style="list-style-type: none"> ▪ The governor should not involve himself in any way to provide protections for the wolf at the expense of those who are most likely affected. ▪ Any future policy needs to include local sheriff’s offices. ▪ People living in areas heavily populated by wolves should have a larger voice in management policies. ▪ More weight needs to be given to the opinion and needs of those living with wolves than those who never deal with them or groups from outside the state.
	Wolf Advisory Group (WAG)	<ul style="list-style-type: none"> ▪ The WAG is a good model but is too small to serve as the locus of problem-solving for the entire state. We recommend exploring trainings in Conservation Conflict Transformation for more interested stakeholders and setting up regional or local WAG-like groups to serve as an ongoing means of addressing conflict around wildlife management and using that conflict to foster civil dialogue and improve quality of your decision-making processes. ▪ WDFW must work more with a coalition of environmentalists, hunters, producers, and outdoor recreationalists. WAG pretends to do this, but in actuality leans heavily toward producers and hunters. ▪ 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. ▪ The use of the WAG for developing policy needs to be abandoned in favor of regional advisory groups that are selected with a more transparent process. ▪ Creating a more balanced citizen representation on the WAG members, to include perspectives of Washington residents who are vegetarian and vegan. The trend is toward lower animal consumption for ethical, environmental, and health reasons. WAG membership has

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Compensation		<p>been weighted heavily with livestock advocates and growers and with hunters.</p>
	Miscellaneous	<ul style="list-style-type: none"> ▪ Collaborate with cattlemen and other livestock and agricultural associations to retrain and offer incentives for careers transitioning from domestic animal industries. ▪ Collaborate with educational institutions and private companies to develop predator-friendly products, similar to salmon-friendly designations with certification, logo, and promotions. ▪ Make sure the public has a voice in wolf conservation in Washington.
	Compensate livestock producers for their losses to wolves.	<ul style="list-style-type: none"> ▪ I believe that compensation is necessary when losses are experienced-- whether these losses are direct or indirect. ▪ Compensate ranchers who lose livestock despite having implemented non-lethal deterrence measures. ▪ Insure livestock producers are properly reimbursed for losses, mitigating measures, and monitoring expenses. ▪ We should be increasing the budget for compensation to cattle ranchers for loss of livestock and trying every method possible before eliminating the problem animals or entire packs. ▪ It seems like it would be cheaper and easier to just pay for damages than to kill wolf packs. ▪ If a rancher is doing their best for non-lethal intervention but that doesn't work, then maybe that rancher should be reimbursed at a higher rate for their loss. ▪ There should be incentive to allow the wolves to relocate back to their historic habitat while also providing management practices that are founded in science and can promote a stable population.
Do not compensate livestock producers for their losses to wolves.	<ul style="list-style-type: none"> ▪ Society should not pay (financially or environmentally) for cattle killed by wolves. ▪ I don't want ranchers reimbursed for losses except on tax forms. If ranchers lose animals while on public lands, it is based on their decision and therefore a cost of doing business. ▪ Why do we pay for cows hunted by wolves on public lands? I understand paying for cattle killed on private land. ▪ If the ranchers bore the cost of the predation, then perhaps they would be more careful where they grazed the cattle and maybe take steps to guard them, too. 	

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	Funding for compensation	<ul style="list-style-type: none"> ▪ It's important to evaluate the future of compensation given that its intended purpose – to compensate for losses while wolves are listed – will no longer be relevant at the time the updated plan is adopted. At a minimum, we advise increased investment in proactive non-lethal actions and more stringent requirements for the use of non-lethal tools and techniques. We also suggest proof of livestock numbers pre- and post-grazing season, proof of end-of-year weight annually, and annual pregnancy rates to determine a baseline prior to offering indirect depredation compensation. ▪ A compensation plan is needed that includes both direct and indirect losses experienced by livestock producers from wolves. A permanent funding source should be secured to pay for approved losses and an independent organization should be created to manage claims. ▪ The state should provide a permanent funding source and a third party to manage a Livestock Compensation Plan to reimburse producers for direct and indirect losses caused by wolves. ▪ Perhaps some tax or subsidies could be made available to ranchers not only for compensation of lost livestock but to help secure their livestock in restricted public areas, such as hiring employees or livestock guardian dogs to protect the herds. ▪ I propose that a continuing fund be generated through donations by private citizens, not any government agency, from which affected landowners can be compensated. Those who truly want wolves in our state, regardless of cost, may contribute privately to this fund. If the money is available, landowners can be compensated for losses. If the money runs out through donor apathy, then lethal removal should occur to a level where the pack has little effect on ranchers.
Conservation and monitoring	Manage wolves sustainably based on limiting factors.	<ul style="list-style-type: none"> ▪ Wolf populations need to be managed taking into account their effect on other wildlife, habitat carrying capacity, their impact on domestic residential and commercial needs, and the cost of managing populations. ▪ The plan should account for the limiting suitable habitat for wolves in setting wolf population objectives statewide (habitat where wolves can exist without significant human interaction). ▪ Maintain wolf populations at a self-sustaining level that can be properly managed by the department, that achieves healthy ungulate populations, and that does not negatively impact livestock producers. ▪ I am concerned that once the statewide numbers are met for wolves in each region that they won't be managed properly. Meaning that the public opinion will prevail over best practices and sound science.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	Limit wolf populations.	<ul style="list-style-type: none"> ▪ The wolf population should regulate its numbers by the amount of food supply. ▪ In areas of livestock production, wolf populations need to be maintained at a level that minimizes both depredations and indirect costs to producers. ▪ Wolf numbers need managed at a level that does not impact big game populations and rural residents and ranchers need unrestricted ability to protect themselves and their animals from wolves. ▪ I believe it could be beneficial to limit pack size and definitely look at the number of packs. The number allowed is way too many considering the size of land available and what is happening in the surrounding states with elk and deer herds. ▪ Once the minimum number of wolves is obtained in a specific zone, the population should only be allowed to grow beyond what is required to keep them from being relisted.
	Manage wolf populations based on population viability analysis/effective population size.	<ul style="list-style-type: none"> ▪ WDFW should maintain population viability by establishing science-based minimum viable population thresholds above which wolf numbers must be maintained. ▪ Please make sure that scientists are the primary input as to when populations have reached a sustainable level. ▪ For a truly genetically viable population, we should allow the wolf population to increase in WA state to around 1,500 animals. ▪ We should be using effective population size, not census numbers, to measure population resiliency. ▪ First steps in the planning process should be to define the management goals and the plan's meaning of "wolf population viability." The assumptions, methods and results of an updated "Washington Wolf Population Viability Analysis" should be conducted as part of the plan's SEPA process and with a robust public and expert review. Parameters for long-term population persistence should be investigated. IUCN's Conservation Planning Specialist Group is recommended to conduct such an analysis. ▪ A SEIS truly premised on the essential "best available science" must demand the preservation of pack integrity and a metapopulation throughout Washington that is truly ecologically effective--one which is conserved so that its grows and disperses pursuant to the wolves' own decision-making instincts—not one cavalierly subject to scientifically baseless non-sensical decentralized "control" actions akin to those routinely carried out in Idaho and Montana.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	Restore wolves to all suitable habitat.	<ul style="list-style-type: none"> ▪ I would like to see a wolf conservation and management plan that has abundance, not low minimum numbers, as its goal. ▪ Wolf management should be focused entirely on restoration of wolves to all public forest, park and wilderness lands, with an emphasis on reconnecting and restoring wilderness at landscape scale. ▪ I believe wolves should be allowed to expand naturally throughout suitable habitat in the state. Wolves should be managed for sustaining the population while providing hunting opportunities. I think it is important to have a healthy wolf population that also needs to be managed. ▪ The Department will manage the gray wolf (and other carnivores) as a priority on our public lands, particularly in wild roadless areas, advocating for restoration of native ecosystems, at the federal and state level. ▪ Wolves deserve to be on the landscape, especially in the Olympic Mountains, where they lived historically. ▪ As a longtime resident of the Olympic Peninsula, I favor WDFW policies that ultimately enable the natural re-inhabitation of the Olympic Mountains by wolves. ▪ Until wolves are in healthy, sustainable numbers in the North Cascades and on the Olympic peninsula, we should not even be entertaining the question of whether or not they have recovered. Recovery will only become more and more difficult as human population increases steadily year after year, so setting up sustainable populations of wolves across the state with wildlife corridors connecting these protected areas (in order to prevent inbreeding and disease) is the only acceptable path forward for actual recovery of the species in WA state. ▪ Habitat reserves should be an option.
	Eliminate wolves from Washington.	<ul style="list-style-type: none"> ▪ The health and safety of our citizens, the protection of our ungulate species, and the sustainability of our livestock industry depends on eliminating wolves from Washington state. ▪ Washington state is too small for large apex predator that lives in packs, please consider the impacts of this all around. Wolves cannot be tolerated in a state this small. Eventually wolves will need to be eliminated for the safety of all Washingtonians.
	Review wolf social structure and incorporate it in	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	management decisions.	<ul style="list-style-type: none"> ▪ While considering wolf management options (such as possible hunting, relocating, etc.), it is imperative to understand the social structures of the wolves. Wolves cannot be managed like bears, because of their social structure. Just as doe tags are released on a limited basis due to the species's social structure, wolf alpha pack members need to be regarded with the same protection levels. Shooting a doe/cow impacts the species more than shooting a stag/bull, shooting an alpha pack member may sentence the entire pack to death. ▪ I believe we should look at scientific evidence to see if wolves should be managed as other wildlife or should we consider the special nature of the pack and manage them in a different category altogether. ▪ 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. ▪ I believe any management of wolves must consider the nature of the species and the importance of alpha males, breeding females and promising pups to the coherence of the pack. ▪ Wolf movements need to be monitored and pack lineages traced. By collaring alpha wolves, both of these essential needs would be met. In order to track their numbers, trace pack lineages, and prevent catastrophic pack demise, at least all alpha wolves should be collared.
	Role of wolves in ecosystems/trophic cascades	<ul style="list-style-type: none"> ▪ Answer the global call by scientists to protect and conserve apex predators. ▪ Use every opportunity to extol the value of top predators in keeping nature healthy. ▪ Ecosystem impact would seem to be a central part of any plan. ▪ I am interested in functioning ecosystems that includes the full suite of our native species. My hope is to see WDFW representing the long-term survival of all our native species, and the habitats they depend on, rather than special or limited interests. ▪ While my desire for a sense of ecological wholeness from my public lands certainly pales compared to the constant onslaught of anti-wolf howling, it is your responsibility to give it equal footing. I implore you to use the best peer-reviewed science available when you construct our post-recovery plan for this tenuous species. Many eastern Washington residents like me revere wildlife diversity.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ I would hope the environmental impact statement WDFW develops regarding wolves fully acknowledges the many positive impacts wolves have on the natural environment. ▪ I believe that the intrinsic value of individual animals, along with the ecological value of pack units, should be considered along with general population conservation goals and public tolerance of wolves. ▪ The science of the trophic cascade effect should be used to help us in our efforts to encourage balance in any ecosystem into which wolves (or other apex predators) are introduced. ▪ The plan should acknowledge wolves as vital keystone species on the landscape and have a management component that protects them as such within prime wolf habitat. ▪ Risk of predation could have an indirect effect by changing habitat use by ungulates, where they rely on lower quality habitats to reduce predation risk, resulting in lower pregnancy or productivity rates. Displacement or changes in behavior of other predators, such as cougars, bears, bobcats, and coyotes could affect ungulate populations through exploitative or interference competition. Alternate prey sources like rabbits, grouse, or mountain beaver, could be influenced by changes in predation patterns that currently exist, in-turn affecting other species that rely on those populations, such as recovering Pacific fishers. Wolves can have a cascading effect on the ecosystem, and it will be important to consider these interactions so that the recovery of one species doesn't result in the detriment of others.
	Management areas/zones	<ul style="list-style-type: none"> ▪ Management of wolves in the state should not be a “one size fits all.” Management should be at the Game Management Unit (GMU) level or individual pack level. Livestock density and available prey base need to be the first considerations in management. ▪ Each wolf recovery area across the state will have different interactions with the citizens, and each zone will need to be managed with input from the residents from that specific zone. ▪ Create Wolf Management Areas (may be combined GMU) with different objectives and hunting possibilities. Determine desired wolf populations and acceptable mortality losses by WMA. ▪ Management zones based on biologically relevant boundaries should be developed based on local conditions based on habitat capacity, prey availability, and potential for conflict with livestock and people. "High risk" areas should be identified. ▪ I ask that you please be considerate of the fact that there are two different ecotypes of gray wolves inhabiting Washington. Specifically,

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>I request that you please manage the admixed population in western Washington to conserve the coastal genes and to not sacrifice them just to achieve statewide delisting goals quicker.</p> <ul style="list-style-type: none"> ▪ This state is broken up into management units in order to manage our animal populations on a more micro-level and maintain herd numbers within the parameters of what the land can sustain. We will inevitably need to do the same with wolves. Regardless of dispersal on the Olympic peninsula, we should still be able to manage growing populations across the rest of the state. ▪ The three recovery zones that exist now are unrealistic in terms of management, situations will not be the same throughout these larger areas, and the new plan should consider more "local" conditions based on habitat capacity, prey availability - accounting for all sources of pressure on those populations, and potential conflict with livestock or people. Identifying high risk areas, to the extent possible, should be a priority so that problems can be avoided and issues can be resolved before they escalate. Any existing data from multiple sources (state, federal, tribes, etc.) should be compiled to assist with understanding these local conditions relevant to wolf recovery and management. These local management areas should be determined based on biologically relevant boundaries.
	Poaching/ illegal take	<ul style="list-style-type: none"> ▪ Retributive “extrajudicial” killings of wolves can be expected to rise as wolves expand and society learns to adjust to their presence. This works against WDFW’s management strategy and should be firmly countered. Enhanced criminal penalties for wolf poaching (including seizure of any firearm, vehicle, or real property used in connection with such a crime) are indicated as a check on this criminal activity. ▪ What plans does the WDFW have to monitor all wolf takings, including hunting, poaching, depredation? What will the consequences be for those who poach, hunt without a license or allow depredation because of poor management of livestock? ▪ Outline and enforce penalties for illegal killing of gray wolves. ▪ Explore the effects of poaching wolves, enforcement, and fines. ▪ We must analyze and enhance poaching investigative capacity so that people in the field have the latest techniques and technology available. ▪ WDFW should increase the penalties for the illegal take, trapping, and poaching of wolves. ▪ WDFW's backing of (and enforcement of any subsequent) legislation to enforce significant financial and criminal penalties, including jail time and felony record, for anyone who kills or assaults a wolf, with

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Diseases in wolves		<p>an exception only in the case of self-defense to the same standard required in any affirmative defense against murder, manslaughter, or assault.</p> <ul style="list-style-type: none"> ▪ There should be policy against any data collection or retention on wolf packs that could be used to locate wolves for the purpose of killing them or which could be made discoverable for the purposes of doing so through public disclosure requests.
	Sterilization	<ul style="list-style-type: none"> ▪ Post-recovery planning should include humane trapping and spaying/neutering of wild wolf packs wherever the wolf population is becoming excessive, then tagging the fixed group or clipping the ear for later identification. ▪ Control of populations through selective sterilization should be an option. ▪ It is important to recognize the dangers and costs associated with hybridization and consider capturing and neutering wolves throughout the state to prevent the widespread hybridization that has occurred in other states in the United States.
	Climate change	<ul style="list-style-type: none"> ▪ The threat of climate change to wolf populations should be thoroughly considered.
	Testing for diseases	<ul style="list-style-type: none"> ▪ The recognition of the disease vector capabilities of wolves and wolf-hybrids is a serious consideration for all citizens who work and live in areas frequented by these animals. Accounting for all these animals and testing for diseases such as rabies and hydatid disease is of utmost importance to the health and safety of Washington citizens and visitors to the state as well. ▪ Add language to stop further spreading of hydatid disease by immediate means not in the least to be restricted to additional WDFW euthanizing of wolves and/or by early delisting of wolves for cautionary/emergency harvesting especially in areas where hydatid is discovered in high concentrations. ▪ All dead wolves and wolf scat need to be tested for hydatid disease and Chronic Wasting Disease prions.
Ecotourism	N/A	<ul style="list-style-type: none"> ▪ Wolf tourism – the ability to see and hear a wolf in the wild – could bring in lots of money to Washington. ▪ I would like to see management goals supporting wildlife-watching tourism. ▪ Ecotourism should be considered and cost/benefit analyses performed to identify the tourism dollars sacrificed due to wolf killing and to persecution - which makes this mammal even more shy and difficult to hear and see.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Please describe if, how, and where WDFW will cultivate ecotourism around wolf-watching by the general public. Can WDFW identify lands where viewing of wolves in their natural habitats would be highly likely given factors such as: WDFW-management which fosters wolf use and protection; surrounding compatible land uses; and current knowledge about wolves and wolf locations in Washington state? This non-consumptive use most likely should occur on public lands that were acquired with the intent to conserve wolves and contribute to their recovery. Please identify how information about wolves and the potential for viewing them will be made available to the public interested in wildlife viewing. Also identify how wolves will be protected from harm if this information is made available to the public. ▪ I'd be glad to pay for quality wildlife experiences if they existed in this state. I pay to visit state and national parks. When will WDFW think about how the people have changed over the years and are now interested in wildlife for different reasons? When I visit places like Yellowstone, I see thousands of people watching a coyote or a black bear or elk and they are fascinated and thrilled. Why can't we do this in our state? We have these animals. I would like to camp and hear wolves at night or when I am hiking, like I do in Yellowstone. I'd like to not have to drive a thousand miles to experience this. ▪ Tourists come from literally all over the world, with plenty of money to spend, and the wolves can be part of that attraction. Instead of delisting wolves, promote them and use the wolf packs as tourist attractions. Live wolves will bring a lot more money to local economies than dead ones. ▪ We want the population to grow to the point that hearing wolves in the wild is reality for campers in the Cascades.
Education and outreach	General	<ul style="list-style-type: none"> ▪ Public education on wolf behavior and ecology - both for residents of rural communities and the general public throughout Washington - should be made a top priority. There should be more opportunities for the public to engage with WDFW to ask and learn about gray wolves in Washington. ▪ WDFW should offer more information sessions and should update their website with the best peer-reviewed science to better inform the public about the wolves in their state. ▪ The Department has an obligation to conduct extensive public education on wolves. This is emphasized in the current plan but has not been fully accomplished, even though all wolf experts say public education is the single most important action to take for successful wolf conservation. WDFW must put much more effort into developing effective and inclusive education and outreach on living

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>with wolves, the use of non-lethal solutions, and dispelling myths and fear.</p> <ul style="list-style-type: none"> ▪ Better education of the public at large is necessary. Our citizens--statewide--must be made aware of the management practices necessary to achieve a sustainable wolf population. Information ought to be extrapolated in a way that the public understands the impact on products they enjoy and/or the costs incurred when adequate management is not provided. ▪ There should be educational opportunities for public appreciation for wildlife diversity and value of individual wild animals, not just percentages and numbers of wild animals. ▪ Determine how facilities, like a wolf education visitor site could be constructed to enhance wolf ecotourism and increase wolf education.
	Education about living with wolves	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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. ▪ More accurate, truthful, and accessible data on wolf encounters is essential to counter local hyperinflated, fear-based reactions to wolf presence in Stevens County. ▪ Ongoing education of the public and stakeholders is essential. People who do not understand wolf behavior and how to best coexist 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 misinformation such as the belief by some hunters that wolves decimate ungulate populations. ▪ 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. ▪ Creating and disseminating informational pamphlets would accomplish the goal of providing educational information to the public, and especially those most likely to encounter wolves. It is especially important that hunters are provided required reading information with their hunting license. Informational pamphlets should be available and at hand to all hikers, hunters, WDFW, and U.S. Forest Service employees in the field, at trailheads, and to county and state law enforcement agents that may be called upon, and may encounter wolves.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	Role of wolves in ecosystems	<ul style="list-style-type: none"> ▪ The state should be focusing on education to help the public understand the inherent value in maintaining top predators like wolves. ▪ The public will fail to see any reason to coexist with wolves if the department fails to explain that wolves are ecologically important and worth conserving. ▪ Indicate through education the value of wolves in sustaining healthy ecosystems.
	Education on wolf-livestock conflict avoidance	<ul style="list-style-type: none"> ▪ I suggest increased education and outreach to livestock producers who are using public land to their benefit and approaches they must use to continue to have the benefit of public land use for their private gain, ongoing discussion about depredation events, and proactive non-lethal ways to reduce such events. ▪ Better outreach and expansion of non-lethal deterrents should be implemented in northeast Washington. ▪ Money should be spent on training ranchers to share the land with native species and to protect their own herds on private property. ▪ Continued education and outreach should be an important component of the post-recovery plan as well as continued support and instruction to livestock producers on use of conflict prevention measures. ▪ I believe the agency should be doing far more education of rural people, especially on how to live with wolves safely and without conflicts.
Funding and economic impacts	Economic analyses	<ul style="list-style-type: none"> ▪ Management must include analysis of economic impact of wolf management to all citizens of Washington state, and plan to minimize that impact in a neutral factual manner. ▪ Macroeconomic impacts should be considered (like industry-wide or on a county-level), but individual economic impact (such as a single farmer/rancher's business) should be minimized and dealt with at another time. ▪ WDFW should continue efforts to implement non-lethal control methods with ranchers, to include analysis of the economic costs of compensation for confirmed wolf kills versus full costs of hunting and removal of wolves. ▪ WDFW also needs more economic studies. Ranching and hunting both bring in little economic impact compared with non-consumptive outdoor users.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Study the impact on affected ranchers if they are not allowed to use public land for grazing and instead allow the wolves to repopulate these areas (NE quadrant and other possible areas) as they seem to want to do. ▪ Please add more info about population densities, local zoning, economic losses for landowners, farmers, foresters, etc. ▪ The plan should include an assessment of areas with concentrations of deer and elk and dairy farms. Are there livestock management concerns and recommendations for dairies in elk concentration areas? How will impacts (e.g., reduced calf and/or milk production) on dairies be quantified and compensated?
	<p>Oppose using general funds for lethal removal/to benefit private business operations.</p>	<ul style="list-style-type: none"> ▪ Oppose the use of taxpayer funds to lethally manage wildlife. ▪ As a voter and taxpayer I do not wish my tax dollars to be used to support private livestock businesses at all, much less at the expense of valuable parts of the natural world, such as wolves. ▪ I am opposed to spending public taxpayer money killing wild animals living in their natural habitat, for the benefit of business and private property owners. ▪ Using state funds for the benefit of private citizens' business interests such as ranching and farming is an improper gifting of public money to benefit a private business. ▪ Washington State should not use taxpayer dollars to subsidize any private commercial enterprise that requires wildlife killing and wildlife habitat destruction. ▪ Based on WDFW's actions so far, there is ample data to identify the public funds expended per wolf killed. This is a critical component that must be included.
	<p>Funding for wolf conservation and management should come from wolf advocates/should not come from hunter and angler license fees.</p>	<ul style="list-style-type: none"> ▪ Funding for wolf management should come out of the general fund, not Fish and Wildlife's funds, which are paid for by sportsmen and not the general population. ▪ Utilize our dollars on better big game management, fisheries management, etc., something that is actually making money for the state so that we have more opportunities with big game and fisheries. Wolf conservation should be funded by environmentalists. ▪ If federal funds are not available, the use of hunting funds is the incorrect way to manage this population. Any funds should come as a direct result of cities as the wolf population is in rural locations. Protection for wolves over other self-sufficient wildlife and farm raising practices should not be funded.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ The people of rural Washington State will be impacted the most by any wolf conservation and management plan and the rancher and loggers impacted even more. So how do we develop a plan that does not cause a negative financial impact on rural Washington? Is urban Washington willing to help pay for a wolf conservation plan or is that left only to rural Washington? ▪ I think that out-of-state organizations advocating recovery efforts should have to put up money for depredation caused by wolves or they should be denied a seat at the table.
	Livestock producers should take financial responsibility for grazing/wolf removal.	<ul style="list-style-type: none"> ▪ Charge the ranchers for the market value of the grazing benefit. ▪ Ranchers, and subsequently consumers, need to take the most responsibility and accept the financial impact of protecting animal species and their habitat. ▪ The amount of our money you spend on collaring and then killing wolves could be spent on buying out ranchers. ▪ If WDFW required livestock operators to reimburse the expenses incurred in killing wolves, it would alleviate some of the department's budget shortfall. If WDFW adopted this policy, livestock operators would be much more amenable to writing off cattle predations as part of the cost of doing business on public lands—just like they do for weather, birthing, and illness-related livestock losses. Adopting such a policy would be a win/win for WDFW and for the state's endangered wolves, and would encourage livestock operators to use better judgment in deciding where they can safely graze their cattle. If livestock operators want WDFW to kill wolves and other predators on public lands after all non-lethal measures have been tried and exhausted, then they must reimburse WDFW the full cost of doing it.
	Economic benefits of wolves	<ul style="list-style-type: none"> ▪ Consider the original distribution of the wolf, its role in the ecology and the possible huge economic benefit of an established population (think Gardiner, Montana and other similar towns). ▪ The plan must explicitly take into account all of the positive and negative effects that it will have on the entire population of the state. Under the current plan, the financial impact on commercial interests seems to be the only factor that is considered, completely ignoring the ecological value of maintaining a healthy ecosystem.
	Miscellaneous	<ul style="list-style-type: none"> ▪ Please consider alternative sources of funding to monetize the economic value of wolves without instituting a hunting season for wolves. Consider solutions other land and wildlife managers are using to raise money from wildlife watchers and recreationists who benefit from experiencing a wild landscape and wildlife. ▪ Local people's economy should be protected.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Land management		<ul style="list-style-type: none"> ▪ State wildlife officials need more resources and consistent funding. ▪ To avoid excessive burden on the taxpayers, I recommend funding the expense of a part time WDFW employee and compensation for loss of livestock via the sale of wolf tags to be issued on an as needed basis by the WDFW, for a particular area.
	Landscape connectivity	<ul style="list-style-type: none"> ▪ Stewardship of our environment should focus on reconnecting natural areas minimally impacted by development. ▪ Forestry practices should be reviewed and investigated so that best available science applications can be used to increase wolf habitat(s), restore degraded habitats, and create “green corridors” for wolf (and other wildlife) migrations. ▪ Explore potential barriers to healthy dispersal patterns of wolves within the state. ▪ The draft EIS should evaluate likely and potentially successful dispersal corridors for wolves (e.g., to cross south over I-90) and how wildlife crossings could assist dispersal. ▪ Look at the effects of the expanding human population and their housing, roads, and all other features that could impact wolf habitat and wolf prey habitat. ▪ Buffers should also be used to minimize human-wildlife interactions. These buffers should be multi-layered so that buffer protection of the green corridor is a gradient that increases protections the further it exists from humans and their habitations.
	Reevaluate grazing allotments in wolf habitat.	<ul style="list-style-type: none"> ▪ The state should work with federal land management agencies like the U.S. Forest Service to reevaluate grazing allotments in prime wolf habitat. ▪ The current use of public lands by ranchers need to be evaluated if the wolves are going to be allowed to live and thrive in certain areas. If ranchers, cattle, and wolves can coexist then that would be good, but if they can’t then maybe a rancher should not be allowed to use certain public lands that are wolf habitat. ▪ 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 USFS need to reexamine cattle grazing allowance on public lands, especially those that are prime wolf habitat. ▪ Work with the Forest Service to cancel grazing permits in prime wolf habitat.

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- Cattle producers should not be leased public lands which also have wolves.
- Domestic livestock can be farmed anywhere. Wolves are environmentally specific. Therefore, keeping the livestock out of wolf habitat should be a priority.
- The USFS needs to vacate a few grazing areas where high stock depredations occur.
- Use the science to define key wolf habitat and create programs and policies to begin phasing out grazing rights in those locations.
- Work to coordinate interagency cooperation at the state and federal level into gray wolf and wildlife management plans to minimize conflict and prohibit permitted grazing in zones of chronic depredation. For example, collaboration with the US Forest Service Colville National Forest staff to discuss grazing modifications, suspensions and retirements on allotments with chronic depredations to ensure wildlife welfare is the top management priority, and Washington's wildlife is not negatively impacted by another government agency's policy.
- Regions with historical grazing rights have assumed a zero wolf population. Can these rights be reassessed now that apex predators are now living within and possibly limit the grazing rights?
- WDFW should consult with the US Forest Service about eliminating private livestock grazing permits on US Forest Service grazing allotments with wolf-livestock interactions. Livestock are non-native species that have multiple adverse environmental impacts on US Forest Service land, which is owned by the public. This is a specific request to make this an alternative in the SEPA DEIS.
- Wolves need some core areas where they are not in conflict with grazing allotments and cows. In my area the Kettle Range would be the best choice for this. I believe that the whole national forest from the Kettle Range to the Okanogan river is open to grazing (under the allotment program).
- Progressive, science-based changes in wolf management, with an emphasis on changes that do not allow lethal removal of wolves on taxpayer supported public lands are sorely needed. In addition, I ask that you to urge the Forest Service to retire grazing permits near known wolf denning sites. Our public lands and ecosystems should not be sacrificed for the private profit of individuals.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ I think it important to review grazing allotments as some are in hilly, forested areas which are not suitable for cattle and make wolf depredation more likely due to cattle being in the wolf's natural habitat. Hilly, forested areas are more likely to provide habitat for deer and elk, the wolf's natural prey. ▪ Grazing permits should not be issued in wolf pack territories. Conflicts should be avoided rather than handled with lethal removals of wolves. Our public lands should not be managed as private ranch land. ▪ Prepare an Environmental Impact Statement for new cattle allotments on USFS property. Improve range habitat with thinning forests. Practice agroforestry. We have the tools for both cattle and wolves. ▪ Each area of public land (state and federal) should be determined to be most suitable for wolf habitat or for livestock grazing and then allocated as such. The Department should work with the US Forest Service to terminate grazing leases in those areas best suited for wolf habitat. ▪ Cattle ranchers need to graze their cattle in other areas other than those known with wolf populations. ▪ 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. ▪ The plan should address the option of removing cattle from federal lands where lethal removal has been done and wolves have repopulated the territory. The leases should be terminated and the ranchers bought out at a fair value determined by an expert panel. <p>The Land Council's "Meadows Plan" outlines areas that are manageable for grazing livestock and where ranching operations could easily keep their livestock together and safe from attack by predators, thereby protecting both the ranchers' investments and our precious wildlife and environment. WDFW should be working to better understand this plan and to working with The Lands Council and the USFS to get it implemented as quickly as possible.</p>
	Allow voluntary retirement of grazing allotments.	<ul style="list-style-type: none"> ▪ WDFW could develop a program that would allow producers to "sell" their permits to conservation buyers who would then allow these allotments to be retired from grazing and used for conservation purposes such as watershed restoration or preservation of ecosystem processes. The process that federal land managers use could be used as a model.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Buy out property from willing sellers. WDFW and the USFWS have invested millions of dollars buying conservation property through the Federally funded Grant Program - Cooperative Endangered Species Recovery Fund. Let's keep continued focus on how those properties acquired under this program are supposed to be managed to benefit wolves and other species of concern, and evaluate the opportunity or need to buffer these properties. Let's be creative in Washington to support a functional ecosystem and opportunities for wildlife watching.
	<p>Wolf management and grazing on WDFW lands</p>	<ul style="list-style-type: none"> ▪ Include a discussion regarding WDFW's land management relationship with local ranchers who are allowed to free range their cattle on state-owned property putting local wolves in danger of being killed. ▪ Please describe how and whether lands that were acquired by WDFW, specifically with federal funding through the Cooperative Endangered Species Conservation Fund for the purpose of contributing to wolf recovery, will be used to conserve and protect wolves under the post-recovery plan. Identify whether any actions will be allowed on these lands which do not conserve and protect wolves; that is, actions that would result in deliberate wolf mortality. Describe impacts to wolves and to the wolf-viewing public if such mortality would occur. ▪ Wolves should be managed the same regardless of ownership of property. Wolves on WDFW property should not receive special treatment.
	<p>Public land grazing</p>	<ul style="list-style-type: none"> ▪ The destructiveness and economic problems of cattle grazing on public land must be examined from the perspective of the need to preserve as much as possible the ecology of the state of Washington. ▪ We need to consider all of the impacts including grazing allotments, loss of habitat, environmental impacts caused by grazing not only on wolf habitat but also on the flora and fauna of the entire ecosystem. Are ranchers really paying an appropriate price for grazing considering all of the damage cattle do to an ecosystem including erosion and degradation of water quality? ▪ Socialized ranchers that run government-subsidized ranches must pay more for public land grazing. I am a public land owner and get zero benefit from these propositions. Ranchers pay less than \$2 a month to graze a cow and calf on my, and your, land. This is a ridiculously low price that doesn't cover damage to public lands. This damage drives native cervids (elk, deer, and moose) from the land. We must raise the price to raise money for lands protection and improvements. ▪ What is not acceptable in the long term, is to continue to allow ranchers to use public land for grazing, while wolves are at risk of being trapped or gunned down doing what wolves do, on public land.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>It's a privilege that may have been okay in Washington's early years but is clearly obsolete now.</p> <ul style="list-style-type: none"> ▪ I believe that WDFW should exercise some strong conviction in working with the federal government to end this abuse of public lands. ▪ The problem could be solved, in part, by disallowing the grazing of cattle on public lands.
	Limit livestock production to private land.	<ul style="list-style-type: none"> ▪ There is no justifiable reason for the public to support an unsustainable cattle industry through subsidized grazing on public lands. If cattle ranchers must continue to produce beef, in my opinion, they should do so on private land, and pay for protective measures from private funds. ▪ Future plans should include removal of free-range animals from public land onto protected (fences, guard dogs, etc.) private property.
	Support active forest management to bolster ungulate populations.	<ul style="list-style-type: none"> ▪ Recent research conducted in Washington and Oregon highlights the importance of quality summer forage (nutrition) for elk. The success of wolf recovery relies on healthy ungulate populations. Habitat goals that support active forest management be considered in the revised plan. It will be incumbent upon WDFW to work with federal land managers, state land managers, and private landowners to achieve this goal. ▪ We support robust efforts to improve ungulate habitat quality through forest management (thinning, prescribed fire and road removal), prevent loss of habitat to development, building wildlife crossing structures to decrease loss of ungulates to vehicle collisions, evaluation of the role of herbicide use in suppressing vegetation that provides ungulate forage, and improving hunter access and hunting season design as ways to address both ungulate population health and loss of hunting opportunity and quality.
Legal status, protections, and hunting	Designate wolves as a protected species/do not classify them as a game species.	<ul style="list-style-type: none"> ▪ Wolves should be fully protected by our government and the law. ▪ Continued protection of wolves and their habitat should be prioritized. ▪ The gray wolf is still extinct in most of its historical range, therefore they must be protected. ▪ The scope should include unmitigated protection for wolves, regardless of any other conflicts they may be part of in their environments. When conflicts arise, solutions must be found that ensure the absolute preservation of this species. ▪ Management of wolves should be returned to WDFW's Wildlife Diversity Division. There should be no need for state-sanctioned

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>hunting or trapping of wolves or designation as game animals. Natural processes and human-caused wolf mortality (e.g. poaching, defense of property killing, roadkills, and occasional WDFW lethal removal) will likely be enough to manage wolf numbers.</p> <ul style="list-style-type: none"> ▪ In 2014, the public voiced opposition to WDFW’s proposal to move wolf management into their Game Management Plan that guides huntable game species.
	Delist wolves from the state endangered species list.	<ul style="list-style-type: none"> ▪ I believe wolves should be eventually delisted in areas where their numbers are stable and where they have become an integral part of the local ecosystem. ▪ Allow northeast Washington’s wolf population to be delisted immediately. ▪ The timeline for management (e.g., hunting) once recovery is achieved must take into account the inevitable lawsuits by environmental groups which will add years to the process. Downlisting must start before populations reach their goals because by the time the process is complete after delays wolves will be overpopulated. ▪ If wolves are federally delisted nationwide, including west of the existing Northern Rocky Mountain Distinct Population Segment, then they should be state-delisted statewide, and kept at the same as federal status. If not federally delisted in the western two-thirds of Washington, then maintain federal status.
	Designate wolves as unclassified wildlife.	<ul style="list-style-type: none"> ▪ I believe wolves should be declassified and farmers should be allowed to protect their livestock and children. ▪ Classify them as a predator, same as a coyote.
	Designate wolves as game.	<ul style="list-style-type: none"> ▪ I believe that the wolf should considered a game species and should be managed as such by the state. ▪ Wolves should be managed the same as other predators in the state, like cougars and bears.
	Relisting provisions	<ul style="list-style-type: none"> ▪ The draft EIS should expand upon the relisting provisions included in the current Wolf Plan and outline the specific temporary or emergency actions the state will take if the wolf population experiences a significant decline. The state should have the ability to institute temporary measures to protect wolves while WDFW investigates the cause or causes of the decline. Once a cause is identified, the updated Wolf Plan should outline an expedited path to restoring protections on a long-term basis.
	Do not consider hunting in the post-recovery	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	plan alternatives.	<ul style="list-style-type: none"> ▪ There should be no allowance of trophy hunting and trapping seasons on wolves and no designation of wolves as game mammals. ▪ I want more wolf protections, and no hunting of wolves. ▪ Hunting is not necessary to control carnivore populations; they self-regulate based on prey availability. ▪ Wolves should never be hunted because they will manage their populations without human intervention. ▪ A general hunting season for wolves is not advisable as indiscriminate killing of wolves disrupts their pack and actually makes it more likely that wolves will prey on livestock. ▪ I suggest no hunting for a time period to demonstrate and document population stability or continued growth. ▪ I do not wish to ever see a hunting season for wolves. They should be allowed to rebound to their natural numbers - which they themselves will regulate according to habitat and game availability. ▪ A few years of hunting -legal or otherwise- could easily push wolves back into non-existence. ▪ The citizens of Washington will never agree to allow hunting of wolves. ▪ Washington's wolves should not be hunted and it's inappropriate for the Department even to consider hunting at this time when wolf populations are still at unsustainable levels and the state's recovery goals are unmet. ▪ Wolf hunting should not be legalized under any circumstances. ▪ WDFW should consider an alternative for post-delisting management that does not include a general, indiscriminate public hunting season for gray wolves. Indiscriminate harvest removes wolves that are part of packs that may be living alongside livestock without causing major problems. While other western states have embraced liberal recreational public harvest of wolves, Washington should consider a different approach. Demographically and geographically, we are different from Montana, Idaho, and Wyoming, and our wolf management policy should reflect Washington's wildlife values. ▪ I believe wolf hunting is an important topic because it should not happen. There is no scientific reason to hunt wolves and the rationale should be explained thoroughly in the plan. Hunting wolves does not increase social tolerance nor does it impact the ungulate population.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>Hunting wolves is pure trophy hunting and should not be allowed in a state that prides itself on its wildlife.</p> <ul style="list-style-type: none"> ▪ Please keep trophy hunting and trapping out of the post-recovery state management plan for wolves. ▪ A hunting season on wolves, once recovery and de-listing goals are met, will negatively impact pack dispersal. The unique social structure of wolves, with only the alpha male and female reproducing, will be greatly affected by hunting. Wolves are not a game species, so hunting will be only for trophy and sport. How will WDFW monitor poaching, tribal harvest, hunting, other takings, and natural deaths of wolves? ▪ Washington State should never allow wolf hunting. In a highly urbanized state with thousands of hikers in the backcountry, the potential for loss of life because of mistaken identity is enormous. WDFW must have policies that protect people - permitting hunting of wolves will only create dangerous situations for our state's citizens. WDFW must also never permit hunting of wolves because of the social structure of the species, as science has demonstrated that when the pack structure is disrupted, it creates instability in the pack and can lead to increased conflict. Hunting wolves does also not reflect the values of the vast majority of citizens of this state, as the number of hunters continues to decline (and the number of carnivore hunters is vanishingly small) while the number of non-consumptive wildlife watchers continues to increase. It's time for WDFW to enter the 21st century of wildlife management, and reflect the values of the majority of citizens, not a dwindling special interest group. Ensuring we have a thriving population of wolves throughout their range is critically important for the state and its ecosystems.
	<p>Consider hunting in the post-recovery plan alternatives.</p>	<ul style="list-style-type: none"> ▪ Well-managed wolf hunting seasons in surrounding states have not resulted in any conservation concerns for the species. Most of these nearby states have very liberal hunting seasons (long seasons, multiple tags). Public hunting increases support and social tolerance for wolf management and conservation in communities and constituencies most affected by wolf recovery. Wolves should be managed as game animals just the same as other large predators in WA state (e.g., bears and cougars) which are currently thriving. Public hunting of wolves provides another tool for wildlife managers to address areas where wolves are a limiting factor to other species. Public hunting of wolves will provide additional revenue for responsible wolf management and conservation. ▪ Public hunting needs to be a measure in at least some of the alternatives analyzed as part of this process.

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- We need to hunt and manage wolves in northeast Washington now, regardless of wolf recovery on the west side.
 - The hunting and culling of wolves should absolutely be used as one of Washington's wolf management tools. Stick to the North American Model of Wildlife Conservation.
 - Open hunting seasons on wolves as soon as sustainable numbers are reached.
 - Allow hunting to maintain pack size and human interaction.
 - Allow wolf hunting after delisting. I have grave concerns of wolf population growth spreading into rural and suburban areas, similar to what is already happening with cougars and bears.
 - Controlled hunt tags by region would be great way to manage this.
 - Hunting of wolves should be authorized in this SEPA EIS as a tool to control wolf population and as a Department revenue source.
 - A successful delisting plan includes eventual hunting and species-management practices. In areas where the wolf population has increased beyond the ability of the local ecosystem to sustain it, managed hunting should be allowed. It should be unlawful to kill a collared wolf with strict penalties.
 - Please consider managing and hunting the wolf population to protect Washington's resources, and prevent another scenario that had transpired in Northern Idaho.
- Please include future hunting opportunities in any plan. Wolf hunting would be a helpful way for WDFW to maintain healthy wolf population levels. Please consider a lottery and/or tags for these hunts. This could be an economic boon and a healthy way to manage the population.
- I strongly suggest that eastern Washington is past due for a wolf hunting season! We already have the precedent of separate elk seasons for east and west Washington; we need to do the same for wolves. Making eastern Washington residents wait until there are more wolves in western Washington is an unjust burden for the east side folks, hunters, ranchers, and other outdoors enthusiasts. Consider the need and costs to exterminate packs of wolves. Instead WDFW could have been selling at least 100 wolf tags per year at \$100+ per tag. Consider a 10% hunter success rate, and the same number of wolves would have been harvested without cost to the state.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ I support the hunting of wolves. I think that WDFW should educate the public on traditional use of various parts of the wolf so people do not think all wolf hunters are only interested in a "trophy." This would have the added benefit of educating hunters on traditional use of various parts of the wolf so that they get the most out of their hunt. ▪ When research shows that populations have reached a healthy sustainable level, there should be no reason wolves wouldn't be reclassified to match the physical representation of their population. WDFW should be allowed to utilize their management tools such as hunting and trapping for recreation should they deem the population healthy enough to sustain such activity.
	<p>Hunt wolves sustainably.</p>	<ul style="list-style-type: none"> ▪ Allow the hunting of wolves as long as a healthy number can be maintained in the state. ▪ All I can say is hunting is conservation. I don't want to see the wolf eradicated from Washington. But we need a hunting season and quick response to livestock depredations. ▪ As the wolf population grows, they should be open to limited hunting. They should be placed under some kind of predatory pressure beyond the occasional culling via helicopter. They need to see humans as innately dangerous, and thus to be avoided. However, they need to survive this process in order for successive generations to learn the lesson. Finally, limited hunting, would provide revenue for their study and preservation. ▪ If hunting becomes allowed, limit tags by lottery, by area, and sex of animal. ▪ Wolf hunting should not be allowed in Washington state until all wolf management areas have more than one breeding pair of wolves. ▪ Public hunting increases support and social tolerance for wolf management and conservation in communities and constituencies most affected by wolf recovery. Wolves should be managed as game animals just the same as other large predators in Washington (e.g., bears and cougars) which are currently thriving. Public hunting of wolves provides another tool for wildlife managers to address areas where wolves are a limiting factor to other species. Public hunting of wolves will provide additional revenue for responsible wolf management and conservation. ▪ A hunting season for wolves is needed to regulate the population of wolves in Washington state from a conservation standpoint.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> <li data-bbox="602 170 1479 275">▪ I would like to see a wolf hunting season that would allow a limited amount of tags based on the wolf population and what amount of hunting the packs can sustain. <li data-bbox="602 317 1503 453">▪ I would like to see the wolves, post-recovery, be managed similarly to other game animals in Washington. A hunting season, with dates and limits appropriate to continuing the population in a sustainable manner. <li data-bbox="602 495 1503 600">▪ I think a predator management plan of a general hunting opportunity with time-based reporting and season closed once harvest objectives are met. <li data-bbox="602 642 1520 810">▪ We need to be ready to open a season to manage certain areas of the state. I think a permit season would be a great idea. It would maximize income for our game department, along with regulating the number of animals taken to ensure the efforts to bring these animals back are not hindered. <li data-bbox="602 852 1520 1062">▪ I believe that wolf hunting should be extremely limited and tightly controlled if allowed at all until it is proven that they have recovered enough for hunting to be sustainable. If that time comes, hunting should only be allowed in areas where they are having livestock kill issues. It should by no means be allowed to be turned into another way for this agency to generate income by selling tags indiscriminately. <li data-bbox="602 1104 1520 1608">▪ Including wolves in the Three-Year Hunting Plan after delisting simply provides the means to scientifically manage wolves in Washington in congruence with all other species. Per the definition of this plan, these wolves will not be endangered, will not be threatened, and as confirmed by WDFW's own research and historical trends in neighboring states — will continue growing and expanding, even with managed hunting and trapping. Washington has an established process for managing wildlife; including the Game Management Plan and the Three-Year Hunting Season setting process. All of the state's big game animals' harvest objectives, and subsequent quotas, are part of this three-year process, based on scientific practices with appropriate time to attain meaningful data. Wolf management, as singled out by special interests for emotional reasons, should not be, or need be, entertained any differently. <li data-bbox="602 1650 1520 1896">▪ WDFW should develop a system for setting wolf harvest quotas that allows for maximum local flexibility and allows for small-scale changes in harvest quotas annually. An unrestrictive statewide management plan that can be locally adjusted will maximize the efficacy of local wildlife managers to manage wolves as they need. Implementing quota and season changes at the smallest scale at which wolves can be managed (e.g., GMU) will allow managers to target responses toward

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	<p>Hunt wolves like bears and cougars.</p>	<p>specific wolf packs or packs within a region, thus responding to a greater array of unforeseen circumstances quickly and with precision.</p> <ul style="list-style-type: none"> ▪ I hope in post-recovery process we get to a point where wolves are treated just like all our other large non-threatened carnivores. They should be hunted, either under a general season with a quota (preferred) or under a special tag style draw hunt. ▪ I'm asking for special tags to be drawn for them so we can properly manage these predators like how we manage coyotes, cougars, and bears. ▪ Once recovered, wolves should be managed in a manner consistent with other wildlife within Washington such as deer, cougar, or bear. The North American Model for Wildlife Conservation has proven successful for decades. Hunting is one tool or aspect within that model. In states like Montana and Idaho, wolves have continued to thrive within those landscapes while being managed with legal, regulated, hunting seasons. These states have also seen an increase in social tolerance of wolves because of their management decisions regarding wolves. ▪ Let trappers, hunters, and ranchers start taking action right now. Use a quota system. Let everyone purchase a tag. A reasonable priced wolf tag will be like a cougar tag. Most people buy it for a slim chance they may see one in the wild and have a chance to punch that tag. The majority of hunters have bought a cougar tag every year and have never punched their tag. A wolf tag will be the same situation. It will generate more revenue for WDFW and help manage a predator all at once. Make it a mandatory report within 24 hours of a wolf harvest. Give each area a number of wolves that can be taken in a certain amount of time. There is already a system for cougars after January 1st that tells hunters which areas are open. Do that for wolves. ▪ Wolves need to be managed the same as all other species in our state.
	<p>Hunt wolves to control populations.</p>	<ul style="list-style-type: none"> ▪ The plan should include hunting as a management tool and where not efficient, employ USDA Wildlife Services to meet desired reductions. ▪ Allow hunting as soon as possible to control the population. ▪ Allowing citizens to help control the overwhelming populations of wolves would be a good start. ▪ WDFW should have the sportsmen of this state as their highest priority. That includes a strong predator control program. ▪ WDFW must carefully manage wolf populations and impacts on ungulates. Management must include hunting and other means of control to keep populations in check.

TOPIC SUB-TOPIC EXAMPLE COMMENTS*

	<ul style="list-style-type: none"> ▪ If there are too many wolves in one area, it should be opened up for a special hunt for hunters, and then monitor how many get taken by a game check station. ▪ Washington needs to be more proactive with population control, not just waiting for a cattle/wolf interaction. There needs to be a season on these animals, not an open season but a controlled season. I think Washington would be wise to model it after Idaho’s system. ▪ Hunting of wolves ought to be authorized as a tool to control these populations, as part of a multi-species management approach that maintains viable populations of all wildlife species. ▪ Hunting should be part of any management strategy with the preference being a quota system to maintain the appropriate population level and pack size. ▪ Set up a plan to keep the wolf numbers and packs in check. I would propose to allow hunting individual wolves within a zone or unit. Maybe the packs are listed as zones. Issue unlimited tags with mandatory reporting required for that zone. Once the quota is reached all hunting stops in that zone for that year (or until the pack/zone goes back above the desired capacity. Once above capacity, additional unlimited tags for that season would be issued and follow the above stated quoted plan. ▪ Any adequate and realistic post-recovery plan must include wolf population control in the forms of managed hunting and trapping. ▪ We should try just hunting for the first two years with seasons identical to Idaho. Then after 2 years, see what the surveys are like and see if trapping is needed also. There will be a huge revenue boost in the sales of wolf tags. Be sure that money goes to the wolf management. Wolves are difficult to hunt and shoot, so don't put a quota on the amount of tags. ▪ I believe once the recovery number is met, the state should issue enough harvest tags to keep the population at that level. Ensure enough tags are issued to reduce the population up to as high as 28%. The percent should be reviewed annually or twice a year. Raise or lower as required to meet tag quotas.
<p>Hunt wolves to address impacts to ungulate populations.</p>	<ul style="list-style-type: none"> ▪ Deer populations in northeast Washington are declining. I have seen it drastically over the last 4-5 years. Wolves are to blame. I think a more aggressive management with hunting seasons is in order. Of the western wolf states, Washington is the smallest, most populated, and has the fewest ungulates, yet our wolf plan suggests the opposite.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ It's time to seriously reduce the wolf population, or better yet, eliminate them so we have our hunting opportunities back for deer, elk, and moose. ▪ I strongly believe the management plan must contain wolf number controls. These include hunting and trapping for affected areas such as northeast Washington. The units in this part of the state such 113, 117, and 121 are suffering from an imbalance in predator/prey ratio. Draw tags or a limited general season should be considered for wolf in these areas. ▪ Hunting of wolves should be authorized in this plan as a tool to control wolf populations, as part of a multi-species management approach that maintains viable populations of all wildlife species. ▪ It is in WDFW's best interests to continue to keep wolf population in Washington to a level were the hunters of Washington can still have quality hunts. When wolves are delisted, hunters should be provided the opportunity to help control wolf populations. ▪ As a hunter and steward of wildlife conservation, I do not see any reason not to properly manage the wolf population like other wildlife in the post-recovery era. Proper management benefits all wildlife in the long term. Predator management is key as well. All populations rely on each other to grow and become stronger. If the population of predator/prey is out of balance it will hurt all wildlife. Not enough prey, the predators will die off. There needs to be balance and management through proper hunting. ▪ Washington needs to manage wolves to maintain a stable population while supporting robust ungulate populations. We cannot have a single unmanaged apex predator on the landscape. We have the advantage of witnessing ~20 years of wolf recovery in other western states. Wyoming, Idaho, and Montana all have robust wolf hunting seasons and continue to support thriving wolf populations. Develop a wolf hunting season that meets harvest quotas and provides generous opportunities while generating revenue for the state.
	<p>Hunt wolves to reduce conflict.</p>	<ul style="list-style-type: none"> ▪ Hunting wolves will help tremendously with social tolerance. It will also allow ranchers and other livestock producers to be more proactive in protecting their livestock. Hunting can also help alleviate pressure in upset wolf/ungulate balance. Wolves are very smart and learn quickly; hunting pressure on wolves will help keep them in more wolf-friendly habitat away from people. ▪ Idaho has successfully managed wolves for years with no concerns created about maintaining a strong recovery of wolves. Specifically, wolves have been managed as a big game animal, creating revenue for the state to ensure recovery goals and benefit all wildlife. In addition,

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>social tolerance for wolves in rural communities that live with wolves has been enhanced by public hunting. Livestock depredation has been minimized and ungulate populations have recovered quite a bit in certain areas because of public hunting and trapping seasons.</p>
	<p>Hunt wolves in areas of wolf-livestock conflict.</p>	<ul style="list-style-type: none"> ▪ There should be a limited, controlled hunt in the area WDFW has had to remove so many wolves. It could be by 'drawing' and the tag expensive. ▪ Open seasons for general hunting in depredation areas. ▪ WDFW could issue tags to qualified applicant hunters from the public. WDFW could also provide online certification/training to potential wolf hunters or establish a trained guide program specifically for safe wolf removal hunts. As part of a wolf tag sale, WDFW would put the qualified hunter or guide in contact with the livestock owner who experienced the loss for proper hunt coordination. If the person suffering the livestock loss did not want hunting on their property, a trapper would be referred to them. This trapper would also purchase their wolf tag via WDFW. ▪ Begin generating revenue from the sales of wolf licenses and/or permits. Facilitate the hunter's access to lands where livestock is impacted by problem wolves instead of paying professionals to remove problem wolves or relocate wolves. ▪ Private Wildlife Control Operators (WCOs) should be used where wolves are damaging private property. There is no reason for the state to spend huge amounts of money to control problem wolves when we already have a system in place for handling nuisance wildlife. WCOs can trap problem wolves at minimal expense to the state. Add wolves to the list of animals WCOs can handle and allow Special Trapping Permits to be written for wolves where appropriate.
	<p>Hunt wolves to raise funds for conservation.</p>	<ul style="list-style-type: none"> ▪ Use wolf hunting as an opportunity to raise conservation funds by issuing tags. ▪ We could be adding to our management fund by allowing a specific number of tags designated by our wildlife biologists. By allowing hunters to engage, everybody wins. Including the wildlife in general, not just humans and wolves. ▪ I would like to see a general hunting season or special draw tags to help keep the wolf numbers in check and also generate revenue for more conservation efforts.
	<p>Issue special permits for hunting.</p>	<ul style="list-style-type: none"> ▪ I would like to see a limited number of special permits in newly established Wolf Management Units (WMUs) using any legal weapon. Hunting would only be allowed on private land.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Plan development process		<ul style="list-style-type: none"> ▪ You should have special draw permits to allow the use of rubber-padded footholds through the trapping season and special draw hunting tags to rifle hunt them.
	There should be no restrictions on hunting wolves.	<ul style="list-style-type: none"> ▪ I am in favor of hunting them with an open season and no restrictions. ▪ I also believe that the wolf population should be managed by WDFW including population control. The wolf management plan will ideally allow an opportunity for an ungulate hunter to kill one if seen by chance during that season or in a rural back yard like a coyote without having to be investigated by WDFW officers. ▪ I hope there will be a hunting season, and that WDFW can keep the wolf packs down to a minimum. If I could, I would vote for open season all year, no bag limit.
	Implement a waiting period before considering wolf hunting.	<ul style="list-style-type: none"> ▪ Research/literature review and lessons learned from other states, including the Great Lakes states, should be considered in a discussion of hunting. At minimum, there should be a five-year waiting period following delisting prior to initiating changes in lethal control of wolves. A comprehensive wolf population study should be conducted following the five-year waiting period.
	General comments	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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. ▪ Management guidance, policies and protocols — and especially those which could result in wolves being killed — must be developed through a science-based, public rule-making process that results in transparent, rational and enforceable strategies. ▪ The new plan should build on the solid foundation provided in the excellent 2011 Wolf Conservation and Management Plan. Elements needing attention include: updating scientific information, especially research on wolf-human conflict, population viability, and predator benefits; applying lessons learned in Washington wolf recovery; emphasizing non-lethal solutions to conflict, including programs for financial compensation for losses; justifying public education expenditures; and reflecting Washingtonians’ changing ethics toward coexistence with predators and valuing their roles in ecosystem health. ▪ The current plan gives an option of downlisting to threatened and then sensitive status. I assume the post recovery plan will be initiated following those steps. ▪ Reach out to individuals who purchase a Discover Pass or hunting license. I feel the department should be reaching out to the population

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>engaged in outdoor recreation and not to a population that does not participate in the provided recreational opportunities.</p> <ul style="list-style-type: none"> ▪ These questions and problems should be dealt with by the game biologist and wildlife managers that are trained in the field (not the Governor and game commissioners). ▪ It needs to be revised to conform to the Governor's directives, the facts, the science and the evidence, rather than myth-based preferences of ranchers and hunters. ▪ Take the word “manage” out of this process and use the word “balance.” ▪ The scope should be more focused on conversation and re-population and less on "management.” Wolf-livestock interactions have been overemphasized in the ongoing discussions, and relatively speaking, such discussion should only elicit a small proportion of the conversation considering the existing wolf population kills an extremely small amount of the existing livestock population relative to the total amount of livestock in the state.
	<p>It is premature to develop a post-recovery plan for wolves.</p>	<ul style="list-style-type: none"> ▪ Creating a “post-recovery” plan for wolves at this time is premature, as Washington is still far from meeting the goals set forth in the current plan. Instead of racing to create a post-delisting plan, the Washington Department of Fish and Wildlife must instead focus its attention on current wolf-management needs. ▪ Planning for post-recovery management seems premature because conditions may have changed by the time wolves are fully recovered. WDFW may have to update this post-recovery management plan before it even gets a chance to use it. ▪ There should be no rush to create a post-delisting plan, as recovery objectives for endangered wolves in Washington have not been met. While important progress has been made in wolf recovery since the launch of the 2011 Plan, including an average annual wolf population growth rate of 28%, most of the recolonization has been in the northeast part of the state, in just one of three recovery zones. Troubling is that the variability in the annual population growth rate has been high, which can be a sign of an unstable population. Also, despite laudable effort to reduce wolf-human conflict by the Department and several NGOs, social tensions over management is increasing. Thus, while stakeholder comments as part of a post-delisting plan process are valuable, the focus of the resource-limited Department should be on recovery. ▪ I am concerned by the state’s rush to delist wolves and develop a "post-recovery" wolf plan. I recommend that the state not hurry to

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>delist, focusing instead on restoring public trust, relying on the best available science and implementing effective non-lethal alternatives to alleviate wolf-livestock conflicts.</p> <ul style="list-style-type: none"> ▪ To move into a management phase that might allow further killing of individuals or entire packs, and to consider allowing the hunting of wolves at this point would be incredibly premature. Please do not move into a post-recovery phase before the wolves have actually recovered! ▪ Wolves have not reached a biologically sustained recovery level in Washington and until they are scientifically recovered, should not be delisted in the state.
	Peer-review/independent review should be part of the development of this plan.	<ul style="list-style-type: none"> ▪ The plan should be reviewed by an outside panel of wolf experts. ▪ The plan needs a public and peer review. Same with the EIS - a peer review of each action item in alternatives. ▪ Every alternative must be completely evaluated by an independent body (WSU, UW or other university) as to the costs associated with that alternative. This would include economic impacts to the communities living with wolves and direct costs to WDFW.
	Public meetings	<ul style="list-style-type: none"> ▪ Meetings should be in Eastern Washington where wolves are, not in Seattle or Tacoma or wherever so that you can actually hear the people who live with wolves voice their opinion. ▪ Local WDFW people should be front and center at local meetings. ▪ We understand the extenuating circumstances at play during the scoping period, but we encourage WDFW to hold a combination of in-person public meetings and interactive webinars throughout the SEPA process. These two vehicles for public participation are complementary and help ensure an equitable and inclusive process.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Predator-prey relations	Research on factors that impact predator/prey dynamics, including climate change	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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. ▪ The draft EIS/Plan should include 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. ▪ The plan should consider the effects of climate change on our wildlife and their habitat. It should examine predator/prey interaction and how that relationship helps improve the health of both populations. It should consider the public's interest in promoting a healthy ecosystem through a return to more sustainable management of our common environment by reducing human pressures on our wild nature. ▪ The science involved in wolf management must include actual population surveys of ungulate populations, not models. Scat surveys of predators should be done in conjunction with those surveys to determine both their population and impacts to prey. ▪ A research question that needs a thorough answer is the degree to which wolves are “decimating” game populations. ▪ We request that continued support for predator-prey research be included in the new plan.
	Develop integrated management guidelines for predators and prey in concert.	<ul style="list-style-type: none"> ▪ It must be a priority of the department to maintain healthy and robust ungulate populations to provide abundant prey for wolves and other predators, as well as ample harvest opportunities for hunters. To accomplish this, the department must adaptively manage using an integrated predator/prey management policy with the goal of achieving robust prey populations for both wolves and hunters. Predators, including wolves, must not be managed in isolation or as a single species. ▪ I would like to know what we are doing to keep ungulate populations growing in the midst of a fast-rising predator population, while still allowing good hunting opportunity for all game species. We need to look at a full plan, that doesn't just focus on the wolf alone, with the mindset of we need to save wolves at all costs, but look at everything as a whole, including human interaction and hunting. ▪ Management recommendations designed to support ungulate populations in relation to wolf populations need to be based on a

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>holistic approach that takes into account the multiple drivers of ungulate population dynamics, including habitat loss and fragmentation, nutritional value of forage, changes in weather and climates, human impacts from year-round recreation and other human disturbance, in addition to predation from wolves and other carnivores.</p> <ul style="list-style-type: none"> ▪ There is room for wolves as long as there is a good effort to grow the prey species populations. ▪ You must weigh wolf interaction with other species as a priority. ▪ Successful management of wolf populations includes the management of wild herds to support them. A comprehensive wolf management plan is also a comprehensive wildlife management plan -- one that allows wild herds and wolves to remain in appropriate balance. Herd and pack sizes must be monitored -- and hunting licenses issued so as to maintain that balance. Such a plan must also recognize that domestic grazing puts pressure on prey species. Due to these impacts, less big game will be available and a smaller number of wolves can be supported in inverse proportion to the extent of domestic grazing. In scoping a post recovery management plan, the interactions of wolves, wild herds and domestic herds must be considered together. ▪ I urge WDFW to develop a post recovery wolf management plan than manages wolves in conjunction with their prey and other large predators on the landscape. Includes the proper ungulate monitoring methodology that is more robust in detecting population declines. Finally, that it recognizes that habitat while important, is beyond our financial ability to significantly change or any many instances is intrinsically limited or human altered beyond feasible change. Wolves and their prey must be balanced with these habitat limitations. ▪ Consider multi-predator systems and the impacts to big game species. Managing the wolf population in concert with the populations of other predators (mountain lion and black bear) and their cumulative impacts on elk and deer should be based on the best available science.
	Control wolf numbers to bolster ungulate populations.	<ul style="list-style-type: none"> ▪ Keep wolf numbers as low as possible. Ungulates are already struggling. ▪ I am concerned that Washington does not allow our deer and elk herds to be decimated like those in Idaho have been. There are miles of prime habitat there that is devoid of game. I support a reasonable wolf population; however, they cannot be allowed to adversely affect other game populations. ▪ Lethal management to support healthy ungulate populations is the most practical and efficient course of action.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ The wolf management plan should be made to benefit the ungulate populations that have been decreasing and the people that are being directly affected by wolves in their area. ▪ Wolf populations and their huge impact on ungulate populations should be carefully monitored and strictly controlled to minimize the impact to wild ungulate populations. ▪ A prey-based plan needs to be used to manage wolf numbers. ▪ The post-recovery plan must identify the availability of natural prey and determine the number of wolves that can be sustainably supported without resorting to livestock predation. ▪ Monitor and manage wolves in balance with prey populations if they return to the Olympic peninsula.
	At-risk ungulate populations	<ul style="list-style-type: none"> ▪ Wild animals impacted by wolves negatively enough to threaten whole populations (caribou, mule deer, antelope, etc.) should be given priority protections. ▪ If wild ungulate populations are in danger of dropping below replacement levels, it should result in lethal removal of wolves. ▪ If cases of localized ungulate decline reach severe levels with wolf predation confirmed as a contributing factor or impediment to recovery, there must be a high level of evidence that killing wolves is a scientifically-backed means by which to improve ungulate populations in such scenarios before this tactic can be considered, either alone or within a suite of recovery methods. ▪ Reduce ungulate harvest when ungulate populations near established wolf packs decline substantially or when growth rates are negative for several years in a row. Hunters exert direct pressure on ungulate populations through harvest, and this source of mortality can be more easily and more rapidly addressed than any other. ▪ Reliable and realistic measures to detect declining ungulate populations should be implemented, such as aerial surveys and/or survival studies. We realize that these methods cannot be conducted throughout the state, as they are costly, but strategically selecting targeted units and cooperating with tribes or others could provide data that are more robust than harvest reporting alone. More inclusive monitoring methodology, such as strategically placed camera grids and/or maintaining a sample of collared animals to monitor both predator and prey populations may also be appropriate. Specific units within the larger management unit could be selected and monitored on a rotational schedule and observed through time.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ There needs to be a process in place on how to manage wolf effects on other threatened and endangered species.
	Wolves may help the health of ungulate populations.	<ul style="list-style-type: none"> ▪ Predators like wolves might be a tool in controlling Chronic Wasting Disease, which is spreading in game species throughout the west. ▪ It is important to the health of the entire ecosystem to restore wolf populations within their historical home ranges to insure the health of our deer and elk populations. CWD and hoof disease can infect entire herds of deer and elk if sick individuals are left to mingle among the rest of the population. Predation by wolves of sick animals would reduce the spread of disease. ▪ Maintaining healthy ungulate populations should not be an objective of the Washington Wolf Plan. Ungulate populations have been shown to be healthier in the presence of wolves so in essence this "objective" is an outcome of restoring wolf populations to Washington but should not an objective of a wolf plan.
	Wolves are impacting hunter opportunity.	<ul style="list-style-type: none"> ▪ Hunter retention is already at an all-time low and if the ungulate herd numbers decline severely in areas with wolves, even less hunters will go afield. ▪ I am deeply concerned with the negative impacts wolves will have on livestock and deer/elk herds. As we all know much of the budget for WDFW comes from fees from hunters and fishermen/women. If there is a noticeable decline in success rate, I can see many people not purchasing tags in the future. ▪ Ungulate hunting opportunity must be a priority over wolves once they are considered recovered.
	Do not prioritize hunting opportunities over wildlife and habitat health.	<ul style="list-style-type: none"> ▪ While mandated to provide sustainable wildlife recreational opportunities, these opportunities shall be secondary to preservation and promotion of resilient sustainable carnivore populations, healthy ecosystems, healthy watersheds, and healthy populations of native prey like elk, deer, and moose. ▪ Restrict ungulate hunting in areas where wolves are managed.
	Wolves may help in conflict situations with ungulates.	<ul style="list-style-type: none"> ▪ The wolves' increased numbers could help to level off the increasing elk herds in the Skagit Valley and deer herds most anywhere in the valleys.
	Ungulate feeding sites	<ul style="list-style-type: none"> ▪ There needs to be a plan in place on how WDFW intends to manage wolf/ungulate conflicts at WDFW winter feeding sites and on WDFW managed lands currently grazed under livestock permits. This should include immediate actions when conflicts occur, alternative

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Research	N/A	<p>long-term solutions, costs of implementation, and economic effects to the department from a reduced ungulate population.</p> <ul style="list-style-type: none"> ▪ The state should contract for and expand scat monitoring to determine prey species being consumed by predators and to better define wolf populations through DNA to improve adaptive management practices. ▪ Research should be done to find ways to make livestock less attractive to wolves, so the economic needs of businesses may be reduced (although not eliminated). ▪ The Department should consider only research done by independent scientists and not that promoted by commercial interests. It should not consider industry-sponsored research that is biased toward a specific result. ▪ Research conducted by representatives of the UDSA Wildlife Services should be viewed as particularly suspect as their mission is to kill wildlife. ▪ Please address what research WDFW will conduct about wolf recovery and its application to post-recovery management. What ongoing or new research will be used to improve decisions about hunting, depredation, and habitat enhancement-relative to improving conditions for wolf survival and wolf pack success? ▪ Assess the impact of wolf-livestock conflicts if you stop killing wolves. ▪ WDFW must produce a scientific-based and concise report on all impacts related to long-term wolf conservation and management, including but not limited to: ungulate population management, hunting harvest impacts (prey species, other carnivores (meso and large, paying attention to trophic interactions that impact the keystone species, and wolves), recreational impacts (behavioral, breeding, pup rearing, and general), impacts of timber harvest at or a wolf den site, habitat loss and fragmentation, county and state zoning restrictions and related impacts (direct and indirect on wolves and their prey/other associated species), 5, 10, and 20 year population dynamics (compared via third party collaborative research against updated model structures as new and best available science is improved over time), impacts of WDFW additive harvest on prey species during spring, fall, and after harsh winters, and emphasize how, if, and when any lethal removal operations may impact the species richness and abundance of any and all associated species with wolves, pack behavior, and population viability (with particular emphasis on genetic impacts) at the local and statewide scale for future enjoyment and use.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Translocation	Translocate wolves to meet recovery objectives.	<ul style="list-style-type: none"> ▪ Help these wolves repopulate the numerous areas that were initially set out as goals. Dedicate your creativity, resources and honor to helping re-establish wolves across this state in ALL the areas of original intent. ▪ Time to transplant wolves to all recovery zones. ▪ They should be reintroduced in other areas of Washington as well to help with wolf population recovery. ▪ Can we safely deter or relocate wolves without harm? Not only would this help ranchers, it could help other unbalanced ecosystems in our state. Relocating could also mean a faster completion of our recovery goal for delisting wolves. ▪ There is no scientific reason the east side should be taking the heaviest impact so wolves can slowly and naturally make their way to all three zones; translocate immediately. ▪ Wolves will always prefer the rural and forest lands in northeast Washington, yet WDFW should consider some method to resettle wolves to central and western Washington. ▪ If the state insists on introducing wolves please locate them in Enumclaw, the Olympics, and the Capitol Forest as well so the legislators and leaders from Western Washington can see firsthand the damage they actually cause. ▪ I think that since most of the people that support wolf recovery are located on the west side of the state. That that is where the major effort should be for relocation/introduction. ▪ Where else have wolves been translocated? What were the results of wolves being translocated? Are moving wolves an effective method for dispersal? How successful were the translocations and how was it measured? Is translocation to areas without ranching operations a viable solution for wolves that kill cattle and sheep? Will translocated wolves have increased risk of poaching, death, and depredation on livestock? How will translocation impact the social structure of wolf packs?
	Translocate wolves involved in conflict with livestock.	<ul style="list-style-type: none"> ▪ There are plenty of open habitats in Washington where depredating wolves could be moved that have fewer potentials for conflict. I would like to see this option explored. ▪ If another state would be willing to catch and transport to their state, let them (in place of lethal removal).

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Please consider relocating wolves rather than killing them. Lethal methods usually means shooting them; shoot problem wolves with a tranquilizer and relocate them away from where they have caused a problem. ▪ I hope that you will use a translocation method of our wolves in this area (which currently seems to have met its balanced numbers) to other areas, rather than allowing ANY killing of any wolf. ▪ Wolves that are going after livestock should be captured and taken to the deep forests of the Olympic Peninsula. ▪ Translocate problem packs to the St. Helen's or Mt. Adams area.
	Translocate wolves to the Olympic Peninsula.	<ul style="list-style-type: none"> ▪ I believe wolves should be taken to the Olympic National Park. Waiting for them to find a way across the busy populated part of Washington could take far too many years. If goats can be moved, wolves can be moved. Rather than killing packs in eastern Washington, why not move them to the deep forests of the Olympics? ▪ I believe it is almost impossible for wolves to make their way to the Olympic National Park due to all the cities and highways blocking their way. I would like to see wolves slated to be killed moved to the deep forests of the Olympic Peninsula. By doing this, wolves will have the opportunity to learn to hunt for wildlife rather than domestic animals. ▪ Translocate packs (from high density areas) to the Olympics and other areas where they have not been established (but previously/historically were). ▪ Wolves deserve to be on the landscape in Washington -- particularly in the Olympic Peninsula. On their own, without human intervention, may not be able to re-populate the Olympic Peninsula. Consequently, an active translocation program should be planned and executed to ensure that wolves can live in their historic ranges in the Olympic mountains. ▪ It should include a positive reintroduction plan for the Olympics, as suggested by Dr. Bill Ripple from OSU.
	Translocate wolves to control disease.	<ul style="list-style-type: none"> ▪ I would like to see packs established in other areas as well. For example, the South Cascades near Mt. Saint Helen's to help with the elk population.
	Limit translocation to wolves not involved in	<ul style="list-style-type: none"> ▪ Translocation must be restricted to non-depredating wolves.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
Wolf-livestock conflict	conflict with livestock.	<ul style="list-style-type: none"> ▪ Translocation should not be utilized for moving a problem animal (or pack) to another location where it could potentially become someone else's problem.
	Do not translocate wolves.	<ul style="list-style-type: none"> ▪ There is no reason to believe that wolves will not recolonize all available habitat in the state naturally. Wolves are resilient animals and provided that managers practice responsible management, they will remain sustainable without the need to spend a significant amount of money to move them around the state. ▪ I have concerns with any plans to translocate wolves to the Olympic Peninsula. ▪ A lack of re-establishment on the Olympic Peninsula should be addressed through modifying hunting seasons and areas to reduce harvest, rather than through human-facilitated translocation. ▪ It's my hope/recommendation that the WA population be allowed to move/populate areas naturally without WDFW manipulation. ▪ Concerned about translocation ideas and creating a "wolf bomb" vs. gradual recolonization. ▪ Use the Precautionary Principle in any future attempts to restore ecosystem balance by reintroducing more wolves into any ecosystem.
	Depredation investigations	<ul style="list-style-type: none"> ▪ WDFW should contract with a third party (e.g. USDA Wildlife Services) for all wolf/livestock depredation investigations.
	Share wolf location data.	<ul style="list-style-type: none"> ▪ Sensitive collar data in real time must be shared year-round with livestock producers who have signed agreements with WDFW. ▪ Collar data must also be available to producer, range riders, and employees. ▪ At least two wolves in each pack ought to be collared with the highest quality technical device available. ▪ Location of wolf packs, their numbers, and related problems should be available to the public. ▪ We support timely, effective data sharing with livestock producers of collar data from Idaho and Oregon. USDA Wildlife Services should facilitate data sharing across state lines.
	Nonlethal tools	<ul style="list-style-type: none"> ▪ Ranchers, individual families, communities, and corporations should use wolf hounds or other livestock guardian dogs to protect livestock and pets. ▪ An emphasis must be placed on deploying any and all tools that have a negative stimulus on wolves that prevent wolves from attacking livestock by changing wolf pack behavior and prevent habituation.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>The department must provide livestock protection tools to livestock producers for conflict management and to change wolf pack behavior. This includes, but is not limited to, fladry, fox lights, propane cannons, etc.</p> <ul style="list-style-type: none"> ▪ I suggest a combination of WDFW assistance to ranchers to construct more cattle-confining fencing, together with a policy to reimburse ranchers for any cattle taken down by wolves on state or federal land. ▪ All non-lethal activities and tools, including all costs, need to be the responsibility of WDFW. Any participation by producers would be voluntary. ▪ The draft EIS should consider options for funding research into how/if current tools are having their intended effect. We urge WDFW to include detailed information about state investments to date in non-lethal tools and programs and any data to illustrate outcomes. WDFW should aim to understand which deterrents are most effective and redirect funding as necessary.
	Emphasize nonlethal tools for reducing conflict.	<ul style="list-style-type: none"> ▪ Resolve, through nonlethal means, conflicts between livestock and wolves. ▪ I urge you to incentivize livestock producers to use non-lethal methods to protect their livestock from carnivores. ▪ Truly teach and enforce non-lethal methods for deterring wolf depredation of livestock. ▪ More emphasis should be placed on proactive deterrents to prevent adverse interactions between wolves, people and livestock. ▪ I am concerned that the plan does not put enough emphasis on reducing wolf-livestock conflicts or on non-lethal methods of reducing such conflicts. I feel more responsibility needs to be put on livestock producers to keep livestock from areas that wolves are known to frequent, and to better manage and control the movements of stock. ▪ In order to minimize conflicts, the state should work with tribal and local communities to devise effective, pro-active non-lethal strategies to prevent as many conflicts as possible before they occur. Since wolf-livestock conflicts in particular can, in many ways, be quite predictable in where they can be expected to occur, the state and all stakeholders need to collaborate on how to best avoid conflicts, including taking measures such as reducing or minimizing grazing (in particular on government-owned lands) in areas with higher wolf activity, and other non-lethal deterrents such as employing range riders, guard dogs, fladry, and hazing. In order for these methods to be effective, it will

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<p>be necessary for ranchers and tribal and state land managers to buy into, support, and employ these methods diligently.</p> <ul style="list-style-type: none"> ▪ WA should assist ranchers, farmers and rural residents generally in implementing nonlethal methods for managing conflicts with wildlife, rather than killing wolves that can serve a key role in maintaining healthy ecosystems by culling weak deer, limiting coyote populations and keeping ungulates from overgrazing riparian areas. ▪ Please continue advancing non-lethal deterrence methods and using science-based protocols for managing persistent conflicts between wolves and livestock. ▪ The draft EIS/Plan should include 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.
	Require nonlethal tools.	<ul style="list-style-type: none"> ▪ WDFW needs to develop a stringent protocol to give wolves every chance. Require multiple methods of non-lethal control, including range riders. This protocol should be analyzed under SEPA to promote transparency and public involvement. ▪ Part of any new lease agreement should be proof that livestock producers have employed multiple techniques to mitigate wolf/livestock conflicts. ▪ It's imperative that cattle ranchers take appropriate steps to mitigate loss. The recovery plan must have some teeth for those ranchers who refuse to help alleviate conflicts. ▪ All of the alternatives should eliminate lethal control actions on public lands. At least one alternative should utilize non-lethal methods only on both public and private lands. Any alternatives that involve lethal methods should identify in detail required non-lethal methods and time scale, as well as a definition of success, before any escalation can occur. Each alternative should include requirements of livestock producers, such as range riders, herders, guard dogs, flagging, and removal of bone piles and carcasses — and require verification before WDFW gets involved. ▪ If a rancher fails to follow guidelines regarding nonlethal deterrents or is found to purposely bait wolves, all of that rancher's cattle should immediately be removed from public lands. If said rancher does not have private land to relocate the cattle, then the cattle should be sold. The offending rancher should not receive any reimbursement for cattle loss on public lands.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ 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 two 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.
	Novel tools for mitigating conflict	<ul style="list-style-type: none"> ▪ Please review research on using lithium-laced carcasses to deter wolf predation on sheep. ▪ Ranchers turning their livestock onto public lands must be required to tag each of their animals with GPS devices so that they can track all of their livestock in real time. The ranchers must have all of their livestock off of public lands by October 15th of each year or have them considered to be abandoned and become property of the state. ▪ Experiment with diversionary feeding of problem area wolves with road-killed ungulates. ▪ Experiment with retraining of open range cattle to behave in a more herd-like manner such that cattle feed in close groups, reducing the chances of wolf encounters and increasing their defensive capability.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Experiment with creating a “phantom wolf pack” - deploy scats and howl boxes in areas to attempt to exclude neighboring packs by mimicking the appearance of another pack in the area. ▪ Experiment with creating a “zombie wolf pack” - sterilize the breeding male and/or female in an area with chronic problems with livestock interactions. The wolf pair will continue to defend their territory, but sterilization could greatly reduce their need to prey on livestock since they will not need to meet the demands of pups. The pack will still eat but, be biologically "dead," since they will be unable to produce offspring. ▪ Allow the return of free-ranging bison and remove livestock. ▪ Cattle and sheep ranchers could give something like Bitrex or other really bad-tasting substances a try by putting it on the most usual places that wolves like to bite their prey. ▪ I support the organization Lockwood Animal Rescue Center (LARC) who would come to Eastern Washington where many of the wolves are and rescue a whole pack by tranquilized darts, not shooting with bullets, and bring them back to the LARC property which includes 4000 acres in the Ventura Mountains in southwest California. The wolves would be put in remote areas in relative isolation from humans with very secure double-perimeter fencing where they could live out their lives. They would be prevented from breeding by the use of oral contraceptives. LARC is a non-profit organization and would pay for everything. It is the most humane, lowest cost solution for the State of Washington.
	<p>Public lands should prioritize wildlife over maintaining grazing opportunities.</p>	<ul style="list-style-type: none"> ▪ Our state needs to stop prioritizing cattle on public lands over wolves. ▪ Cease current messaging that prioritizes livestock over wolves. ▪ Wolves and other wildlife should be allowed to thrive on open public lands, and plan to fulfill its paramount responsibility of preserving, protecting, and perpetuating the state’s gray wolf population, for future generations. ▪ Help find ways to end archaic grazing practices that prioritize domesticated animals over native species. ▪ It is unconscionable that wolves are destroyed for killing animals grazing on public lands. Grazing simply should not be allowed on public lands that are wolf habitat. These are public lands owned by all of us, not by ranchers. It is time we give priority to wildlife instead of cows.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ I don't think livestock should take priority over wolves on federal land. ▪ Multiple use means balancing uses, not ignoring recreationists and shooting wolves. ▪ Using public land for grazing should not be subsidized by public costs in dollars or in wildlife diversity, specifically lethal wolf management practices. ▪ Rather than killing wolves to benefit private business owners who are relying on public grazing allotments to make a living, WDFW should either move livestock off of public lands or halt the killing of wolves in response to depredations. ▪ If ranchers or others can't adapt to an environment that is natural to wolves and other predator species, perhaps it is they who should relocate. Do not expect the majority to approve clearing out wildlife for the purpose of catering to private business, ESPECIALLY on public lands. ▪ Prioritize management of the gray wolf (and other carnivores) over private interests on state and federal public lands. For example, when there is conflict between wolves and livestock, move the livestock and stop killing wolves on state and federal public lands. ▪ I do not believe that livestock should be grazing on public lands to the detriment of wolves. We must find ways to reduce these conflicts. I also believe that ranchers should not be permitted to shoot wolves if they have not utilized and correctly implemented nonlethal methods for deterring wolves.
	Range riding	<ul style="list-style-type: none"> ▪ Range riders are effective and needed. ▪ It needs to be a requirement for ranchers to have range riders with their cattle and other nonlethal protection. ▪ It is important to utilize hazing methods to manage wolf pack activities. Range riders are necessary to protect, guard, remove and move livestock away from wolves--but tools must be used to deter wolves from coming near the livestock in the first place. It is imperative that wolves receive a negative stimulus in order to revise wolf pack behavior and prevent habituation. ▪ WDFW and ranchers should work together to create a state-wide range-rider program with incentives for participating farms/ranches. ▪ Range riders should be used, when practicable, to protect, guard, remove, and move livestock away from wolves to minimize

TOPIC SUB-TOPIC EXAMPLE COMMENTS*

	<p>depredations. They must also be used to deter wolves from approaching livestock by implementing harassing tools. Distinction must be made between requirements and restrictions placed on contracted range riders and range riders who are hired by the livestock producer.</p> <ul style="list-style-type: none"> ▪ Range riders with herds 24 hours a day with a rider per so many head of livestock should be mandatory.
<p>The inherent risk of wolf-livestock conflict on public land should be assumed by livestock producers.</p>	<ul style="list-style-type: none"> ▪ 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. ▪ Livestock owners should be to accept responsibility for minimal losses. ▪ If a rancher wants to utilize public land for grazing, one of the hazards is the possibility that they will lose some livestock to wolves. ▪ If ranchers refuse to use the adaptations available to them, then we (the state) should not have to pay for lost cattle. ▪ Lethal management should never be an option on public lands. Livestock producers should "assume the risk" when they choose to avail themselves of the bargain and privilege of grazing their livestock on our public lands. In such situations of chronic depredation, there should be interagency collaboration to consider grazing modifications, suspensions and retirements. Native wildlife must take priority on Washington's public lands. ▪ 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. ▪ Ranchers who graze livestock on publicity leased lands should not have special protections from predators. ▪ I feel the ranchers that are using public land to graze their cattle are getting a larger voice in wolf management. A large portion of the citizens of Washington state would prefer our public lands be allowed to go back to a more natural ecological state which includes natural predators. If a rancher wants to use public land for grazing privileges, then they take the risk that they may occur some loss due to predation. ▪ Ranchers who continue to graze their cattle on public lands for very little or no cost must accept predation as a given risk/cost to the rancher, not the taxpayers or the lives of the wolves.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ When considering grazing allotments on public land, those using the land for grazing should need to sign a waiver accepting the risk associated with utilization of this public land to include the potential loss of livestock due to natural predators. This use of public land is no different than a person recreating on the land where the government, state, or citizens are not liable for recreational injuries or death while on the land. ▪ All WDFW actions that take place on public land should be evaluated very critically. Likewise, any action that directly or indirectly impacts wolves or any species that they interact with should be noted and weighed against the human-livestock conflict spectrum. All alternatives actions should emphasize putting the burden of responsibility on those affected, when and if they are non-cooperative (in any way). For example, any producer who chooses not to adopt improved husbandry practices within a 5, 10, and 20 year period should not be compensated for loss and not be allowed to kill a wolf or wolves associated with livestock injury or mortality events. Additionally, any livestock producer who utilizes public land should also not be eligible for any form of assistance from the state. ▪ Cattle should not be on public lands. If cattle are allowed to graze on public lands, then owner(s) must be made aware that there will be losses due to wolf predation and that wolves (and other predators) will not be killed to prevent livestock predation. Educational programs for minimizing wolf predation of cattle/sheep are needed.
	Maintain wolf social structure.	<ul style="list-style-type: none"> ▪ The draft EIS/Plan should include 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. ▪ More attention needs to be paid to selecting which problem wolves might be eliminated to avoid making a bad situation worse. The social structure of wolf packs is key to their successful management.
	Review the scientific literature about lethal wolf control.	<ul style="list-style-type: none"> ▪ Stop cherry-picking science to justify wolf-killing. ▪ Please do a widespread literature review of research into the efficacy of lethal control. ▪ The EIS must include recent research studies evaluating the effectiveness of lethal control methods. A distinction should be made between actions that occur on public lands vs. private lands. Each alternative involving lethal methods should include analysis of trophic cascade effects that result from the killing of apex predators like wolves.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Evidence-based research does not support the use of killing pack members to decrease livestock depredation. Please make sure the plan includes a commitment to using solid, evidence-based science in wolf management. ▪ Document how WDFW killing of wolves for depredation has made hunters and ranchers more tolerant of wolves.
	Use lethal removal only as a last resort.	<ul style="list-style-type: none"> ▪ Lethal measures should never be used unless livestock producers have acted responsibly. ▪ Killing should be nothing more than a last resort in addressing rare conflicts with livestock. ▪ Lethal removal of wolves as a result of livestock or other conflicts should be a last resort, but it is a tool that does need to remain accessible. Given the urbanizing current-day landscape of Washington and its carrying capacity for wolves and other predators, we understand that responsible wolf recovery may sometimes require lethal removal. ▪ It's critically important that we seek to maintain, and improve upon, the lethal wolf removal statistics in the state, which were less than 3% of the state wolf population last year compared to 12% for other Western states.
	A balanced perspective is needed when considering lethal removal.	<ul style="list-style-type: none"> ▪ “Kill them all and sort it out later” is too extreme and “don’t kill any wolves for any reason” is too extreme.
	Chronic conflict zones	<ul style="list-style-type: none"> ▪ Families determined to destroy packs should be reviewed for the number of times and number of wolves killed. Allowing ranchers to direct this department is unethical and smacks of collusion. ▪ Recognize zones of chronic depredation, areas of repeated wolf/livestock conflict; and no longer consider lethal management of wolves in these areas. ▪ Use master hunters for wolf depredation areas. ▪ We are uncertain about the effectiveness of citizen-based (e.g., through Master Hunters) lethal control for ending livestock depredation but this option should be thoroughly examined as local control is an important component of successful conservation in general.
	Do not allow lethal removal	<ul style="list-style-type: none"> ▪ I think the plan should give wolves complete protection on public lands. On private land, ranchers can have more freedom to protect

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	on public lands.	<p>their livestock. But if ranchers opt to graze their livestock on public lands, that does not give them the right to kill wolves on public lands.</p> <ul style="list-style-type: none"> ▪ I urge a ban on killing of wolves on public lands by government agencies on behalf of ranchers. ▪ Lethal management of wolves on public lands should not be part of the wolf management plan, especially when it is consistently on behalf of a very few interests in the state. ▪ I oppose lethal predator control because it usually is not successful long-term and usually is on public lands. I could understand a limited amount if it was to protect animals on private land and the owner had done everything possible to protect his/her animals and had documented this to my satisfaction. I do not think any wolves should be killed on public lands for predator control. <p>There should be an alternative that does not allow the lethal taking of wolves on public lands that are too rugged or mountainous for preventative measures to be effective. To be meaningful, preventative measures must be potentially effective. In rugged, mountainous country, cattle are typically too spread out for range riders or any other measure to be effective. In these conditions, ranchers are not capable of following the protocol requiring non-lethal measures. Losses in these situations need to be accepted.</p> <ul style="list-style-type: none"> ▪ I believe wolves should be controlled if they repeatedly come into conflict with livestock on private land only. Livestock on federal/state land are there at the owner's risk. Furthermore, livestock on federal/state land often cause substantial damage and their numbers should be greatly reduced.
	Lethal removal is unacceptable.	<ul style="list-style-type: none"> ▪ Senseless wolf killings shouldn't become the new normal. ▪ Remove lethal control as a management option. I support WDFW's proposal to develop protocols for removing livestock from areas of conflict rather than terminate wolves. I feel it is never appropriate to kill wolves to protect livestock. ▪ Any plan that allows blatant murder of wolves by both ranchers and WDFW should be tossed in the shredder where it belongs. ▪ I believe there should be an immediate end to killing wolves. A farmer who loses a cow because he doesn't want to pay for a nice fence shouldn't justify killing wolves. ▪ The Department will oppose government, state and federal, sanctioned killing or hunting of the gray wolf and other native carnivores.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Stop lethal removal immediately. Remove livestock from public land if the producer has issues with wolves. ▪ There should be a moratorium on shooting collared wolves. ▪ I oppose any killing of wolves. The wolves should be managed through nonlethal means. ▪ Lethal removal is not an acceptable management plan for dealing with livestock depredation. Move the livestock, don't kill the wolves. ▪ WDFW should not kill wolves to accommodate private livestock businesses; private businesses can insure their inventory and be responsible for inventory wellbeing and security. ▪ Stop killing our wolves at the behest of private ranching interests whose cattle ruin some of the most beautiful and pristine public lands that our state holds. Stop putting private ranching interests above those of a huge majority of Washington residents and taxpayers! ▪ "The status quo of annual lethal removal is simply unacceptable," Gov. Inslee wrote in a letter instructing the Washington Department of Fish and Wildlife to focus on finding nonlethal solutions for conflicts between livestock and wolves. Anything at odds with these instructions is inconsistent with law and guidelines required for such decisions. ▪ The Department should heed the Governor's advice and focus on fixing its broken lethal protocol to effectively resolve wolf-livestock conflicts without annually killing a large portion of the state's wolf population at the behest of the commercial livestock industry. ▪ 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.
	Lethal removal is an important tool for mitigating wolf-livestock conflict.	<ul style="list-style-type: none"> ▪ Lethal removal to manage the conflict between ranchers, stock loss, and problem wolves is a priority. ▪ I firmly believe the wolf population needs to be reduced and controlled better. ▪ People should be allowed to employ lethal actions when property is endangered, not just life.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> ▪ Keep packs small and aggressively remove problem animals, otherwise there is a significant portion of the population that will resent their presence. ▪ Livestock owners, post-recovery, must be allowed to protect their property using any means necessary - including lethal options. ▪ WDFW needs to be completely transparent with its constituents and clearly state the need to manage wolf populations with lethal removal. Recreational hunting should be a part of this, and justification should include economic analysis of the cost of government-run removal programs.
	<p>Lethal removal should occur more quickly when wolves depredate livestock.</p>	<ul style="list-style-type: none"> ▪ When wolves kill cattle, the number of kills should be lowered for lethal removal. You shouldn't have to lose so many before lethal action is taken. ▪ All efforts must be made to control known depredating wolves within 48 hours of discovery of livestock killed by wolves after the second confirmed depredation in 12 months. ▪ USDA-APHIS Wildlife Services must be given the authority to provide depredation investigations and to implement lethal control when two depredation events have occurred during a trailing 12-month window, with at least one depredation resulting in dead livestock. I also support continued incremental control of problem wolves that could result in pack removal if wolves continue to depredate. ▪ Incremental removal of depredating wolves needs to take place within seven days of the first depredation as prescribed by the research of Elizabeth Bradley in Montana. ▪ After the first livestock animal is killed by a wolf, there should be complete wolf removal in that area. ▪ We need to act immediately upon the first livestock depredation. We also need to have more pressure on the wolf by hunting and trapping to help relieve the stress on our livestock and agricultural community. Faster action from WDFW officers would also be a great help with much more emphasis on local control coordinated with elected county officials. ▪ Confirmed depredation of livestock by the pack needs to result in lethal control of the that pack, not just one or two members. ▪ The plan should include a zero-tolerance policy for wolves in areas of livestock production.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
	Lethal removal permits	<ul style="list-style-type: none"> ▪ The cattle farmer that is using state land to graze their cattle should show the WDFW where their cattle were killed. WDFW should give them a special tag so they can go and track the wolves that are in that area and shoot them. ▪ An idea would be to issue the famer/rancher a damage permit instead of hiring contractors with helicopters. ▪ Follow California's mountain lion strategy and only issue depredation permits for identified wolves that prey on livestock or other domestic animals. ▪ If depredations happened on private land, then the rancher should have the right to take the steps to protect his cattle, sheep, etc. ▪ The plan must also recognize that some wolves may become habituated to human presence and feed on livestock. Ranchers and farmers must be given the support to eliminate such wolves once they are identified. This will maintain a certain fear level necessary to imprint on wolves to reduce habituation.
	“Caught-in-the-act” scenarios	<ul style="list-style-type: none"> ▪ Continue the implementation of WAC 220-440-080 (caught in the act to protect livestock and human safety). ▪ 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.
	Lethal removal decision-making process	<ul style="list-style-type: none"> ▪ The lethal removal protocol and its application needs revision; the protocol should be an appendix to the new plan. Suggestions for the policy, include: a) a priori depredation numbers suggesting when to remove wolves should serve only as an approximate decision parameter (if at all), with the specific context of each situation fully analyzed before wolves are killed; and b) guidelines should differentiate management actions based on key landscape characteristics, such as public versus private lands, and “defensibility” of cows. ▪ The WDFW Director should not have unilateral discretion to order wolf killing – that action should also require approval by the governor. We have seen a long history of WDFW directors who, each in their own turn, yield to political pressures to kill our wolves in acts of vengeance.

TOPIC	SUB-TOPIC	EXAMPLE COMMENTS*
		<ul style="list-style-type: none"> <li data-bbox="602 170 1511 243">▪ There will be no killing of pups or either member of the breeding pair in each pack. <li data-bbox="602 285 1511 390">▪ The existing predation guidelines that trigger lethal slaughter of entire packs is misguided and should be reviewed to include nonlethal removal of grazing livestock, rather than slaughtering entire packs. <li data-bbox="602 432 1511 747">▪ The plan must abandon the current Wolf-Livestock Interaction Protocol which is not working and is irredeemably defective. The numerical measures used to implement lethal control are too easily triggered and too quickly acted upon. That a "suspected" wolf depredation can be counted on the same level as a "confirmed" depredation makes no logical sense. Three incidents within a thirty-day period should require a change in ranching activity, not in wolf killing. And four incidents in a ten-month period has no meaningful connection in time among the events that lead to lethal action. <li data-bbox="602 789 1511 852">▪ Livestock producers should not be required to implement non-lethal protection tools in order to initiate lethal control. <li data-bbox="602 894 1511 999">▪ We support incremental removal of problem wolves that could result in the eventual elimination of an entire pack if wolves repeatedly depredate livestock.

*Comments edited for length and clarity, but original wording preserved wherever possible.