Hi, I am David Linn following up on my comments of yesterday. As I said then, the discussion about the SFA group was extremely concerning. In the previous iteration of Section 9 it was specified that the Director would designate an SFA and the department staff would conduct an assessment. It said “The assessment must include conversations with affected producers, associated landowners, range riders, representative of the county sheriff if applicable, and land management agencies (hereafter referred to as “the group”)

- It further states that the staff working with that group will develop a conflict mitigation plan, and then specific details follow in the writeup. Let me say it again, the staff will develop a conflict mitigation plan.

- In Rob’s notes from yesterday, the focus morphed from having conversations between the department staff and the group to investing the group with decision-making authority e.g. “How does the group resolve differences? What’s their decision-making process? “.

- From my perspective, the WAG, by its design, is not a body which is representative of the citizens of the state, it has a definite bias. The SFA group is even less representative by the nature of its membership, namely affected producers, associated landowners, range riders, representative of the county sheriff if applicable, and land management agencies. It would be completely inappropriate for such a narrowly-focused group to be given decision-making authority over issues that affect all of us. The purpose of the SFA group should be simply to provide information to the staff in carrying out their assessment. Further, having this group select 3rd party experts would put them in a conflict-of-interest position – that selection should be done by the department. Would the ranchers be so keen on having a group of 5 environmental organizations select the 3rd party experts and make the decision about conflict mitigation? Probably not.

- Section 9 states that “The group must complete the conflict mitigation plan, working with affected livestock producers, prior to beginning of the next grazing season.” Well duh, the affected livestock producers are part of the group – another conflict – and again, it is not the group that develops the plan, it is the staff. This whole process suffers from the department’s insularity – a refusal to accept outside input or review with a critical eye. Sure, we can talk for three minutes, but it seems to have no impact.

- Moving on, at an earlier WAG meeting, I told this group that the Leadpoint pack territory should be an SFA even though it may not meet your narrow definition – that was because of the activity that occurred there last year and it was obvious that it had a high potential for conflict this year. But I was told that no, we can have only a few SFAs and Leadpoint doesn’t meet our definition, so it can’t be so designated. Well, guess what – the first conflict is...not Kettle, not Togo, but Leadpoint. With such a rigid process you allow for more conflict because you will not anticipate the future – your data will always be 1 – 2 years out of date.

- Which brings me to the next point which Amaroq so clearly made yesterday. By your own admission, the number of declared SFAs is severely limited to a small portion of the state. To develop rules of conflict management for the whole state using information which is restricted to such a small slice of the population makes no sense. Does that mean that when the declared SFAs change from year to year that we will need to have rule making for those newly-designated
Wolf Advisory Group, April 8, 2021
Public Comment

SFAs? No, you must take a realistic look at the entire state in order to develop a rational and inclusive process. Right now the public is cut out of this.
- This department must represent all the people and not just a select few. You cannot go forward with a process that ignores a majority of the population. We who are concerned about the long term viability of our planet need to finally be heard and not relegated to an inferior status by this department. Short term commercial interests cannot dominate the long term stability and viability of our environment.
- But will you listen? If the past is prologue, likely not.
- Thank you for your time.

Zoe

- **Section 9 content**
  - If this conversation is evolving towards local assessments of ungulate populations at the GMU-scale or finer to look at prey availability in SFAs, you need to complete the wolf-livestock-prey triangle by asking whether livestock are influencing prey abundance through direct competition for forage, or whether livestock presence is altering local or seasonal ungulate movements and behavior.

- **Frustrations with WAG process today**
  - Primarily the oversight of including WDFW staff during the inner circle vote, since they normally would have been asked for their opinion last during an in-person meeting.
  - The continued lack of WAG member understanding regarding WAG procedure, including the decision-making process when WAG members are absent.
  - Lastly I’m really disappointed so many WAG members decided not to attend this meeting at this important juncture prior to the grazing season, especially considering these dates have been on the calendar for months, and it makes me question this group’s motivation and commitment to the cause.
  - Therefore, I encourage the Department to ensure all WAG members are up-to-speed on WAG procedure and continue to push for funding to hire a third-party facilitator.

Chris

- It’s important we answer Dave’s questions. Perhaps we ask for Brock’s (a Dept. staff member) help?
- He echoes Zoe’s points.
- Regarding prey base, look at both the impact of wolves and livestock (presence, forage, density).

Ilene

- She’s concerned about what sounded like a significant misunderstanding about governing processes on how policies are initiated and implemented. The legislature enacts statute; procedures are established by WAC; and the Dept. is authorized to develop the WAC to enact the statute. The Dept. would then institute policy development, and the WAG’s purpose is to help the Commission and Dept. develop that policy. Remember the final product that you see may or may not look like the meeting results in the end.
Jocelyn

- She echoes David’s concerns regarding “the group” for SFA plans. She’s concerned this group would be responsible for selecting the 3rd party review.
- She echoes the need to look into livestock impacts on ungulates.

Rachel

- She agrees with Chris and Zoe to look into livestock impacts on ungulates.
- She feels like some of the WAG members aren’t listening to Dept. staff, when staff try to explain the difficulty to collar wolves vs. the usefulness of the data.
- She hears that ranchers feel that the Dept. isn’t doing enough for them, while she thinks the Dept. is bending over backwards for them, using public money, to help them maintain their private business.
- She appreciates everyone’s time but it’s taken too much time.

Chris

- Regarding moose, they didn’t live in WA until the 20s-30s. Using the moose population as a sign of predatory carnivores is a dead end.