Snoqualmie Indian Tribe

September 19th, 2019

Lisa Wood SEPA/NEPA Coordinator WDFW Habitat Program, Protection Division P.O. Box 43200 Olympia, WA 98504

RE: Snoqualmie Indian Tribe Comments on Wolf Post-Recovery Plan Scoping

Dear Lisa Wood,

With this letter the Snoqualmie Indian Tribe is providing comment on the scope of the Washington Wolf Post-Recovery Plan. The Snoqualmie Indian Tribe [Tribe] is a federally-recognized sovereign Indian Tribe and a signatory to the Treaty of Point Elliott of 1855, in which it reserved to itself certain rights and privileges, and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved to itself, among other things, the right to fish at usual and accustomed areas and the "privilege of hunting and gathering roots and berries on open and unclaimed lands" off-reservation throughout the modern day state of Washington. Treaty of Point Elliot, art. V, 12 Stat. 928." Long before the early explorers came to the Pacific Northwest, our people hunted deer, elk, and bear, fished for salmon, and gathered berries and wild plants for food, medicine, and fiber. Today, many of our members live in the communities of Snoqualmie, North Bend, Fall City, Carnation, Issaquah, Mercer Island and Monroe, and they exercise their cultural heritage and traditions using resources from across what is now the state of Washington, and beyond.

The Snoqualmie People have shared the land with the wolf since time immemorial, and we are committed to the protection and management of all native species. Article XIV of the Constitution of the Snoqualmie Indian Tribe states that:

"Nature and its biodiversity, the environment and the tribal heritage are the responsibility of every tribal member. The tribal government shall endeavor to guarantee for every tribal member the right to a healthy environment and the possibility to influence the decisions that concern their own living environment."

To this end, we support the sustainable recovery of wolves in their important ecological role as predators in the state, and as creatures that the Tribe has always co-existed with. We believe that in order to accomplish this, the state needs to invest in a range of strategies, with the end goal being a balanced approach to minimizing conflicts.

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, and especially for the maximum effectiveness that the Tribe desires, it will be necessary for ranchers and tribal and state land managers to buy into, support and employ these methods diligently.

Lethal removal of wolves as a result of livestock or other conflicts should be a last resort, but it is a tool that the Tribe believes 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. We do not support a general public hunting season on wolves in Washington at this point. We do support opportunities for Snoqualmie Tribal members to exercise their treaty rights in sustainable hunting and lethal removal opportunities for wolves in the state.

The Tribe also requests timely and transparent communications with the state in regards to adaptive wolf management, especially prior to the lethal removal of wolves or any other state endangered species. While we work with the state to recover and manage wolves, we support state and other research into the interactions of wolves with deer, elk, moose, and other ungulates and game animals, and analyses of how wolf populations may or may not affect game populations, and the availability of these game populations for tribal treaty hunting. We will need reliable scientific data to accomplish this, and so we request that the state make sure that this data is available, by funding and executing well designed monitoring and research efforts into wolf-ungulate ecology in Washington. As the wolf post-recovery plan is implemented, we request continued consultation and communication regarding known wolf territories or areas with wolf presence in Washington State. This way, the Tribe can be sure to communicate with and provide information to Tribal members who may be exercising their treaty rights in areas where wolves may be present or active.

Thank you for the opportunity to comment on Washington's Scoping of its Wolf Post-Recovery Plan. We look forward to further discussion with our co-managers regarding the details of the plan as it is further developed and implemented.

Sincerely,

Robert de los Angeles Snoqualmie Tribal Council Chairman



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