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**RE: Post Recovery Management Plan Scoping Comment**

Director Susewind,

*I first want to thank you for your dedication to WA wildlife. We have an incredible state. We are blessed to have extensive public lands, wild places, and an abundance of native wildlife species. We are even more fortunate in that our state can support recovery of threatened and endangered species such as salmon, Columbia basin pygmy rabbits, bald eagles, and of course wolves.*

*I grew up in WA state and have made this my home, though I have lived and traveled in many places in the world. I grew up in Spokane, lived and worked in the Seattle area for 18 years, and moved back to eastern WA 10 years ago. I am a wildlife biologist as well. I received a BS in biological oceanography, and worked for the WDFW in the Fish Program as a research diver for 5.5 years. I have worked with the USGS in salmon research, NOAA with bowhead whale recovery, with a consulting firms helping develop habitat conservation plans for timber companies, and now with a Master's in wildlife management and ecology, I work in habitat restoration across Washington, Idaho, and Oregon. In my current position over 10 years, I routinely work closely with private landowners including ranchers, and all manner of other entities as partners: state, federal, Tribal, local non-profits, and many others. Believe me, I know of the challenges in working on lands that are multi-use, with many entities engaged as partners with their own agendas and ideas, and achieving mutual agreement on projects.*

*I have followed this wolf conflict situation over the years since wolves have returned to WA state. It's an incredibly emotional issue for people on both ends of the spectrum, and you likely never hear from anyone but those that are most passionate on either side. But the big picture is this – rarely does any country in the world have the opportunity to recover endangered species as we do. The United States is large enough and rich enough to have this opportunity. Where ever we can recover populations and ecosystems, we have the duty to do so, and we all need to keep the big picture in mind, that these ecosystems are the lifeblood of the planet. The world's ecosystems are in crisis. Life on this planet cannot persist without healthy natural resources, but the majority of the population is ignorant of the true threats to our survival and to this earth. Those of us in the fields of wildlife management, natural resource management, habitat restoration, water quality, etc, we know the true cost of not doing this important and hard work. It is not just about wolves and ranchers. It is about doing what is hard and right to protect the earth's ecosystems from destabilizing any further and recovering from the damage humans have wreaked thus far. We have the ability and the opportunity in this instance to restore a species and benefit ecosystems in Washington state. The WA Department of Fish and Wildlife has the responsibility of leading in this endeavor.*

*It is critical to keep the proper big-picture perspective, and to do so in a timely manner. We must do this work now, while there is still the opportunity. I support everything in the letter below and ask that you incorporate all aspects of it into your post-recovery wolf management plan, and do so at the right time, not before the species is recovered, as this distracts from the importance of the conflicts taking place right now. Stop killing wolf packs in areas where this is not working to reduce conflict. Stop allowing these conflicts to continue on lands that are not defensible and are not meant for cattle grazing. Find other solutions for Washington's wolves, citizens, and the big picture: our planet.*

As you are aware, Washington has not met recovery goals laid out in the Wolf Conservation and Management Plan (pp 58-68). It could be said that regional recovery goals have been met in the Eastern Recovery Region, however

regional recovery is not a goal of the plan. We understand the desire to plan ahead, but focusing on post recovery management at this stage appears to be a diversion to draw attention from pre-recovery management and the repeated use of lethal force to manage gray wolf conflict on public lands. It misleads the public into believing we are close to recovery goals.

Post recovery management should focus on growth and maintenance of sustainable gray wolf populations and handling conflict using pro active non lethal means. Meeting recovery goals is the first step down that path, not the last. The Department should focus on continued population growth to reach sustainable population levels and restoration/preservation of gray wolf habitat as well as habitat connectivity allowing genetic exchange at a statewide level and beyond. Recovery numbers as they exist in the current plan were initially set too low not allowing for inter-regional genetic exchange, and are not based on best available science, this should be considered before moving forward with a post recovery plan.

There is strong public support for recovering and sustaining viable gray wolf populations in Washington and little support for lethal control and/or hunting of the gray wolf. Washington can provide a source population of gray wolves that can support national recovery. We can be a national leader promoting human-wildlife coexistence, using lethal control only when absolutely necessary.

Social tolerance is an important aspect for wolf recovery. The term frequently references people's tolerance for the wolf's presence. However, social tolerance is a two sided coin, and the coin is flipping. Social tolerance for the state's repeated killing of wolves is plummeting.

Finally, the Post Recovery Gray Wolf Conservation and Management Plan should be reviewed by an outside panel of wolf experts.

Once the gray wolf reaches recovery in the state of Washington, we would like the following incorporated into post recovery management of the gray wolf:

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, and
- Oppose government, state and federal, sanctioned killing or hunting of the gray wolf and other native carnivores and,
- Outline and enforce penalties for illegal killing of gray wolves.
- Recognize zones of chronic depredation, areas of repeated wolf/livestock conflict; and no longer consider lethal management of wolves in these areas, and
- 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, and
- Work to reform policy to 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. 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. 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. Hunting is not necessary to control carnivore populations, they self regulate based on prey availability, and

- Manage native carnivores in the state of Washington using the best available science, and
- Oppose the use of taxpayer funds to lethally manage wildlife.

Respectfully,

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Wildlife Biologist, Conservationist, and WA State Resident

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