

Rocky Mountain Elk Foundation

The Rocky Mountain Elk Foundation appreciates the opportunity to submit the attached comments regarding wolf post-recovery planning in Washington.



**ROCKY MOUNTAIN
ELK FOUNDATION**

October 30, 2019

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

Re: Wolf Post-recovery Planning in Washington

Dear Ms. Wood,

The Rocky Mountain Elk Foundation (RMEF) is a national nonprofit organization with more than 234,000 members and a mission to ensure the future of elk, other wildlife, their habitat and our hunting heritage. RMEF's members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk.

Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.6 million acres of North America's most vital habitat (including nearly 500,000 in Washington) for elk and other wildlife. This work includes land acquisitions, land exchanges, conservation easements, and habitat improvement through prescribed burning, thinning, and weed treatments. In addition, RMEF has supported more than 50 research and management projects (committing over \$1.1 million) in order to gain a better understanding of and improve management of elk-wolf interactions.

RMEF appreciates the opportunity to participate in the Washington wolf post-recovery planning process. Since 2008, Washington's wolf population has grown by an average of 28% per year. The Washington Department of Fish & Wildlife (WDFW) recently documented a minimum of 126 individuals, 27 packs, and 15 successful breeding pairs, the highest counts to date. In addition, wolf distribution in Washington continues to expand; WDFW recently confirmed the state's first wolf pack west of the Cascade crest.

Broad-level goals in the current plan include maintaining healthy and robust ungulate populations and managing wolf-livestock conflicts. RMEF encourages WDFW to continue emphasis in these areas, with the following suggestions.

RMEF agrees with WDFW that Washington's wolf population is on a path to recovery. As Washington approaches the time to transition from population establishment to population management, RMEF encourages WDFW to set management directions based on Washington's data and experiences, along with an ever-increasing body of science and experiences from other western states. Specifically, RMEF requests WDFW's consideration of multi-predator systems and the impacts to big game species (Horne et al. 2019, Eacker et al. 2016). 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. RMEF requests that continued support for predator-prey research be included in the new plan.

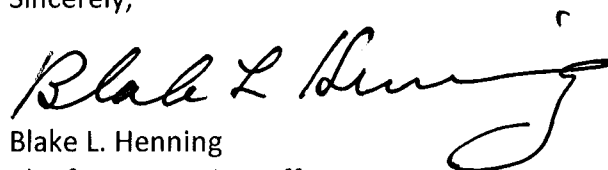
In addition, recent research conducted in Washington and Oregon highlights the importance of quality summer forage (nutrition) for elk (Rowland et al. 2018). The success of wolf recovery relies on healthy ungulate populations, and RMEF requests habitat goals that support active forest management be considered 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.

RMEF requests that the wolf delisting criteria for all recovery regions be re-evaluated to streamline delisting in Washington. In the short-term, RMEF requests WDFW give special consideration to the eastern third of the state, where wolves are not currently under federal protection. Impacts to eastern Washington hunters, landowners, elk, and other big game populations are increasing. With the rise in wolf-related conflicts, RMEF requests that WDFW delist wolves in the eastern third of the state, separately, as has been done in Oregon. Similarly, as the population in the North Cascades recovery region continues to grow, Washington will need to be prepared to address wolf conflicts. Restructuring the delisting criteria across the recovery regions will allow managers to delist wolves more efficiently and provide for more effective management tools.

While the majority of wolf packs exist in Washington without livestock or human conflicts, increased activity in the Kettle Range of northeast Washington sets an example of how communities can be impacted. RMEF encourages WDFW to consider all appropriate tools (including hunting and trapping, when available) for managing wolf populations. Actions in the revised plan in response to livestock depredation and human safety must be scrutinized to ensure effective response. Related, RMEF supports continued education and outreach about wolves, ungulates, and their interactions.

RMEF has a long and proud history of partnership with WDFW. We look forward to future engagement in the revised wolf plan and other successes together.

Sincerely,



Blake L. Henning
Chief Conservation Officer