

As a Washington resident and biologist, recently retired after a 35-year career in wildlife conservation that included serving on two advisory councils for DFW, I submit below seven comments for your consideration when creating a post-state-delisting Wolf Conservation and Management Plan:

1) 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.

2) 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.

3) 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 co-existence with predators and valuing their roles in ecosystem health.

4) Management of wolves should be returned to DFW's Wildlife Diversity Division. Post-listing, there should be no need for state-sanctioned hunting or trapping of wolves or designation as game animals. Natural processes and human-caused wolf mortality (e.g. poaching, defense of property killing, road kills, and occasional DFW lethal removal) will likely be enough to manage wolf numbers. If non-game status is not sufficient their classification could always be changed.

5) DFW policy on lethal removal of wolves and its application needs revision; the Policy 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.

6) The post-listing plan should call for greater coordination and discussion between DFW 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; DFW ought to lead this effort to the full extent allowed by law.

7) The post-listing plan should highlight the responsibility of DFW to work with diverse partners to educate the public on the importance and methods of co-existing 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 (WAG).