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I appreciate the opportunity to submit comments and recommendations for the future conservation and management of Washington's wolves. While I am not currently a resident of Washington, many of the wolves live within public lands which belong to all US citizens and to which we all have a say in how the wildlife on these lands are managed. Over the past five years I have been educating young people about wolves. The students we reach in Washington have expressed the desire to have a thriving wolf population in their future. To this end, state must maintain a healthy wolf population above recovery thresholds sufficient to conserve this iconic native species into the future.

Washington's wolves are just beginning to recover and still are years from meeting the recovery objectives of 4 successfully breeding pair of wolves in each of the three recovery regions (Eastern WA, North Cascades, Southern Cascades) for three years and 3 successful breeding pairs anywhere else in the state. Currently, only one region meets the state's delisting objective. Wolves must continue to receive adequate protection even after their population meets state and federal recovery goals.

The Draft Environmental Impact Statement (EIS) for a post-recovery management plan for Washington's wolves should include the following:

1. Alternatives that do not use general sport hunting to manage the wolf population. Research has shown that general public hunting is not an effective means of preventing or reducing wolf conflicts with livestock. Indiscriminate hunting - killing wolves for sport or trophy - should never be an option. The EIS should include a scientific review of the impact of indiscriminate killing - how this loss affects the dynamics of the pack and the potential resulting impact of that loss on livestock.
2. Alternatives that preserve intact wolf packs, taking into account the role of the wolf social structure in maintaining a resilient population and management methods that seek to protect the integrity of wolf packs wherever feasible. Wolves are known to self-regulate their population. The preservation of intact wolf packs is key to a robust and healthy wolf population in the long term.
3. Alternative that prioritizes non-lethal methods that are appropriate and adaptive to diverse types of livestock as well as the diverse landscapes upon which they graze. All potentially effective non-lethal measures need to be exhausted before lethal take can be requested. This needs to include a component that requires adequate time for the measure to possibly take effect.
4. Alternative that does not allow the lethal taking of wolves on public lands that are too rugged or mountainous for preventative measures to be effective. To be meaningful, preventative measures must be potentially effective. In rugged, mountainous country, cattle are typically too spread out for range riders or any other measure to be effective. In these conditions, ranchers are not capable of following the protocol requiring non-lethal measures. Losses in these situations need to be accepted.
5. Acknowledgement of wolves as vital keystone species on the landscape and a management component that protects them as such within prime wolf habitat.
6. Alternatives that take into account the role of habitat modification, climate factors, wild predation and human-caused mortality on ungulate population trends and how these factors can be

managed to restore and maintain healthy ungulate populations for both predators and people.

7. A strong adaptive management component so the plan can be updated as we learn more about wolf ecology, ungulate population response, effectiveness of deterrence measures for preventing livestock depredations, and human social dynamics around wolf presence in Washington.

8. A strong public outreach and education component to support coexistence as wolves establish packs in new parts of the state, including wolf behavior and what to do during a wolf encounter. Education is key to the public's acceptance and tolerance of wolves on the landscape.

Thank you for developing a new, science-based Wolf Conservation and Management Plan, and for working towards long-term wolf recovery and coexistence in Washington.

Thank you for considering my comments.