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Thank you for inviting comment on a post recovery plan for wolves in Washington. Unfortunately, since 2012, Washington Department of Fish & Wildlife has killed an estimated thirty-one endangered wolves and pups, has obliterated entire wolf families, and has caused countless packs to fragment as a result of targeting individual wolves. This track record does not align with the primary recovery objective of restoring self-sustaining wolf populations to Washington. These killings have also been authorized under the guise of managing wolf-livestock conflicts, although in reality this was done to satisfy the desires of a small number of for profit livestock operators.

In regard to the second objective of the wolf plan, to maintain healthy ungulate populations, I would suggest that this should not be an objective of the Washington Wolf Plan. Ungulate populations have been shown to be healthier in the presence of wolves so in essence this "objective" is an outcome of restoring wolf populations to Washington but should not be an objective of a wolf plan.

As mentioned above, WDFW management of wolf-livestock conflict does need to be revised given the number of 'authorized' killings in support of livestock operators. Too much concern and influence is given to livestock operators. The management paradigm should be moved to managing livestock not managing wolves. It has been noted in numerous studies that improved husbandry practices reduce depredation incidents and also, as you are aware, peer-reviewed studies have shown that killing wolves to deter depredation on cattle is ineffective and can even result in increased attacks. Non-lethal measures are effective and in the event of a confirmed depredation incidents, livestock operators / ranchers are compensated AND in the current scenario the 'offending' wolf, or any wolf for that matter, is unjustly killed at taxpayer expense. In any business, shrinkage or losses are built-in as a cost of doing business and mitigating measures are put in place to reduce the threat of loss, yet livestock operators are able to graze their cattle on public lands for pennies on the dollar, destroying wildlife and habitat in the process along with wolves and are paid for any losses and any threat to their business model is dealt with and paid for by the taxpayer. This is not the way to restore and protect wolves, but rather to promote, subsidize and protect livestock.

The last objective to develop public understanding and promote coexistence is admirable but should be number 2 in priority and the focus should be on coexistence in the presence of livestock given the majority of wolf mortality is in support of livestock operations. That is why non-lethal measures should be promoted and lethal removal should not be a primary or even secondary or third option. How can you expect to promote public understanding and coexistence of wolves with one breath and then authorize killing wolves, especially when categorized as endangered, to support private enterprise, often on public land with the other.

In summary the scope of the post-recovery plan should move towards the management of livestock and not management of wolves. The main objective should be to restore and protect self-sustaining wolf populations and promote coexistence and understanding. Maintain healthy ungulate populations is the result of a healthy wolf population but not an objective of the wolf plan. The management of wolf – livestock conflicts needs to become a people and livestock management approach rather than a wolf management approach. Here is where developing a public understanding and promoting coexistence comes into play but primarily focused on the livestock operators by helping them with funding for non-lethal measures and improved husbandry practices

Overall the key item that could make any wolf plan successful is to remove cattle from public land

and non-lethal measures should be utilized. When non-lethal measures are utilized compensation programs could be utilized to offer financial assistance due to depredations or even from a preventative aspect by paying for additional non-lethal protections to mitigate against further potential depredations. Wolves should not be killed at livestock operators request and lethal options should be few and far between, if even used at all. The disastrous legacy of the WDFW's approach to wolf management is hard to overcome and it will take a massive revision of the wolf plan and a basis in best available science, transparency, and true inclusiveness to succeed and do what is right for wolves, Washington and to regain the public's trust.