

# The Lands Council

Chris Bachman  
Wildlife Program Director  
The Lands Council  
25 W. Main Ave. Ste 222  
Spokane, WA 99201 [cbachman@landscouncil.org](mailto:cbachman@landscouncil.org)  
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Kelly Susewind, Director  
Washington Department of Fish and Wildlife  
PO Box 43200  
Olympia, WA 98504-3200  
Phone: 360-902-2225  
Fax: 360-902-2947  
[director@dfw.wa.gov](mailto:director@dfw.wa.gov)

RE: Post Recovery Management Plan Scoping Comment

Director Susewind,

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,

Chris Bachman  
Wildlife Program Director  
The Lands Council