

Agenda Summary Report (ASR)

Franklin County Board of Commissioners

DATE SUBMITTED: October 15, 2019	PREPARED BY: Derrick Braaten
Meeting Date Requested: October 22, 2019	PRESENTED BY: Derrick Braaten
ITEM: (Select One) <input checked="" type="checkbox"/> Consent Agenda Brought Before the Board Time needed:	
SUBJECT: Franklin County's Wolf Post-Recovery Plan EIS Scope Request for Comment Response Letter	
FISCAL IMPACT: None	
<p>BACKGROUND: On May 14, 2019, Mike Livingston, with WDFW, provided an update to the Board of County Commissioners regarding wolves in Washington State. During that presentation, Mr. Livingston stated that the Federal Government was proposing to delist grey wolves in the lower 48-states. He also indicated that the State's Wolf Management & Conservation Plan, adopted in December, 2011, regarding the management of wolves in Washington, was a relative success, such that wolves in Washington State appear to have "recovered", and it will be necessary to develop a "post-recovery" plan.</p> <p>On August 1, 2019, Franklin County received notice of the Determination of Significance (DS) and Request for Comments regarding the proposed scope of the Environmental Impact Study (EIS) for the Washington State Department of Fish & Wildlife (WDFW) Wolf Post-Recovery Plan. This is a request for the public, affected jurisdictions, and agencies, to provide comments regarding, in part, what the Wolf Post-Recovery Plan environmental study should include/investigate.</p> <p>On August 27, 2019, Franklin County held a duly advertised public hearing to solicit comments from the public regarding the proposed Wolf Post-Recovery Plan Scope. At the public hearing, one member of the public spoke about the need for wolves in WA to be better managed and for landowner's rights to protect their property and livelihoods to be better clarified. Various comments from the Board of County Commissioners (BoCC) regarding wolf activity were also provided.</p> <p>The Planning & Building Department Director, acting as Franklin County's SEPA Lead Official, has compiled the substantive comments received, either in writing or verbally at the public hearing, and prepared a draft official response. At the August 27, 2019 public hearing, the BoCC requested that the response be brought before them for consideration before being sent to WDFW. Any proposed changes agreed to by the BoCC will be incorporated into the final version sent to WDFW. Comments regarding the Washington State Wolf Post-Recovery Plan EIS Scope are due November 1, 2019.</p>	
RECOMMENDATION: Approve the letter, as presented.	
COORDINATION: Staff provided an outline of subjects/issues Franklin County desires to see in the EIS Scope Response Letter to the County Administrator and each of the County Commissioners, and solicited feedback to ensure issues or concerns of the individual Commissioners were included, as well as all comments received by the September 2, 2019 comment due date.	

ATTACHMENTS: (Documents you are submitting to the Board)

(1) Draft Wolf Post-Recovery Plan EIS Scope Request for Comment Response Letter (2) WDFW Notice of DS and Request for Comments

HANDLING / ROUTING: (Once document is fully executed it will be imported into Document Manager. Please list name(s) of parties that will need a pdf)

To the Clerk of the Board: None

To Planning: None

I certify the above information is accurate and complete.

 Derrick Braaten



FRANKLIN COUNTY Draft

PLANNING AND BUILDING DEPARTMENT

October 24, 2019

Lisa Wood
SEPA Responsible Official, SEPA/NEPA Coordinator, and HPA Appeals Coordinator
Habitat Program - Protection Division
WASHINGTON DEPARTMENT OF FISH AND WILDLIFE
PO Box 43200 | Olympia, WA 98504

RE: Washington State Wolf Post Recovery Plan EIS Scope Comments

Ms. Wood,

Thank you for the opportunity to provide comments regarding the proposed scope for the Washington Department of Fish & Wildlife (WDFW) Washington State Wolf Post-Recovery Plan. We were very disappointed that the September 25, 2019 open house scheduled for Pasco was canceled. Many of our residents, and those of surrounding counties, were planning on attending the event. This would have been a prime opportunity for the public and WDFW to engage in a conversation about the subject, and would have been a great opportunity for WDFW to better inform the public about the wolves in Washington.

The 2011 Wolf Recovery Plan appears to be, if not a success, well on its way to being so. In fact, it may be argued that the Recovery Plan has been too successful in some areas. Franklin County, WA, is beginning to see evidence of wolf activity in the northern parts of the County. In addition, various County residents have rights to rangeland both in Franklin County and counties further north. Some now refuse to move their herds into their northern ranges because of either personally experiencing wolf predation, or due to the risk of such to their herds. As WDFW develops its EIS Scope for the Post Recovery Plan, it is our hope that your agency will investigate the following items:

- 1. Investigate why there are no significant wolf packs west of, or really even in, the Cascade Range.** Considering the number of elk, deer, and other herd animals within the range, the alpine environment, relatively low intensity human development, etc., it is odd that such prime wolf habitat is nearly absent of wolves. The perception of many affected landowners is that Westside wolves get moved to the east of the Cascades, but eastern wolf packs/individual wolves are never moved from the East to the West. What is the cause for the wolves located in western Canada to always move east of the Cascades before they move south into Washington?
- 2. Investigate better tracking and reporting methods.** WDFW acknowledges getting an accurate wolf count is difficult, partly because only certain animals are electronically tracked. Why not track all wolves that are encountered? Based on WDFW's estimates, there are around 126 wolves in Washington, but that is likely an undercount. More accurate tracking will help clarify this, as well as questions regarding how far each animal ranges, whether there is mixing of packs and breeding pairs, whether a "lone wolf" is actually alone, or part of a pack, etc. Another benefit will be to assist in clarifying whether livestock predation is at a higher risk due to wolf activity in an area, allowing WDFW to potentially develop a warning system to inform ranchers and others impacted by wolf activity that additional steps to protect livestock may be necessary, in real time.

3. **Review the process for the siting/introduction of wolves to an area, and remove those areas from consideration that have high levels of human activity.** Regardless of whether habitat areas from the past appear to be optimum for the maintenance of existing packs, or for the relocation of wolves, such ranges that now have high levels of human activity in the area should be eliminated from consideration. To do otherwise only increases the likelihood of negative wolf/human/livestock interactions, as well as increasing the likelihood of “problem wolves” being created.
4. **Develop “best management” practices that respect landowner rights and clearly outline a landowner’s rights regarding the protection of life and property.** As currently practiced, it is unclear as to when a landowner can take lethal action to protect livestock from wolf predation, except if one sees the wolf in the process of actually taking down an animal. What about if it is stalking or chasing livestock? What preventative actions will be available to landowners for protecting their property and life from wolf predation?
5. **Investigate how current policies and practices can be amended to give a complainant the benefit of the doubt, creating a less adversarial interaction between investigators and parties impacted by wolf predation.** Too often, reports of livestock wolf kills are not taken seriously, or investigators of the kill insist the animal was technically “killed” by something else. This attitude of disbelief and distrust towards victims of wolf predation only furthers the perception by many that WDFW and wolf advocates value the “rights” of the wolf population above those of the resident humans in the area. By many, this is considered a betrayal by government, who should be there to help, not hinder. Incidents where a wolf incapacitates or mortally wounds an animal, and then the kill stroke comes from another animal, should be viewed as a wolf kill. After all, if a wolf had not initially maimed the animal, then it would have had at least a fighting chance against the killing animal. Any abuse by livestock owners of such an approach would become readily apparent, especially if the tracking of wolves in Washington was more robust.
6. **Investigate ways to ensure the Post-Recovery Plan is based on science, and protected from politics.** Politics should have little place in the science of developing a wolf post-recovery plan for Washington. Even when the science determines that what is best is not politically popular, such as a need to cull a pack due to consistent predation of livestock, or because there are too many wolves in one area. However, it should never be the case that the needs of the wolf population are considered more important than the needs of the local humans in the area, especially if such an action increases the risk to the lives and property of said residents.
7. **Investigate ways to streamline the process, and minimize costs to a complainant, for reporting wolf predation.** Do not require a process to prove a wolf kill that is so arduous and expensive it costs more than the value of the loss. Simplify the process, minimize subjectivity in the analysis, and give the benefit of the doubt to the damaged party. It will become readily apparent if a party is abusing the process.
8. **Investigate methods to appropriately weigh the value of comments received regarding wolf policies.** Public input is imperative to developing a wolf post-recovery plan for Washington State, as well as providing opportunities to educate the public on the subject, through face-to-face discussions. However, all comments should not be necessarily considered equal. An individual living in an urban center may love or hate wolves, but they will likely never interact with one. A rancher in Stevens County experiencing wolf predation on his herds may have tips or information about the local wolf activity even WDFW is unaware of. Under the current process, they both can provide comment about the process, but how will each comment be weighed regarding relevancy or knowledge of the subject?
9. **Investigate ways to improve voluntary cooperation from landowners.** Very few landowners are voluntarily agreeing to become cooperating partners with WDFW’s plans regarding wolves in Washington State. Anecdotal evidence indicates this is primarily due to a belief they will lose their rights; a negative perception of WDFW’s priorities; a lack of trust in, or understanding of, the plan; how the plan is being implemented; or because of their fear of, or lack of faith in, the

program, they ascribe to the "Triple "S"" theory of wildlife management (See it, Shoot it, and Shut-up). To improve the likelihood of cooperation from landowners, investigate ways to encourage voluntary assistance, including incentives and reimbursement for losses, without requiring they give up their rights or involuntarily sacrifice property/funds to do so. It must be remembered that the impacted landowners' livelihoods are being affected, if not their lives. They are the key as to whether the program will be a success.

In closing, if Washington State desires to continue protecting wolves, then it must find ways to do so that respect a landowner's rights, and provides recompense for wolf activities that cause harm. Increasing the wolf population without providing clear guidance as to how far one can go to protect against livestock predation, or how to go about culling the population of problem animals, increases the likelihood of negative interactions between wolves, humans, and livestock. We do not want the Wolf Post-Recovery Plan to create a situation in Washington similar to issues California is having with sea lions and mountain lions. If the current practices continue forward as they are, then the Plan will not achieve its goal. It will continue to generate little cooperation from landowners to assist, as their efforts or ideas are perceived to be spurned or unappreciated, or they believe their rights and property are effectively taken, without recompense.

Thank you for your consideration of our comments, and we look forward to continuing to work with the Washington Department of Fish & Wildlife regarding this, and other wildlife issues, in Franklin County.

With regard,

Derrick Braaten
Planning & Building Director
Franklin County SEPA Lead Official

**Washington State Wolf Post-Recovery Plan Development
Notice of DS and Request for Comments**



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: P.O. Box 43200, Olympia, WA 98504-3200 • (360) 902-2200 • TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

**DETERMINATION OF SIGNIFICANCE
AND REQUEST FOR COMMENTS ON SCOPE OF EIS**

Name of Proposal: DS/Scoping 19-044: WOLF POST-RECOVERY PLAN
DEVELOPMENT

Description of Proposal: Historically, gray wolves (*Canis lupus*) were common throughout much of Washington, but due to high mortality from government-sponsored predator eradication programs, wolves were extirpated from Washington by the 1930s. Confirmed reports of dispersing wolves in northern Washington from growing populations in Idaho, Montana, and British Columbia, Canada began to increase after 1990, but the first resident pack in the state since the 1930s was not documented until 2008 in Okanogan County in north-central Washington. Since that time, wolves have continued to naturally recolonize the state by dispersing from resident Washington packs and neighboring states and provinces.

In 2007, anticipating dispersal of wolves into Washington from surrounding states and provinces and the likely formation of resident packs, the Washington Department of Fish and Wildlife (WDFW) initiated development of a state Wolf Conservation and Management Plan for Washington (available at <https://wdfw.wa.gov/publications/00001/>). Assisted by an 18-member working group comprised of stakeholders, the plan was adopted in December 2011 by the state Fish and Wildlife Commission and has been the guiding document for wolf management in the state to date.

Since 2008, Washington's wolf population has grown by an average of 28 percent per year. As of December 31, 2018, wolf numbers in Washington have increased to a minimum of 126 individuals, 27 packs, and 15 successful breeding pairs, marking a population increase for the 10th consecutive year and the highest counts to date. Not only is Washington's wolf population growing, but its distribution is also expanding westward in the state. In 2018, Department biologists confirmed the state's first wolf pack west of the Cascade crest in the modern era, and the number of packs in the North Cascades recovery region increased from three to five and the number of successful breeding pairs from one to three. The Department is confident that Washington's wolf population is on a path leading to successful recovery.

In addition, on March 15, 2019, the U.S. Fish and Wildlife Service published a proposal to federally delist gray wolves in the lower 48 states. Under the proposal, wolves in Washington statewide would be federally delisted and management authority would be returned to the state, except for tribal reservations and national parks.

Given the pace of wolf recovery and in light of potential listing status changes, WDFW proposes to develop a post-recovery conservation and management plan for wolves to guide long-term wolf conservation and management under state authority once wolves are considered recovered in Washington and are no longer designated as state or federally endangered.

Proponent/Applicant: Washington State Department of Fish and Wildlife (WDFW)
Contact: Julia B. Smith
P.O. Box 43141
Olympia, WA 98504
(360) 902-2477
Julia.Smith@dfw.wa.gov

Location of Proposal, including street, if any: Statewide

Lead Agency: Washington Department of Fish and Wildlife (WDFW)

EIS to be Prepared: WDFW has determined that this proposal may have a significant impact on the environment. An environmental impact statement (EIS) will be prepared under RCW 43.21C.030(2)(c).

Scoping: WDFW is seeking public input throughout the EIS process. More information regarding the proposal can be found at <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/post-recovery-planning>. We are conducting a survey designed to help identify major topics and issues the plan should address. You may participate in the survey online at <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/post-recovery-planning/public-input/survey>. The survey allows you to input additional questions or comments as well. General information about wolves in Washington is available at <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf>.

Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable impacts, and licenses or other approvals that may be required. We must receive your comments within 92 days of the date of this letter. The comment period and survey will close at **5:00 pm on November 1, 2019**.

Method of Comment:

The following procedures shall govern the method to comment on agency SEPA proposals. Comments received through these procedures are part of the official SEPA record for this proposal. *Please provide the title of this proposal and your name in the subject area of your comment.*

You can submit your comments any one of the following ways:

- Online at <https://wdfw.wa.gov/species-habitats/at-risk/species-recovery/gray-wolf/post-recovery-planning/public-input/survey>
- Submit a written comment in person at one of the public open houses listed below.
- Mail a written comment to the address below.

Responsible Official: Lisa Wood

Position/Title: SEPA/NEPA Coordinator, WDFW Habitat Program, Protection Division

Address: P.O. Box 43200, Olympia, WA 98504-3200

Comments must be received by **5:00 pm on November 1, 2019**.

After the comment period closes, applicants may view the updated status of this proposal on the WDFW SEPA website: <https://wdfw.wa.gov/licenses/environmental/sepa>. Once the status is posted as final, applicants and permittees may take action on the proposal.

If you have questions about this DS/Scoping or the details of the proposal, contact Lisa Wood at the address, e-mail, or fax number above; you can also call her at (360) 902-2260.

DATE OF ISSUE: August 1, 2019

SIGNATURE:



SEPA Log Number: 19-044.ds/scoping

The Washington Department of Fish and Wildlife (WDFW) has scheduled public scoping open houses across the state Sept. 3 – Oct. 30 and will take comment on wolf planning through 5:00 pm on November 1, 2019.

The public scoping open houses will be held at the following locations and times:

Spokane – Sept. 3 – 6 p.m. to 8 p.m.

Spokane Community College (SCC), The Lair Student Center, Building #6, Sasquatch and Bigfoot Room 124 & 124C, 1810 Green St., Spokane, WA 99217

Colville – Sept. 4 – 6 p.m. to 8 p.m.

Agriculture & Trade Center, 215 S. Oak St., Colville, WA 99114

Clarkston – Sept. 5 – 6 p.m. to 8 p.m.

Quality Inn and Suites, Half Mahogany Room, 700 Port Drive, Clarkston, WA 99403

Chelan – Sept. 11 – 6 p.m. to 8 p.m.

Chelan Fire Station, 232 E. Wapato Ave, Chelan, WA 98816

Pasco – Sept. 25 – 6 p.m. to 8 p.m.

Franklin PUD auditorium, 1411 W. Clark St, Pasco, WA 99301

Selah – Sept. 26 – 6 p.m. to 8 p.m.

Selah Civic Center, 216 S. 1st St., Selah, WA 98942

Mt. Vernon – Oct. 7 – 6 p.m. to 8 p.m.

Padilla Bay National Estuarine Research Reserve, 10441 Bayview-Edison Rd., Mt. Vernon, WA 98273

Issaquah – Oct. 8 – 6 p.m. to 8 p.m.

Eagle Room, City Hall, 130 E. Sunset Way, Issaquah, WA 98027

Kelso/Longview – Oct. 9 – 6 p.m. to 8 p.m.

Red Lion Hotel and Conference Center, 510 Kelso Drive, Kelso, WA 98626

Morton – Oct. 10 – 6 p.m. to 8 p.m.

Lyle Community Center, 700 Main Street, Morton, WA 98356

Olympia – Oct. 15 – 6 p.m. to 8 p.m.

Natural Resources Building (Room 172), 1111 Washington SE, Olympia, WA 98504

Goldendale – To Be Announced – 6 p.m. to 8 p.m.

Goldendale High School cafeteria, 525 Simcoe Drive, Goldendale, WA 98620

Port Angeles – Oct. 29 – 6 p.m. to 8 p.m.

Peninsula College, House of Learning (Longhouse), 1502 E. Lauridsen Blvd., Port Angeles, WA 98362

Montesano – Oct. 30 – 6 p.m. to 8 p.m.

Montesano City Hall, 112 N. Main St., Montesano, WA 98563