

Erin Hauge

November 14, 2019

Kelly Susewind, Director
Washington Department of Fish and Wildlife
PO Box 43200
Olympia, WA 98504-3200

Dear Director Susewind and staff,

It is premature to be considering a post-recovery plan for wolves when the state of Washington is still far from meeting goals that indicate true recovery in the current wolf management plan. Therefore, creating a "post-recovery" plan for wolves at this time is not appropriate, scientific or rational - it is putting the cart before the horse.

I would also like to remind the Director that your own Governor has contacted you directly, asking that you make changes to the current wolf recovery plan that would increase the use of non-lethal management methods. Governor Inslee is directly requesting that you fulfill the wolf management plan's goals and work to greatly reduce the need for lethal removal of wolves in Washington. The Governor's letter is attached here for your reference.

I'd like to point out a few inconsistencies with any logic that argues for continued lethal removal:

1. The wolves living in the northeast portion of Washington have their territories primarily on federal public lands, which belong to all of us, not just a few livestock operators, and therefore those wolves have a right to live on our public lands.
2. Killing wolves has been shown to create more livestock conflict, not less, because wolf pack families are thrown into conflict and crisis when alpha members are killed.
3. Public lands grazing is a privilege, not a right, and does not include, carte blanche, the green light to kill wildlife living on our public lands at the request of private livestock operators.
4. Every business takes risks and sustains some loss. This is reality. Wolves don't need to die because less than 1% of livestock may be lost to predators annually. And that means that more than 99% of livestock dies or is lost by other means, including birthing complications, weather, disease and rustling and we certainly can't blame wolves or other predators for that statistic.
5. It's not entirely clear why there are so many conflicts between wolves and livestock operators when there are just a handful of federal grazing allotments in Northeast Washington. But this would suggest that livestock operators are not consistently and/or correctly employing non-lethal deterrence methods as a means to avoid conflict, they're simply asking for kill orders.
6. The first guideline of the North American Model of Wildlife states: "Wildlife is a public resource. ...Government at various levels has a role in managing that resource on behalf of all citizens and to ensure the long-term sustainability of wildlife populations."
7. Wolves living on public lands are a public resource. Period.

Instead of racing to create a post-delisting plan, the Washington Department of Fish and Wildlife must instead focus its attention on current wolf-management needs.

- The Department must resolve conflicts between livestock and wolves using non-lethal methods. Most of the conflict is taking place on public lands and on some of the state's best habitat for gray wolves. Killing them is not a science-based or rational response.

- The Department has an obligation to conduct extensive public education on wolves. This is emphasized in the current plan but has not been fully accomplished, despite the fact that all wolf experts say public education is the single most important action to take for successful wolf conservation. WDFW must put much more effort into developing effective and inclusive education and outreach on living with wolves, the use of non-lethal solutions, and dispelling myths and fear.
- The Department must develop management guidance, policies and protocols using best available science and fair public rule-making processes. This will bring best results for transparent, rational and enforceable strategies. Under the current plan, the Department is using lethal control, which is unacceptable, unsustainable and goes against sound, science-based management. Wolves continue to die at the request of public lands ranchers despite public outcry. These wolves die to placate a very small number of people who are already taking advantage of our public lands and resources at \$1.35 per cow/calf per month to run their cattle (AUM 2019 rate). Not only is that a basement bargain at twice the price, it is not necessary to wipe out entire wolf packs to be able to manage them. Killing multiple wolves living on public lands to prevent livestock loss is not management. It is simply killing wolves.

To be considered a scientifically motivated Department that is respected for being forward-thinking, effective and rational, WDFW must:

- Stop cherry-picking science to justify political actions. The Department's wolf-killing placates a few ranchers who should be using non-lethal management methods applied in a consistent and correct manner and, blatantly, are not.
- Get in step with the scientific global call to protect and conserve our apex predators. We are in a mass extinction crisis, stop participating in the crisis and manage wolves through non-lethal methods.
- Develop a public education and outreach program that promotes the value of top predators for keeping ecosystems healthy and helps dispel misunderstanding and fear. Stop sending the message that the state prioritizes livestock over wolves by stopping the Department's wolf killing. Assist the public in seeing the value of coexisting with wolves by teaching that wolves are ecologically important and worth conserving.

The Washington Department of Fish and Wildlife has a responsibility to conserve and protect wolves held in the public trust in perpetuity. And that will only happen if: the Department ceases to kill wolves as a blanket solution; talks to citizens of all ages and backgrounds throughout Washington frequently and practically about coexisting with wolves; and works with livestock operators to use non-lethal solutions that are applied with oversight and guidance in a consistent and correct manner.

The Department is not yet in 'post-recovery' mode for wolves. Please focus on the critical wolf recovery and conservation that still needs to happen.

Thank you for your consideration.

Best,
Erin Hauge
Ecologist and Certified naturalist

JAY INSLEE
Governor



STATE OF WASHINGTON
Office of the Governor

September 30, 2019

Kelly Susewind
Director
Washington Department of Fish and Wildlife
PO Box 43200
Olympia, Washington 98504-3200

Dear Director Susewind:

I write to ask that you make changes in the gray wolf recovery program to further increase the reliance on non-lethal methods, and to significantly reduce the need for lethal removal of this species.

I understand that conflicts between wolves and livestock do occur, especially as the state's wolf population continues to grow. The department, working with the Wolf Advisory Group, livestock producers, hunters, conservation groups and others, has made significant progress in securing both gray wolf recovery and increasing the social tolerance of wolves on the Washington state landscape. The State's Wolf Conservation and Management Plan (Wolf Plan) has contributed to the recovery of this species, and is a model of citizenry engagement and statewide leadership. I acknowledge that the Wolf Plan is successful in most parts of our state.

As you know, wolves were extirpated in the state by the 1930s on behalf of livestock interests. The animals started migrating back to the state in 2008 from surrounding areas. Most of the wolves live in the northeastern corner of the state and their territories have high overlap with federal public lands. For reasons that are not entirely clear, numerous conflicts with livestock producers have occurred in a handful of federal grazing allotments. Chronic livestock depredations and annual lethal removal of wolves in the Kettle River Range in Ferry County, have resulted in public concern and outrage over lethal management actions taken by the department.

I share the public's concern and am troubled that the Wolf Plan does not appear to be working as intended in this particular area in Northeastern Washington. I believe we cannot continue using the same management approach on this particular landscape. We must look for other strategies that address the unique nature of this particular geographical area, an area which has been characterized as prime gray wolf habitat. We must find new methods to



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better support co-existence between Washington's livestock industry and gray wolves in our state. The status quo of annual lethal removal is simply unacceptable.

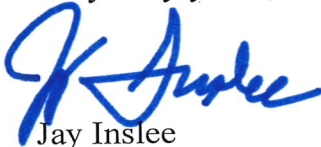
I understand that your advisory group and agency experts are currently reviewing the wolf-livestock interaction protocol, and may recommend changes to the guidelines for lethal management in particular. I ask that you accelerate the update to the lethal management guidelines, with the goal of significantly reducing the role of lethal removal in the wolf management program. In addition, please consider what opportunities exist to work with the U.S. Forest Service and other public land managers to make changes that would reduce the conflicts, including changes in allotment policies for public lands that are prime wolf habitat, the addition of more intensive range riding, and other proven or promising methods.

My requests are consistent with the requirements of ESHB 2097, signed into law this past legislative session, which calls for proactive deterrence and community collaboration to reduce conflict between wolves and livestock. These will be important for maintaining the economic viability of the livestock industry, the state's wolf populations, public acceptance of the wolves in northeastern Washington, and public acceptance of ranching on public lands. Additional funding was provided in the 2019-21 budget for wolf-livestock conflict management in Stevens and Ferry Counties.

Please provide me with an update on the above requests and statutory requirements, along with any recommendations for additional action, by December 1, 2019.

If you have any questions, please contact my Senior Policy Advisor for Natural Resources, J.T. Austin, at JT.Austin@gov.wa.gov or at (360) 902-0638. Thank you for your work.

Very truly yours,



Jay Inslee
Governor

CC: Larry Carpenter, Chair, Washington State Fish and Wildlife Commission