



November 15, 2019

Lisa Wood
SEPA/NEPA Coordinator
Washington Department of Fish and Wildlife
Habitat Program, Protection Division
P.O. Box 43200
Olympia, WA 98504

Dear Ms. Wood,

On behalf of the Center for a Humane Economy and Animal Wellness Action, two related animal welfare organizations with a mission of halting cruelty and protecting the viability of species, I write in response to the Department of Fish and Wildlife's invitation for public comment on the scope of a post recovery plan for wolves in Washington State, in accordance with the State Environmental Policy Act.

There are three precepts driving our thinking that we hope the Department will embrace:

1. No trophy hunting of wolves
2. No killing wolves on public lands for livestock depredation
3. Mandatory training for ranchers in the use of non-lethal wolf management

A high-pitched, organic public scoping process has occurred throughout the state over the past year, providing guidance to the Department on the social dimensions of wolf management. In sum, the public has a strong aversion to killing wolves, including in circumstances where there is a perceived conflict with livestock.

Expressions of concern have been evinced through lawsuits, administrative petitions, full page newspaper ads, billboards, rallies outside the Department offices, letter of admonition from the Governor, petitions with half a million signatures, polling showing overwhelming support for non-lethal remedies, restive meetings, and workshops cancellations for safety reasons. Many of these expressions of public concern over the Department's actions have prompted print and electronic media coverage.

To overlook these inputs in favor of this controlled and clinical comment process is to walk indoors from a hurricane and stand in front of a fan. The public's opposition to the Department's recent behavior toward wolves is unmistakable and should prompt a serious reassessment of its approach to wolf management.

Animating this debate is the lethal removal of wolves perceived to be in conflict with ranchers (with a single ranching operation's complaints accounting for 87% of wolves killed in the state in recent years). Rather than boring down on these conflicts, asking more of the leadership at the Diamond M Ranch whose mismanagement of cattle and unreasonable demands have stoked the wolf controversy, the Department has now pivoted and is publicly flirting with the idea of opening a trophy hunting season for wolves.

With the state's Wolf Conservation and Management Plan in disarray and mired in controversy – due for humane revisions at the urging of the Governor – we believe it is premature and a misuse of the



Department's personnel and resources to be game-planning for a recovered, thriving wolf population and establishing a pretext for future wolf hunting. The state's oft-cited (and disputed) descriptive brushstroke of "120 individuals, 27 packs and 15 successful breeding pairs" suggests the recovery goals established in the Plan are within sight, but we contend that we are much closer to the starting gate than the finish line.

Wolves are slowly making a comeback in Washington State, having been driven to extinction by the combination of lethal actions by private citizens and a government eradication program. The state has hampered recent recovery efforts by killing wolves before exhausting non-lethal management options, in some cases eliminating entire packs.

The Department's overreach was made evidence in a case before a Superior Court judge who issued an injunction asking for a cessation of killing in a portion of the Colville National Forest. Put simply, the Department has too willingly assumed the role of hired gun for ranchers who do not want wolves sharing public lands with their cattle.

The Department is not evolving, and its conduct is misaligned with the values of the majority of Washington citizens.

On November 1st, Seattle radio station KUOW aired an interview with Department director Kelly Susewind discussing this very scoping exercise, and its nexus to potential wolf hunting. Susewind said a recovered wolf population can be successfully managed *with* a hunting season, or *without* a hunting season. Either works, from his perspective. Wolf hunting wouldn't be necessary for conservation, scientific or economic reasons, he was suggesting; hunting wolves would be discretionary, for fun, for sport.

Ultimately the fate of Washington's wolves, after finally being restored and in balance in their natural setting, would be decided by a state agency that almost always comes down on the side of more killing of wildlife, resisting the idea of simply letting apex predators survive and thrive while working to manage the limited conflicts that arise.

The Department should take trophy hunting of wolves off the table and concentrate on reducing state killing of wolves to benefit livestock ranchers on public lands.

Wayne Pacelle
President
Center for a Humane Economy

Founder
Animal Wellness Action

7315 Wisconsin Avenue #650
Bethesda MD 20814

Mitchell Fox
Director of Advocacy
Center for a Humane Economy
Seattle