

# Defenders of Wildlife

## **What is your gender?**

Prefer Not to Say

## **Age?**

1

## **County (or Counties) of Primary Residence?**

Seattle, WA

## **Residential setting:**

Other

Defenders of Wildlife has staff in urban and rural settings throughout the nation and the NW, specifically.

## **Do you identify yourself as any of the following?**

Environmentalist

## **Do you have general comments about the scope of Washington's updated wolf conservation and management plan?**

Please see attached comment letter from Defenders of Wildlife.



**Northwest Office**

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November 14, 2019

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

*Comments submitted electronically*

RE: Comments on the scope of a draft Environmental Impact Statement for the development of an updated Washington Wolf Conservation and Management Plan

Dear Ms. Wood,

Thank you for the opportunity to provide comments to the Washington Department of Fish and Wildlife (WDFW) regarding the scope of a draft Environmental Impact Statement (EIS) for the development of an updated Washington Wolf Conservation and Management Plan (Wolf Plan).

Defenders of Wildlife (Defenders) is a national non-profit conservation organization with over 1.8 million members and supporters nationwide, including more than 24,000 members and supporters in Washington state. Founded in 1947, Defenders is a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend. Defenders has worked for decades to advance wolf recovery across the west. In Washington, Defenders focuses on collaborative solutions to reduce conflicts among people, and between wolves and livestock. We served on the state's Wolf Advisory Group, where we helped develop the Wolf-Livestock Interaction Protocol. We also provided funding to support the implementation of non-lethal tools and techniques in communities sharing the landscape with wolves.

Defenders appreciates WDFW's proactive approach to updating the Wolf Plan. However, we are concerned that delisting and removal of protections for wolves appears to be a foregone conclusion -- especially in light of the state's controversial lethal removal actions under the current wolf management regime. Any plan resulting from this process should be based on the best available science and prioritize non-lethal approaches to minimizing conflicts between wolves and livestock. We strongly urge the state to invest its resources in resolving wolf management issues arising under the current Wolf Plan. Doing so will reassure the public of the state's commitment to science and coexistence. We believe this is critical to securing support

and buy-in for an updated Wolf Plan to guide wolf conservation and management into the future.

As you prepare the draft Environmental Impact Statement (EIS), we ask that you consider the following:

**The state should demonstrate its commitment to the best available science and to coexistence by investing resources in resolving ongoing issues arising under the current wolf management regime.**

The state should not rush to delist gray wolves, nor should it present delisting and removal of protections as a foregone conclusion. The current Wolf Plan states that the gray wolf will be considered for delisting upon reaching recovery objectives – a milestone that gray wolves have yet to reach.

Defenders urges WDFW to focus its resources on restoring public trust and implementing effective non-lethal alternatives, particularly in areas of prime wolf habitat and repeated wolf-livestock conflict like the Kettle Range. Ongoing lethal removals have eroded public trust in the agency at a time when widespread buy-in is necessary to develop a credible post-delisting wolf plan. In the near term, Defenders recommends that the state work with federal land management agencies like the US Forest Service to reevaluate grazing allotments in areas of prime wolf habitat – a key way to reduce a pattern of ongoing conflicts and wolf killings.

Governor Jay Inslee drafted a letter on September 30th to WDFW Director Kelly Susewind that directed WDFW to “increase the reliance on non-lethal methods, and to significantly reduce the need for lethal removal” of wolves. For either the current or updated Wolf Plan to have credibility, it is crucial that the state immediately implement this directive to alleviate the current situation in the Kettle Range, restore public trust, and demonstrate its commitment to wolf recovery and the best available science.

**The updated Wolf Plan should embrace a coexistence philosophy that clearly prioritizes the use of non-lethal tools and techniques to reduce conflicts between wolves and livestock.**

The draft EIS should explicitly say that it is the policy of Washington state to prioritize the use of non-lethal tools and techniques to reduce conflicts between wolves and livestock. It should be clear to all stakeholders and members of the public that lethal removal is an option of last resort – and the state must implement the plan accordingly. Defenders recommends that the draft EIS contain a plan for a community-based model of human-wildlife coexistence.

A successful non-lethal plan will include the following elements:

- **Engagement/Trust building:** WDFW staff time invested in forming relationships and building trust with landowners, community members, decision makers, managers, partners, conservation organizations, and others.

- **Identify Solutions:** When conflicts arise or are likely to arise, WDFW staff and partners work directly to help communities realize science-based solutions from an expanding coexistence toolkit to mitigate or reduce the chances of conflict.
- **Address Social Conflicts:** Address social conflicts by meeting with and convening diverse stakeholders and encouraging dialogue and, when possible, collaboration.
- **Implement Tailored Interventions:** Explore funding mechanisms to:
  - a. cost-share tools and field support;
  - b. host workshops and trainings for community members and wildlife managers;
  - c. provide specialized technical assistance to community members and wildlife managers; and/or
  - d. increase public awareness through the WDFW website, informational meetings or webinars, social media, and other activities to increase acceptance of living with wildlife.
- **Continuous Testing:** Work with partners to conduct field test tools and techniques to determine their application across different landscapes. In this way, projects serve as demonstration projects and models for other communities to follow and adapt.
- **Transition Ownership:** Empower local stakeholders to maintain coexistence projects with support as needed.
- **Expand Efforts:** Get ahead of conflicts by expanding coexistence support in areas of likely wolf dispersal or population growth.

A successful non-lethal plan will also adapt according to the best available science and embrace advancements in the science of human-wildlife coexistence:

- **Develop and Test New Methods:** Research and develop new coexistence tools and strategies in response to community needs.
- **Create Decision Support Tools:** Develop materials and resources to support stakeholder decision-making in assessing risk and choosing methods.
- **Evaluate Effectiveness:** Research and field test coexistence tools and strategies for effectiveness at mitigating human-wildlife conflict.
- **Develop Protocols:** Develop and promote ecological and social science evaluation protocols for coexistence interventions.
- **Evaluate Interventions:** Systematically collect and analyze data from coexistence interventions to ensure practices are successful in helping communities and wildlife coexist.

**The state must provide a transparent and equitable public process with meaningful opportunities for members of the public to weigh in.**

The public process has already been compromised by safety concerns that led to the cancelation of public meetings during the scoping period. WDFW staff conducted multiple interactive webinars and did an admirable job of conveying complicated information and addressing questions from participants. Defenders recognizes that WDFW's first priority is – rightly – the safety of its staff and members of the public. However, interactive webinars are

not a substitute for in-person public meetings and deprive Washingtonians of the opportunity to provide direct feedback to decision makers.

We understand the extenuating circumstances at play during the scoping period, but we encourage WDFW to hold a combination of in-person public meetings and interactive webinars throughout the SEPA process. These two vehicles for public participation are complementary and help ensure an equitable and inclusive process.

**We also request that the following issues be addressed in your analysis:**

- **Interagency Coordination** – WDFW should evaluate opportunities to work with federal land management agencies like the US Forest Service to reevaluate grazing allotments in prime wolf habitat, and especially in areas of repeated wolf-livestock conflict. This approach is crucial to resolving the current crisis and pattern of ongoing conflict and wolf killing in the Kettle Range. However, it's also an important tool for mitigating future conflict and addressing potential hot spots as wolves disperse across the state.
- **Relisting** – The draft EIS should expand upon the relisting provisions included in the current Wolf Plan and outline the specific temporary or emergency actions the state will take if the wolf population experiences a significant decline. The state should have the ability to institute temporary measures to protect wolves while WDFW investigates the cause or causes of the decline. Once a cause is identified, the updated Wolf Plan should outline an expedited path to restoring protections on a long-term basis.
- **Clarifying and Reconciling Inconsistencies** – Wolf conservation and management in Washington is dictated by the Wolf Plan. However, the plan is supplemented by guidelines and protocols developed by the Wolf Advisory Group, as well as legislation that can significantly shift how the Wolf Plan or established guidelines are implemented. This overlapping system is complicated and often leads to conflicts and inconsistencies. Updating the Wolf Plan is a good opportunity to reconcile these inconsistencies and establish a clear and definitive source for Washington's wolf conservation and management policies, subject to a transparent and public process.
- **Public Lands** – The draft EIS should consider a range of options for managing wolves on state and federal public lands. Defenders urges the state to adopt a more protective and precautionary approach on these lands, and show deference to the broad public interest in conserving natural resources over narrow private interests. As applied in the updated Wolf Plan, we advise heightened and stringent standards for the use of non-lethal tools and techniques. On public lands in particular, lethal removal will always be controversial and should only be used when justified by the best available science and as a last resort after exhausting all other non-lethal options.
- **Agency Funding** – The draft EIS should analyze existing staff and financial resources and identify funding necessary to implement the provisions of the updated Wolf Plan. In

particular, WDFW should explore funding necessary to develop, implement, and maintain a robust non-lethal program to minimize wolf-livestock conflicts in the state over the long-term. Defenders has supported budget requests to help make the agency whole and to effectively implement its conservation mission, and we will continue to support funding proposals that advance wolf conservation in Washington.

- **Hunting** – Defenders opposes public hunting or trapping of wolves in the state. We urge WDFW not to reclassify gray wolves as a game species, but rather consider a designation that recognizes the unique history of this species in Washington and its vulnerability to both legal and illegal hunting. The draft EIS should also fully analyze the potential impacts of tribal treaty hunting on the overall wolf population and develop a plan to monitor and respond to hunting impacts in areas not under WDFW’s jurisdiction.
- **Poaching/Illegal Take** – The draft EIS should include an analysis of the impacts of poaching and other forms of illegal take on the wolf population. The analysis should include provisions for emergency management actions to protect wolves if poaching leads to population declines. WDFW should allocate more funding and law enforcement resources toward investigating and prosecuting poaching incidents, too many of which are unresolved. Additionally, the Department should invest in a public education campaign to reduce poaching in the first place, and to encourage reporting when it does occur.
- **Habitat Connectivity and Dispersal Corridors** – The draft EIS should evaluate likely and potentially successful dispersal corridors for wolves (e.g., to cross south over I-90) and how wildlife crossings could assist dispersal.
- **Evaluating the Efficacy of Deterrents** – The update of the Wolf Plan is a good opportunity to evaluate the efficacy of the existing suite of non-lethal deterrents and interventions. The draft EIS should consider options for funding research into how/if current tools are having their intended effect. We urge WDFW to include detailed information about state investments to date in non-lethal tools and programs and any data to illustrate outcomes. WDFW should aim to understand which deterrents are most effective and redirect funding as necessary.
- **Compensation** – Per the current Wolf Plan: “Wolf compensation programs were started as a means to build greater social acceptance for wolf recovery by reimbursing producers for some of these losses while wolves were listed.” (Page 82, emphasis added). The updated Wolf Plan is intended to guide wolf management post-delisting and should include a detailed analysis of how the state’s compensation program should evolve. Defenders established one of the first wolf compensation programs in the west and has provided matching funds for Washington’s compensation program. However, it’s important to evaluate the program’s future given that its intended purpose – to compensate for losses while wolves are listed – will no longer be relevant at the time the updated plan is adopted. At a minimum, Defenders advises increased investment in proactive non-lethal actions and more stringent requirements for the use of non-lethal

tools and techniques. We also suggest proof of livestock numbers pre and post grazing season, proof of end-of-year weight annually, and annual pregnancy rates to determine a baseline prior to offering indirect depredation compensation.

- **Public Education and Outreach** – The draft EIS should analyze WDFW’s current public education and outreach practices and determine where there are gaps and room for improvement. Although the agency has a procedure to inform Wolf Advisory Group members about wolf program updates and potentially controversial actions, this is not an effective venue for informing the general public. Defenders encourages more media and outreach about wolves themselves, including pictures of pups and dispersing wolves, pack makeup, and biology on the website. To date, most of the publicly released information about wolves is relegated to details about depredations or conflicts. Defenders also urges the agency to speak publicly to correct inaccurate, misleading, or unsupported statements about wolves or the “impacts of wolves.”

### **Conclusion**

We appreciate the opportunity to provide scoping comments for the development of an updated Wolf Plan. We strongly urge you to embrace a coexistence philosophy and defer to the best available science in decision making. We look forward to participating throughout this public process and are happy to address any questions or concerns.

Sincerely,



Quinn Read  
Director, Northwest Program  
Defenders of Wildlife