

# Center for a Humane Economy

**What is your gender?**

Male

**Age?**

59

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

King

**Residential setting:**

Urban

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

Environmentalist

**WDFW has identified a list of impact topics to include in the Plan/EIS. Impact topics are a means of organizing the discussion of issues and analysis of impacts. Impact topics can be thought of as chapter or section headings in the Plan/EIS.**

**Please review this list and add other topics, or items that fit under these headings.**

**Please check the topics you view as most important.**

Wolf-livestock conflicts

Wolf hunting

Land management

Goals objectives strategies and tasks

November 15, 2019

Lisa Wood  
SEPA/NEPA Coordinator  
Washington Department of Fish & 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 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.

To begin, there are three main positions we advocate:

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

An informal organic public scoping process has occurred throughout the State over the past year, providing meaningful guidance on sentiment regarding wolves.

Expressions of concern have been evidenced 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, workshops cancellations for safety reasons and over a hundred news stories and newscasts.

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 profound and unmistakable.

Animating this debate is the lethal removal of wolves perceived to be in conflict with ranchers (or in the case of 87% of wolves killed, one rancher in particular). Rather than focusing on these conflicts, working with ranchers on non-lethal, coexistence techniques, promoting the compensation fund for deprivation and developing wolf management policies, protocols and practices in a legal and transparent manner, the Department seems more interested in imaging a time when wolves are so plentiful that they support "sustainable harvesting."

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 tacitly establishing a pretext for future wolf hunting. The State's oft cited (and disputed) maxim of "126 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 government eradication programs some 100 years ago. The State has hampered recent recovery efforts by killing at least 30 wolves, many by aerial gunning. The Department has engaged in unscientific and unethical wolf kills, under circumstances that have led a Superior Court judge to issue injunctions halting this conduct. 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 privately owned grazing cattle.

The irrational duality of the Department's mission to preserve, protect and perpetuate wildlife while at the same time providing sustainable, recreational hunting opportunities is in stark relief when applied to wolves.

On Friday, November 1, the NPR affiliate KUOW in Seattle aired an interview with Department Director Kelly Sussewind discussing this very scoping exercise, and its nexus to potential wolf hunting. Sussewind said a recovered wolf population can be successfully managed *with* a hunting season, or *without* a hunting season. Either works. 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 this apex predator, after finally being restored and in balance in its natural setting, would come down to politics, influence and PR.

Efforts to embed a hunting preference in the State's post recovery plans for wolves must be stopped. We strongly oppose this gambit being undertaken by the Washington State Department of Fish & Wildlife.

Wayne Pacelle  
President  
Center for a Humane Economy

Founder  
Animal Wellness Action

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