



Jamie Rappaport Clark

President & Chief Executive Officer

National Headquarters

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

February 3, 2014

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee:

I hope you have enjoyed your first year in the Governor's Mansion. We certainly miss your leadership on environmental issues on Capitol Hill and know that as Governor, your commitment to environmental stewardship and conservation remains strong.

I am writing today on an issue of great importance to Defenders of Wildlife and our 37,000 members and supporters in Washington—the recovery and long term sustainability of wolves in your state. Wolves are in their early recovery phase in the state and are currently listed as endangered under both the state and federal Endangered Species Acts. In 2010, after years of negotiation by a broad array of stakeholders and significant public outreach, the state finalized a Wolf Conservation and Management Plan to guide the recovery of wolves in Washington.

Defenders has always touted the Washington state plan as an example of responsible and forward-thinking wolf management, contrasting it to the actions by states in the Northern Rockies such as Idaho, which is embracing the lethal removal of wolves in every way possible. The latest example of Idaho's war on wolves is Governor Otter's proposal to divert \$2 million taxpayer dollars to kill up to 75% of the state's wolves. The state also recently sent a trapper into a federal wilderness area to eliminate two wolf packs for the benefit of hunting outfitters. Idaho's management of wolves is rapidly focusing on eradication, rather than co-existence, balance and long term sustainability of wolves.

Given your long standing leadership on conservation issues, we believe you personally are committed to the recovery of wolves. However, recent actions by the Washington Department of Fish and Wildlife (WDFW) are now eroding the thoughtful management measures in your state's wolf management plan. These actions by WDFW are of grave concern to Defenders and our members who reside in your state. I hope they are also of significant concern to you.

Recently, WDFW abruptly issued a revised protocol on the lethal control of wolves, which it put into effect immediately. This was directly contrary to a previous commitment WDFD made to its Wolf Advisory Group (WAG) to continue a discussion of this sensitive issue at the next meeting of the WAG in March. We firmly believe the revised lethal control protocol threatens to seriously undermine efforts to recover the gray wolf in Washington by significantly lowering the threshold for killing wolves due to instances of depredation.

Under the new protocol, just two instances of depredation could result in the removal of an entire pack.

Defenders has two major concerns with this action by WDFW. With no imminent threat of depredation, we see no justifiable rationale for WDFW short-circuiting and undermining the WAG process and preemptively issuing the new protocol. It calls into serious question the continued commitment of the State of Washington to seek the recommendations of outside stakeholders on wolf management and seems at odds with your own personal views on transparency and good governance.

Even more troubling, WDFW's new protocol fails to provide the level of protection that should be afforded an endangered species. The new low threshold for killing wolves in response to depredation pales in comparison to the more balanced approach adopted next door in Oregon. Under the new weakened protocol, it is likely that many more wolves will be killed even though additional livestock depredations would be far from certain. The perception that wolves always continue killing livestock once they start is more folklore than scientific reality.

In the world of science, the more commonly accepted approach in dealing with endangered species is the adoption of the precautionary principle. This principle stands for the cautious notion that when in doubt, one should err on the side of protecting the species. For that reason, Defenders rejects WDFW's new protocol and supports a standard of four depredations in a four-month period before lethal control can be considered.

By contrast, WDFW has now adopted as its much lower standard for lethal control as few as two depredations in a four-month period and has given itself added flexibility to extend the period to an entire calendar year. The end result is that WDFW now has the discretion to begin lethal control after just two depredations (only one of which must involve a kill) in a calendar year.

Another major concern of Defenders is the premature push by WDFW to treat wolves as game species. There have been recent proposals, publicly supported by the WDFW, to legally designate wolves as game species. Moreover, management of wolves within the Department has been moved from the Endangered Species Division to the Division of Game Management. That seems clearly at odds with the management needs of a declared endangered species and calls into question the rationale for game management professionals overseeing the recovery of an endangered species rather than the endangered species professionals in the same department, as it was previously conducted.

The Department is now considering what should be included in its 2015-2021 Game Management Plan and we are concerned that there will be language to include a section on hunting wolves. Wolves are presently listed as endangered under both state and federal laws and are not likely to be recovered (as that term is defined in the state's current approved wolf management plan) in the state by 2021. Accordingly, any discussion of hunting wolves

Governor Jay Inslee

February 3, 2014

Page 3

as a game species is premature and should not be included in the revised Game Management Plan.

Finally, it increasingly appears that WDFW is looking to Idaho as its model for wolf management, when in fact it should be closely collaborating with Oregon. The state of Idaho has rapidly become the most hostile state in the west to wolves and wolf recovery, and has adopted a series of extreme anti-wolf measures designed to seriously undermine wolf recovery and sustainability in the state and drive wolf population numbers down to the absolute minimum. This is hardly a management model to follow.

Oregon, by contrast, has adopted a thoughtful approach to wolf management that sets a careful balance between conservation and management controls. Given your close working relationship with Governor Kitzhaber on climate change, marine conservation, transportation and other issues of importance to the Pacific Northwest and the fact that your states share many common values, we hope that the conservation and recovery of wolves expanding through the Pacific Northwest will be collaborative as well.

In closing, I urge you to request WDFW to rescind its lethal control protocol and to rewrite it with involvement of the WAG and appropriate public input to ensure adequate protection for gray wolves. I also urge you to publicly oppose the premature designation of wolves as a game species in your state.

I would appreciate an opportunity to meet or speak with you in the near future and to work with you to ensure a more balanced approach to managing this important apex predator.

Sincerely,



Jamie Rappaport Clark
President and Chief Executive Officer

cc: Ted Sturdevant, Executive Director of Legislative & Policy Office
Aisling Kerins, Executive Director of External Relations
JT Austin, Policy Advisor