

Via Electronic mail

Phil Anderson
Director, Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501

February 6, 2014

RE: Lethal Control Protocol for Gray Wolves in Washington

Dear Director Anderson:

We are writing to express the views of the organizations that comprise the Washington Wolf Collaborative on issues important to the recovery and conservation of wolves in Washington. Together, we represent hundreds of thousands of Washington citizens.

The Washington Wolf Conservation and Management Plan (Plan) serves as the State's recovery plan for wolves and provides guidance on the potential use of lethal control on wolves in instances of repeated depredations. While it sets forth various requirements before lethal control would be considered, the Plan does not define the phrase "repeated depredations." Consequently, the Washington Department of Fish and Wildlife (Department) and its Wolf Advisory Group (WAG) have discussed what might constitute an appropriate definition of this important phrase. Since the spring of 2013, the Department has put forth various iterations of a document now entitled "Protocol for Lethal Removal of Gray Wolves in Washington During Recovery." The precise number of depredations that would qualify as "repeated," as well as the time frame within which those depredations must occur, has been an ongoing topic of discussion within the WAG and within the larger conservation community.

At the most recent WAG meeting, on December 19th, 2013, conservation group members of the WAG advised the Department and other WAG members that they did not agree with the Department's proposal that "repeated depredations" should be a range, which the Department proposed to be 2-4 depredations within a 4 or 6 month time frame. The Department took this and other suggestions under advisement and indicated that edits would be made to the Lethal Control Protocol document to reflect suggestions. The Department told WAG members that the issue would be revisited at the next WAG meeting, which is set for March 20, 2014.

The Department unexpectedly issued a revised version of this document on January 24, indicating it would be effective immediately. The Department issued this new protocol without referencing their prior commitment for additional discussion with WAG members at the next meeting. Further, the document issued on Friday includes several inconsistent definitions, none of which meet the concerns of the conservation community.

Since the December 19th meeting, the Conservation community at large has met to discuss the number of depredations and time frame required to trigger the consideration of lethal control. Our goal was to reach a consensus on an agreed upon set of recommendations to the Department, and we succeeded in reaching that consensus. In particular, we have agreed that “repeated depredations” should be defined to mean no fewer than four separate confirmed mortal depredation incidents within a time frame of no greater than four months. Anything less protective risks undermining the recovery efforts of this endangered species.

We base our position on the fact that the gray wolf (*Canis lupus*) is an endangered species under federal law across the western two-thirds of Washington and under state law across the entire state and that we do not consider two depredations occurring over as long as six months to demonstrate that wolves are repeatedly preying on livestock such that the problem is out of control or they have switched from wild prey.

Our approach of four depredations in four months is precautionary based on the endangered status of the wolf. The intent is to institute measures before and after depredations occur, using nonlethal means to address depredation until it can be demonstrated that the measures are not working. It does not assume those measures were in place initially; they may or may not have been. It also accounts for the fact that livestock operators are being compensated for their losses and that non-lethal measures to reduce the risk of depredation are a more effective means for addressing conflicts with wolves than is killing wolves.

In Washington, the recovery of the endangered gray wolf is in its infancy. This status requires that the state exercise the most stringent measures to protect wolves and to avoid risk of harm both to individual wolves, pack fidelity and to the population as a whole. For the foreseeable future, the state should exercise precaution in all aspects of wolf conservation, including lethal control of State-listed wolves.

Finally, we note that the current version of the lethal control protocol document also continues to contain multiple inconsistent standards as to when lethal control could be used, as well as assertions and definitions that have no basis in science. While these additional problems have repeatedly been brought to the attention of the Department, it has failed to correct any of these deficiencies. These inconsistencies make it difficult for the conservation community to fully understand the Department’s authority, making it impossible to monitor whether the Department’s actions are consistent with the protocol or not.

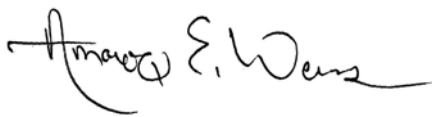
We hope this letter helps all parties understand the position and serious concerns of the conservation community regarding the lethal control protocol. We ask that you refrain from implementing this policy until engaging the WAG to discuss these concerns.

Sincerely,

The Washington Wolf Collaborative, as follows:



Nick Cady, Legal Director
Cascadia Wildlands



Amaroq Weiss, West Coast Wolf Organizer and Tim Ream, Staff Attorney
Center for Biological Diversity



Derrick Knowles, Conservation Associate
Conservation Northwest



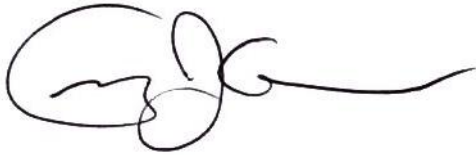
Suzanne Asha Stone
Senior Northwest and Rockies Representative
Defenders of Wildlife



Jessica Schafer, Conservation Director
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Dan Paul, Washington State Director
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Tim Coleman, Executive Director
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Diane K. Gallegos

Diane Gallegos, Executive Director
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Cc **Governor Jay Inslee**
 Dave Ware, WDFW Game Division Manager
 Washington Fish and Wildlife Commission