



Talking Points for Commission Testimony
WDFW Proposal to Downlist Wolves
Updated June 19, 2024

I. General testimony guidance.

- A. Always be courteous and respectful. You might thank the commissioners for the opportunity to testify and/or for their service on the commission.
- B. If you are from Washington, tell the commission where you are from.
- C. If you are not from Washington, consider describing why you are invested in the issue (i.e., member of a group like the Endangered Species Coalition, long-term Washington resident (even if you are not currently), or have a connection to this issue because...)
- D. Make your testimony personal, if you can. You can describe how the issue affects you or why you care about it. Go any direction you wish, but think about how you can make your testimony and perspective unique. Examples include talking about your connection to a particular species, an encounter you had, your relevant education or experience, your concerns about biodiversity loss, your concerns about the world your children and grandchildren live in, etc.
- E. Use the below talking points sparingly, or not at all if you prefer. They can be good reference points, but do not feel the need to cram lots of facts into your testimony, especially if you are not comfortable with them.

II. Themes

- A. Washington's wolf population has not met the standards set by the state wolf plan for downlisting to either threatened or sensitive. There are still no breeding pairs in the third and largest recovery region.
- B. WDFW should either follow the plan or revise it. The plan reflects extensive work by staff, scientists, and stakeholders and should not be ignored. If it needs to be revised, the agency should do that using the same painstaking process.
- C. It is a betrayal of public trust to simply disregard the plan because WDFW and certain special interest groups are impatient that wolves have not yet recovered and want to start to ease protections prematurely.
- D. Healthy wolf populations are vital to healthy ecosystems. This means we should aim to restore wolves to beyond the minimal levels set by the state recovery plan.
- E. Wolves should continue to be listed as state "endangered" until they have met the standards for downlisting because they need that continued protection to reach recovery goals.

III. Washington’s wolves have not met standards for downlisting under the state plan.

- A. Washington’s wolf population has not met the standards in the state wolf recovery plan necessary to downlist the population to *either “threatened” or “sensitive” status*.
- B. In 2011, Washington Developed a **Wolf Conservation and Management Plan**, a nearly 300-page document that was subjected to peer review and analyzed through an Environmental Impact Statement (EIS). WDFW has never updated that plan. The Plan sets standards before wolves can be delisted or downlisted, and Washington’s wolf population has not met these benchmarks.
- C. The Plan establishes 3 wolf recovery zones: Eastern Washington, Northern Cascades, and the Southern Cascades and Northwest Coast. To downlist to threatened, the Plan requires at least 2 successful breeding pairs in each of the 3 recovery regions. To downlist to sensitive, the Plan requires at least 4 successful breeding pairs in each of the 3 recovery regions.
- D. There are no successful breeding pairs in the South Cascades and Northwest Coast recovery zone, which is the largest recovery zone with the most wolf habitat.
- E. Because Washington’s wolf population has not met the state’s requirements for downlisting, WDFW has simply moved the goalposts so it can falsely declare success and cater to powerful special interest groups by downlisting wolves prematurely.
- F. WDFW’s disregard of the 2011 Plan shows contempt for the lengthy planning process that involved significant citizen input and scientific review.
- G. This behavior undermines public trust in WDFW. It solidifies the long track record of the agency ignoring or discarding its own policies, plans and guidance when they don’t serve the goals management wishes to achieve.

IV. The Washington wolf population does not meet the standards for downlisting to threatened or sensitive set state law.

- A. WAC 220-610-110 sets the standards and process or listing, downlisting, and delisting under the Washington endangered species law. It provides that “endangered” wildlife is any wildlife species native to Washington that is “seriously threatened with extinction throughout all or a significant the portion of its range within the state.”
- B. WAC 220-610-110 defines “a significant portion of its range” to mean “that portion of a species’ range likely to be essential to the long term survival of the population in Washington.”
- C. Washington’s wolves have not met the legal threshold for downlisting. They are not only “seriously threatened with extinction” in a “significant portion” of their range: they are *still*

virtually extinct in a significant portion of their range—the entire South Cascades and Northwest Coast Recovery Zone.

- D. WAC 220-610-110 provides that “if a species is listed as endangered or threatened under the federal Endangered Species Act, the agency will recommend to the commission that it be listed as endangered or threatened.”
- E. Wolves are listed as an endangered species under the federal Endangered Species Act in the western two-thirds of the state, meaning that WDFW should recommend that they continue as a state endangered species.

V. WDFW’s downlisting recommendation is entirely based on a flawed, incomplete, and already outdated population study whose conclusions do not justify downlisting.

- A. WDFW’s downlisting proposal relies entirely on a single flawed population model (often called the Petracca Study) that purports to predict the trajectory of the WA wolf population for the next 50 years.
- B. WDFW admits that this study is not intended to predict the future, but that is exactly how it is using it, as a substitute for the law and the carefully formulated state wolf plan.
- C. The population study assesses the wolf population under different scenarios, but that analysis is not meaningful for two main reasons.
 - a. It looks at each scenario in isolation only. For example, it looks at what would happen if over a 50-year time period if there is decreased immigration and increased hunting, *but not* what would happen if both of these things occurred.
 - b. The study entirely fails to examine the effect of wolf poaching or the impact of downlisting.
 - 1. There has been an alarming increase in wolf poaching in the past few years, with 13 *known* wolf deaths due to poaching in the last two years and many more cases over the border in Oregon. Studies indicated that half of poaching incidents are not discovered, meaning that the real total in Washington could be as high as 26.
 - 2. Downlisting will decrease the already-low penalty for poaching wolves. In addition, studies have shown that when a state downlists or otherwise decreases protections for wolves, poaching rises.
- D. Even with the flaws in the study, its predictions are grim when taken at face value. WDFW claims that the study shows that wolves are very likely to recovery in 50 years under almost all scenarios, but that is not true.
 - a. The study shows a median likelihood of recovery of over 50% for only 3 of the 8 different scenarios that it modeled, and below 50% for five other scenarios.
 - b. However, the study uses outdated numbers as a baseline for tribal hunting, which has risen significantly in the past three years. Tribal hunting last year killed 22 wolves, or

10.2%. At this current level of hunting, the likelihood of recovery plummets to only 11% within the next 50 years.

VI. Downlisting wolves to sensitive is an important step toward removing all protections and will place wolves at greater risk.

- A. WDFW pretends that downlisting will not really change anything. If that is true, why is it pushing this recommendation forward when wolves have not met recovery objectives? The truth is that downlisting wolves would have important consequences.
- B. It would allow WDFW to issue permits to livestock producers to kill wolves on *public land* grazing allotments, whereas WDFW has previously only issued such permits for private land. This is significant, given that most wolf predations are on cattle grazing on public land, such as in the Colville National Forest.
- C. It would decrease the penalties for poaching wolves from \$5,000 and/or up to a year in jail to \$1,000 and/or up to 90 days in jail—at the same time that wolf poaching incidents are on the rise.
- D. It would eliminate the requirement that foresters avoid tree harvesting and road construction within 1 mile of known wolf den sites, a rule that will become more and more important as the wolf population moves west.
- E. Most importantly, prematurely downlisting wolves shows that Washington is no longer concerned about its wolves and is a big step toward prematurely removing all protections.
 - 1. It will move the wolf population a step closer to complete delisting, following the same broken logic. If WDFW feels free to ignore the 2011 Plan requirements for downlisting, there is no reason to believe that it will follow the Plan’s delisting requirements.
 - 2. It moves Washington one step closer toward following in the steps of Idaho, Wyoming, and Montana and opening up “recreational” wolf hunting. WDFW has been talking about the possibility of a wolf hunt for years.

VII. The downlisting recommendation violates WDFW’s duty as a trustee of the state’s fish and wildlife.

- A. Director Kelly Susewind has been promising special interests such as the livestock industry for years that he would work toward removing wolves from both the federal and state endangered species lists, including writing in support of lifting federal ESA protections.
- B. Governor Inslee opposes downlisting plan, including because “downlisting would be counter to public opinion and would put aside the stakeholder-developed Wolf Conservation and Management Plan.” The people of Washington have elected Governor Inslee to speak for them. Neither Susewind nor the Commission are democratically elected or accountable to the people.

- C. The downlisting proposal is best understood as WDFW's attempt to deliver on promises it has made to the special interests that have long controlled WDFW policy, including Washington's tiny livestock industry and carnivore hunters who are clamoring to be allowed to kill wolves.
- D. The proposal disregards the best interests of the state's wolf population and the interests and values of the vast majority of the Washington population and betrays WDFW's obligation as a trustee of state fish and wildlife.