

Melinda Mueller

I am a biologist, biology instructor, and long-time resident of Washington State, having lived both in Eastern Washington and West of the Cascades. I have the following comments about this plan: ? The science of the plan must be updated; the current plan does not reflect more recent studies of wolf behavior, wolf recovery, or the most effective methods of avoiding wolf-livestock conflict. ? This plan should NOT be based on "social consensus" of a small number of participants in the process (a number reduced by the department's cancellation of all public hearings in favor of just 3 webinars). Any wildlife management plan should be driven by science, by experts, and by broad opportunities for public input. It must be developed through a science-based, public rule-making process that results in transparent, rational and enforceable strategies. ? Studies of wolf-livestock conflict consistently show that non-lethal means are MORE effective than killing wolves. The new plan must prioritize non-lethal means for management of this issue. ? Lethal means of managing wolves (such as the destruction in Washington of four wolf packs by the department) has been shown to decrease the public's tolerance for the presence of wolves in our ecosystems, likely because lethal management conveys the message that wolves are harmful rather than beneficial. ? Wolves should NOT be killed on public lands, whose ecological resources--including wildlife--are held in trust for ALL. Public lands should NOT be treated as "private reserves" for livestock operations. ? Wolves should not be designated nor managed as "game." Trophy collection, trapping, and hunting should be forbidden in the new plan. ? A management plan for wolves should be implemented by the department's endangered species staff, not by the Game Management Division. ? Growth of the wolf population in Washington State was stagnant in 2013, 2017, and 2018. This indicates that a plan for "post delisting" is pre-mature, particularly since there are NO wolf packs in one of the state's "recovery zones." ? This plan should include steps for educating the Washington State public about wolves, including their beneficial effects they have on ecosystems. Therefore I join with the Center for Biodiversity in urging you to: (1) Stop cherry-picking science to justify wolf-killing; (2) Answer the global call by scientists to protect and conserve apex predators; and (3) Use every opportunity to extol the value of top predators in keeping nature healthy, and cease current messaging that prioritizes livestock over wolves. The public will fail to see any reason to coexist with wolves if the department fails to explain that wolves are ecologically important and worth conserving. Thank you for considering my comments.