Karen Jacques

I am submitting comments because I have loved wolves all my life and am also aware of the significant role they play in creating healthy ecosystems (e.g. the positive changes that occurred to Yellowstone after the reintroduction of wolves). I live in California and I testified in several of the hearings that lead to wolves being listed on the California Endangered Species. I have also been active in opposing the Trump administration's attack on wolves and its misguided attempt to gut the federal Endangered Species Act. Because I have been following this issue for a long time, I am well aware that attempts to keep wolves from being listed or to remove their endangered species protections frequently come from members of the livestock industry, or from people who fear wolves, but know nothing about them, or from trophy hunters. With regard to livestock, as both Project Coyote and Defenders of Wildlife have demonstrated, there are effective non-lethal means of protecting livestock from wolves and other predators so there is no practical or ethical justification for making it easy for the livestock industry to kill wolves. With regard to ignorance, people can be educated. With regard to trophy hunting, it is an ethical outrage and should be banned. It is good news that the number of wolves in Washington State is increasing, but the total number of wolves is still very small for a state the size of Washington and there is room for wolf populations to expand. Washington is far from meeting the wolf population goals set forth in its current plan so creating a "post-recovery" plan for wolves at this time is premature, Instead of racing to create a post-delisting plan, the Washington Department of Fish and Wildlife must instead focus its attention on current wolf-management needs. This includes: (1) Resolving, conflicts between livestock and wolves by non-lethal means. This is something that is already taking place in some of the state's best habitat for wolves and these. efforts should be expanded. There is no justification for Washington state to prematurely delist wolves and allow their killing when successful non-lethal means are available. The state needs to seek a win-win situation where livestock are protected and wolf populations can thrive. (2) Conducting extensive public education on wolves. This is emphasized in the current plan but has not been done by you, despite the fact that all wolf experts say public education is the single most important action to take for successful wolf conservation. It is unacceptable to ignore this important means of promoting coexistence. Additionally, under the current wolf plan and any future wolf plan, management guidance, policies and protocols — and especially those which could result in wolves being killed — must be developed through a science-based, public rule-making process that results in transparent, rational and enforceable strategies. Therefore I urge you to: (1) Stop cherry-picking science to justify wolf-killing. Doing so is a deliberate misuse of scientific data. that will not only lead to unjustified delisting and death, but also lead to public distrust of your agency. (2) Answer the global call by scientists to protect and conserve apex predators; (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; and (4) The planet is currently facing collapsing ecosystems and an extinction crisis. Your agency should be doing everything in its power to avert this crisis and that means working to support healthy wolf populations and the ecosystems that depend on them, not prematurely depriving wolves of endangered species status. Thank you for considering my comments.