JAMESTOWN S'KLALLAM TRIBE
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Re: Wolf Post-Recovery Plan Comments from Jamestown S'Klallam Tribe

Ms. Wood,

The Jamestown S'Klallam Tribe (the Tribe) is very interested in Washington State's wolf post-recovery planning. For thousands of years the S'Klallam people existed with wolves on the Olympic Peninsula. The Tribe recognizes that the ecosystem evolved with wolves as an apex predator, and that reestablishing wolves has the potential to improve ecosystem functions (Bescheta and Ripple, 2012; McLaren and Peterson, 1994). However, urban development, changes to habitat, modern means of hunting and an increased number of hunters all change the way humans and wildlife interact. The reintroduction of a top predator may change the habits of ungulate species and limit big game hunting opportunities, to the detriment of many Tribal hunters.

The Tribe would like to see the wolf post-recovery plan maintain a stable wolf population sufficient to keep wolves from being relisted as an endangered species and, once begun, ensure continued state and Tribal management. The Tribe requests that the State's management plan take all measures necessary to protect big game resources and that the State prioritize the maintenance of ungulate populations over the expansion of wolf populations beyond the safe minimum required population size/threshold. The Tribe does not want to see wolf recovery prioritized over robust ungulate populations, and instead hopes to see a balance between the two. Hunting mortalities in wolves are often a source of additive mortality, so excessive harvest could threaten the sustainability of wolf populations and must be carefully controlled (Creel and Rotella, 2010). If wolf populations exist without substantially reducing ungulate hunting opportunities for Tribal hunters, then they should be allowed to grow as carrying capacity and recreational hunting pressures dictate.

The Tribe wishes to have at least annual communication with the State. The Tribe will be impacted by wolves and ensuing changes to wildlife populations and habitat changes. As co-managers, local Tribes should be consulted before changes are made to wolf management and we are interested in population information, research projects, monitoring data, and long-term management objectives.

We have provided, as an attachment, concepts for wolf management that the Tribe would like to see in the State's post-recovery wolf management plan. Thank you for the opportunity to comment and we look forward to increased communication regarding wildlife management.

Sincerely,

Hansi Hals
Natural Resources Director

Attachment: Suggested concepts to include in wolf management planning:

1) Reduce ungulate harvest when ungulate populations near established wolf packs decline substantially or when growth rates are negative for several years in a row.

Harvest reductions could be made via removing special licenses, ending cow harvest, changing the season structure or shortening season lengths, as suits the local game management unit (GMU). Unless degraded habitat quality is of primary concern, determining the cause(s) of the ungulate population decline is less important than stemming the decline, as falling populations should be addressed regardless of the cause. Proving any relationship as cause-and-effect in a highly complex ecosystem is challenging, if not impossible. Hunters, along with wolves, habitat changes, land use, abiotic conditions, diseases and more, are one variable in an infinitely complex and interconnected web of interactions that will impact ungulate populations. Hunters exert direct pressure on ungulate populations through harvest, and this source of mortality can be more easily and more rapidly addressed than any other.

2) Ensure wolf management relies on local input and maximizes local flexibility to manage wolves

WDFW should develop a system for setting wolf harvest quotas that allows for maximum local flexibility and allows for small-scale changes in harvest quotas annually. An unrestrictive statewide management plan that can be locally adjusted will maximize the efficacy of local wildlife managers to manage wolves as they need. For example, the statewide plan should allow for up to a 9 or 12 month hunting season on wolves (in case of high population and low harvest), but also allow managers to stop all hunting seasons for multiple years (in case of low population numbers). The Olympic Peninsula could have no established breeding pairs present when the state resumes management of wolves, so any broad and prescriptive management decisions applied to the entire South Cascades and Northwest Coast recovery area would have very different impacts on the Olympic Peninsula than in the Cascades. Flexibility will allow wildlife managers the maximum number of tools to balance multiple interests while abiding by the post-recovery management plan.

Wolf quotas and season dates should be reviewed and revised annually. An annually adjustable quota system would benefit all parties because the overall wolf population is small, meaning proportionally large changes could occur within a single year, especially in areas with the fewest wolves and breeding pairs. With an annual review and quota revision, unexpected wolf mortalities could be compensated for by reducing or halting next year's harvest, while an overabundance not reduced by hunters the previous year could be addressed by increasing quotas and season length. Implementing quota and season changes at the smallest scale at which wolves can be managed (ie: GMU) will allow managers to target responses towards specific wolf packs or packs within a region, thus responding to a greater array of unforeseen circumstances quickly and with precision.

3) Increase co-management communication, and discuss proposed changes with co-managers.

The Tribes will be impacted by wolves and ensuing changes to wildlife populations and habitat changes. As co-managers, local Tribes should be consulted before changes are made to wolf management. Increased communication regarding research projects, monitoring data, and long term management objectives will only benefit wildlife and the inhabitants of Washington.

The Tribes on the Olympic Peninsula are in a unique position, because wolves are not certain to be established on the Olympic Peninsula when post-recovery management begins. The Olympic Peninsula and southern Cascades are in a single recovery area (Southern Cascades and Northwest Coast recovery area), yet wolves appear likely to establish in the South Cascades before the Olympic Peninsula, due to the close proximity of the south Cascades to established packs in the north Cascades, which may serve as a source population for dispersing individuals. Establishment of packs in the Olympic Peninsula may be slowed by the distance from the Cascades (>130km straight line, not counting southward movement to avoid the Tacoma and Olympia areas), and moderate to high levels of human development over much of that distance, as wolves tend to avoid human development (houses, agriculture, etc.) when dispersing (Treves et al. 2009). Dispersing wolves are at a greater risk of being killed by humans than non-dispersing wolves (Boyd and Pletscher 1999). These factors could result in the wolves struggling to establish on the OP. The Tribe requests that a lack of re-establishment on the OP be addressed through modifying hunting seasons and areas to reduce harvest, rather than through human facilitated translocation.

Literature Cited:

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McLaren, B.E. and R.O. Peterson. 1994. Wolves, moose, and tree rings on Isle Royal. *Science* 266:1555-1558.

Wydeven, A.P., Van Deelem, T.R. and E.J. Heske. Recovery of Gray Wolves in the Great Lakes Region of the United States. Springer Publishing. 2009.