



MUCKLESHOOT WILDLIFE PROGRAM

39015 172nd Ave. S.E. • Auburn, WA 98092
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Lisa Wood
SEPA/NEPA Coordinator, WDFW Habitat Program, Protection Division
P.O. Box 43200
Olympia, WA 98504

October 22, 2019

Dear Lisa:

The Muckleshoot Indian Tribe Wildlife Program is submitting scoping comments for the wolf post-recovery conservation and management plan. We are including a copy of our previously-submitted scoping comments for a translocation plan, those comments should be also be considered as scoping comments for this proposed recovery plan.

Our suggestions are:

If wolves are federally delisted nationwide, including west of the existing Northern Rocky Mountain Distinct Population Segment, then they should be state-delisted statewide, and kept at the same as federal status. If not federally delisted in the western two-thirds of Washington, then maintain federal status.

Ungulate hunting opportunity must be a priority over wolves once they are considered recovered.

Open a permit-only wolf hunting season where population goals have been met and there is a harvestable surplus.

Do not increase recovery targets, they were agreed upon in the initial 2011 plan, and they should remain as they were in the 2011 plan.

Fully involve Muckleshoot in wolf and prey management activities throughout the Point Elliott, Medicine Creek Treaty areas, and Game Management Units 335, 336, 340, 342, 346, 352, 356, 360, 364, and 368.

Muckleshoot management will do what it takes to protect resources Tribal members rely on. Muckleshoot will intensively continue to study they prey base as well as other predators and take actions as necessary and lawful.

Thank you for the opportunity to provide scoping comments. Sincerely,

Melissa Calvert, Director, Muckleshoot Wildlife Program

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Julia Smith
Wolf Coordinator
Washington Department of Fish and Wildlife
1111 Washington St. SE
Olympia, WA 98501

May 7, 2019

RE: Wolf translocation scoping

Dear Julia:

The Muckleshoot Indian Tribe Wildlife Policy Committee offers the following comments regarding the WDFW's proposal to begin scoping and drafting SEPA documents for wolf translocation. The Muckleshoot Tribe has reserved treaty rights under the Treaties of Point Elliott and Medicine Creek, and has clearly demonstrated and documented traditional use in areas east of the Cascade Crest, so our area of interest is broad and includes all or portions of 4 WDFW regions. While the treaty right to hunt and gather under the Treaties of Point Elliott and Medicine Creek is not limited in terms of geographic scope, the Tribe understands that the state holds a more limited view based on state case law. The Tribe points to established traditional areas in this letter because such areas satisfy the state's test, but, in doing so, the Tribe does not waive any argument with respect to the geographic scope of the treaty hunting and gathering right. Muckleshoot Tribal members expect opportunities to harvest game animals throughout the Tribe's treaty and traditional areas, therefore the Muckleshoot Wildlife Program is actively involved in managing these resources to ensure adequate, and sustainable populations. We also actively manage our hunters to distribute harvest throughout the landscape to prevent localized overharvest.

The Muckleshoot Tribe has developed a 21 year data set of radio-marked elk and deer in the White (GMU 653), Green (GMU's 485 and 466), and Cedar River (GMU 490) watersheds. We have had a female mule deer study ongoing since early 2013 in certain GMU's (primarily PMU 33) east of the Cascade Crest. We are highly skilled at capture and monitoring radio-marked animals. We are also skilled at mortality investigations, data collection, and data analysis. We actively survey elk and deer herds throughout our area of interest, although more intensively locally, and where we have radio-marked animals.

Our studies guided us in recovering depressed elk herds in the Green (GMU's 485 and 466) and White River (GMU 653) watersheds to where they now meet population objectives. We actively balance ungulates with their habitat and major predators. The proposal to translocate wolves concerns us because of the added effect of another major predator upsetting the balance we have worked so long and hard to achieve. Depending on the federal status of wolves and a Tribal wolf management plan, the Tribe may be engaged in active management of wolves that could impact the WDFW's wolf restoration goals. So obviously there is a need to work together and understand each other's objectives and limitations to ensure sound management for all species.

- Our first comment regarding translocation would be: **NOT IN OUR BACK YARD!** We encourage you to avoid transplanting wolves to areas where there is active and substantial tribal harvest to avoid conflicts with tribal use. As mentioned, Muckleshoot has invested too much in local elk and deer herd research and management to have it potentially negatively affected by transplanting a known predator of ungulates into this area.

- The SEPA must include an assessment of current prey population availability and where prey populations stand relative to population objective, and whether those resources are meeting user demand. The analysis must include measures of population size, productivity (e.g., fawn:doe or calf:cow ratios or pregnancy rates), survival, and known causes and rates of mortality. If available, analyses should consider compensatory or additive mortality factors so that additive mortality factors could be managed to offset the needs for wolves since they would add to the current suite of mortality. Each area considered for transplant, as well as a buffer the size of a typical wolf territory, should be modeled to assess each local impact on prey populations, hunter opportunity, and ability to meet or maintain population objectives. Wolves should be translocated only to areas where prey resources exceed objectives and hunter demand is being satisfied.
- Any translocations proposed within the Point Elliott or Medicine Creek Treaties must include active communication and involvement with all tribes within those treaty areas. Tribes have considerable resources to share and are an important co-manager.
- Conflict management of translocated wolves must be aggressive. Where wolves are preying on livestock or causing significant negative impacts to their natural prey base wolf numbers must be managed. Unfortunately too few prey populations are monitored intensively enough by WDFW to detect significant impacts, so WDFW must begin intensive monitoring of prey resources in areas where wolves are translocated to.
- If translocations succeed in meeting wolf objectives in Washington State, then the WDFW must move forward rapidly with declassifying and delisting the status of wolves in Washington. The 2011 Plan outlined those criteria, so stick with the approved Plan. Failure to do so will only erode confidence in WDFW management and make future similar plans untrusted.
- The draft environmental document must include a full range of alternatives. Too often proposed projects have a limited range of alternatives.
- Consider moving wolves to places that have wolf in their name, such as Wolf Point near Mt. St. Helens, Gray Wolf Ridge on the Olympic Peninsula, Timberwolf Mountain north of Rimrock. There are good reasons for old place names such as Goat Mountain, Sheep Mountain, or Cougar Mountain.

Please consider our comments and keep us informed of progress. The Muckleshoot Tribe definitely wants to be involved in any wolf activities occurring locally. We invite you to be proactive and have open discussion with the Muckleshoot Tribe before we have a wolf encounter in our local landscape associated with our studies. The Tribe intends to be an active co-manager of wolves in Washington. Thank you.



Mike Jerry Sr., Chair
Muckleshoot Wildlife Committee

Cc: Jim Woods, Amy Windrope, Larry Phillips, Mike Livingston, Kessina Lee