

Makah Tribe

Comments are being submitted in the attached file. An original hard copy of the letter with Makah Tribe Chairman's signature will also be mailed to Lisa Wood, SEPA Coordinator.



MAKAH TRIBE

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November 1, 2019

Lisa Wood
SEPA/NEPA Coordinator, WDFW Habitat Program, Protection Division
P.O. Box 43200
Olympia, WA 98504

Re: Makah Tribe's Scoping Comments on WDFW's post-recovery wolf management

Dear Ms. Wood,

The Makah Tribe submits the following comments for the scoping phase of WDFW's post-recovery wolf management planning. We appreciate the opportunity to be involved in this early planning stage and hope that our perspective is valuable in shaping the new management plan and the analysis of impacts in that process.

It should be a priority of the Washington Department of Fish and Wildlife in this process to engage the Makah Tribe in a co-management role, to help guide management options and decisions for wolves now and into the future. Makah members hunt in areas off-Reservation under the Tribe's reserved hunting rights in the 1855 Treaty of Neah Bay, and it is important that we are a part of the process as a sovereign co-manager of the wildlife resource and not just another public commenter because of the great importance of protecting treaty subsistence hunting opportunities for our membership. WDFW should engage the Tribe and involve our elected leaders and wildlife biologists throughout the process. Makah has wildlife biologists who have conducted extensive research, dedicating time and resources to understanding both predator and prey populations in the areas of the Olympic Peninsula where our hunters, gatherers, and non-consumptive users exercise their treaty rights. Our research has provided data used by WDFW to establish harvest guidelines on deer and elk and we value the relationship we have developed over the years with WDFW staff in our region. This co-management relationship should not be limited to deer and elk, but should be relied on for all wildlife on the Peninsula.

The Tribe appreciates that wolf management is an extremely complex and controversial issue and often requires a compromise between policy, scientific, and legal issues. However, the post-recovery wolf management plan should be an adaptable, well thought out document that prioritizes the impacts wolves may have on prey species and the people who depend on hunting those species for subsistence. The needs of the Stevens Treaty tribes, as well as different user groups, should be evaluated and incorporated into the management plan. We understand that the goal of this scoping process is to help determine the proposed actions, alternatives, and impacts to be included in the Environmental Impact Statement for long-term wolf management following de-listing. The Tribe's specific concerns and recommendations are outlined below.

The Tribe's primary concern is the ability of ungulate populations on the Olympic Peninsula to sustain the current pressure from multiple predators, and subsistence hunting opportunities for our members, with the addition of a predator that has been absent from this area for 90 years. If wolves return to the Peninsula, it will be necessary to inclusively manage both predator AND prey populations, because single species management does not work. The Makah rely heavily on subsistence harvest, which is prevalent in over 65% of households on the Reservation. We have an increasing population and an increasing demand on our resources and we need to protect Makah's treaty hunting rights. The Makah wildlife staff have been monitoring deer and elk populations for over 20 years and have demonstrated with several studies evidence of limited population growth from predation on young-of-the-year. We have seen increases in the elk population, but it has come at a significant cost to our hunters, limiting harvest numbers and seasons. We are concerned that if wolves return, our prey populations and our hunters will suffer significant losses unless we have the ability to monitor and responsibly manage both predator and prey populations by making informed harvest recommendations and decisions. Apart from state hunter harvest reports, the burden of monitoring deer and elk within our primary hunting area has fallen on the Tribe. We will likely end up monitoring predator populations as well, and are concerned that decisions regarding wolves will be made without appropriate knowledge and input from the Tribe. While we are willing to take on the added responsibility of monitoring these populations, it will take significant resources to do so. At a minimum, we should be involved in shaping any decisions that will result in increased management burdens on the Tribe and, ultimately, will affect our members' ability to meet their subsistence needs.

The new wolf management plan should develop management zones far different from what is currently outlined. The three recovery zones that exist now are unrealistic in terms of management, situations will not be the same throughout these larger areas, and the new plan should consider more "local" conditions based on habitat capacity, prey availability – accounting for all sources of pressure on those populations, and potential conflict with livestock or people. Identifying high risk areas, to the extent possible, should be a priority so that problems can be avoided and issues can be resolved before they escalate. Any existing data from multiple sources (state, federal, tribes, etc.) should be compiled to assist with understanding these local conditions relevant to wolf recovery and management. These local management areas should be determined based on biologically relevant boundaries.

Predation is generally most pronounced on young of the year, which influences the future of ungulate populations. Studies of adult ungulates typically report little variation across large geographic scales. Harvest data alone does not measure recruitment, in many cases doesn't provide information on the female segment of the population, and it severely limits the ability to discern effects of predation or possible population declines. These passive types of monitoring programs may only detect large changes over several years, and broad scale monitoring may not detect more local changes at all. Reliable and realistic measures to detect declining ungulate populations should be implemented, such as aerial surveys and/or survival studies. We realize that these methods cannot be conducted throughout the state, as they are costly, but strategically selecting targeted units and cooperating with the Tribes or others could provide data that are more robust than harvest reporting alone. More inclusive monitoring methodology, such as strategically placed camera grids and/or maintaining a sample of collared animals to monitor both predator and prey populations may also be appropriate. Specific units within the larger management unit could be selected and monitored on a rotational schedule and observed through time. As long as monitoring methods are well thought out and provide meaningful data.

In addition to the direct impact wolves have on ungulates, we are also concerned about their indirect effect and their impact on other species. For example, risk of predation could have an indirect effect by changing habitat use by ungulates, where they rely on lower quality habitats to reduce predation risk, resulting in lower pregnancy or productivity rates. Displacement or changes in behavior of other predators, such as cougars, bears, bobcats, and coyotes could affect ungulate populations through exploitative or interference competition. Alternate prey sources like rabbits, grouse, or mountain beaver, could be influenced by changes in predation patterns that currently exist, in-turn affecting other species that rely on those populations, such as recovering pacific fishers. Wolves can have a cascading effect on the ecosystem, and it will be important to consider these interactions so that the recovery of one species doesn't result in the detriment of others.

Management options should balance the needs of wolves, their prey, and people. The Tribe's suggestions include the following strategies: 1) regulated wolf hunting by tribes and others that will maintain healthy populations of both predators and prey, and that will adequately fulfill tribal subsistence or ceremonial needs, 2) engaging with tribal hunters or other qualified hunters to help reduce costs and burden to landowners for dealing with wolf conflicts, 3) using professional staff or contracted wildlife services for authorized lethal removal, when other options aren't possible, and 4) adapting harvest "quotas" or "goals" while populations of prey stabilize within the management zones determined under this plan.


Since WDFW has stated that they will consider translocation, we would like to express our concerns regarding this option as a management tool. Wolves have recovered in the state of Washington, regardless of an arbitrary definition that states a specific number of wolves need to be recovered in all historic areas throughout the state. Despite consistent removal of wolves, their population continues to increase at a steady rate throughout northeast Washington, and they continue to spread west and south, albeit at a slow pace. The post-recovery management plan should anticipate that the spread of wolves will continue west and south, eventually recolonizing the Olympic Peninsula without the need for translocation. There is no reason to believe that wolves will not recolonize all available habitat in the state naturally, given what they have been able to accomplish over the past 20 years. Wolves are resilient animals and provided that managers practice responsible management, they will remain sustainable without the need to spend a significant amount of money to move them around the state. Makah supports natural expansion of the recovering wolf population. This approach to recolonization is more desirable, and will likely happen over a reasonable period time, giving prey and human populations more time to adjust. If WDFW continues to examine translocation as a viable option, they should be evaluated on a case-by-case basis, and utilized only when specified conditions have been met. Use of translocation needs to be well thought out and only implemented in areas established as low-risk, after considering the effect on treaty-protected rights and affected interest groups within the potential target area, weighing the benefits with the costs, and ensuring adequate prey populations exist. Translocation should not be utilized for moving a problem animal (or pack) to another location where it could potentially become someone else's problem.

We urge you to develop a plan that is flexible and involves the Tribes in a co-management role throughout the process. Specifically, we request that the scoping process include co-management of wolf (and prey) resources with the Tribe (and other Stevens Treaty tribes) and treaty hunting of wolves in your analysis. In addition, the EIS should evaluate the increased cost of monitoring and managing both ungulate (and other prey) and wolf populations as they expand their range in the state. The plan

should provide for management of wolves in conjunction with their prey and account for other predators or affected species on the landscape. The plan should include adequate monitoring methods robust in detecting prey population declines and prepare for adjusting these methods as needed to accomplish the intended goal. The plan will need to have a robust adaptive management component, with a wide range of management options to fit a majority of circumstances that evolve. Management options should consider that the financial and realistic ability of landowners to alter habitat or modify practices may be limited, and that other options should be available for these situations. We understand that wolves existed here once, and they play an important role in our cultural history. Wolves will once again be a part of our ecosystem, but we need to be responsible in how we see that through. We want to be sure that once wolves return to the Olympic Peninsula, our members can continue to rely on ungulate populations to meet their subsistence needs under the treaty and both humans and prey can adapt to the changing landscape without compromising our treaty rights.

Sincerely yours,

MAKAH TRIBAL COUNCIL

A handwritten signature in blue ink, appearing to read "John Ides Sr.", written in a cursive style.

John Ides, Sr., Chairman