

Rob Smith

Please accept the attached comment on behalf of the National Parks Conservation Association (NPCA)

Thanks,

Rob Smith



**Comment on Washington State Wolf Post-Recovery Planning
Phase
National Parks Conservation Association**

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November 15, 2019

Director Susewind,

The National Parks Conservation Association (NPCA) appreciates the opportunity to submit these comments in response to the public comment period on the scope of a post-recovery management plan for wolves in Washington.

Background

NPCA is an independent, nonpartisan, non-profit organization that, together with more than 34,000 members and supporters in Washington State and 1.3 million nationally, works to protect and preserve our nation's national parks for present and future generations. Our members and supporters regularly visit and use national park sites and appreciate the native species that live in our parks. Our parks benefit not only from the remarkable and protected habitat within their borders, but also from the surrounding

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mosaic of public lands and the associated management of wildlife and other resources on those lands. Thus, we are interested in engaging in wolf management in Washington and hope to offer the Washington Department of Fish and Wildlife (WDFW) a unique perspective on how wolf management may benefit or otherwise impact our national parklands.

Best Science & Transparent Process

Wolf management must be science-based, using robust scientific literature to ensure that management actions do not set back good progress toward the recovery and dispersal goals set by WDFW's 2011 Wolf Conservation and Management Plan. Wolf management must be transparent, allowing public scrutiny to ensure that agency decisions are made in good faith. We encourage the WDFW to work closely with other land managers, like the National Park Service, US Forest Service, US Fish and Wildlife Service, Washington Department of Natural Resources and Bureau of Land Management to ensure that wolf management considers the goals and objectives set forth by those land managers. We also encourage significant public outreach to non-profit membership organizations, like NPCA, so that we can involve our membership in the process and maximize public engagement with and understanding of WDFW proposed actions.

Hunting

NPCA does not necessarily oppose hunting and fishing of abundant populations of wildlife outside of our national parks. However, we value the dispersal of wolves into the Southern Cascades and Northwest Coast recovery region where we have not yet seen recovery. This region includes two systems with large swaths of protected lands including Olympic National Park and Mount Rainier National Park. Both these systems will benefit from wolf recovery and should not be left out from the recovery process because other recovery metrics are met. Hunting is likely to reduce the pressure on populations to disperse over time by keeping populations low. WDFW will not meet dispersal goals if wolves are managed for scarcity as we have seen in the Northern Rockies and other regions. Hunting must not jeopardize wolf recovery, and is unlikely to be appropriate for some time. That said, some exceptions must be made for tribal entities pursuing their cultural heritage in the form of traditional wolf harvest. We ask that WDFW continue to work closely with local tribes, respect their treaty rights, and consider their requests with additional deference.

Wolf Translocation

NPCA has supported translocation of endangered species into suitable habitat. Recent examples include our support for translocation of wolves into Isle Royale National Park as well as our advocacy to support grizzly bear translocation into the North Cascades. WDFW should study opportunities to meet dispersal goals through translocation, especially in isolated areas where natural recovery is unlikely to occur. However, any translocation must be done to restore viable populations using the best practices and best available science and through a long-term commitment to restore wolves, rather

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than any short-term commitments to meet dispersal metrics required for changing the listed status of wolves in western Washington.

Defer to National Park Land Managers

We ask that WDFW defer to national park land managers when it comes to wolf management on National Park System lands. These lands include the North Cascades National Park, Ross Lake National Recreation Area, Lake Chelan National Recreation Area, Mount Rainier National Park, Olympic National Park, Lake Roosevelt National Recreation Area, and any other units that may see wolf populations. National Park System land managers are likely the best deciders in wildlife management on these special federal lands that Congress has set aside “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”¹

Public Meetings

While NPCA empathizes with agency staff over the conflicts regarding wolf management, public officials must not shy away from public meetings. If the agency, other partners or the public are threatened, those threats must be reported to the police. If laws are broken at public meetings, then the perpetrators must be brought to justice. Public meetings and in-person discussions are the bedrock of our democratic system. Public meetings provide some of the best venues for Washington residents to see and understand one another. Public advocacy groups rely on public meetings for advocacy; NPCA opposes the agencies recent elimination of public hearings and in-person public comment. Walling off the agency will not deliver quality and accountable management which taxpayers pay for and expect.

Adequate Monitoring

Smart wolf management will require significant monitoring to maximize the information we have about wolf populations, dispersal, prey availability, and other metrics that help wildlife managers make management decisions. Future analysis from WDFW must consider how the agency will conduct rigorous monitoring that underscores decision making. Monitoring must continue even if wolves are delisted, so that the agency knows population trends, and so that WDFW has information about what forces drive those population trends. In the name of transparency, NPCA would like to see more findings reported to the public, as data is gathered.

Manage for Abundance

WDFW must consider opportunities to manage for abundant wildlife populations, including both predators and prey species. Managing for abundance means that agencies should try to maximize wildlife on our lands. As many species are threatened by population growth, human development, climate change, and many other forces, we must manage them for abundance, knowing that extraordinary challenges to biodiversity

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exist in the present, and are likely to increase in the future. Washington's wildlife is one of our most treasured resources in the state, and we are confident that the public will support efforts WDFW must take to manage for abundance, including being allocated sufficient resources to carry out agency tasks, like law enforcement, species recovery, and other important types of resource protection and management.

Thank you for considering our comments. We look forward to the next phase of this project.

Sincerely yours,

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ⁱ National Park Service Organic Act

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