

# Olympic Park Associates

TO: Washington Department and Fish and Wildlife

FROM: Olympic Park Associates

RE: Scoping for WA Post-Recovery Conservation and Management Plan for Wolves

November 15, 2019

Olympic Park Associates (OPA) is a 70 year-old conservation organization that has a longtime interest in protecting and restoring the ecological integrity of Olympic National Park (ONP) and the Olympic ecosystem. Our representatives participated in the planning process for the 2011 Washington Wolf Conservation and Management Plan. We recognize the need for post-recovery planning, and we agree with your purpose, "to develop an updated conservation and management plan for wolves in Washington to ensure a healthy, productive wolf population with long-term stability." But with an estimated 126 wolves statewide and only one pair of wolves documented west of the Cascades, contemplating delisting is premature. However, the scoping process offers an opportunity to reassess the effectiveness of wolf management to date in Washington state and point to new directions.

One of the central shortcomings of the 2011 management plan is its procedural obstructions to wolf recovery in Olympic National Park. We foresee continued conflicts as wolves recover in cattle ranching country. The importance of having sustainable wolf populations in protected preserves like Olympic National Park cannot be understated. Indeed, wolf populations free from hunting pressures could be critical in maintaining the long-term viability of wolves in Washington state.

One notable flaw in the 2011 management plan was ruling out reintroduction as a means for establishing wolves in isolated areas. This should be corrected in the DEIS. Reintroduction was key to restoring wolves to Yellowstone National Park and the northern Rocky Mountains. It is a tool too important to be scuttled in Washington state, particularly in regards to Olympic National Park.

In 1999 the U.S. Fish and Wildlife service published a feasibility study for reintroducing wolves to Olympic National Park. It concluded that restoring wolves to Olympic is both feasible and beneficial to the ecosystem, and that minimal conflicts with humans would result. The study identified Olympic National Park as the best potential habitat for wolves in the state. It also concluded that reintroduction was necessary for restoring wolves to ONP, and that natural migration of wolves into the Olympics from elsewhere in Washington would not occur. Your 2011 management plan concurs with that finding. Alternatives in the DEIS should include this recommendation.

Another serious flaw in the 2011 management plan was combining the Pacific Coast and South Cascade regions into a single recovery area. No justification was given for this. As is clear in that plan, "connectivity" would not occur in this scenario. In fact, the Olympic Peninsula would be isolated from wolf recovery in Washington and effectively blocked from natural migration. The result could be that wolves will be delisted in Washington without any breeding pairs in the state's best available habitat.

With its abundant elk populations (8,670 for the peninsula plus 3,000 for ONP), excellent habitat, and distance from population centers, the west side of the Olympic Peninsula is a prime locale for wolf recovery. The Olympic Peninsula should be identified as a primary preferred and initial site for translocation from other areas of the state where recovery goals have been met. This is

particularly important in light of climate-driven habitat changes and human pressures elsewhere in the state. The USFWS feasibility study clearly documents a low probability of wolf-human conflicts on the Olympic Peninsula.

That study concluded that Olympic National Park and Olympic National Forest could support up to 56 wolves distributed in five packs. Statewide recovery should be augmented by translocations to Olympic National Park.

The benefits of wolf recovery to the Olympic Peninsula are many. With the successful reintroduction of the fisher, the wolf is the only species missing from Olympic National Park, a World Heritage Site and Biosphere Reserve that experiences an annual visitation of more than 3 million. Wolf predation would strengthen the Roosevelt elk population in the Olympics and likely redistribute elk browsing patterns, benefiting riparian forest development and aquatic habitats. Elk hoof disease (THAD) has been on the increase in southwest Washington since 2008 and has been reported recently in Olympic Peninsula elk herds. This could prove devastating to the park's major wildlife population. In the park's non-hunted elk population, wolf predation would insure the long-term health of Olympic's elk. Wolves would also have a tempering affect on burgeoning coyote populations in Olympic National Park, which have posed a grave threat to the park's endemic marmots. As stated, wolves in the park would have minimum conflicts with humans. In contrast, the presence of wolves would be a draw to park visitors and an economic boon to surrounding communities. Wolf-inspired tourism to Yellowstone produces economic benefits to surrounding communities estimated at \$35 million dollars annually.

The ban on reintroduction from outside the state and the ill-advised combination of central Cascades and Pacific coast recovery areas in the 2010 plan have effectively walled off wolf recovery in Washington's most promising habitat. The DEIS should address these problematic issues and correct them.

In regard to alternatives in the post-recovery DEIS, we agree with Governor Inslee that trophy hunting, trapping, and killing of wolves to protect livestock should have no place in the plan. Employ translocation with an eye to habitat areas that provide a minimum of wolf-human conflict. Although outside the scope of this plan, we believe cattle grazing allotments should be cancelled on Forest Service lands. Our National Forests should be habitats for native wildlife.

Thank you for this opportunity to comment.

Tim McNulty  
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