

OLYMPIC PARKS ASSOCIATES' COMMENT LETTER ON WOLF DEIS

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January 5, 2010

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RE: Wolf Conservation and Management Plan for Washington DEIS

Olympic Park Associates (OPA) is a 60 year-old conservation organization that has a longtime interest in protecting and restoring the ecological integrity of Olympic National Park (ONP) and the Olympic Peninsula.

Our representatives attended scoping meetings and public meetings on the draft plan and offered comments at those venues. Our comments below pertain to the DEIS cited above.

OPA fully supports the plan's goal of ensuring the reestablishment of a self-sustaining population of gray wolves in Washington and encouraging social tolerance for the species. However, we do not feel that your preferred alternative (Alternative 2) will accomplish either of these objectives. Upon analysis, we find that the plan's preferred alternative is not based on the best science and it offers little hope for achieving sustainable populations of wolves in our state. We favor the approach offered in Alternative 3 with the following added points. Because our specific interest is the Olympic Peninsula, we will frame our comments from the perspective of wolf recovery in the Olympics.

Ruling out reintroduction is a serious flaw in the plan.

One of the plan's two main sideboards is flawed: The plan rules out reintroduction to supplement wolf numbers in Washington. This is a fundamental mistake. Reintroduction has proven to be key in restoring wolves to Yellowstone National Park, the northern Rocky Mountains, and other areas. It is a tool too important to be scuttled in Washington state. Further, OPA contends that the Washington Department of Fish and Wildlife does not have the authority to prohibit wolf reintroduction in Olympic National Park or other national parks in Washington. That is certainly beyond the scope of this plan.

In 1999 the U.S. Fish and Wildlife service published a feasibility study for reintroducing wolves to Olympic National Park. The study 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. (An earlier National Park Service study identified Olympic as the second best site for wolf relocation in the NPS system, after Yellowstone.) The USFWS feasibility study 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 DEIS concurs with that finding.

Rather than dismissing reintroduction, the final plan should embrace it as the only means to meet the plan's stated goal of reestablishing a naturally reproducing and viable wolf population distributed in a significant portion of its former range in Washington.

Combining Pacific Coast and South Cascade recovery regions a mistake. Given the unlikelihood of wolves crossing the Interstate 5 population corridor, the recovery regions described in your preferred alternative are without scientific justification. The preferred alternative unexplainably combines the Pacific Coast and South Cascade regions into a single recovery area. There is no justification given for this. As is clear in the 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. With its high 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. And as your source map shows, it could be an important source area for supplementing wolf recovery elsewhere in Washington. The preferred alternative not only fails to acknowledge or make use of this. It, in fact, prevents it. In order to insure viable wolf recovery for Washington, the final plan should restore a separate recovery area for the Pacific coast.

Translocation is key to the Olympic Peninsula and to statewide wolf recovery. The Olympic Peninsula should be identified as a primary preferred and initial site for translocation from other areas of the state to take advantage of the area's outstanding habitat and low probability of wolf-human conflicts. A recovery goal should be established for the Pacific Coast region separate from the South Cascades, which offers different habitat characteristics and does not face the connectivity challenges of the Peninsula.

Target numbers for wolf recovery are too low. The USFWS feasibility study for wolf reintroduction to the Olympics concluded that Olympic National Park and Olympic National Forest could support up to 56 wolves distributed in five packs. Based on these numbers, your target population of 15 breeding pairs needed to transition from threatened to sensitive status seems extremely low. The plan's target number are also inconsistent with USFWS

recommendations statewide (a range of 500 on the high end and 300 on the low end). Clearly, further research and analysis is needed before a target population can be established for delisting wolves in Washington.

#### Benefits of wolf recovery to the Olympic Peninsula.

The benefits of wolf recovery to the Olympic Peninsula are many. With the recent 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 4 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, as a recent study suggests. Wolves would also have a tempering affect on burgeoning coyote populations in ONP, which have had adverse impacts on the park's endemic marmots. And 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.

Non-lethal methods for resolving wolf-human conflicts.

OPA favors non-lethal methods, including translocation, in dealing with "problem wolves" that interfere with livestock operations. Legal and illegal shooting are anathema to recovering wolves in Washington. We support the compensation program to reimburse ranchers for stock killed by wolves as described in the current plan.

Olympic National Park offers the best habitat, the largest unmanaged elk population, and the lowest probability of wolf-human conflicts in the state. Returning the park's keystone predator -- the only species missing from Olympic -- would benefit the entire ecosystem, from endemic Olympic marmots to streamside forests. And the presence of wolves would bring lasting economic benefits to surrounding Olympic Peninsula communities.

Wolves need the Olympics, and the Olympics need wolves. Please select Alternative 3 in your final plan with the above recommendations. Thank you for this opportunity to comment.

Sincerely,  
Tim McNulty  
Olympic Park Associates