



Olympic Park Advocates

April 22, 2024

TO: Washington Department and Fish and Wildlife

FROM: Olympic Park Advocates

RE: Changing Status of Gray Wolf from Endangered to Sensitive

Olympic Park Advocates (OPA) is a 75 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 agree with, as stated then, part of your purpose, "to ensure a healthy, productive wolf population with long-term stability." With an estimated 260 wolves statewide and no pair, in fact only one wolf documented, in the South Cascades/Northwest Coast region the proposed change in status is clearly premature. Downlisting should not be considered until genetic diversity, genetic connectivity, and genetically viable population goals have been met for at least five years.

One of the central shortcomings of the 2011 management plan is its procedural obstructions to wolf recovery in Olympic National Park. While we commend the efforts of the WAG we have seen continued conflicts as wolves recover in cattle ranching country. These ongoing conflicts underline the importance of having sustainable wolf populations in protected preserves like Olympic National Park. Indeed, wolf populations free from hunting pressures could be critical in maintaining the long-term viability of wolves in Washington state. We believe this significant downlisting of gray wolf status from Endangered to Sensitive, skipping Threatened status completely, continues to ignore this shortcoming in the management plan. Wolves remain at risk in the North Cascades and Eastern regions and we believe downlisting compounds that risk and makes it increasingly unlikely that wolves will establish themselves in the Northwest Coast region.

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.

We are aware, and celebrate, the various efforts to create underpasses/overpasses for I-5 and Highway 12, and we also have heard directly from those involved with their creation that it may be ten years or more before funding is obtained and construction completed. Development

along the 1-5 corridor will only increase during that time leaving less habitat for wildlife, and wolves, to safely navigate a route to a connectivity corridor. We encourage the relocation option available to you to reestablish extirpated wolves in the Northwest Coast region. 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 mammal 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 effect 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.

Thank you for this opportunity to comment.

John Bridge, President, OPA