



June 30, 2006

Vaughn Baker, Superintendent
Rocky Mountain National Park
1000 Highway 36
Estes Park, CO 80517-8397

RE: Elk and Vegetation Management Plan Draft EIS

Dear Superintendent Baker,

Thank you for the opportunity to comment on the Elk and Vegetation Management Plan Draft EIS. Please accept these comments on behalf of the 490,000 members and supporters of Defenders of Wildlife.

The objectives of this Draft EIS as listed in the Purpose and Need section are to:

1. Restore and/or maintain the elk population to what would be expected under natural conditions to the extent possible.
2. Restore and/or maintain the natural range of variation in vegetation conditions on the elk range, to the extent possible.
3. Opportunistically collect information to understand chronic wasting disease prevalence in the park within the framework of the alternative.
4. Ensure that strategies and objectives of this plan/EIS do not conflict with those of chronic wasting disease management.
5. Continue to provide elk viewing opportunities.
6. Recognize the natural, social, cultural, and economic significance of the elk population.

Based on the best available science as well as on experience from Yellowstone National Park, restoring wolves is the most successful way to achieve these objectives. It is a winning strategy supported by the majority of U.S. citizens. It may even help control Chronic Wasting Disease. Unfortunately, the National Park Service's (NPS) Alternative 2 – the Preferred Alternative – does not rely on wolf restoration but rather relies on the band-aid approach of lethal elk control through shooting. Fewer elk through shooting may reduce elk impacts on vegetation, but it will not change elk behavior and therefore is not comparable to the success that would follow wolf restoration.

Defenders of Wildlife urges you to issue a new Draft Plan that fully considers restoration of a self-regulating population of wolves within Rocky Mountain National Park (RMNP). Given that RMNP is not large enough to contain a self-regulating population of wolves in isolation, we recommend that this scenario be developed within the context of a regional-scale wolf restoration plan involving the U.S. Fish & Wildlife Service, the U.S. Forest Service, the Colorado Division of Wildlife and the NPS. This is the process that NPS followed with the

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overwhelmingly successful restoration of wolves to Yellowstone National Park, even though Yellowstone is not large enough to contain a self-regulating population of wolves and even though state agencies initially opposed that effort.

This Draft EIS clearly identifies the need for wolves and for wolf predation. In many places throughout the document it notes the mounting scientific evidence that the restoration of wolf predation has near-term and sustained benefits for vegetation. This need for wolves is also an opportunity to further the recovery of a species still listed as endangered under the Endangered Species Act while meeting the needs of the Park's resources and implementing the wishes of most Americans.

Defenders of Wildlife stands ready to help. We are committed to our promise to reimburse ranchers and farmers in the southern Rockies for verified livestock losses caused by wolves, and to help pay for proactive measures that prevent wolf/livestock conflicts in the first place. Further, we commit to both programs at least until such time as wolves no longer require federal protection. For a summary of this program to date, please see Appendix A.

The general views of wolf proponents and opponents are listed succinctly on Page 24 of the Draft EIS.

- Proponents of wolf release maintain that wolves would control elk populations and return a missing predator to the ecosystem.
- Opponents posit that the region is too developed and that the wolf no longer has a suitable niche within this human-dominated system. Others question whether a plan to release wolves in the park could occur without cooperation from other agencies or if it would be consistent with the Colorado Wildlife Commission draft Wolf Management Plan. There is also concern that release of wolves in the park would result in depredation of livestock and/or domestic animals.

The proponent viewpoint is supported by science. In Yellowstone National Park, scientists are documenting the important role reintroduced wolves are playing in rebuilding greater biodiversity within the ecosystem. Since the reintroductions in 1995 and 1996, studies have demonstrated the wolf's ability to cull weak and old ungulates (hooved animals such as elk and deer) (Smith, Peterson and Houston 2003) and to reduce long-term concentration of elk herds and the damage they do to sensitive meadows and wetlands (Ripple and Beshta 2004). In what is known as the cascade effect, wolves are exerting influence over a multitude of species within the park's ecosystem. Elk, wary of the reintroduced top predator, have altered their grazing behavior. With less grazing pressure from elk, streambed vegetation such as willow and aspen is regenerating after decades of overbrowsing. As the trees are restored, they create better habitat for native birds and fish, beaver and other species. In addition, wolves have reduced Yellowstone's coyote population by as much as 50 percent in some areas, which in turn has increased populations of pronghorn antelope and red fox (Crabtree and Sheldon 1999).

According to a recent scientific review of the ecological importance of top predators such as the wolf, the presence of these predators is essential to the long-term maintenance of biodiversity. In the interest of maintaining overall biodiversity, high priority should be given to the re-

establishment of such predators wherever they have been extirpated and where viable habitat remains to support their re-establishment (Terborgh et al. 1999; Soule et al. 2003).

The stated views of opponents, however, are clearly not reason enough to remove consideration of wolf restoration. This is for several reasons.

- Success for wolf restoration relies more on human tolerance than on proximity to human development. European countries contain wolf populations within short distances of millions of humans.
- Wolf restoration in Yellowstone shows that this can occur even if it is not in line with state plans. Endangered species recovery and National Park Service mandates should not take a back seat to the wishes of a handful of state wildlife commissioners.
- Depredation of livestock and/or domestic animals will certainly occur, but the numbers will be relatively minimal and the economic impact almost immeasurable. In addition, as stated above, Defenders of Wildlife stands ready to compensate for these losses. Finally, as in Yellowstone, the economic gains of wolf restoration will far outweigh the minor economic losses.

Scientists have verified what wolf supporters have long-suspected: wolves are good for the bottom line. Merchants in Yellowstone National Park's gateway communities have attributed an economic upturn to the return of the wolf (Milstein 1995, Brooke 1996). According to a 2006 study by John Duffield of the University of Montana, more than 150,000 people visit Yellowstone annually specifically because of wolves, bringing \$35 million to Montana, Idaho and Wyoming each year. Duffield determined that nearly 4 percent of the park's 2.8 million annual visitors say they would not have visited the nation's oldest national park if wolves were not there. In addition, those dollars turn over in local communities, pushing the regional economic impact to about \$70 million a year (Duffield, Patterson and Neher 2006). In Minnesota—a state from which the wolf never disappeared—the International Wolf Center in Ely added \$3 million to the local economy in 1995 and created, directly or indirectly, the equivalent of 66 full-time jobs (Schaller 1996). A 2005 study of ecotourism and red wolves in northeastern North Carolina demonstrated that tourists vacationing at the popular Outer Banks beaches would take day trips and spend money to visit nearby red wolf territory. While the chances of seeing a red wolf in the wild are slim, visitors are interested in attending wolf "howlings" and viewing other wildlife—such as black bears, river otters and waterfowl—that share red wolf habitat. The study also revealed that 100 percent of the local residents surveyed in the rural areas where red wolves reside would be interested in building tourism businesses based on red wolves and other wildlife (Lash and Black 2005). In the southwest, wolf-related tourism is growing and economic analyses show that Mexican wolf reintroduction has generated substantial regional economic benefits (Kroeger, Casey and Haney 2006).

Implementing the flawed Alternative 2 will prove a waste of money. It would cost \$16-18 million over a 20 year period for a less-than-adequate solution. Alternative 2 notes that if monitoring shows that management objectives are not being met, wolf restoration will be considered. In other words, there is a strong likelihood that millions will be spent on non-wolf efforts only to fall back on wolf reintroduction once those efforts fail. Instead of spending such a large sum of money on a first attempt that will not result in a permanent solution, why not spend that money on wolf restoration planning and implementation right from the beginning?

Once monitoring shows that management objectives are not being met, Alternative 2 would then consider wolf reintroduction only according to the process described in Alternative 5. But the process described in Alternative 5 does not equal wolf recovery but rather limits the population to a maximum of 14 heavily-manipulated wolves. In addition, Alternative 5 acknowledges that the proposed use of wolves may not be compatible with the provisions of the Endangered Species Act, as it does not promote recovery of the listed species and it is uncertain whether approval would be granted.

National Park Service management policies clearly underscore the strong conservation focus that should prevail in the management of the Parks. From the Draft Plan at p. 31:

Management Policies 2001 (NPS 2000b) establishes service-wide policies for the preservation, management, and use of park resources and facilities. These policies provide guidelines and direction for management of elk and vegetation within the park.

Section 4.4.1.1 requires that the National Park Service “adopt park resource preservation, development, and use management strategies that are intended to maintain the natural population fluctuation and processes that influence the dynamics of individual plant and animal populations, groups of plant and animal populations, and migratory animal populations in parks” (NPS 2000b).

Section 4.1.5 also directs the National Park Service to reestablish natural functions and processes in human-disturbed components of natural systems in parks (unless otherwise directed by Congress). Impacts on natural systems resulting from human disturbances include the disruption of natural processes. The National Park Service will seek to return human-disturbed areas to the natural conditions and processes characteristic of the ecological zone in which the damaged resources are situated. The National Park Service is to use the best available technology, within available resources, to restore the biological and physical components of these systems, accelerating both their recovery and the recovery of landscape and biological- community structure and function. This includes the restoration of native plants and animals, which Section 4.4.1.3 defines as “all species that have occurred or now occur as a result of natural processes on lands designated as units of the national park system” (NPS 2000b).

Given these policies, it seems logical that the NPS would fully explore the opportunity to develop a management plan based upon the best available scientific information. In light of overwhelming scientific evidence pointing to the absence of wolves as the root of RMNP’s problem with elk herbivory, it is puzzling that the Preferred Alternative does not include wolf restoration.

Wolves have restored balance in the Greater Yellowstone Ecosystem. In Yellowstone, we’ve seen that wolves do indeed balance prey populations and thereby alter vegetative communities.

We are hopeful that the same benefits will occur in Rocky Mountain National Park and across the southern Rockies.

Thank you for sincerely considering our comments.

Sincerely,



Jonathan Proctor
Southern Rockies Representative

[Defenders of Wildlife](http://www.defenders.org) is recognized as one of the nation's most progressive advocates for wildlife and its habitat. With more than 490,000 members and supporters, *Defenders of Wildlife* is an effective leader on endangered species issues. For more information, go to www.defenders.org.

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Appendix A

History of Defenders of Wildlife's Compensation and Proactive Programs

In 1987 Defenders initiated a livestock compensation program to cover wolf-caused livestock losses in the northern Rockies. We have since extended the program to cover grizzly losses in the northern Rockies as well as wolf losses in the Yellowstone, Idaho, Arizona and New Mexico, and more recently, to cover lynx losses in Colorado. Now known as the Bailey Wildlife Foundation Wolf and Grizzly compensation trust, this dedicated trust helps to shift the economic burden of threatened and endangered species recovery from livestock producers to those who support reintroduction efforts. To date we have paid approximately \$665,805 to 492 ranchers impacted by these recovery programs.

Here's how our compensation program works: if a rancher suspects he or she has lost stock to wolves or grizzly bears, they contact either the local state wildlife agency, U.S. Fish and Wildlife Service or U.S.D.A. Wildlife Services. A wildlife biologist then visits the ranch to inspect the dead or injured livestock and verify cause of death or injury. Once the cause is verified, the agency or rancher notifies Defenders. Defenders pays 100% of the Fall market value for confirmed depredations by wolves or grizzly bears, and 50% of the value for probable depredations.

We hope that wolves one day reclaim parts of their former range in the southern Rockies. Occasionally, these carnivores prey on livestock or cause other problems. When depredations occur in the Southern Rockies, Defenders will strive to help resolve these conflicts associated with the recovery of these animals.

In this spirit Defenders has also created the Bailey Wildlife Foundation Proactive Carnivore Fund, which is intended to prevent conflict between imperiled predators and humans before it occurs. If ranchers or landowners have repeated predator problems, we ask them to think about what could be done to reduce conflict. If the concept is practical and within our means, we share the cost of the project. Projects can also be proposed by government agencies or by Defenders. Projects which we have supported include herding dogs, predator fencing, radio-collar activated alarm systems, and range riders.

Our proactive fund has three objectives: 1) to reduce conflicts between predators and humans; 2) to keep predators from being unnecessarily killed by agencies in response to human conflicts; and 3) to increase general tolerance for carnivores across the landscape.

Although the number of livestock lost to wolves is low overall, these losses can have a significant economic impact on those few ranchers who do experience chronic wolf predation. By taking responsibility for the occasional problems that wolves cause, Defenders of Wildlife hopes to increase landowner tolerance for wolves, reduce mortality and improve recovery prospects.

In 2005, we surveyed compensation recipients (livestock owners with confirmed losses to wolves) to determine the overall effectiveness of the program (Stone et al. 2005). Our survey respondents represent 44 percent of those who applied for and received compensation from 2002 to 2004. Almost 80 percent of these respondents were not in favor of wolves in their area, but nearly 70 percent said they were satisfied with the amount of compensation they received. This indicates a high level of satisfaction with their compensation despite negative attitudes toward wolves overall. Most important, nearly all respondents stated that their tolerance toward wolves would be lower if compensation had not been available. Encouragingly, these respondents also indicated a high level of learning about—and implementing—nonlethal methods to reduce conflicts with wolves.

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Appendix B

Wolf Ecotourism: Conserving Wildlife and Boosting Local Economies

Ecotourism: “responsible travel to natural areas that conserves the environment and improves the well being of local people” (The International Ecotourism Society, www.ecotourism.org)

Ecotourism is quickly coming to the forefront of family recreational activities. In recent years, more tourists have sought vacations where they can enjoy wilderness areas. According to the 2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, 39% of all American adults participate in some form of wildlife-related recreation. Wildlife watchers alone spent \$38 billion in the United States in 2001. Wolf-oriented ecotourism, part of this larger social trend, is evident by the fact that many Americans are willing to travel long distances to see wolves. Wolf-related activities have generated economic benefits throughout North America.

Red Wolves in North Carolina

Since the first red wolves were reintroduced to northeastern North Carolina in 1987, an estimated 100 red wolves now roam in the wild. A 2005 study (<http://www.biodiversitypartners.org/econ/report/redwolf.shtml>) found that the red wolf and wildlife may increase tourism throughout the “Inner” Banks region. Alligator River National Wildlife Refuge holds weekly howling tours in the summer as part of this tourism.

- Red wolf activities are forecast to attract over 25,000 households and bring in about \$37.5 million to Eastern North Carolina, boosting tourism by up to 19% in the region.
- A Red Wolf Center could potentially bring more than \$1 million in gate receipts and food or gift purchases over a summer season.
- About 900 local residents and visitors from across the United States participated in howling safaris in the summer of 2005.

Gray Wolves in Yellowstone National Park

Since wolves returned to Yellowstone National Park in 1995, the charismatic predators have stimulated significant economic activity, indicating that wolves are clearly having a positive impact on the economy of the greater Yellowstone area. Visitors to the park now rank the wolf as one of the primary animals they come to see, thereby creating new demand for lodging, guided wolf-watching tours and a variety of wolf-related merchandise.

- In Cooke City, Montana, by the northeast entrance to Yellowstone, 22% more tourists passed through the town in the summer of 1995 than just one year prior, and 71% of business owners thought wolf recovery was responsible for the increased tourist travel.
- Safari Yellowstone is one of many guides and outfitters that offer wolf viewing opportunities in the park. Each year, about 200 people pay \$1,700 a week to come to Yellowstone to watch wolves.
- Merchants in the Lamar Valley report that stuffed wolves, books on wolves, wolf T-shirts and wolf stationary have been selling rapidly since the reintroductions.
- Each year, visitors to Yellowstone spend about \$35 million in Montana, Idaho and Wyoming, culminating in a regional economic impact of \$70 million a year.

The International Wolf Center in Ely, Minnesota

The International Wolf Center (IWC) is a wolf educational facility and a tourist destination for visitors to Ely, Minnesota. Along with outdoor recreational activities in the nearby lakes and forests, the IWC's educational programs and exhibit wolf pack are a main reason that tourists visit Ely. Visitors to the center have a major economic impact in St. Louis and Lake Counties.

- A third of all tourists to Ely visit the IWC, and about half of IWC visitors state that the center influenced their decision to visit Ely and that they might return on a future vacation.
- A recent survey shows that the IWC brings as much as \$3 million per year to Ely and creates as many as 66 jobs in tourism-related businesses and other industries.
- In 2004, the retail department at the IWC generated \$120,000 in net revenues.

Mexican Wolves in the Southwest

In 1998, the Mexican gray wolf was reintroduced in east-central Arizona and west-central New Mexico, including the Gila and Apache National Forests. Anecdotal evidence indicates that wolf reintroduction has triggered tourist visitation.

- The Arizona Heritage Alliance organizes wolf-related tours to the wolf reintroduction area during which participants lodge at local inns.
- Many private citizens lead hiking trips in the wolf reintroduction area for visitors to see wolves.
- The Grand Canyon Chapter of the Sierra Club organizes trips to the area to volunteer with wolf recovery. Participants stay at local lodges and generate benefits for the local economy.

Eastern Wolves in Algonquin Provincial Park

Algonquin Provincial Park in Ontario, Canada is the largest protected area for the wolf and has been successful in using wolves to attract visitors. Since 1963, the park's public wolf howls have been one of the most popular events in Algonquin. At these events, park naturalists imitate wolf howls in the hopes that a nearby pack will return the call, making an unforgettable thrilling experience.

- By 2005, more than 126,500 people had participated in the public wolf howl program.
- More than 2,000 people participate in the howling expedition each summer.
- Visitors to Algonquin contribute almost \$1.9 million to Ontario's economy.