



National Headquarters

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

February 13, 2008

MT Fish, Wildlife and Parks
Wildlife Division, Attn: Public Comment—WOLF SEASON
POB 200701
Helena, MT 59620-0701
Email: fwpwld@mt.gov

Re: Montana Hunting and Trapping Regulations for Wolves

Defenders is a national non-profit conservation organization with more than 800,000 members and supporters nationwide. Defenders is a science-based advocacy organization focused on conserving and restoring native species and the habitat upon which they depend, and has been involved in such efforts since its establishment in 1947. Over the last three decades, Defenders has played a leading role in the recovery of wolves in the Northern Rockies, including the administration of The Bailey Wildlife Foundation Wolf Compensation Trust, which has reimbursed ranchers in the region for more than \$1,000,000 since the program was founded in 1987. In Montana alone, over the twenty year history of the Trust, we have paid \$317,000 for 336 cattle, 689 sheep and 16 livestock dogs and 15 miscellaneous livestock to in 276 payments to livestock owners. Additionally, Defenders administers The Bailey Wildlife Foundation Carnivore Conservation Fund, which assists Montana family ranchers and farmers with nonlethal, proactive methods that help reduce or prevent livestock losses to wolves. These methods include sharing the cost of range riders, livestock guarding dogs, predator deterrent fencing, alternative grazing, and more.

Defenders has a long history of cooperation with the state of Montana. In 2000, Montana Governor Marc Racicot appointed the Montana Wolf Management Advisory Council, a broad-based stakeholder committee that included Hank Fischer, a representative from Defenders of Wildlife. The council was responsible for guiding the development of the state's wolf management plan.

In 2006, Montana Fish, Wildlife and Parks (MTFWP) established a second stakeholder group of more than 30 Montana citizens, state and federal agency personnel, and tribal representatives which developed a comprehensive proposal for the "Montana Livestock Loss Reduction and Mitigation Program." I also served on this stakeholder group and as a member of the *ad hoc* subcommittee that was subsequently created to develop the framework for the state's program. This framework was developed into a legislative bill that was passed in the Montana state legislature in 2007 as House Bill 364 and signed by Governor Schweitzer on April 26, 2007.

Montana established a commendable record for its efforts to create a comprehensive management plan by engaging stakeholders in the management process and focusing on

wolves as valuable species to the state's wildlife diversity. However, it is with great disappointment that we submit our comments against Montana's proposed wolf hunting season. As we have explained in meetings and other communication, we believe adopting a wolf hunting season upon the transition of federal to state management is premature, especially given the tenuous status of wolves in Montana. That the state would propose killing 130 wolves (including all forms of human caused mortality) in the first year of this hunting season signals that Montana is ultimately more concerned with killing wolves and limiting their numbers than conserving the species.

Montana already kills more wolves as punishment for livestock depredation than any other state in the region, which is a very disturbing trend. These are signals to the American people that wolves within the region must remain under federal protection until such a time that the states are able to withstand political pressures and maintain science-based, responsible conservation strategies that ensure a long-term robust regional wolf population.

The Montana Department of Fish, Wildlife and Parks states that the agency "intends to proceed cautiously and conservatively and would not jeopardize wolf recovery" (MFWP December 20, 2007) but then dismisses the option to postpone a wolf hunting and trapping season without considering the consequences. Rather than proceeding cautiously as other states like Wisconsin and Minnesota have done, Montana is rushing forward to adopt this plan for implementation upon delisting. By doing so, Montana has demonstrated that it will allow political pressures to dictate the state's wolf management policies, and be seen as adopting the same rigid wolf control focus as Idaho and Wyoming.

In summary, Montana's proposed wolf hunting regulations would result in:

- The loss of one third of the current wolf population, fragmenting the population from wolves in Canada, Idaho, and Wyoming and preventing wolves from fulfilling their ecological function in their native habitat;
- Failure to adequately integrate wolf behavior, conservation biology and traditional harvest strategies based on species population viability;
- Potentially greater conflicts with livestock;
- The loss of public confidence in the state of Montana due to overzealous initiation of wolf hunting in the state.

We ask that the Department postpone setting a wolf hunting and trapping season and work to strengthen its record of wolf conservation before considering a hunting season on wolves.

There is no biological reason to kill so many wolves. In fact, there are biological reasons *not* to kill more wolves in Montana.

Starting from a recorded population of 66 wolves in 1995, the wolf population in northwestern Montana climbed to an estimated 108 wolves in 2002, and then declined again by 54 percent to only 59 wolves in 2004. It then doubled to 130 wolves in 2005. By the end of 2006, the wolf population was again on a positive trend with an estimated 171 wolves comprising 12 breeding pairs. Under the Service's original recovery goal of 10 breeding pairs in each of the three recovery areas successfully reproducing litters for three consecutive

years, it appears that this goal was met in 2007 (the Service claims to have met this goal in 2002 but only after changing the recovery goalposts from 10/10/10 to 30 breeding pairs overall, allowing the Service to discount the lagging wolf population in the NW Montana wolf recovery area). While this recent trend is encouraging, this population should be monitored for several years to determine if it is robust enough to sustain itself indefinitely, and to provide a reliable conduit for connectivity between Canada and the northern portion of the proposed DPS.

Wolf numbers are still too low to consider initiating a hunting season. Montana has a wolf population of nearly 400 animals, too small to be capable of sustaining hunting pressure. The growth of the wolf population has been tenuous, with wolves in northwestern Montana actually declining in recent years. Killing 30 percent or more of the wolf population is unjustifiable, especially when population trends have been so unstable. No other endangered species has transitioned from federal to state management and immediately been subjected to such intense hunting pressure by this or any other state. It sends the message that the state of Montana is eager to kill wolves without justification and aggressively cap the total number of wolves in the state, thus threatening their long-term viability.

The prey base can sustain more wolves. With an estimated 130,000 to 160,000 elk, Montana's elk population far exceeds the state's management objectives. Hunters are benefiting from one of the most liberal elk harvest seasons in the western United States but even with these liberal seasons, the elk numbers are growing. As the main prey base for wolves in Montana, the elk population has grown so large that it would benefit from increased wolf numbers to help reduce disease (e.g. brucellosis and chronic wasting disease) and disperse elk from overbrowsing and overgrazing sensitive portions of their habitat such as riparian areas and meadows. From a wildlife management perspective, there should be more wolves in Montana, not fewer.

Wolves are social animals, with complex pack structures. Randomly killing wolves can disrupt packs, and may actually result in *increased* levels of livestock depredation. The loss of the alphas or breeding pair of a pack often results in the disbanding of the pack (Brainerd et al 2006). If hunters disrupt a pack of wolves when they are denning, the pack can lose their pups for the year as well as disband. If key members of a stable wolf pack are killed, or if the pack disbands, remaining pack members that are unable to adequately hunt wild prey (e.g. pups and sub-adults) are more likely to kill livestock. Hunting can also inadvertently create conflicts in certain areas by removing wolf packs that are holding their territory from other wolves that may be more likely to prey on livestock. The pack's territory then becomes a high conflict area, and even more wolves are likely to be killed. These scenarios, if replicated widely, would lead to unsustainable and fragmented wolf populations.

If the hunting of wolves serves no wildlife management purpose other than to limit conflicts with livestock, MFWP would be better served by increasing assistance to livestock owners to implement animal husbandry practices (e.g. carcass and sick livestock removal when feasible) and preventative measures where appropriate.

Hunting wolves in the future.

While we strongly oppose the adoption of a wolf hunting season at the present time, we realize that states may ultimately establish hunting seasons sometime in the future. Before adopting a hunting program, the state must ensure that wolf population levels would remain robust, and must have an adequate management plan in place, including a science-based annual monitoring program, baseline demographic data, and a coordinated adaptive management program if wolf population numbers change. Such plans are routinely in place for other hunted species like waterfowl and big game, which are far more abundant than wolves and therefore less sensitive to errors in management decisions.

Any future wolf hunting regulations should be based on the conservation of the species, and allow wolves to occupy suitable habitat where it is available, not serve as a means for capping the population to minimum recovery levels. Montana maintains abundant wildlife population levels for deer, elk, bears, and mountain lions and other species and should likewise secure a robust wolf population.

A wolf population can withstand hunting pressure when the size and distribution of the population is sufficient to produce a surplus that can be harvested without negatively affecting the population's viability. In some cases a harvest may be feasible, but in others it may not. This goes back to the unique environmental factors wolves face on a state by state level. Each case must be scientifically evaluated by state wildlife agencies to determine if the population can support a hunt and how hunting will impact other important issues like livestock conflicts, disease, illegal killing of wolves and more. The wolf population is not at this point yet.

The proposed Montana wolf hunting quota is set too high; any future hunt should be based on permit, not quota, system.

The proposed quota system assumes that wolf migration into Montana from Idaho and Wyoming (where many of Montana's wolves come from) will continue, even though these states plan to kill hundreds of wolves immediately upon delisting. A quota of one-third of the population is too high given the continued low abundance of wolves in Montana, and what we know (and don't know) about pack social structure. Any future hunt should be based on a permit system, not a quota system, so the number of wolves killed in a season can be more closely monitored and controlled.

Trapping should be eliminated.

Traps are indiscriminate in their targets, and often catch pets, raptors, and other endangered species. Trapping wolves is archaic and unnecessarily brutal. They conjure up images of wolves caught in traps during the historical period when wolves were persecuted in and ultimately eradicated from Montana. Even the Montana Wolf Council stakeholders opposed trapping during the early stages of hunting (Montana Wolf Management Advisory Council. January 10, 2008).

There are still issues to address with Montana's wolf management plan.

While Montana's wolf plan provides the highest level of protection of Service-approved plans in the NR DPS, the Montana state legislature has failed to codify to implement the

plan or harmonize its provisions with other aspects of Montana law. What is more, the plan – like all state plans under consideration here – suffers from a lack of dedicated funding to ensure that it will be followed and implemented to provide for continued wolf conservation.

Summary

Defenders does not oppose regulated hunting programs in states with well-thought-out, responsible conservation-based management plans for wildlife species that are not facing conservation risks or threats. However, Defenders cannot currently support a wolf hunting program in the northern Rockies because the states do not have the proper, enforceable management plans in place to ensure the continued conservation of the species. Idaho's and Wyoming's wolf management plans focus on killing too many wolves, which would threaten their states' wolf populations and lead to fragmentation of the regional wolf population. Montana's wolf management plan is only voluntary and the state's wolf population level is very tenuous due to aggressive agency lethal control of wolves involved in livestock depredations and due to illegal killing.

We urge the MFWP commission to postpone any plans to hunt wolves at the state's current wolf population level and to reject any plan that includes trapping of wolves as the general public vigorously opposed this method of killing wolves.

We appreciate your consideration of these comments.

Sincerely yours,

Suzanne Asha Stone
Northern Rockies Representative
Defenders of Wildlife
P.O. Box 773
Boise, Idaho 83701 USA
Ph: 208.424.9385
Fax: 208.424.0169
Visit www.defenders.org

Citations:

Brainerd, S.C., H. Andren, E.E. Bangs, E.H. Bradley, J.A. Fontaine, W. Hall, Y. Iliopoulos, M.D. Jimenez, E.A. Jozwiak, O. Liberg, C.M. Mack, T.J. Meier, C.C. Niemeyer, H.C. Pedersen, H. Sand, R.N. Schultz, D.W. Smith, P.Wabakken, and A.P. Wydeven. 2008. The effects of breeder loss on wolves. *Journal of Wildlife Management* 72(1):89–98.

Montana Fish, Wildlife and Parks Commission Agenda Item Cover Sheet. Meeting date: December 20, 2007.

Montana Wolf Management Advisory Council Meeting Summary. December 9 and 10, 2007.

