

30 April 2002

Attn: Wolf Issues

Montana Department of Fish, Wildlife and Parks

490 North Meridian

Kalispell, MT 59901

On behalf of Defenders of Wildlife and our more than 430,000 members and supporters nationwide, including more than 3,000 in the state of Montana, we deeply appreciate the opportunities to have representation on the Montana Wolf Management Advisory Council, and provide additional comments on this draft plan. Founded in 1947, Defenders is a national, not for profit organization, and recognized as an established leader in the conservation of wolves in the northern Rockies and throughout North America. To date, we have contributed more than \$200,000 through our Bailey Wildlife Foundation Wolf Compensation Trust to reimburse livestock owners for wolf depredation losses. Of this total, more than \$50,000 has been reimbursed for livestock losses in Montana alone, reducing the economic impact to an even more minimal level, and building greater tolerance and acceptance for wolves.

Beyond compensation, we believe the best method is to prevent depredations before they occur and work collaboratively to provide alternatives and deterrents that resolve conflicts through nonlethal methods funded through The Bailey Wildlife Foundation Proactive Carnivore Conservation Fund. Some examples of this proactive fund at work include the cost-sharing of livestock protection dogs, radio activated guard alarms, fencing, hay and alternative grazing support, and the coordination of the Wolf Guardian program to provide volunteer labor to assist in utilizing these and other nonlethal deterrents. Though wolf depredations are very small (less than one half of one percent) in comparison to other losses, we feel this investment of our time and resources has created more tolerance for wolves and helped us form better working relationships among those who share the land with them. We continue to seek and implement new ideas that further the recovery and long term acceptance of wolves in their native territory.

One of our main concerns with this plan is based on the federal government's recent deviation from the original recovery goal of 10 breeding and reproductive pairs in each of the three recovery areas for three consecutive years to the referenced 30 packs over the region without regard to distribution. This confusion over the delisting criteria makes it difficult for states to assess the true recovery goal and for reviewers to make adequate comments. Top wolf researchers have identified long term population viability at a minimum of thousands of animals (Paquet 2002). Thirty packs that are isolated from a larger metapopulation will not guarantee long term viability and therefore the connectivity from these recovery areas to the greater Canadian wolf population is absolutely vital. Northwestern Montana's wolf population has not significantly increased over most of the last decade. Illegal mortality combined with lethal control appears to be

the primary reasons for the stagnation of this population. This is of serious concern because the strongest and most viable link to the Canadian wolf population is through northwestern Montana and maintaining a strong stable wolf population there is essential. Changing the recovery goals to less than ten packs would only increase the possible failure of this region to provide this essential connectivity.

Additionally, the draft plan is too lenient in allowing the lethal take of wolves simply for "threatening" to kill livestock or pets - especially on public lands. This standard is far too vague and would allow for varying and liberal interpretation essentially permitting any livestock or pet owner to kill wolves simply for being present but without requiring evidence of depredation intent. For example, the draft plan could not prevent a livestock operator from driving a herd of livestock toward a wolf den on public land and then killing wolves for protecting their young. The final plan should allow for only non-lethal deterrents in the case of wolves threatening livestock instead of such liberal lethal control based on individual interpretation of "threatening." Pet owners should protect their pets and wildlife by controlling their pets, especially on public lands, and avoiding situations that place their animals at risk. Lethal control should only be used as a last resort when other methods have been exhausted and failed. It is important that livestock operators and owners also demonstrate responsible animal husbandry practices including the removal of dead livestock carcasses whenever possible, treating and removing injured or diseased animals, and avoiding active wolf den sites. Reasonable incentives for citizens working to reduce or avoid conflicts should be considered and adopted.

We strongly support the use of augmentation as a method to jumpstart a wolf population. However we would object to its use in lieu of good management including proactive nonlethal deterrents to resolve depredation conflicts, and strong regulatory and law enforcement protections including the active monitoring of wolf packs and prosecution of wolf poachers. New radio-collar devices are available which allow for monitoring on an hourly or daily basis. These collars may be of significant value in areas of high illegal wolf mortality.

The early stages of state management will likely be the most difficult. We encourage you to include a provision for a state wolf management advisory council to continue to identify, discuss and discern management goals, conflict resolutions and public education opportunities. As with this initial council, it's important that diverse interests are allowed full and meaningful participation in the process and we anticipate working collaboratively with the state and other participants in the future.

Additionally, we recommend that the state begin its training with wolf management prior to delisting by working with federal wolf biologists now to radio-collar and monitor wolves. This would achieve three important objectives; direct experience with wolves; enhanced monitoring and protection of existing wolves; and enhanced documentation of wolf reproduction. Additionally, it will be important to work with Canadian biologists and agencies to monitor population trends across the border. These trends may be of greater significance to long term wolf population viability than those of adjoining states and must be considered when making decisions affecting wolf numbers within the state.

Enforcing protection for the wolves in Montana will also be critical for the long term viability of the species. Montana Senate Bill 163 changed the status of wolves from "predator" to species "in need of management" but failed to identify the penalties for an illegal take once the wolf is delisted. We believe these penalties must be weighted toward the maximum allowed under state law and seriously enforced to ensure enough protection for a delisted but highly vulnerable population or else the plan will fail to provide its basic purpose as an adequate regulatory mechanism to allow for delisting

We are concerned about the lack of adequate funding identified in the plan. The plan itself acknowledges this lack and notes that without funding, the goals will be difficult to implement. Adequate funding is indeed critical, and the plan should recognize and state that its approval is dependent upon adequate funding and could be revoked if such funding is not obtained.

An enormous challenge for wolf managers is personal and societal perceptions about wolves. These perceptions affect how individuals, organizations and communities view wolves and their management. Often these perceptions are based on emotions and opinions that are contrary to known facts about wolves. As a result, wolves have often suffered from the misunderstanding and misrepresentation of their role and impact upon western landscapes. Unfortunately, as small children one of the first images we're taught about wolves is the "big, bad" demon-like creature that devours grandmothers and blows down pigs' homes. Despite such childhood fairy tales, among the large carnivores, wolf attacks on humans are the most rare. Yet the fear and representative rhetoric of such a threat still guides many to conclude that wolves are instead among the most dangerous animals - despite the overwhelming evidence to the contrary.

Claims that wolves will destroy all wild ungulate populations or the livestock industry at large are equally unfounded. If wolves had been of such a nature as to decimate their prey, elk and deer would have been extinct before Columbus landed in America. Considering that wolves were one of the most common predators found in the world, the same would be true of most continents they originally inhabited and of Canada where wolves and their prey species have thrived in abundance. The evidence of the wolves' co-evolution and coexistence with their primary prey species is well documented and scientifically unrefuted.

Unfortunately, the value of carnivore species like the wolf is rarely understood among those who see them only as a competitor, yet their ecological, economic, and aesthetic benefits are greatly significant to our region. The restoration of wolves has already enhanced local economies through increased tourism by local, regional, national and international visitors. Studies conducted just prior to wolf reintroduction anticipated that this influx of tourist revenues would bring a net increase of \$10 million annually (Duffield and Neher 1996) and the evident success of this income is obvious throughout the Yellowstone area. This benefit is more than twenty times the expected losses associated with wolves yet it is rarely recognized in public education or management policy decision making.

Wolves are an important keystone species that help restore lost biological balance to

their native ecosystems (Places for Wolves. 1999). Recent research in Idaho documents that wolves will cull unhealthy elk and deer more than other native predators like mountain lions and bears (Power and Husseman, 2002). This unique attribute of wolves serves to ensure that ungulate populations are less susceptible to overpopulation of non reproductive or weakened members and reduces the number of diseased animals within these populations. The carcasses of wolf-killed ungulates also support a number of other wildlife species including eagles, wolverine, bears, and a wide variety of smaller birds and mammals. Wolves have often been observed killing coyotes which may explain the significant expansion in coyote populations during the absence of wolves from their native habitat.

Early research indicates that wolves are having a positive albeit indirect impact on the land itself. Wolves are coursing predators, and unlike the stealth and surprise hunting technique of the cougar, they test and monitor possible prey on an active basis. During the decades that wolves have been absent from Yellowstone National Park, researchers noted that elk avoided other predators by congregating in open meadows where they could better avoid stealth attacks (Dekker 1997). These meadows suffered as a result of overuse, the riparian vegetation declined dramatically, and many common species disappeared including song birds, beaver, aspens, and willow. The wolves' return may help restore a more natural use of these sensitive areas by deterring elk from heavy use of the riparian zones that are no longer "safe" sanctuaries from predators (W. J. Ripple et al 2001). With less pressure from elk, the regrowth of aspen and return of riparian dependent species has been recorded by researchers - and attributed as a probable positive benefit of the ecological impact of wolf restoration (Beschta, pers. comm. 2002).

Its still very early to make absolute conclusions as to the immediate and long term benefits of the wolves' return, but early evidence is supportive of their value and should be included in public information and education outreach. Educating the public about the importance of predators, in general, would benefit wolves and residents who support healthy dynamic ecosystems. We encourage the use of educational outreach like the "Living with Carnivores" program which is currently being promoted throughout Washington, Oregon and Idaho and utilized as a tool for helping residents (rural and urban) learn ways to avoid conflicts with native predators. We would welcome the opportunity to help tailor and implement a similar program for Montana that addresses public concerns, attractants, and non-lethal control alternatives specifically related to living with wolves.

The overall tone of this draft plan is reasonable, cooperative and professional and we appreciate and commend the comprehensiveness of the issues explored. One of the key statements within the plan is Dr. Steven Fritts' speculation that "Perhaps no other wildlife species is as affected by human perceptions and attitudes as the gray wolf." For this reason alone, we encourage you to maintain a strong commitment to solid, science-based management of this species, a fair but aggressive legal protection and enforcement against illegal take, and a substantial investment in continued open, balanced public education and awareness programs.

Perhaps the greatest gift that the wolf brings to us is the challenge to work with people

of diverse beliefs, values, and backgrounds. How we answer this challenge says far more about us than the fairly simple ecological return of a native species. Abuse of native species and native peoples marked the end of wolves in the West. Respect for wild creatures, especially those as controversial as wolves, signals greater depth of human tolerance and understanding - and hope that the wild aspects of America can be protected and restored. Montana's wolf management plan will become a mile marker in history. Let's leave future generations something that will ensure this effort was worthwhile and won't need to be repeated. A well-balanced plan will ensure that.

We enthusiastically endorse the process that the State of Montana has chosen to pursue which allows all interests to be heard and considered and hope this foundation will be representative of the future management and policy making decisions of the state and the Montana Fish, Wildlife and Parks Department.

Literature Cited

Beschta, Dr. Robert. Oregon State University. pers. comm. 2002

Dekker, D. G. 1997. Wolves of the Rocky Mountains from Jasper to Yellowstone. Hancock House. Blaine, WA.

Duffield, J.W and C.J. Neher. 1996. Press in proceedings at the North American Wildlife and Natural Resource Conference. Tulsa, OK.

Paquet, P. 2002. Ecology and Behavior of Coastal Wolves. North American Interagency Wolf Conference. Boise, ID.

Places for Wolves. 1999. Defenders of Wildlife.

Power, G. and J. Husseman. 2002. Winter Predation Field Studies. University of Idaho. A report to the Idaho Fish and Game Commission.

W. J. Ripple et al. 2001. Trophic cascades among wolves, elk and aspen on Yellowstone National Park's northern range. *Biological Conservation* 102 (2001) 227 - 234.

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