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FWP – Wildlife Bureau
Attn: Public Comment
POB 200701
Helena, MT 59620-0701

Dear Montana Fish, Wildlife & Parks,

On behalf of the Natural Resources Defense Council (NRDC), I appreciate the opportunity to submit the following comments on Montana Fish, Wildlife & Parks's proposed 2010 Wolf Seasons & Quota Alternatives. We request that this letter be included in the official comment record and that the issues raised here receive specific responses from Montana Fish, Wildlife & Parks (FWP).

NRDC is a national conservation organization with over 1.3 million members and online activists, including over 5,900 members and online activists in Montana. Many NRDC members regularly hike, recreate, hunt and fish in Montana, and they treasure its magnificent wild country, scenery and wildlife.

At this time, NRDC opposes a wolf hunt in Montana. Before implementing any wolf hunt, Montana must ensure that wolves are fully recovered in the Northern Rockies. Scientists call for a minimum of 2,000 wolves in the tri-state area. Of critical importance to the long-term health and viability of Northern Rockies wolves is a larger wolf population with legitimate genetic exchange between the subpopulations of central Idaho, northwest Montana, and greater Yellowstone. Currently, there are roughly 1,700 wolves in the Northern Rockies. Full recovery is essential for wolves to successfully disperse between subpopulations and fulfill their ecological role.

Once recovery has been achieved and its long-term viability ensured, a hunt that sustains the population at recovery levels could reasonably be implemented, and NRDC would not oppose such a hunt. But we're not there yet.

This spring, FWP instituted new lethal control guidelines, allowing USDA-Wildlife Services to kill wolves at suspected wolf depredation sites without getting permission from FWP. A hunt on top of increased lethal control, especially a hunt that nearly triples last year's quota, is irresponsible. When implementing changes, FWP should be more conservative and evaluate results before instituting additive changes.

FWP must adequately consider the ecological value of wolves on the landscape. Studies have shown that wolves influence ungulate herds, which allows trees and vegetation to grow,

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which, in turn, improves habitat for many other species. Wolves have reduced the coyote population in Yellowstone National Park, which has increased the number of pronghorn. The incredible ecological benefits that a viable wolf population brings by restoring natural ecosystem function must be better appreciated and considered.

In FWP's hunt proposal's "Supporting Information," FWP states that connectivity between subpopulations in the Northern Rockies may be affected by the hunt quotas, and that quotas may need to be adjusted. FWP should not propose any actions that risk connectivity. Natural dispersal between subpopulations is critical to the long-term health of the species and successful restoration of wolves in neighboring states.

Hunting areas and quotas were set by FWP to have more wolves killed in certain locations to protect livestock and elk/deer herds. Wolves should not be killed to protect elk or deer herds when the state ungulate populations remain largely over objectives. And attempting to protect livestock through a general wolf hunt is misguided.

FWP is attempting to reduce Montana's wolf population with hunting, which indiscriminately removes wolves from packs, rather than targeting problem animals. Wolves have evolved under complex family-based social structures, and maintaining pack structure is important for several reasons. Pack disintegration has been tied to a potential for increased livestock conflicts. Management policies should look beyond numbers to biological and ecological considerations.¹

If a wolf hunt goes forward, NRDC encourages FWP to implement the hunt with the following three much-needed changes from the 2009 hunt:

- (1) FWP should establish a buffer zone around Glacier and Yellowstone National Parks: No hunting should be allowed within 10 miles of Park borders to protect core populations and wolf research projects. Last year, several wolves were killed on the edge of the National Parks, including multiple members of Yellowstone's Cottonwood pack. This cannot be allowed to happen again.
- (2) FWP should eliminate all hunting in the Centennial Mountains, the primary corridor for wolves traveling between the central Idaho and the Greater Yellowstone Ecosystem subpopulations.
- (3) FWP should eliminate all hunting in backcountry areas, where wolves rarely have conflicts with livestock.

¹ Rutledge, L. Y., B. R. Patterson, K. J. Mills, K. M. Loveless, D. L. Murray, B. N. White. 2010. Protection from harvesting restores the natural social structure of eastern wolf packs. *Biological Conservation* 143 (2010) 332-339. Wallach, A. D., E. G. Ritchie, J. Read, A. J. O'Neill. 2009. More than mere numbers: The impact of lethal control on the social stability of a top-order predator. *PLoS ONE* 4(9): 6861. Treves, A. 2009. Hunting for large carnivore conservation. *Journal of Applied Ecology* 46: 1350-1356. (All three articles are enclosed.)

Finally, there are two rules in the wolf hunt proposal that NRDC supports: (1) any illegal killings (poaching) will be subtracted from the hunting quota; and (2) any "over-run" of the quota in an individual sub-unit will be subtracted from the quota in the larger hunting district.

A wolf hunt in Montana is premature at this time. Should a wolf hunt take place anyways, however, we strongly urge FWP to incorporate our suggestions into its design of the hunt.

We appreciate the opportunity to submit these comments and look forward to FWP's response.

Sincerely,

Matt Skoglund

Enclosed:

Rutledge, L. Y., B. R. Patterson, K. J. Mills, K. M. Loveless, D. L. Murray, B. N. White. 2010. Protection from harvesting restores the natural social structure of eastern wolf packs. *Biological Conservation* 143 (2010) 332-339.

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