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October 15, 2007

Steve Doherty, Chair  
Montana Fish Wildlife & Parks (FWP) Commission  
Helena, Montana

Dear Mr. Doherty:

Life Net, a nonprofit organization for wildlife studies, education, and conservation, respectfully urges the FWP Commission not to establish a general hunting and trapping season on gray wolf in Montana at this time. Please consider the following:

*Wolf population connectivity* – A general hunting season on Montana’s wolf population (estimated minimum of 316 individuals, Montana Gray Wolf 2006 Annual Report) could eliminate wolves from areas essential for regional population connectivity, a prerequisite for wolf conservation in the Northern Rockies (MFWP 2002, USFWS 2007). Of particular concern would be hunting or trapping of wolves from habitat areas that link the Greater Yellowstone wolf recovery area to those in Idaho and northwest Montana. Oakleaf et al. (2006), in a peer-reviewed paper on habitat selection by wolves, identified three possible wolf dispersal corridors from Yellowstone to other primary wolf areas. They concluded that for wolf conservation “it will be necessary that dispersal corridors to the Yellowstone ecosystem be established and conserved.”

Only three known wolves reside within a broad 90-mile area directly linking the core population areas of Greater Yellowstone Area and central Idaho (see Sime et al. 2007), while the persistence of other packs along the periphery of these core areas seems in jeopardy (e.g., the Wedge pack, apparently eliminated by recent lethal control actions). Likewise, only one pack (again, three wolves) was recorded over a comparable distance between wolves in the Gallatin Mountains of Greater Yellowstone and in the Sapphire Mountains southwest of Missoula. Most often, dispersing wolves establish territories or join packs near their natal pack or as far as 30-60 miles away (Fuller et al. 2003). Removal of wolves from linkage areas extending beyond such distances could, in effect, result in wolf population fragmentation. (In 2006, wolves were not recorded within the third dispersal corridor linkage identified by Oakleaf et al., which roughly follows the

Bridger and Big Belt Mountains). Recent genetic evidence (Vonholdt et al. 2007) suggesting that Yellowstone wolves are already isolated supports this concern.

Montana's wolf management plan (MFWP 2002) recognizes the imperative that wolves move within and between islands of occupied habitat, and assures that non-problem wolves will be permitted to move through these areas. However, removal of wolves from major movement corridors and "stepping stone" habitats by hunting and/or trapping could undermine this objective and the broader policy goal of integrating and sustaining wolves in suitable habitats.

*The need for tri-state management* – Wolves in Montana cannot persist as a stand-alone population, apart from those in Idaho and Wyoming. Establishing scientifically based hunting seasons requires collaborative interstate wolf management. Currently, Montana's sister states are poised to undertake heavy reductions in wolf numbers through liberal control actions and hunts. A lack of coordination among states, especially in border areas, heightens the risk of excessive harvest in Montana, and of jeopardizing the gains made in recovering gray wolf in the region.

*The gray wolf's ecological role* – We suggest that a general wolf season could contribute to a diminished wolf population unable to reassume its role as a keystone species in Montana's natural communities. Wolves and other wild carnivores can benefit ecosystems by controlling the number and distribution of wild grazers/browsers, such as elk, thereby promoting healthy plant communities, river channels, and a diversity of songbirds and other native wildlife (see, for example, Beschta and Ripple 2006; Fortin et al. 2005; Ripple and Beschta 2006). We look to the day when the gray wolf reassumes its functional role broadly across western Montana's natural ecosystems.

*Public perceptions and expectations* – A wolf season at this early stage of species recovery may create a public perception that FWP sees removal as the first and foremost approach to complex wolf management issues. It may also raise unrealistic public expectations, making "adaptive management" politically difficult should overkill or other factors negatively impacting the wolf population necessitate reductions in harvest or a closed season. We believe that emphasis on addressing wolf-human conflicts through a range of non-lethal measures should receive highest priority at this time. A general hunt could complicate wolf conservation in the years ahead if it has the unintended effect of destabilizing established packs and causing wolf movements into areas of conflict with livestock and development.

We suggest that if the Commission sets a wolf hunting season in the near future that it be a conservative one in terms of how many and where wolves are taken, bearing in mind the issue of wolf population connectivity, the need for tri-state collaboration, and the importance of ecological, recreational, economic, and other benefits of wolf presence in Montana.

Your decisions on wolf management may profoundly affect wildlife conservation philosophy and policy in Montana and elsewhere. Many conservationists anticipate

serious biological, legal, and public relations consequences should the states pursue heavy-handed wolf management. You have a great opportunity to establish an exemplary wolf management program for Montana that can serve as a coexistence model for the recovery of wolves and other large carnivores in the western United States and beyond.

Please contact us if you would like to discuss any of the points raised in this letter. Thank you for allowing us to share our views.

Sincerely,

***Tony Povilitis***

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Chris Smith, Chief of Staff (FWP)  
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