



Greater Yellowstone Coalition

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March 3, 2011

Dear Chairman Brenden and members of the Senate Fish & Game Committee,

This afternoon your committee will consider H.B. 471 which proposes to set a maximum objective of 15 breeding pairs of wolves for the entire state. We ask that you oppose H.B. 471 for a number of reasons:

1. This bill undermines Montana's wolf management plan which was developed through a collaborative process that included hunters, ranchers, conservationists and many others. Montana developed a wolf management plan that works and has developed a solid track record of adaptive wolf management. Montana's wolf plan uses the number of 15 breeding pairs of wolves as the trigger for more or less aggressive management actions. If there are more than 15 breeding pairs in the state, FWP can use regulated hunting and trapping to manage the state's wolf population. In addition, FWP becomes more liberal in authorizing the lethal control of problem wolves in response to livestock conflicts. If there are fewer than 15 breeding pairs, no regulated hunting or trapping can be used to manage wolves, and the response to livestock conflicts becomes more conservative. (See attached Table 1 from Montana's Wolf Management and Conservation Plan.)

2. Overriding Montana's federally approved management plan will only delay the day the state gets to manage its wolves. Montana's wolf management plan and regulations are approved by the U.S. Fish and Wildlife Service (USFWS) under the requirements of the Endangered Species Act. This is a critical step toward the eventual delisting of wolves. This bill will almost certainly cause the USFWS to reevaluate its approval of Montana's wolf management plan.

3. H.B. 471 sets an artificial cap on the number of wolves in Montana by setting the maximum number of breeding pairs at 15. This will require FWP to continue intensively (and expensively) monitoring the wolf population to ensure the population remains securely recovered. Montana is legally required, along with Idaho and Wyoming, to maintain a minimum of 30 breeding pairs in the region (10 pairs in each state). Managing down to 15 or less breeding pairs could cause wolves to be returned to the Endangered Species List.

Montana's Wolf Management Plan was formulated based on extensive public input, in an open process that included all stakeholders. The U.S. Fish and Wildlife Service approved that plan and accompanying regulations; since receiving that approval, Montana Fish, Wildlife and Parks has been the lead agency on wolf management under a cooperative agreement with the USFWS even while wolves remain a listed species. **Amending Montana's plan now may void that approval and only further delay delisting.** Let's respect the wishes of the public and manage wolves like other Montana wildlife, such as elk and black bears, without artificial caps on population numbers.

Please vote No on HB 471 and protect Montana's broadly supported wolf management plan.

Sincerely,

Barb Cestero, Montana Director

Table 1. The spectrum of management activities to manage and conserve wolves in Montana. The adaptive management model calls for selection of different management strategies as the number of wolf packs changes from less than 15 to 15 or greater. The different management settings (Public Lands and Mixed Land Ownerships) call for different strategies, depending on landownership patterns, social factors, land use patterns, biological constraints, and the physical attributes of the environment. Some management strategies may apply across all numbers of wolf packs or management settings, as indicated by the right arrows.

	WOLF PACK NUMBER			
	Less Than 15 Packs* ←		→ 15 Packs or Greater	
	Public Lands <i>(backcountry areas & near National Parks)</i>	Mixed Land Ownerships <i>(interspersed public and private lands; interspersed agriculture)</i>	Public Lands <i>(backcountry areas & near National Parks)</i>	Mixed Land Ownerships <i>(interspersed public and private lands; interspersed agriculture)</i>
Montana Fish, Wildlife & Parks Wolf Conservation and Management Strategies	Adaptive management	→	→	→
	Integrate with ungulate management	→	→	→
	Health and disease surveillance	→	→	→
	Population monitoring	Enhanced population monitoring	Limited monitoring to determine pack status	Enhanced monitoring in selected areas
	Research to improve ecological understanding of wolf-ungulate interactions	→	→	→
	Research to evaluate specific management actions	→	→	→
	Law enforcement, high priority	→	Law enforcement	→
	Public outreach to inform and address specific needs	→	→	→
	Interagency, tri-state coordination	→	→	→

Table 1. Continued.

	WOLF PACK NUMBER			
	Less Than 15 Packs* ←		→ 15 Packs or Greater	
	Public Lands <i>(backcountry areas & near National Parks)</i>	Mixed Land Ownerships <i>(interspersed public and private lands; interspersed agriculture)</i>	Public Lands <i>(backcountry areas & near National Parks)</i>	Mixed Land Ownerships <i>(interspersed public and private lands; interspersed agriculture)</i>
Montana Fish, Wildlife & Parks	Summarize annual mortality; track pack numbers using USFWS definition	→	Summarize annual mortality; track pack numbers using combination USFWS definition and other techniques	→
	Ensure human safety; discourage wolf habituation	→	Discourage wolf habituation; more proactive removal of potential problem wolves	→
	No regulated hunting and trapping	No regulated hunting and trapping; licensed sportsperson may be used to resolve conflict w/ livestock in lieu of government response	Regulated hunting and trapping w/ MFWP Commission oversight; conservative harvest on quota or permit system w/ mandatory reporting	Regulated hunting and trapping w/ MFWP Commission oversight; harvest on quota or permit system w/ mandatory reporting; harvest quota more liberal as pack #s increase
Wildlife Services Management Strategies	Incremental approach, conservative	→	Incremental approach; lethal removal of problem wolves more liberal	Incremental approach; lethal removal may be 1st, especially on private land
Private Citizens	Non-lethal harassment	→	→	→
	Lethal take in defense of life/property	→	→	→

* Montana shares a legal requirement with the states of Idaho and Wyoming to maintain a minimum total of 30 breeding pairs in the region. Since not all packs successfully breed and have pups every year, Montana will maintain at least 14-17 packs statewide to insure achievement of a minimum number of 10 breeding pairs with at least two pups on December 31.