

**Date:** Mon, September 13, 2010 10:32:42 PM

**Cc:**

**Subject:** Final ECQ Version

GREETINGS ECQ COMMISSIONERS,

I'M SORRY I COULDN'T BE HERE TODAY TO ADDRESS YOU PERSONALLY BUT MY FRIEND JERRY BLACK AGREED TO READ MY LETTER.

I WOULD LIKE TO ADDRESS SEVERAL KEY ISSUES PERTAINING TO "MANAGEMENT" OF WOLVES IN THE STATE OF MONTANA.

SINCE GRAY WOLVES WERE RE-LISTED BY JUDGE MOLLOY, A CURIOUS HYSTERIA HAS BROKEN OUT AT MONTANA FWP. THEY SEEM HELL BENT ON HAVING A WOLF HUNT AND ARE THROWING EVERY IDEA AT THE WALL TO SEE WHAT STICKS. JOE MAURIER CALLED IT "THE SHOTGUN APPROACH". THE PROPOSALS INCLUDE BUT ARE NOT LIMITED TO:

**CONSERVATION HUNTS:** THEY'RE ASKING USFWS TO ALLOW A HUNT ~~BECAUSE~~ TO BENEFIT WOLVES. THEY ACTUALLY SAID THIS WITH A STRAIGHT FACE. KILL WOLVES TO SAVE WOLVES. RIGHT!

**CHANGE THE ESA:** A PROPOSAL IS ON THE TABLE TO MEDDLE WITH THE ENDANGERED SPECIES ACT TO EXCLUDE GRAY WOLVES FROM PROTECTION. SENATORS BAUCUS AND TESTER BOTH WANT TO PURSUE THIS AND REP. REHBURG IS FOLLOWING SUIT.

**CHANGE THE STATUS OF WOLVES IN NORTHWEST MONTANA:** WOLVES NORTH OF I-90 ARE FULLY PROTECTED. THEY WANT TO CHANGE THEIR STATUS FROM ENDANGERED TO THREATENED, SO THEY CAN BE KILLED UNDER THE 10J RULE.

OTHER "MANAGEMENT IDEAS" BEING TOSSED AROUND ARE GASSING WOLF PUPS IN THEIR DENS AND STERILIZING ALPHA PAIRS, THIS WAS PROPOSED BY IDAHO.

IN JUNE OF THIS YEAR WYOMING WIPED OUT A WOLF PACK AND THEIR SIX PUPPIES FOR THE DEATH OF ONE LAMB. THEY ALSO SLAUGHTERED EIGHT MEMBERS OF ANOTHER WOLF PACK, INCLUDING THEIR PUPS. IN ALL 16 WOLVES WERE SLAIN, INCLUDING TEN PUPPIES.

WHAT HAVE WE COME TO AS A SOCIETY THAT KILLING PUPPIES IS ACCEPTED? PEOPLE WERE OUTRAGED WHEN A TEENAGE GIRL IN EUROPE WAS VIDEOTAPED TOSsing NEWBORN PUPPIES OFF A BRIDGE INTO A RAGING RIVER BUT WHAT'S THE DIFFERENCE BETWEEN THAT AND KILLING WOLF PUPS?

TO BRAINSTORM THESE IDEAS MONTANA FWP HELD A MEETING IN HELENA ON AUGUST 20TH, WITH ANTI-WOLF "STAKEHOLDERS" FOR THE PURPOSE OF FORMING A COALITION. NO NOTICE AND NO OPPORTUNITY FOR PUBLIC COMMENT WAS OFFERED. THEY FORMED THE COALITION THE SAME DAY WITH 10 HUNTING, FARMING AND RANCHING GROUPS, INCLUDING THE RMEF AND WOOLGROWERS ASSOC. THIS WAS WIDELY REPORTED IN THE PRESS.

FROM THE BOZEMAN CHRONICLE:

*"...at the first meeting of a group the FWP organized, state officials said they will be drafting a new strategy for getting more state control over wolves. The ideas will then be circulated to the groups in the new coalition for their approval.*

*"I think it's important to have a coalition so that especially our congressional delegation understands it's Montana-wide, this concern," said FWP director Joe Maurier."*

[http://www.bozemandailychronicle.com/news/article\\_603e1bf4-aaaa-11df-b1ab-001cc4c03286.html](http://www.bozemandailychronicle.com/news/article_603e1bf4-aaaa-11df-b1ab-001cc4c03286.html)

A COALITION OF ENEMIES OF THE WOLF IS NOT A MONTANA WIDE CONSENSUS. IT'S A CONSENSUS OF PEOPLE WHO DISLIKE WOLVES.

THIS BEHAVIOR MAY PLAY WELL WITH RANCHING AND HUNTING INTERESTS BUT IT'S ALIENATING ORDINARY CITIZENS. SHOULD MONTANA FWP BE RENAMED MONTANA FOR CATTLE AND HUNTING? THAT'S THE WAY IT LOOKS TO NON-CONSUMPTIVE USERS LIKE MYSELF, WHO'VE BEEN CUT OUT OF THE DISCUSSION.

THE MAJORITY OF AMERICANS WANT WOLVES ON THE LANDSCAPE, WHICH PUTS MONTANA FWP OUT OF STEP WITH THE REST OF SOCIETY. AMERICANS RECOGNIZE WOLVES BENEFIT NOT ONLY UNGULATE HEALTH BUT ALSO FOREST HEALTH AS WELL. THIS IN TURN CONTRIBUTES TO THE VIGOR OF OTHER SPECIES OF WILDLIFE, WHICH MONTANA FWP IS ENTRUSTED TO REPRESENT, NOT JUST ELK AND DEER.

THE HUNTING COMMUNITY CONVEYS THE IDEA THEY ARE CONSERVATIONISTS BUT DOES BUYING A HUNTING LICENSE AND A GUN QUALIFY THEM TO CALL THEMSELVES STEWARDS OF THE LAND?

MONTANA IS THE THIRD LARGEST STATE IN THE LOWER FORTY EIGHT, A VERY BIG STATE, YET IT CAN'T ACCOMMODATE 500 WOLVES? MINNESOTA HAS NINE TIMES THE WOLF POPULATION OF MONTANA (4500 WOLVES), A MUCH SMALLER LAND MASS AND A LARGER HUMAN POPULATION, YET THEY ARE ABLE TO COPE QUITE WELL. MINNESOTA ALSO HAS A LARGE DEER POPULATION WHO LIVE ALONG SIDE WOLVES. MINNESOTA HAS STATED IF THEIR WOLF POPULATION IS EVER DE-LISTED THEY WOULDN'T CONSIDER A WOLF HUNT FOR FIVE YEARS, IF EVER, WITH LOTS OF PUBLIC COMMENT. YET MONTANA HELD A WOLF HUNT MERE MONTHS AFTER WOLVES WERE DE-LISTED. WHERE ARE THE FOLLOW UP STUDIES ON THE EFFECTS THE HUNTS HAD ON THE MONTANA WOLF POPULATION? I COULD FIND ZERO? YET FIVE HUNDRED WOLVES DIED IN THE NORTHERN ROCKIES IN 2009.

WE KNOW WOLVES ARE HIGHLY SOCIAL ANIMALS, RIVALING ONLY HUMANS AND AFRICAN LIONS. WHY WOULDN'T MONTANA FWP BE EVEN MILDLY CURIOUS ABOUT THE EFFECTS SO MUCH KILLING HAD ON WOLF FAMILIES?

WHEN YOU PUT IT IN PERSPECTIVE, OVER REACTION IS NOT A BIG ENOUGH WORD TO DESCRIBE THE POLITICALLY DRIVEN WOLF PERSECUTION THAT'S OCCURRING IN THE NORTHERN ROCKIES, IN PARTICULAR MONTANA AND IDAHO AND WYOMING.

THE TWO EXCUSES THE STATE USES TO JUSTIFY GRAY WOLF KILLINGS ARE LIVESTOCK DEPREDATION AND PREY DECLINES.

I'LL ADDRESS LIVESTOCK DEPREDATION FIRST:

WOLVES KILL VERY FEW LIVESTOCK, EVEN THE 'WOLF MANAGERS' ADMIT THIS.

THE 2009 NORTHERN ROCKIES YEARLY INTER-AGENCY WOLF REPORT STATES, "WOLF PREDATION RESULTS IN A COMPARATIVELY SMALL PROPORTION OF ALL LIVESTOCK LOSSES. IN 2009". JUST 214 COWS WERE LOST TO WOLVES OUT OF SIX MILLION CATTLE.

IN MONTANA, WITH OVER TWO MILLION CATTLE, WOLVES WERE RESPONSIBLE FOR 97 CATTLE DEATHS AND 200 SHEEP, BUT EVERYTHING KILLS SHEEP, THEY LITERALLY HAVE NO DEFENSES. IN RESPONSE TO THIS 145 WOLVES WERE ELIMINATED IN MONTANA IN 2009. DUE TO THESE TINY LIVESTOCK LOSSES.

*"Officials say wolves account for a fraction of livestock losses.*

*In 2009, sheep producers reported losing 56,000 animals for reasons other than predators, such as disease and weather. They also reported losing another 18,800 animals to all predators, mostly coyotes. Eagles were blamed for another 600 sheep deaths, the U.S. Department of Agriculture National Agricultural Statistics Service reports.".....THE BILLINGS GAZETTE*

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TO PUT THIS IN PERSPECTIVE 10,500 COWS DIED IN ONE YEAR DUE TO WINTER STORMS. IN 2005 VULTURES KILLED MORE COWS NATIONALLY THEN WOLVES (NASS 2006), THE TOP PREDATORS OF LIVESTOCK ARE COYOTES AND DOMESTIC DOGS BUT EVEN THOSE LOSSES ARE JUST A TINY FRACTION. DISEASE, WEATHER, REPRODUCTIVE ISSUES AND THEFT ARE RESPONSIBLE FOR MOST CATTLE DEATHS (NASS 2005). PLEASE REVIEW THE CHARTS BELOW, WHICH ARE THE LATEST NASS NUMBERS (2006)

### Mammalian Carnivores that Killed Cattle

Data From USDA NASS (2006) Cattle Death Loss

Figure 1

Percentage of 10,500 Cattle Deaths Due to Mammalian Carnivores

Carnivore Type	Percentage	Number of Cattle
All other carnivores	57.14%	6,000 cattle
Coyotes	21.90%	2,300 cattle
Wolves	14.29%	1,500 cattle
Domestic Dogs	4.80%	500 cattle

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### Cattle Production & Deaths for 2005

Data From  
USDA NASS (2006) Cattle Death Loss & USDA NASS (2005) Cattle Inventory

Figure 2

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Cause	Number of Cattle
Respiratory Problems	1,110,000
Digestive Problems	1,440,000
Calving	5,720,000
Unknown	4,740,000
Weather	2,750,000
Other	2,210,000
Disease	1,740,000
Lameness/Injury	1,120,000
Metabolic Problems	780,000
Maturity	670,000
Poison	190,000
Theft	21,000

Cattle Production (2005) = 39,700,000  
Cattle Deaths (2005) = 470,000

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LETS STOP PRETENDING WOLVES ARE DECIMATING CATTLE OR SHEEP IN MONTANA OR ANYWHERE ELSE.. THE NUMBERS AREN'T THERE TO BACK ANY OF THESE CLAIMS, YET THIS HAS BECOME ENTRENCHED ANTI-WOLF DOGMA REPEATED OVER AND OVER. IT REMINDS ME OF SOMEONE BEING ACCUSED OF A CRIME THEY DIDN'T COMMIT, NO MATTER HOW MUCH THEY PROTEST, THEY ARE NOT BELIEVED. WOLVES

<http://us.mg4.mail.yahoo.com/dc/blank.html?bn=470&.intl=us&.lang=en-US>

Page 3 of 5

CAN'T SPEAK FOR THEMSELVES, WHICH MAKES THEM COMPLETELY VULNERABLE AND AN EASY TARGET.

THE SECOND REASON WOLVES ARE BEING TARGETED IS HUNTERS AND WOLVES COMPETE FOR THE SAME PREY ANIMALS. MONTANA FWP' BUDGET IS PARTIALLY SUPPORTED BY HUNTING LICENSING FEES. THIS CREATES A CONFLICT OF INTEREST. HUNTERS ARE DEMANDING FWP KILL MORE WOLVES SO THEY IN TURN DON'T HAVE TO COMPETE WITH WOLVES. THIS OF COURSE IS NOT BASED ON SCIENCE.

IN THE SPRING OF 2009 THE ROCKY MOUNTAIN ELK FOUNDATION POSTED THEIR 25TH ANNIVERSARY PRESS RELEASE TRUMPETING THE SUCCESS OF ELK RECOVERY SINCE THEIR INCEPTION.

### Elk Population Reflects Success of RMEF's First 25 Years

<http://www.rmef.org/NewsandMedia/NewsReleases/2009/ElkPopulations.htm>

ELK NUMBERS WERE UP IN TWENTY THREE STATES INCLUDING MONTANA, WITH A POPULATION OF 150,000 ELK. OBVIOUSLY THERE IS NO PROBLEM WITH ELK NUMBERS IN MONTANA. IN 2010 ELK NUMBERS REMAINED UNCHANGED IN MONTANA. OF COURSE HUNTING GROUPS HAD TO FIND A WAY TO GET AROUND THIS GOOD NEWS SO THEY FOCUSED ON THE NORTHERN YELLOWSTONE ELK HERD, WHICH ONCE NUMBERED 17,000 ANIMALS AND NOW STANDS AT APPROX. 7,000. MANY THINGS HAVE CONTRIBUTED TO THE ELK'S DECLINE IN THAT PART OF THE PARK, WOLVES ARE ONLY ONE FACTOR, DROUGHT IS ANOTHER. BUT THE IMPORTANT POINT IS THE NORTHERN YELLOWSTONE ELK HERD NUMBERS WERE NEVER MEANT TO BE THAT HIGH. THEY DID A LOT OF DAMAGE, MUNCHING DOWN ASH AND COTTONWOOD TREES, DAMAGING RIPARIAN AREAS AND DRIVING OFF THE WATER MANAGING BEAVERS, SONG BIRDS AND OTHER WILDLIFE. SINCE THE WOLVES CAME HOME TO YELLOWSTONE THE TREES HAVE REBOUNDED AND THE BEAVERS HAVE RETURNED. IT'S THE TROPHIC CASCADE EFFECT.

### Tracking science: Biologist's findings show forest diversity, health influenced by wolves

[http://missoulia.com/lifestyles/territory/article\\_3ec9fc54-c01f-11de-bf16-001cc4c002e0.html](http://missoulia.com/lifestyles/territory/article_3ec9fc54-c01f-11de-bf16-001cc4c002e0.html)

WOLVES HAVE ALSO HELPED YELLOWSTONE'S PRONGHORN FAWNS, BECAUSE THEY KEEP COYOTE NUMBERS IN CHECK.. COYOTES HAVE A TASTE FOR PRONGHORN FAWNS AND PREY ON THEM WHEN WOLVES AREN'T AROUND.

WOLVES ALSO INFLUENCE THE HEALTH OF THE SOIL, AGAIN BY KEEPING COYOTE NUMBERS DOWN, WHICH MEANS THERE ARE MORE ROTO-TILLING GROUND SQUIRRELS TO IMPROVE SOIL QUALITY.

EVERYTHING IS CONNECTED, COMMISSIONERS. YOU CAN'T MANAGE FOR A FEW ANIMALS AND KILL OFF THE REST BECAUSE TWO SPECIAL INTEREST GROUPS (RANCHERS AND HUNTERS) DEMAND IT.

MONTANA FWP ARE THE STEWARDS FOR ALL WILDLIFE IN THE STATE AND REPRESENT ALL IT'S CITIZENS, NOT JUST A SELECT FEW RANCHING AND HUNTING "STAKEHOLDERS".

WOLVES INHABIT A SMALL FRACTION OF THEIR HISTORIC RANGE AND FACE THE SAME PERSECUTION THEY FACED ONE HUNDERD YEARS AGO. TO UNDERSTAND THE HISTORY THAT LED TO THEIR WESTERN EXERMINATION I RECOMMEND READING:

### **PREDATORY BUREAUCRACY: THE EXTERMINATION OF WOLVES AND THE TRANSFORMATION OF THE WEST BY MICHAEL ROBINSON.**

<http://predatorybureaucracy.com/book/>

THE SAME ATTITUDES OF INTOLERANCE ARE PRESENT TODAY IN THE NORTHERN ROCKIES DRIVING THE WOLF HYSTERIA. WOLVES ARE A KEYSTONE SPECIES. THEY ARE AN IMPORTANT PART OF THE NATURAL ORDER OF OUR WILD PLACES. INSTEAD OF KILLING THEM WE SHOULD FIND WAYS TO CO-EXIST WITH THEM SO THEY CAN DO WHAT GOD PUT THEM ON THIS EARTH TO DO. ELK AND WOLVES HAVE CO-EXISTED FOR HUNDREDS OF THOUSANDS OF YEARS. THE ELK OWES IT'S FLEETNESS OF FOOT TO THE WOLF WHO HAS CHASED THEM THROUGH TIME.

MONTANANS SHOULD BE PROUD TO HAVE WOLVES ON THE LANDSCAPE. THE GYA BRINGS IN 35 MILLION A YEAR FROM WOLF ECOTOURISM. PEOPLE LOVE WOLVES AND WANT TO SEE THEM .MONTANA SHOULD THINK ABOUT TAPPING INTO THIS MARKET TO BENEFIT BOTH WOLVES AND PEOPLE.

IN CLOSING I WANT TO QUOTE FROM AN ARTICLE IN THE NEW YORK TIMES, WRITTEN WEEKS BEFORE WOLVES WERE RELISTED IN THE NORTHERN ROCKIES. I BELIEVE IT SUMS UP THIS TRAGIC SITUATION PERFECTLY. INTOLERANCE IS THE ENEMY OF WOLVES. WE ARE REPEATING THE MISTAKES OF THE PAST AND DEMONIZING WOLVES ONCE AGAIN. THE COUNTRY IS WATCHING WHAT WE DO HERE.

**FROM THE NEW YORK TIMES, JULY 21, 2010:**

*"In Idaho and Montana, in early 2009, gray wolves were removed from the endangered species list and left to the mercy of state "management plans." Those plans have been crafted to satisfy hunters rather than protect the wolves or the ecosystem in which they play an essential role. They all but guarantee the slow extinction of the roughly 1,700 wolves left in the Rocky Mountain West. The wolf-hunting quota in Montana was 75 animals last year. This year it is 186 out of an estimated 524 wolves in the state. Idaho, which is expected to announce its quota next month, will allow wolves to be trapped, then shot, and it will let hunters use electronic calls.*

*These plans are the extension of a weak and outdated recovery plan (approved by the federal government in 1987) that requires each state to maintain only 100 wolves and 10 breeding pairs — far below what's necessary to guarantee genetically healthy populations. And since that is the only official minimum on the books, it is an invitation to Idaho and Montana to keep killing wolves, until they approach that number. (In Wyoming, wolves are still on the endangered list because the state has yet to develop even a minimally acceptable management scheme.)*

*The hunts are not based on biology. They are political hunts, the result of pressure from ranchers, who rarely lose livestock to wolves, and from hunters, who believe that only they should be allowed to kill the elk on which the wolves feed."*

THANK YOU FOR YOUR TIME COMMISSIONERS.

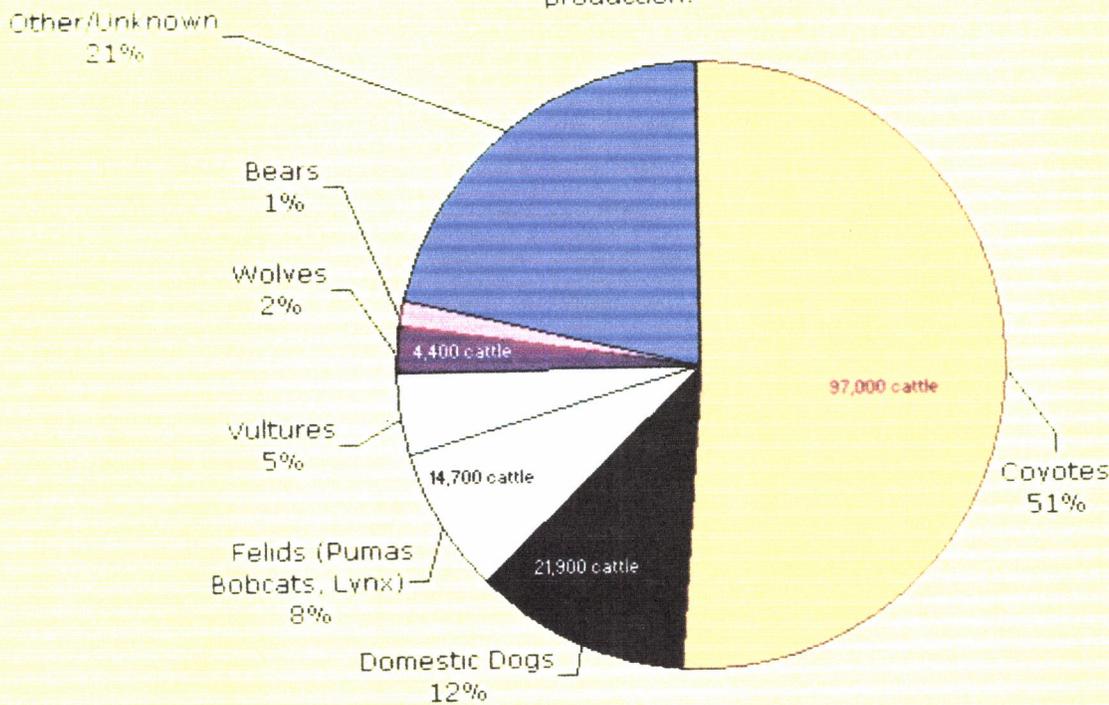
SINCERELY,

Stevie Woods  
Bozeman, Montana

# Mammalian Carnivores that Killed Cattle

Data From USDA NASS (2006) Cattle Death Loss

In 2005, 104,500,000 cattle produced in U.S. Mammalian carnivores killed 190,000 cattle, or 0.18% of the total production.



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# Cattle Production & Deaths for 2005

Data From USDA NASS (2006) Cattle Death Loss & USDA NASS (2005) Cattle Inventory

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