Wild Livelihoods Public Comment on FWP proposal to be amended: MT Statewide Wolf Quota (not including WMU's 313 & 316)

Dear Commissioners,

The Wild Livelihoods Coalition represents businesses throughout the Greater Yellowstone Regions whose bottom line depends on healthy wildlife populations and sustainable tourism. We write to provide public comment on the proposed 2025-2026 wolf hunting and trapping regulations and amendments currently before the Commission.

We support FWP's initial proposal to maintain quotas of 3 wolves each in WMUs 313 and 316 and we are glad to see these units excluded from Commissioner Burrows' proposed amendment. This measured approach recognizes the unique economic value of wildlife viewing in areas adjacent to Yellowstone National Park, where wolf-specific tourism generates $82 million annually for gateway communities alone. These conservative quotas protect the wildlife viewing opportunities that sustain our businesses while allowing for continued management.

However, we do not support a statewide quota. Regional quotas are essential to maintaining consistency in population monitoring, demonstrating compliance with existing legislative mandates and applying spatially relevant wolf hunting and trapping rules. Regional quotas enable spatially varied and targeted wolf management across Montana's large area, diverse habitats and land uses. To preserve the integrity of local regions and accomplish goals, we recommend maintaining Region 3's previously existing quota and focusing any wolf reduction efforts on the regions where change is needed, and can be measured for success.

Policy decisions that undermine wildlife populations threaten not only conservation goals but also the economic foundation upon which thousands of Montanans depend for their livelihoods.

We urge the Commission to consider the full economic impact of these regulations on Montana's tourism economy, maintain quotas that ensure sustainable populations, and reject amendments that would extend hunting seasons.

Additionally, we have the following comments and observations about the amendment's rationale:

Summary of Main Unsubstantiated Biases in Amendment Rationale

1. **One-sided use of "prey reduction" as a negative**, omitting trophic benefits, including benefits to the agricultural economy which regularly argues for lower elk populations to reduce crop/fence/disease damage.
2. **Selective citation of elk limitation studies** without equal weight on habitat/climate/human harvest factors.
3. **Predator competition is framed as harmful** rather than ecologically normal.
4. **Ecosystem service benefits of wolves excluded**, suggesting a conflict-oriented management lens.
5. **Language that assumes continuous human micromanagement** rather than letting natural systems self-regulate.
6. **Most significantly, the language admits the importance of maintaining WMU 313 and 316 and then assumes no social-economic benefit of wolves in the modern era and applies a one-size-fits all, state-driven bureaucratic system to each overall region**. The proposal fails to call out FWP's own admission that wolf populations in Region 3 are not causing social or elk population problems in whole (where the local, modern tourism economy benefits from their presence) and yet still applies a top-down, Helena-driven quota system rather than locally-driven system that accounts for regional nuance, other than WMU 313 and 316. If more wolves need to be removed from Region 1 to improve ungulate populations, how will the state achieve this if the quotas are filled elsewhere? The very statement on your 2025 Wolf Conservation and Management plan states "manage wolf populations across the state with flexibility". (https://fwp.mt.gov/conservation/wildlife-management/wolf) **Recommendation**: To preserve the integrity of local regions and accomplish goals, we recommend maintaining Region 3's existing quota and focusing your reduction efforts on the regions where change is needed, and can be measured for success.
7. **The proposal does not account for the changes in wolf population due to livestock conflict removals (a 100 wolf quota) or illegally harvested wolves. Three wolves were illegally harvested in Region 3's Park County Montana last wolf season, and do not even count against the quota.** How are citizens, including hunters, to understand this as fair wildlife management and have any trust in the system? **Recommendation**: Amend the proposal to account for legal livestock conflict removals and illegal harvest against the quotas.

Detailed Response

1. Carrying Capacity Framing

- **Bias**:
  The citation of the delisting rule's claim that maintaining 1,500 wolves "would slowly reduce wild prey abundance" positions wolves as a potential overpopulation threat

without providing balancing evidence of wolves' trophic benefits or the natural oscillations in predator-prey dynamics. The proposal omits the benefits of maintaining ungulate populations for the agricultural industry. FWP repeatedly has failed to increase hunting opportunities for bison by creating a bison management plan and the State has argued for lower numbers of bison in Yellowstone National Park, and yet fails to recognize positive impacts of wolves on elk population control.

- **Scientific Gap**:
  Long-term studies in Yellowstone (Ripple & Beschta 2012; Smith et al. 2020) show that wolf-driven reductions in certain ungulate numbers may lead to vegetation recovery, improved riparian function, and biodiversity gains. The proposal omits these positive outcomes, presenting a one-sided ecological cost-benefit view.

2. Predation Impacts on Ungulates

- **Bias**:
  The discussion of wolf predation on elk recruitment focuses on "limitation" and "declines" but selectively cites studies in areas of *nutritional limitation* or *multi-predator pressure* without mentioning cases where wolves have not caused sustained ungulate population declines—or where declines were due to **habitat quality or overharvest by humans**.
- **Scientific Gap**:
  Numerous studies (Hebblewhite et al. 2010; Middleton et al. 2013) show that elk populations are often more strongly affected by severe winters, drought, and human harvest rates than by wolves alone. Without that context, the section implicitly frames wolves as primary limiting agents.

3. Inter-Carnivore Competition Emphasis

- **Bias**:
  The section on wolves competing with other carnivores (e.g., mountain lions) presents the interaction largely as a *negative impact* on the other species, without acknowledging the evolutionary normalcy of these relationships or the potential benefits of predator diversity for ecosystem stability.
- **Scientific Gap**:
  Carnivore guild competition is a normal, ancient dynamic. The omission of balancing context (e.g., that lion populations in wolf areas can remain stable given adequate prey) implies that wolf presence is inherently harmful to other predators.

4. Absence of Ecosystem Function Language

- **Bias**:
  While there is acknowledgment that predator-prey and predator-predator interactions are "complex," the proposal omits the **well-documented functional roles of wolves**—such as regulating mesopredator populations, reducing disease prevalence in ungulates, or triggering trophic cascades.
- **Scientific Gap**:
  Foundational studies (Estes et al. 2011; Ripple et al. 2014) show wolves can have net

positive ecosystem impacts. The proposal's selective presentation of science leans toward portraying wolves as a management problem rather than as an ecological asset.

5. Language Choices that Imply Overcontrol

- **Bias**:
  The proposal's repeated framing of wolf numbers in terms of thresholds, limits, and "maintaining" rather than *allowing natural population processes* reveals a top-down control mindset rooted in maximizing game species availability and minimizing perceived conflicts.
- **Scientific Gap**:
  Predator populations in intact ecosystems regulate themselves through density dependence and prey cycles (Fuller et al. 2003). Overemphasis on numerical "benchmarks" as control points is a human-centered hunting management bias rather than an ecological necessity.

6. Exclusion of Economic and Social Benefits

The proposal states that wolf populations from the Lewis and Clark era "cannot be expected to be maintained" without addressing the modern economic role of wolves. Yellowstone wolf tourism alone generates roughly **$82 million annually** for gateway communities, **$500 million annually** for Park County, and over **$1 billion annually** for Montana's Greater Yellowstone tourism economy. Park County bed taxes average $8M annually to the state's benefit, including some of it going to FWP. The omission of these figures presents an incomplete cost-benefit analysis and biases policy toward consumptive uses of wildlife rather than also recognizing non-consumptive economic drivers. There is an analogous model for this in the "catch and release" and "catch and eat" approach to our trout fishery. FWP's own surveys show increasing tolerance of wolves; why not at least acknowledge in your amendment the recreational benefit of wolf watching tourism as we do with the fly-fishing "catch and release" tourism?

Wildlife management must recognize that healthy wolf populations represent both sound conservation policy and essential economic policy for communities throughout the Greater Yellowstone ecosystem.

Thank you for your consideration of these economically informed comments as you deliberate on regulations that will significantly impact both wildlife conservation and economic longevity in our region.

Respectfully,
Wild Livelihoods Steering Committee

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