

MC

BEFORE THE DEPARTMENT OF FISH WILDLIFE AND PARKS  
OF THE STATE OF MONTANA

In the matter of the adoption of a New ) RULEMAKING PETITION  
Rule pertaining to wolf management )  
stamps] )  
)

TO: All Concerned Persons

1. Petitioner's name and address is Marc Cooke, on behalf of Wolves of the Rockies, P.O. Box 742, Stevensville, MT 59870.

2. Petitioner is a 501(c)(3) non-profit whose mission is to protect and to protect and defend the wolves of Yellowstone National Park and the Rocky Mountains by advocating and educating, and gathering wolf advocates worldwide to consolidate their voices into a force that will influence the protection and acceptance of wolves that call the Rocky Mountains their home. Wolves of the Rockies membership includes non-consumptive users, they spend significant time attempting to see, and observing, wolves throughout Montana. If the rule is adopted, it will create a collaborative group of consumptive and non-consumptive users to participate and guide wolf management in Montana.

3. Montana's current wolf population estimates are based various habitats characteristics using an integrated population occupancy model (iPOM). It purposes to eliminate the need for intensive field-based monitoring, but still provide a means to estimate wolf populations. These estimates, though, without field based monitoring or ground truthing are fraught with error. FWP is on the verge of amending the Montana Gray Wolf Conservation and Management Plan to allow the use of iPOM, and it has been using it for a number of years. Due to the potential errors in wolf counts, iPOM cannot be used in isolation. This rule is necessary to ensure that the Department's wolf counts and modeling accurately reflect wolf populations in Montana. And knowing wolf populations in Montana is critical to managing wolves to sustainable population levels that everyone can enjoy.

**ADOPTION:**

The rule[s] as proposed to be adopted would provide[s] as follows:

[NEW RULE I WOLF POPULATION CALCULATIONS. (1) the department is obligated to manage wolves for the benefit of all Montanans, and to maintain and enhance to regional wolf populations. In pursuing those goals, Montana must determine population levels in the state with a level of certainty that cannot be accomplished with modeling alone. The department must calculate wolf populations based on the methods used prior to the adoption of the integrated population occupancy model (iPOM). Those methods include, but are not limited to:

(a) Hunter harvest survey;  
(b) Requiring hunters to report wolf sightings;  
(c) Data from Collared Wolves;  
(d) Acoustic surveys using howl boxes that play a highly amplified series of wolf howls and then records the responses;

(e) Genetic capture-recapture methods;  
(f) winter track counts;  
(g) aerial tracking; and,  
(f) Population counts from structured surveys.

(2) the Department must calculate the population of wolves using these methods every two years, and report the information to the Fish and Wildlife Commission at least 60 days prior to the Fish and Wildlife Commission's annual season and harvest limit meeting.

[NEW RULE I WOLF POPULATION CALCULATIONS. (1) the department is obligated to manage wolves for the benefit of all Montanans, and to maintain and enhance to regional wolf populations. In pursuing those goals, Montana must determine population levels in the state with a level of certainty that cannot be accomplished with modeling alone. The department must calculate wolf populations based on the methods used from 2007 to 2014 and may not include the use of the integrated patch occupancy model (iPOM).

(2) the Department must calculate the population of wolves using these methods every two years, and report the information to the Fish and Wildlife Commission at least 60 days prior to the Fish and Wildlife Commission's annual season and harvest limit meeting.

5. Persons known to petitioner to have an interest in the proposed agency action are:

KC York, Trap Free Montana, P.O. Box 325, Hamilton, Mt, 59840

Derek Goldman, Endangered Species Coalition, Missoula, Mt 59801

6. Petitioner requests a hearing for expression of petitioner's and other interested persons' views.

WHEREFORE, petitioner requests the Department of Fish Wildlife and Parks to adopt this proposed rule.



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Marc Cooke  
Wolves of the Rockies  
October 19, 2023