



**2024 Montana Fish Wildlife and Parks Commissioner
Wolf Comments.**

Chair Robinson and Commissioners,

25 July 2024

The killing of wolves should be avoided for several important reasons rooted in ecological balance, ethical considerations, and cultural significance. Ecologically, wolves play a critical role as apex predators in maintaining the health and balance of ecosystems. They help regulate prey populations, such as deer and elk, preventing overgrazing and promoting biodiversity. Without wolves, these prey populations can expand uncontrollably, leading to the degradation of vegetation and negatively impacting other species in the ecosystem. This trophic cascade demonstrates the essential role of wolves in fostering a balanced and thriving natural environment.

Ethically, many argue that wolves have an intrinsic right to live free from unnecessary harm inflicted by humans. Wolves, like all sentient beings, experience pain and suffering, raising significant animal welfare concerns. Furthermore, wolves exhibit complex social structures, living in family units and displaying strong bonds and cooperation within their packs. The disruption of these social structures through killing can cause immense distress and destabilization, further emphasizing the ethical considerations against their elimination.

Culturally, wolves hold significant value and symbolism in various human societies, from Indigenous cultures that view them as sacred and integral to their heritage, to modern conservationists who recognize their importance in the natural world. Respecting these cultural perspectives fosters greater appreciation and protection of wildlife, encouraging coexistence rather than conflict.

Economically, non-lethal methods of managing wolf populations, such as using guard animals, fencing, or compensation programs, can be more sustainable and beneficial to local communities than lethal control methods. These approaches can reduce livestock predation while preserving wolf populations, allowing for a balanced cohabitation where both human and wildlife interests are considered.

In conclusion, protecting wolves from being killed aligns with ecological, ethical, cultural, and economic arguments, supporting a multifaceted approach to wildlife conservation that benefits both the environment and humanity.

You have an opportunity to acknowledge and respect the desires of the non-consumptive community. Stop the slaughter of Yellowstone and Montana wolves. Please review supporting documents.

Marc Cooke
President
Wolves of the Rockies
Stevensville, Montana

Elk are counted in winter or spring by aircraft. It is not possible to count all elk in a management unit and elk plan objectives are based on "Observed Elk", which may be elk observed on trend areas in some cases. Counting elk is an inexact exercise subject to a multitude of weather and timing variables and elk movements between hunting districts. Therefore, counts in some years may not accurately reflect elk numbers and better counts from previous years are reported.

Hunting District(s)	Elk Management Unit (EMU)	Most Recent Elk Count (as of 2023)	Year of Count	Average Count ¹	Population Goal Range	Status ²
100	PURCELL	Surveys not conducted due to difficulty observing elk in forested cover.				
101	EUREKA	Surveys not conducted due to urban low altitude flying constraints.				
103	SALISH	Population count surveys not conducted due to variable and inconsistent elk counts.				
104	CABINET	Surveys not conducted due to difficulty observing elk in forested cover.				
110	WHITEFISH	Surveys not conducted due to difficulty observing elk in forested cover.				
120	SALISH	Surveys not conducted due to difficulty observing elk in forested cover.				
121	LOWER CLARK FORK	1,497	2022	1,497	1,350-1,890	At
122	SALISH	Surveys not conducted due to difficulty observing elk in forested cover.				
123	LOWER CLARK FORK	376	2023	344	360-510	Below
124	LOWER CLARK FORK	Surveys not conducted due to difficulty observing elk in forested cover.				
130	BOB MARSHALL	Surveys not conducted due to difficulty observing elk in forested cover.				
140	BOB MARSHALL	67	2023	67	250-350	Below
141	BOB MARSHALL	Surveys not conducted due to difficulty observing elk in forested cover.				
150	BOB MARSHALL	206	2023	206	450-630	Below
170	NORTH SWAN	Surveys not conducted due to difficulty observing elk in forested cover and urban flying constraints.				
Region 1 Total³		2,146		2,114	2,410-3,380 ³	Below ³
200	LOWER CLARK FORK	265	2021	266 ⁴	240-360	At
201	MISSOULA/NINEMILE	2,297	2023	2,208	1,600-2,400	At
202	LOWER CLARK FORK	536	2022	532	400-600	At
204, 261, 262 Skalkaho/Willow	NORTH SAPPHIRE	313	2023	385	300-500	At
204, 261, 262 Willow/Eight Mile		346	2023	412	360-540	At
204, 261, 262 Eight Mile/North		743	2023	691	400-600	Over
210, 211, 212, 216	ROCK CREEK & FLINT CREEK	2,513	2023	2,453	1,440-2,160	Over
213	FLINT CREEK	2,424	2023	2,116	920-1,380	Over
214	FLINT CREEK	133	2023	160	160-240	At
215	DEER LODGE	1,958	2023	1,834	1,360-2,040	At
217	FLINT CK	562	2023	672	480-720	At
240	BITTERROOT	741	2023	697	600-900	At
250	WEST FORK BITTERROOT	750	2022	778	800-1,200	Below
260	BITTERROOT/CLARK FORK	105	2023	105 ⁵	0-100	Over
270	EAST FORK BITTERROOT	4,554	2023	4,331	3,600-4,400	At
280	BOB MARSHALL	No Wintering Elk.				
281	BOB MARSHALL	463	2022	536	500-700	At
282	BOB MARSHALL	583	2023	677	900-1,100	Below
284, 293, 339, 343	GRANITE BUTTE	2,734	2023	2,072	1,800-3,500	At
285 (Gold-Belmont)	BOB MARSHALL	206	2022	220	240-360	Below
290, 298	GARNET	1,006	2022	954	480-720	Over
291	GARNET	633	2023	674	480-720	At
292	GARNET	540	2022	610	640-960	Below
Region 2 Total		24,405		23,383	17,700-26,200	At
301, 309	BOZEMAN	963	2023	831	400-800	Over
302	TENDOY	1,247	2023	2,008	1,100-2,100	At
303	TENDOY	994	2023	904	650-1,100	At

304	LOWER MADISON	2,046	2023	2,056	1,500-3,000	At
310	GALLATIN/MADISON	326	2023	561	600-1,000	Below
311 North Tobacco Roots Herd	LOWER MADISON	655	2023	573	200-1,000	At
311 Red Mountain Herd		838	2023	678	200-1,000	At
312	BRIDGER	1,139	2023	1,196	1,000-2,000	At
313	NORTHERN YELLOWSTONE	5,142	2023	5,075	3,000-5,000	Over
314	UPPER YELLOWSTONE	3,959	2023	3,965	2,900-4,200	At
315	CRAZY MOUNTAINS	2,519	2023	2,403	1,200-2,000	Over
316	NORTHERN YELLOWSTONE	No Wintering Elk.				
317	ABSAROKA	1,834	2023	1,826	900-1,700	Over
318	DEER LODGE	666	2022	647	400-800	At
319 S	FLEECER	1,153	2023	970	850-1,100	At
319 NE	FLEECER	572	2023	487	450-600	At
320	TOBACCO ROOT	1,450	2023	1,288	500-1,500	At
321 S	WEST BIG HOLE	756	2023	1,001	800-1,000	At
321 N	WEST BIG HOLE	647	2023	804	800-1,000	At
322	GRAVELLY	8,509	2023	10,399	6,000-10,000	Over
329	PIONEER	1,086	2023	959	700-1,300	At
331	PIONEER	1,260	2023	1,441	1,250-1,950	At
335	DEER LODGE	967	2023	1,076	500-1,400	At
339, 343	GRANITE BUTTE	Counted with 284 and 293 - see above				
340	HIGHLAND	806	2023	883	800-1,200	At
350	WHITETAIL-BULL MTN	356	2023	280	300-400	Below
360	GALLATIN-MADISON	4,653	2023	5,458	3,300-4,700	Over
361	GALLATIN-MADISON	Few wintering elk. No stated population size goal.				
370	WHITETAIL-BULL MTN	378	2023	328	350-450	Below
380	ELKHORN	1,601	2023	1,698	1,700-2,300	Below
388	GRANITE BUTTE	Survey not conducted. No stated population size goal.				
390	BRIDGER	1,829	2023	1,584	1,200-1,800	At
391	SW BIG BELT	1,953	2023	1,479	1,000-1,500	At
392	NW BIG BELT	212	2023	269	480-720	Below
393	BRIDGER	4,141	2023	3,778	2,700-4,000	At
Region 3 Total		54,657		56,904	38,230-62,620	At
400, 403, 404, 405, 406, 419, 444, 471	GOLDEN TRIANGLE	Survey not conducted. No stated population size goal.				
401	SWEETGRASS HILLS	707	2023	654	450-650	Over
410	MISSOURI RIVER BREAKS	2,106	2023	2,698 ⁶	2,600-3,200	At
411, 535	SNOWY	10,380	2023	9,858 ⁶	6,000-12,000	At
412	SNOWY	1,188	2023	986	600-1,500	At
413	LITTLE BELT	1,200	2023	1,028	700-1,000	Over
415	BOB MARSHALL	154	2022	178	150-250	At
416	SW LITTLE BELT	195	2023	1,444	1,000-1,500	At
417	MISSOURI RIVER BREAKS	2,443	2023	2,452 ⁶	1,500-2,500	At
418	NE LITTLE BELT	362	2023	303	200-300	Over
420, 448	NE LITTLE BELT	1,160	2023	1,137	1,000-1,500	At
421	BIRDTAIL	924	2023	727	400-600	Over
422	BOB MARSHALL	1,339	2023	1,124	600-800	Over
424, 425, 442	BOB MARSHALL	2,223	2023	2,223 ⁵	2,250-2,750	Below
426	MISSOURI RIVER BREAKS	452	2023	317	150-350	At
441	BOB MARSHALL	740	2023	631	500-700	At
445, 455	DEVIL'S KITCHEN	5,989	2023	4,730	2,500-3,500	Over
446	EAST BIG BELT	2,322	2023	2,825	1,500-2,000	Over

447	HIGHWOOD	1,516	2023	1,572	800-1,200	Over
450	TETON	577	2023	574	300-400	Over
451	BRIDGER	961	2023	366 ⁴	200-800	At
452	CASTLE MOUNTAIN	1,683	2023	1,325	800-1,200	Over
Region 4 Total		38,621		37,152	24,200-38,700	At
502	ABSAROKA	202	2023	179	150-250	At
515	MID-YELLOWSTONE	1,045	2022	1,054 ⁶	900-1,500	At
525	ABSAROKA	3,161	2022 & 2023	2,788	2,200-3,300	At
535	SNOWY	Counted with 411 - see above				
540	SE LITTLE BELT	1,448	2023	1,651	1,500-2,000	At
555	ABSAROKA	166	2022	138	150-250	Below
565	ABSAROKA	351	2023	302	225-375	At
575	ABSAROKA	908	2023	949	650-1,050	At
580	CRAZY MOUNTAINS	5,141	2023	4,668 ⁶	2,500-4,000	Over
590	BULL MOUNTAINS	3,717	2023	3,297 ⁶	2,400-3,600	At
Region 5 Total		16,139		15,026	10,675-16,325	At
600, 640, 650, 652, 670	PRAIRIE BREAKS	Survey not conducted. No stated population size goal.				
620, 621, 622	MISSOURI RIVER BREAKS	1,292	2022	1,642 ⁶	1,600-2,400	At
630	MISSOURI RIVER BREAKS	254	2022	330 ⁶	400-600	Below
690	BEARS PAW	696	2023	861 ⁶	800-1,200	At
Region 6 Total		2,242		2,833	2,800-4,200	At
700	MISSOURI RIVER BREAKS	1,379	2022	1,314 ⁶	1,600-2,400	Below
701	PRAIRIE BADLANDS	Survey not conducted. No stated population size goal.				
702, 704, 705	SOUTHEASTERN MONTANA	3,721	2022 & 2023	2,726 ⁶	3,240-4,860	Below
703	HI LINE	Survey not conducted. No stated population size goal.				
Region 7 Total		5,100		4,040	4,840-7,260	Below
STATE TOTAL		143,310		140,679	96,015-151,425	At

Over
 At
 Under
 Not Counted



¹Average counts are for the past three years unless otherwise noted

²Status is classified as At, Below or Over the population goal using the count average specified in the Elk Management Plan

³Only includes HDs where elk are countable

⁴Average count is for the last five years

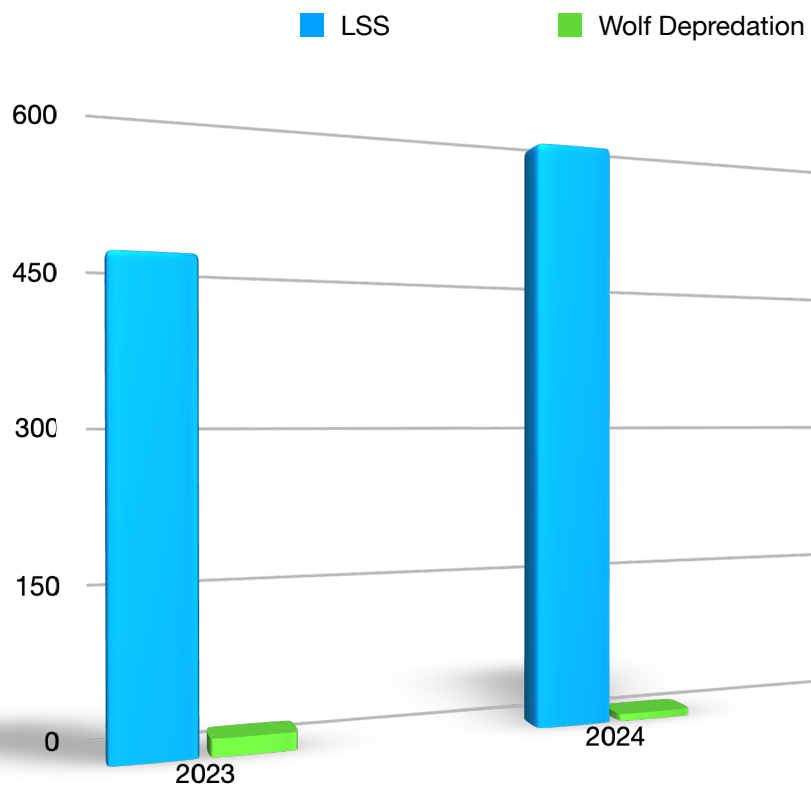
⁵Average count is the most recent count

⁶Average count is for the last four years



Livestock Lost, Strayed or Stolen Compared to Wolf Depredation.

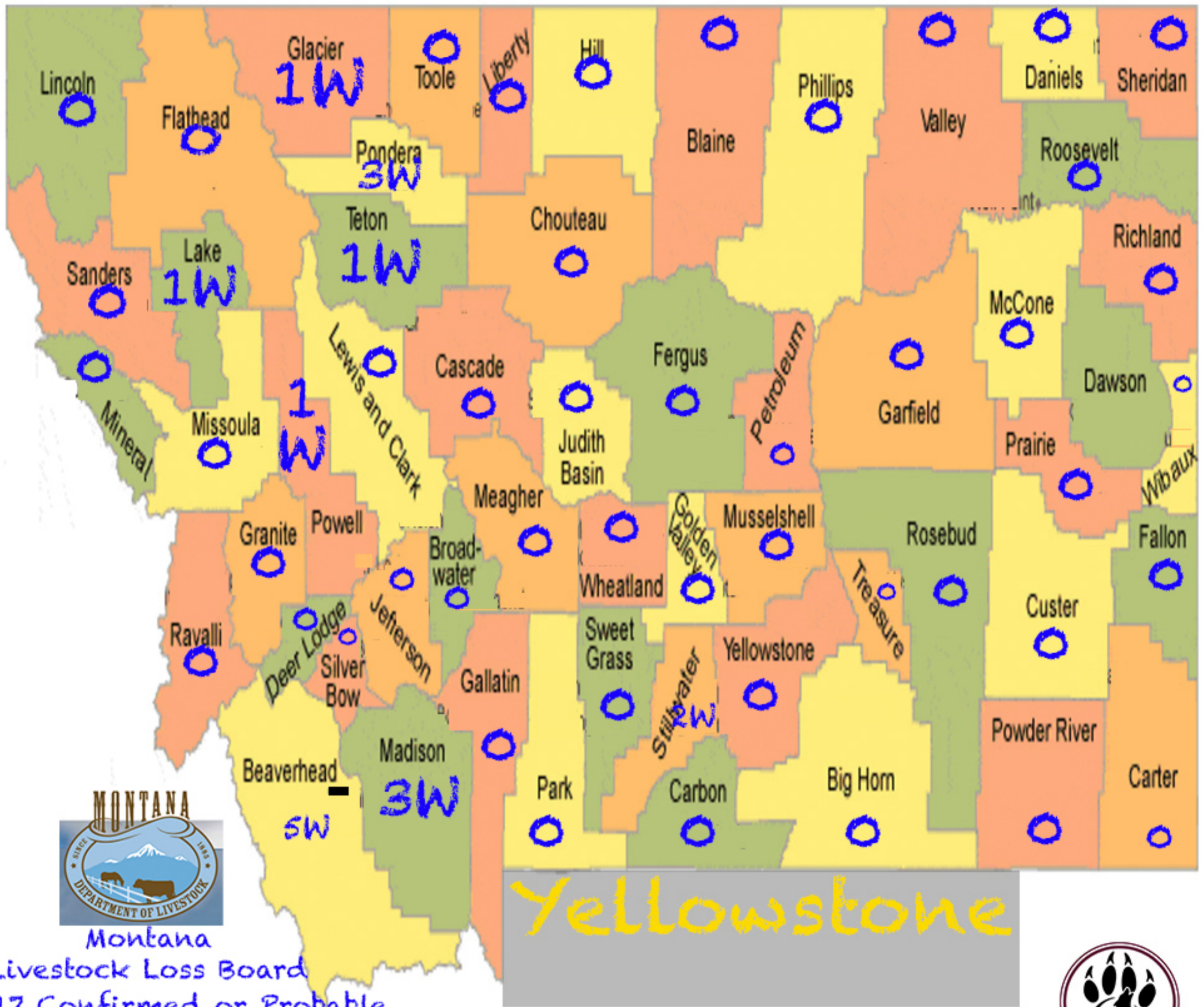
~WHY ARE WE KILLING WOLVES ?~



Statistics provided by Montana Department of Livestock.

Montana County Map

2023 Wolf Livestock Depredation



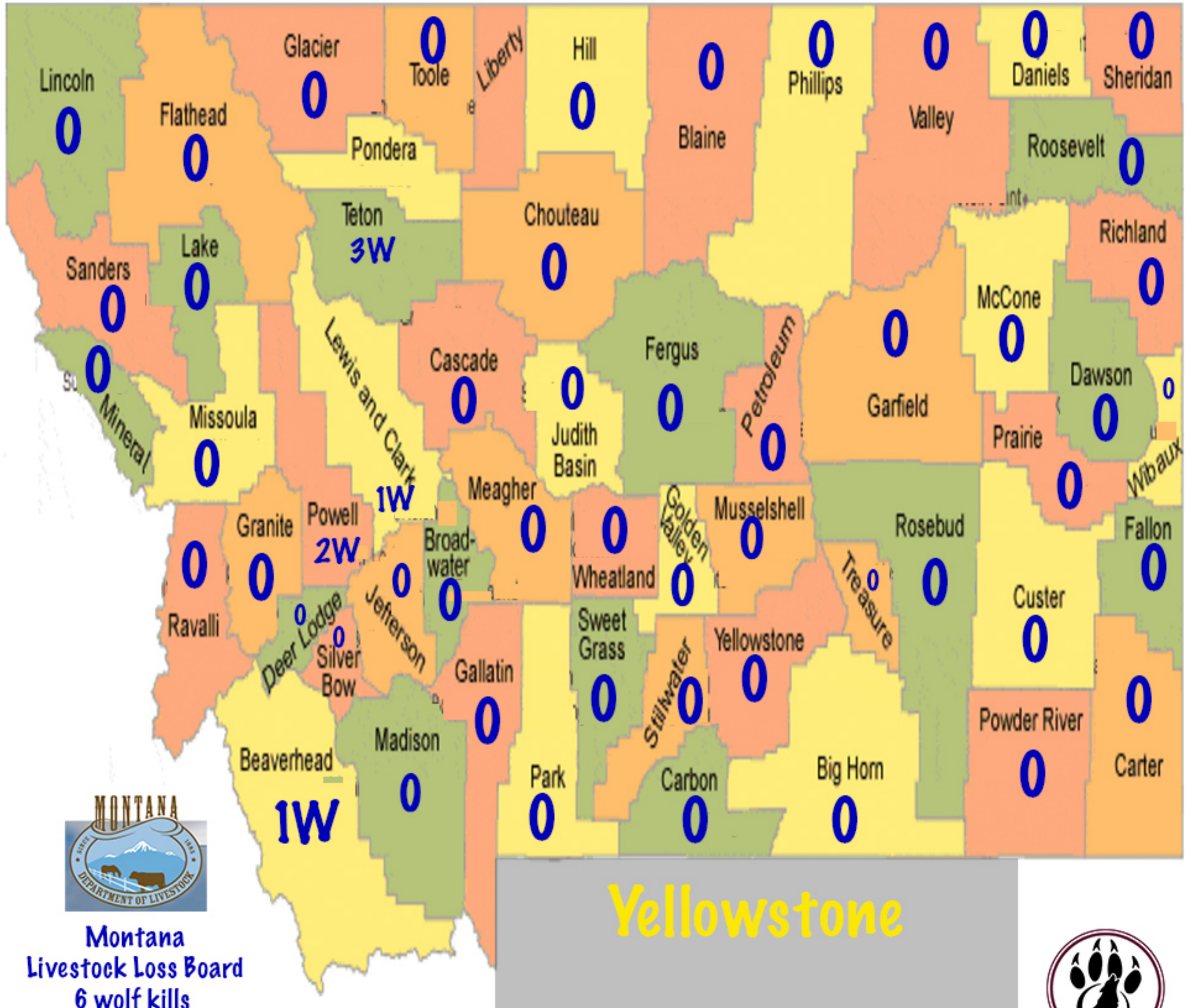
Montana

Livestock Loss Board
 17 Confirmed or Probable
 wolf depredation.



Montana County Map

2024 Wolf Livestock Depredation



Montana
Livestock Loss Board
6 wolf kills
Confirmed or Probable

