



**THE WILDLIFE SOCIETY  
MONTANA CHAPTER**

Gayle Joslin, President  
2763 Grizzly Gulch  
Helena, MT 59601  
Phone (406) 495-3268  
Email: gjoslin@mt.gov

August 24, 2006

Mr. Christopher Brown, Director  
Wilderness and Wild and Scenic Rivers Resources  
U.S. Forest Service, Department of Agriculture  
201 14<sup>th</sup> Street, S.W.  
Washington, D.C. 20250

RE: Proposal for Predator Damage Management in Wilderness Areas

Dear Mr. Brown,

The following are the comments of the Montana Chapter of The Wildlife Society regarding the Proposed Directive for Predator Damage Management in Wilderness Areas 71 Fed. Reg. 32915.

The Wildlife Society is a non-profit association of professional wildlife biologists dedicated to excellence in wildlife stewardship through science and education. For nearly 70 years it has promoted wildlife conservation and its connections with people. The Society's goals include:

- Advancing professional stewardship of wildlife resources and their habitats, and
- Advocating the use of sound biological information for wildlife policy decisions.

The Montana Chapter of the Wildlife Society strives to support the wildlife management profession, endeavors to conserve ecosystem integrity and restore habitat for wildlife across the state, and promote sound policies that sustain hunting and wildlife-related recreation and the resources essential to that purpose.

Members of the Montana Chapter, TWS believe that the federal regulation regarding predator control in designated Wilderness Areas should increase restrictions on methods of take, ensure full involvement of the U.S. Forest Service in the NEPA compliance process and application of Wilderness management statutes, and recognize the wildlife management authority of States.

While we recognize the importance of Wildlife Services and the contributions this agency makes toward wildlife management in the state of Montana, we feel that relaxing agency checks and balances in favor of relatively unrestricted use of predator control

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methods by Wildlife Services within Wilderness Areas is contrary to statewide wildlife management goals of promoting biological diversity.

Predator communities are ecologically vital to sustaining biological diversity and maintaining viable populations of native and desired non-native species.

Within the state of Montana, a significant number of species currently listed as Threatened or Endangered, and thereby protected under the Endangered Species Act are predators. These species include the grizzly bear, gray wolf, Canada lynx, black-footed ferret, bald eagle, and bull trout - all predatory species, many of which are under federal protection today at least in part because of past predator control efforts.

Some predator control methods (particularly poisons and/or traps using baits) are difficult to use in a manner that accurately targets one particular species, let alone individual offending animals. Given that many of our threatened and endangered species (and other species of management concern, such as Forest Service sensitive species) are predators and thus susceptible to baited control mechanisms, the use of such indiscriminate methods should be outright prohibited, but at the very least must be closely scrutinized on a case-by-case basis.

The proposed rule states that: "The Forest Service recognizes APHIS-WS's authority and expertise for conducting predator damage management activities on NFS wildernesses." While there is no argument that Wildlife Services has the expertise for conducting predator damage management activities, the capability for managing activities to protect wilderness character, minimize disturbances to wilderness resources and visitors is clearly held within the land management agencies (USFS, BLM, NPS). Wildlife Services personnel cannot be expected to keep pace with the ever-changing wilderness management protocols.

Because it is Forest Service personnel rather than Wildlife Services personnel who have the site-specific knowledge required to effectively manage agency actions to protect wilderness resources, it is imperative that Regional Forester approval for predator damage management actions within designated Wilderness Areas continue to occur on a case-by-case basis, rather than authorizing such actions through the blanket approval of annual operating plans. The proposal does not clearly indicate where the accountability lies for compliance with the National Environmental Policy Act (NEPA), the Wilderness Act, and other federal statutes pertaining to the management of lands within the national forest system.

In Montana, state law assigns joint responsibility for addressing wildlife damage to Montana Fish, Wildlife and Parks and the Montana Department of Livestock. In fact, development of wildlife management plans, including predators, is uniquely a state fish and wildlife agency function. The Federal Register proposal does not properly

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acknowledge the lead responsibility state fish and wildlife agencies have for developing wildlife management plans and for the overall conservation and management objectives for wildlife on federal, state, or private lands within their borders. Where listed species are concerned, the State works closely with the U.S. Fish and Wildlife Service.

The Montana Chapter of The Wildlife Society emphasizes that the states have a Public Trust responsibility relative to management of fish and wildlife and any MOU between agencies has an obligation to recognize that commitment. We urge alteration of the Federal Register proposal to require full involvement of the U.S. Forest Service in the NEPA compliance process, and acknowledge and incorporate state participation in management of wildlife damage. This Federal Register proposal must not discount Section 4.(d)(8) of the Wilderness Act which states,

“Nothing in this Act shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests.”

The Montana Chapter of The Wildlife Society strives to demonstrate the highest standards of ethics and respect for wildlife. Please incorporate our comment into the official record.

Sincerely,

Gayle Joslin  
President