

MONTANA FISH, WILDLIFE & PARKS

PUBLIC COMMENTS FOR THE 2021 WOLF SEASON

COMMENTS PROCESSED AS OF JULY 26, 2021

1. Director Worsech,

Please consider unlimited quota for hunting and trapping. I believe the trapping license should include a minimum of 10 but really only 1 or 2 people would ever harvest more than that. But, why would we want to limit the few who can actually help control the overpopulation. A minimum of 1 Wolf licenses should be included in the Sportsman License. Very few people would ever have the opportunity to harvest more than one but again, Why would we want to limit someone who could help.

There are a lot of roads that are closed to vehicles that are not used by recreationalists that have restricted setbacks year around because they are open to vehicles at some point of the year. That makes no sense. If the road is open, then have set backs. If the road is closed, there are no setbacks until the road is opened again. If someone is too mentally challenged to understand this then they should not be out without supervision anyway.

Wolves run the roads because it is the path of least resistance. Requiring traps to be 150 feet back makes it impossible to put enough stink out for them to notice it. 2 of my friends and I trap around St Regis and over the past 9 seasons have caught 28 wolves. One came off public land, the rest were caught on private land where we could place traps close to the roads and trails.

I don't have a problem with increasing setbacks in high usage area such as ski resorts and hiking trails. Mostly because no one is trapping there anyway. We do not want to catch someone's dog. We need to stop catering to the most vocal people and start using science to manage our wildlife. I am getting very frustrated with it always being concessions to the out of touch, out of state voices who don't have anything better to do than complain about trapping. Let's open trapping on closed roads while they are closed and give trappers a chance.

The department could have signage printed that says traps may be in this drainage and put them on most secondary roads to make people aware of the requirement to contain their dogs but not put a flag out for them to steal more of our traps and cameras.

There is a lot of people spouting about how bad snares are but unfortunately they are only repeating what they have heard. Yes, there can be unintentional catches. But with a little training those can be very limited. The Montana Fur Harvesters are already moving forward with free training by having a trapper with good experience in snaring coming over from Idaho to explain tips and techniques to avoid unwanted catches. One of the biggest issues is the catch of someone's dog but the fact is that dogs that have been on a leash do not fight the cable and can be released in the morning.

I know there is always going to be people who oppose any form of trapping but Idaho has been using snares for about 11 years and have worked out most of the details. We have the opportunity to learn from their mistakes. We need to move forward with allowing snares this year, even if only on private property this year. But we need to announce that it will be available statewide for the next season now to show that we understand the intentions of the Legislature. We need

to add the training in the new Trapper Education program and make it available for everyone to understand what they are doing. Idaho has pictures of nearly 300 Lynx and 91 confirmed Grizzlies in areas where they allowed trapping and snaring from mid November through January with no By Catches. Let's not create a problem when there isn't one.

Let's control our wolf population so we can have a Moose, Elk and Deer Population.

Thank you for your time and consideration,

Larry Rattray
Proctor, Montana

2. To whom it concerns,

I oppose the wounding and killing of 450 more wolves this year (where already 550 wolves were brutally hunted, trapped, snared, baited, wounded and killed in 2020 !)

Other wildlife will be in danger of undergoing the same fate as well, when will this horrendous massacre of our precious wildlife stop!!

Sadistic invaders can do anything they like to do to our sentient wildlife and their pups, it is horrendous! The emotional state of mind of all those who oppose this kind of cruelty has to be considered as well. Please stop this brutality, stop hunting, trapping, snaring and all other killing plans! Wolves never recovered from these extermination plans in the past! They are needed badly to manage the environment to keep it healthy.

Sincerely,

Chantal Buslot
Belgium

3. To whom it may concern

As a non-US resident I would like to propose my own input into the proposed killings of wolves from Yellowstone park, who venture out of the park unbeknown to them. Which in turn puts them in danger, could this be re-addressed and managed and maybe new ideas could be discussed in meetings to prevent this from happening.

Thank you for taking the time to read my email.

I wish you a good day.

Ms Collette Clara Loizou
UK

4. Please accept these comments on the proposed 2021-2022 MT wolf hunting and trapping regulations. Thank you for the opportunity to comment.

Erin Edge, Defenders of Wildlife



Missoula Office
P.O. Box 1858 | Missoula, Montana 59806 | tel 406.728.9436
www.defenders.org

July 23, 2021

Wildlife Division
PO Box 200701
Helena, MT 59620-0701
Submitted at: fwpwld@mt.gov

RE: 2021-2022 wolf hunting season proposals

Members of the Commission:

Thank you for the opportunity to comment on the Montana Fish, Wildlife and Parks proposal for the 2021-2022 wolf hunting season. Defenders of Wildlife (Defenders) is a national non-profit conservation organization with 9,300 members and supporters in Montana and more than 2.1 million nationwide. Over the last three decades, Defenders has played an important role in the restoration of wolves in the Northern Rockies. This work included our long-running livestock loss compensation and conflict prevention programs. We transitioned our compensation program to the Montana Livestock Loss Board in 2008 and continue to assist livestock producers in Montana and across the West with conflict mitigation tools and techniques to minimize losses to wolves and other predators. We operate these projects in partnership with county, state, tribal and federal agencies.

The 2021 Montana legislature passed several laws that conflict with ethical, science-based wildlife management and conflict with the facts on the ground. These harmful laws attempt to tie the hands of the agency's own experts on behalf of anti-wolf politicians with extreme views. As such, they harm both the reputation of Montana Fish, Wildlife and Parks and its ability to wisely steward our state's wildlife on behalf of all Montanans. We ask that you consider wisely the decisions before you and reject the extremism to the maximum extent possible.

Montana Fish, Wildlife and Parks (MFWP) data make clear that deer and elk numbers are robust across Montana. Regions 1 and 2 are at or above elk objective (2019-2020 Elk Count Spreadsheet, accessed online at www.fwp.mt.gov). Statements by some politicians that wolves are decimating Montana's deer and elk herds are simply not factual, and their efforts to see more wolves killed due to this belief are poor public policy.

In fact, it is the impact of recent high levels of wolf hunting and trapping on the state's wolf population that is of concern. Total documented mortality of wolves in Montana in 2019 was 394 wolves, 24% higher than the 6-year average since 2013 (2020 Montana Wolf Report, p. 16). In the current wolf hunting proposal MFWP notes that the harvest in 2020 is predicted to result in a decline and that current hunting season structure may reach the intent of SB 314 (MFWP, Wolf Hunting Proposal, p. 1). The intent of SB 314 was to reduce the wolf population to a sustainable level, but not less than 15

breeding pairs. The use of the word “sustainable” in this new law is undefined, however, killing hundreds of more wolves to reduce the wolf population to artificially keep it as close to 15 breeding pairs as possible is far from “sustainable” wolf management.

In addition, there is not sufficient information on projected long-term impacts to the wolf population and regional connectivity that would result from the extreme hunting and trapping methods and season proposals, especially from the Intermediate New Tools and Maximum New Tools options. The Commission should take a hard look at the best available science and incorporate the ecological importance of wolves into its decisions. Defenders recognizes the importance of social dynamics in wildlife management, hence our continuing support for work to minimize conflicts and our past compensation program. However, the direction provided by the 2021 legislature is misguided and could prove disastrous for Montana’s wolf population.

Allowing snaring of wolves in Montana will likely result in injury and death to other wildlife species including grizzly bears and lynx, as well as to our pets. Montanans and visitors to our state love recreating on our public lands, often with their dogs. Snares are a real and significant danger to their health and safety. The risk of snares on our public lands is simply unacceptable. We ask the Commission to reject the use of snares on public lands anywhere in Montana as it is a direct threat and has no ethical or science-based justification.

By extending the wolf hunting seasons, the risk of incidental take of grizzly bears and domestic dogs also increases. We ask the Commission to reject the option to lengthen wolf hunting season. Capturing grizzly bears in snares can be dangerous for bears, trappers and MFWP staff. We also ask you to reject the option to increase the number of wolves a single hunter/trapper can kill as well as the unethical options to hunt at night and bait for wolves.

In addition, we ask the Commission to retain the quota areas and quotas adjacent to National Parks as proposed by the “Limited New Tools” option (MFWP Proposal, Table 1, p. 4). Yellowstone National Park’s wolves are unequivocally prized for their worldwide social interest and scientific and economic importance. Montana gains significant economic benefit from tourism dollars spent in and around National Parks and many gateway businesses rely heavily on these dollars. In 2020, 3.9 million national park visitors to Montana spent approximately \$445 million in local gateway regions and supported 6,690 jobs and \$619 million in economic output to the Montana economy (Cullinane et. al., 2021). Widespread killing of wolves in Montana and especially the killing of Yellowstone wolves when they cross the park border, result in negative economic impacts to small businesses that rely on tourism.

We appreciate that MFWP has proposed an annual Commission review of wolf regulations rather than biennial review. Monitoring annual wolf mortality will be extremely important as wolf mortality increases. We ask that MFWP continue to release annual reports to the public and maintain this information on the website for transparency.

Montana Fish, Wildlife and Parks is at a crossroads with wolf management. The agency has been advancing work that attempts to reduce conflicts and balance wolf recovery with other goals. Unfortunately, this year’s extreme anti-wolf legislation in both Montana and Idaho has increased mistrust of state management of wolves among many, and actions to drastically reduce the wolf

population may result in reassessment of federal listing status. Will Montana be a leader in science-based wolf conservation, research, outreach, and education or roll back decades of investment and conservation by killing hundreds more wolves each year to drive down the population? We urge you to carefully consider the options before you and choose the most conservative and conservation-minded approach.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "E Edge". The signature is fluid and cursive, with the first letter "E" being particularly large and stylized.

Erin Edge, Senior Representative, Rockies and Plains Program
eedge@defenders.org

Citations

Cullinane Thomas, C., and L. Koontz. 2021. 2020 national park visitor spending effects: Economic contributions to local communities, states, and the nation. Natural Resource Report NPS/NRSS/EQD/NRR—2021/2259. National Park Service, Fort Collins, Colorado.
<https://doi.org/10.36967/nrr-2286547>.

Inman, B., K. Podruzny, A. Nelson, D. Boyd, T. Parks, T. Smucker, M. Ross, N. Lance, W. Cole, M. Parks, and S. Wells. 2019. Montana Gray Wolf Conservation and Management 2019 Annual Report. Montana Fish, Wildlife & Parks. Helena, Montana. 106 pages

5. Montana Fish & Game Commission:

It would seem best for the reviving wolf population to make no changes to your 2021-2022 regulations. I am sure that many Montana residents value wildlife, especially the wolves who have been losing their habitat due to hunting and extension of human habitation into the wilderness. Many tourists also come to Montana with the express wish to see animals like wolves on the land.

Please do not add special provisions for using snares on private land, nor baiting of wolves, nor allowing hunting at night.

Thank you for your thoughtful consideration,

Gretchen V Hansen

6. To Whom it may Concern,

As a Northwestern Montana resident, I am extremely disappointed in our government's current stance on our state's wolves. I am strongly against any changes to the 2020 Hunting Regulations and the best change for our Montana wolves in 2021 is No Change. I do not feel that the extreme measures that will be taken to cull these animals have ANY science based information at all to warrant such barbaric, cruel and extreme measures. The methods proposed to kill these animals in such ridiculously high numbers does not at all seem like its intent is to "manage" the wolf population but rather to eradicate it. I understand responsible hunting management, I come from a family of lifelong hunters, but what the state is trying to do to these wolves is not responsible management, it's disgusting and I implore you to reconsider the 2021 regulations. It's absolutely heartbreaking that one of the most magnificent apex predators in our beautiful state is on the verge of being culled to such an extent. Please do Not do this. Our state is known for its wildness and it's beauty and wolves belong in our wilderness and they help create an ecological balance in that wilderness. People come to our state from all over the world to see it's magnificent wildlife and wolves need to be a part of that equation. I implore you to stop this.

Sincerely,

Jennifer Hedvall

7. Attached are Friends of the Wild Swan's comments on the 2021 Wolf Season. Please acknowledge that you received them.

Arlene Montgomery
Friends of the Wild Swan

**Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911**

July 23, 2021

Montana Dept. of Fish, Wildlife and Parks
Via email to: fwpwld@mt.gov

These comments are directed at the 2021 Wolf Season.

We are opposed to increasing the bag limit and allowing a person to take more than one wolf per license.

Traps should be checked every 24 hours to hopefully limit the indiscriminate killing of animals.

Snares should not be permitted on public lands because they pose a danger to wildlife, humans and domestic animals.

Limit the number of snares and leghold traps a trapper can set.

Require trappers keep maps of their snare locations and require warning signs for traps and snares. A minimum 150' setback from roads and trails for traps and snares.

Revise wolf trapping season dates to January 2 - February 28 to try to avoid incidental trapping of grizzlies and upland game bird dogs.

Prohibit snares on elk and deer winter range.

Prohibit power snares and the use of drags on traps and snares.

Do not allow trapping or snares on lands adjacent to national parks.

Prohibit use of bait and night hunting of wolves.

Require all non-target animals caught in traps and snares be reported.

/s/Arlene Montgomery
Program Director

8. Please stop the needless, senseless, and brutal killing of these important creatures. It has been proven that wolves are an important part of a healthy ecosystem. This isn't hunting. It's sports killing.

JoAnne Russell

9. Friends in Helena,

A rancher here in Southwestern MT, ranching and living next to Yellowstone Park.

Let's be careful on the bigger picture here. Let's honor all of our struggles while we try to maintain agriculture and wide open spaces in places like the GYE. Let's remember we're all just trying to remain- both the HUMAN and the NON-HUMAN.

We have a variety of preventative measures in terms of livestock loss for ranchers who live and work in wild places. And we're always happen to share and gather information around this. Why not, right?

Please reach out if you have any questions. Montana can do better than these proposals.

Montana IS better than these proposals.

Thank you!

Malou Anderson-Ramirez

10. Dear Fish and Wildlife Commission:

Below in the attached are comments by the Gallatin Wildlife Association's concerning the future of wolf management within the state of Montana as they pertain to the recent proposals mandated by the State Legislature and the Governor's signature. We find these proposals troublesome, unscientific and even question their legal intent when compared to that of Montana's Constitution.

We urge you to error on the side of proper scientific management. We find it troublesome that many comments provided by the public in opposition to legislation at that time seemed to have been ignored by an obstinate state legislature. You have a chance to right a wrong. We urge you to do so.

We do want to thank the Fish and Wildlife Commission for this opportunity to comment.

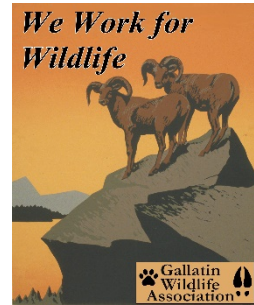
Sincerely,

Clinton Nagel, President

Gallatin Wildlife Association

**GALLATIN WILDLIFE
ASSOCIATION**

P. O. Box 5317
Bozeman, MT 59717
(406) 586-1729
www.gallatinwildlife.org



July 26, 2021

Montana Fish and Wildlife Commission, fwpwld@mt.gov
Director Hank Worsech, hank.worsech@mt.gov
Wildlife Division Administrator Ken McDonald, kmcdonald@mt.gov

Montana Fish, Wildlife and Parks
1420 East Sixth Avenue
P.O. Box 200701
Helena, Montana 59620-0701

cc: Governor Greg Gianforte, governor@mt.gov
Senator Jon Tester, rjt@tester.senate.gov

Dear Montana Fish and Wildlife Commissioners, Director Worsech, and Administrator McDonald:

Last month, the Montana Fish and Wildlife Commission (FWC) began a 30-day public comment period concerning several wildlife issues. On June 24, the FWC drafted regulation proposals for wolf trapping and snaring. The Gallatin Wildlife Association (GWA) has severe apprehensions about many of the state's wildlife policies, especially those directed towards wolves and other large carnivores. GWA comments of June 24, 2021 highlighted our concerns over the recent passage of adverse wildlife bills passed by the state legislature. We would like the comments below to be considered as an addendum to those and become part of the official record.

Before we continue on, we would like to state for the record again, our credentials and purpose for commenting. GWA is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501(c)(3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

We are saddened and disappointed that a state agency, one which has had some measured signs of success, respect and professionalism, be turned into a political tool of the current administration, an administration which seems determined to carry out long-sought vindictive measures against wildlife. This change in policy brought forth by a new

administration has placed the public's trust in Montana's wildlife management at a new low. The FWC needs to restore science and common sense to the Department of Fish, Wildlife and Parks (FWP). One way to do that is to have a guarded approach to the state's 2021/2022 wolf hunting and trapping regulations. GWA has consistently provided comment and testimony over the importance of gray wolves and other carnivores within the ecosystem. They are an iconic species, one that provides balance to a natural world. The power of restoring faith and trust in the institution of FWP is in your hands. You can do that by utilizing science and instilling a new purpose to your commission.

The multiple facets of the proposed regulations on snaring and trapping are not based upon any science, period. For this reason alone, we cannot condone the proposals as presented. We feel they are capricious and based upon false assumptions. In addition, many of these proposals are indiscriminate and will increase the take of several other species and domesticated animals. Not only that, but the way the regulations were presented to the public are disrespectful to the wildlife in our state.

We suggest the following actions.

- We urge the FWC to prohibit snaring. If snaring must be done in some capacity simply as a requirement based upon the new state law, then we urge the FWC to limit that potential in the strongest terms. Snares threaten indiscriminately. They pose threats and death to endangered and threatened species such as grizzly bears and Canada lynx. They also harm and can kill pets.
- We urge the FWC not to extend the hunting or trapping seasons for wolves in the spring or fall. We cannot find any scientific rationale for such an extension.
- We urge the FWC not to allow any unethical measures or actions such as baiting, spotlighting of wolves or the unlimited killing of wolves by a single license holder. GWA has long held a commitment ethics and fair chase. We feel these regulations are in violation of that commitment.
- We urge the FWC not to remove quotas from those areas adjacent to National Parks. Specifically, we are referring to Units 110, 313 and 316, units located to Glacier and Yellowstone National Parks respectively. By affecting populations of wolves near Glacier or Yellowstone National Parks, you have made this a national issue, one that belongs to all Americans. They need to have input on this issue.
- We urge the FWC to set the sustainable levels of wolves high. S.B. 314 requires wolves to be managed at sustainable levels, but it does not provide insight as to what those levels are. There is no science for this rationale to increase the take of wolves. With that in mind, FWP has already reported a 15-20% decline in the wolf population as a result of increased wolf mortality in last year's hunting and trapping season. We strongly urge you not to enact any measures that would further reduce the wolf population.

- With the existing decline in wolf population, we believe these proposed regulations as presented by the FWC will deplete the wolf population as well as other species needlessly and capriciously.
- One of GWA's predicates is that the management of Montana's wildlife should be based upon the best available science. In fact, this is stated in the Montana's Constitution. We firmly believe that these proposed regulations violate the intent of the Montana Constitution, Title 87, Fish and Wildlife § 87-5-103.

GWA has presented this excerpt from the State Constitution before as we firmly believe that the intent of the recent legislation violates the intent of the Constitution. The ongoing proposals being considered by the FWC and the public are not taking the following sentiments into consideration.

“(1) The legislature, mindful of its constitutional obligations under [Article II, section 3](#), and Article IX of the Montana constitution, has enacted The Nongame and Endangered Species Conservation Act. It is the legislature's intent that the requirements of this part provide adequate remedies for the protection of the environmental life support system from degradation and provide adequate remedies to prevent unreasonable depletion and degradation of natural resources.

(2) The legislature finds and declares all of the following:

(a) that it is the policy of this state to manage certain nongame wildlife for human enjoyment, for scientific purposes, and to ensure their perpetuation as members of ecosystems;

(b) that species or subspecies of wildlife indigenous to this state that may be found to be endangered within the state should be protected in order to maintain and, to the extent possible, enhance their numbers;

(c) that the state should assist in the protection of species or subspecies of wildlife that are considered to be endangered elsewhere by prohibiting the taking, possession, transportation, exportation, processing, sale or offer for sale, or shipment within this state of species or subspecies of wildlife unless those actions will assist in preserving or propagating the species or subspecies.

The department shall conduct investigations on nongame wildlife in order to develop information relating to population, distribution, habitat needs, limiting factors, and other biological and ecological data to determine management measures necessary for their continued ability to sustain themselves successfully. The department shall conduct ongoing investigations of nongame wildlife.”

In Conclusion:

As an organization that prides itself in trying to adhere to the best available science as it relates to wildlife management and conservation, we'd like to bring attention to a recent letter dated July 1, 2021 addressed to President Biden, Secretary of the Interior Deb Haaland, and U.S. Fish and Wildlife Service Principal Deputy Director Martha Williams.

In that letter signed by 400 scientists, they urge the administration to take an active role to protect and conserve wolves. Scientists refer to the political actions taken by three western states that has impeded a stable wolf population thus the ecological integrity, one of those states is obviously Montana. The link to the letter can be found here.

https://wildlifecoexistence.org/wp-content/uploads/2021/07/Why-We-Should-Act-Now-in-Defense-of-Wolves_7.1.2021.pdf

We want to highlight one passage from the letter, a passage that also refers to the recent laws passed in Montana.

“We view the new state-sponsored wolf control laws as: 1) a major setback for wildlife recovery in North America; 2) a misinformed and short-sighted policy that lacks scientific credibility and disregards successful, non-lethal mitigation measures to promote human-wolf coexistence; and 3) a decision by three states that runs counter to modern day wildlife management and to the will of much of the American people who value wolves.”

We would like to remind the FWC and any State Representative and Senator who might be hearing these words; this is exactly what many of us were testifying during our public testimony. This was testimony which seemed to have been ignored during debate. We could pull several paragraphs and statements from this letter highlighting all the reasons why implementation of these proposed measures is a bad idea for our wildlife population, our biodiversity, our forest integrity, and for society as a whole. It is incumbent upon the FWC to enact measures based upon science. We trust you will read this letter and all pertinent data and act accordingly.

Finally, one more piece of science based upon the report entitled; Improving Estimation of Wolf Recruitment and Abundance, and Development of an Adaptive Harvest Management Program for Wolves in Montana dated December 2020 (Sells, et al. 2020).

<https://fwp.mt.gov/binaries/content/assets/fwp/conservation/wildlife-reports/wolf/1-montana-wolf-monitoring-study-final-report-compressed.pdf>

Toward the end of the report, on page 83, *General Suggestions for Montana’s Wolf Program*, there are these three passages which we believe the need to be aware.

“It will be important to manage the wolf population in a manner to account for uncertainty. We suggest that MFWP set threshold population sizes that would trigger additional monitoring effort and management responses.....

Importantly, selected thresholds should be sufficiently high to allow time for both data collection and resulting changes in management to take effect. Estimated rates of population change from iPOM could possibly help forecast whether and when thresholds might be crossed (including by the bounds of uncertainty from iPOM). Monitoring effort should be increased before a threshold is projected to be reached....

A greater buffer of time and population size may thus be required to prevent a population at risk of disease from falling below minimum thresholds....

We believe the proposed wolf snaring and trapping regulations are contrary to these scientific recommendations. GWA in good faith, cannot condone any other action other than to adopt measures that further maintains the wolf population at current levels. Here we have a report based upon science just waiting to be put to use. As we have seen, there is science which states wolf populations still have not reached their full potential in order to have positive affects upon their respective ecosystem. To not make the best use of science and research funded by taxpayer dollars is borderline dereliction of duty.

We are glad to see the public having some opportunity to gain input in these decisions as they pertain to our public wildlife heritage. Having said that, that doesn't remove the frustration from the faulty process exhibited during the state legislature. We believe many of these issues wouldn't even be considered today if it wasn't for political interference from a minority with access.

Sincerely,

A handwritten signature in cursive script that reads "Clinton Nagel".

Clinton Nagel, President
Gallatin Wildlife Association

11. Dear Fish and Wildlife Commissioners,

I have been a witness to the enormous economic impact that the wolves of Yellowstone have had on local communities surrounding the Park. The tourism draw to see the wolves is an extraordinary opportunity that our region provides. I have witnessed the faces of young and old who get so excited when they see the wolves. That moment captures their understanding of how and why wolves are such an important part of our natural world.

I want to point out that the use of snares to capture wolves can cause incidental harm to family pets and other wildlife including grizzly bears, Canada Lynx and wolverines.

As a person who does trout fishing, I have appreciated the re-growth of bushes and willows, along river and stream banks, since the introduction of the wolves. Heavy browsing by the elk once led to decimation of this needed vegetation- to cool the water, and to provide cover for the fish, as well as aquatic insects that trout feed upon. With fewer wolves, the elk will once again dominate the landscape - leading to an unbalanced ecosystem.

Your consideration of this commentary is greatly appreciated.

Mike Menzel, MD

Silver Gate, MT

12. Hello,

Knowing the positive impact wolves have on our ecosystem and suspicious of the constant drive by the very same people who once nearly drove them to extinction under the very same guise of protecting livestock. I feel the need to speak out and echo what those more knowledgeable about the area propose.

1. I support maintaining the current quotas of 2 wolves in wolf management units 313 and 2 wolves in unit 316 near Yellowstone NP and the current quotas near Glacier. In the Gardiner and Silver Gate gateway communities, a healthy wolf population is the highest value, economically, for research, and because people want wild wolves in the ecosystem.

2. I am opposed to the quota of 450 wolves for the hunting season. 50% of the population is far too many.

3. Fix the regulations so that perpetual emergency meetings won't be necessary.

4 I am opposed to cruel trapping and snares in general but it's especially impactful where there are lynx and grizzly bears.

5. Baiting and night hunting are completely unnecessary and should be illegal they are in many other jurisdictions.

Thank you for taking the time to read my comments.

Ramona Boston, RLBoston

13. Dear Montana Fish and Wildlife Commission-

I strongly urge you NOT to expand wolf hunting in Montana as has been proposed. As a resident Montana hunter for nearly 40 years, I believe the proposed expansion of the wolf hunting regulations are unnecessary, unethical and will seriously harm Montana's hunting heritage. The proposed wolf hunting regulation expansion will be a black mark on Montana and returns us to a dark age of wildlife mismanagement.

Montana should reflect ethical and sound hunting practices which reflect fair chase.

1. Please do not allow snaring of wolves within the state. Snaring of wolves should not be legal in Montana - it will end up snaring and killing other species such as deer, bears, bobcat, lynx, etc not to mention dogs, both yours and mine. Snaring results in unnecessary suffering and indiscriminate harvest across the state. Wolf snaring is unacceptable in all locations including private lands.
2. I strongly urge you to not allow night hunting of wolves. This is unethical, dangerous and opposed to the concept of fair chase.
3. Do not approve hunting of wolves over bait on any lands within the state including private lands. Such a hunting "technique" is in no way a fair or sportsmanlike hunt. In this day and age, such hunting is not a matter of "survival" it is indeed unethical, unnecessary and abhorrent to any serious Montana hunter.
4. Please do not expand the wolf trapping season by 30 days which may extend it to within the breeding season. We don't need these traps on the landscape in early December and March.
5. Wolf bag limits should not be increased. Increasing bag limits to ten or no limit is unnecessary and would reflect poor sportsmanship.
6. The number of wolves killed to initiate a commission quorum to evaluate for adjustments to hunting and trapping should be reduced from 450 wolves to 300 wolves so there is sufficient time to make needed adjustments.
7. In addition I need to protest the payment/reimbursement (even by private organizations) of hunting expenses incurred by a hunter killing a wolf. This represents an archaic throwback to the dark ages of wildlife and predator control. Hunters should hunt for food and sport and not for monetary remuneration.

If you must select one of your three proposals as listed on MTFWP website I urge you to select the "Limited New Tools Proposal" although this should be modified to eliminate all snaring of wolves in Montana.

Please do not allow any of these new wolf hunting proposals to go into effect. Montana FWP has, in the past, had a nationwide reputation for sound wildlife management based on science and numbers and not on legislative anecdote.

Montana has a valued tradition over the last half century of respect for wildlife, hunting ethics and standards, and management based on research and science. Do not tarnish this reputation.

Sincerely,

Scott Hancock

Red Lodge, MT

14. I oppose any changes to these setbacks in Sanders County . I also oppose any of Paul Fielder's changes to trapping regulations. I wish that FWP would cater to the public instead of to trappers.

Shirlee Glade

15. Dear Commissioners,

As a landowner in Meagher and Park counties, I am writing to voice my concern about the options before you regarding wolf management in the state of Montana. There are several points of issue I would like the commission to address:

1) **A lack of a science-driven, data-based approach to wolf management.** This legislation was based on a personal passion project, rather than a reasonable and scientific rationale. The majority of Montanans do not agree with the new legislation to manage wolves. We look to the commissioners to use a science-driven, data-based approach to wildlife management and not to pander to the politicians and their agendas.

2) **Inconsistent rationales for reducing wolf numbers.** The legislation for wolf management was supposedly based on concerns that elk numbers were declining as a result of wolf predation. Yet, at the same time the commission is tasked with managing the overabundance of elk. It can't be both ways. And the relationship between wolves and elk numbers is not a direct correlation. There are moderating variables influencing wildlife numbers, including habitat loss as a result of development and drought, extreme seasons, etc. The commission needs to look at the range of factors influencing elk populations, not just the *one* factor you have been pressed by the politicians to consider.

3) **Wolves as a wildlife management tool.** In their own right, wolves serve as a way of balancing wildlife numbers and eradicating disease in the ungulate herds. This is especially critical at a time when we are encountering an increase in Chronic Wasting Disease in the ungulate populations.

4) **Unethical hunting.** Montanans have always stood proudly for their hunting values and principles. Allowing snaring, baiting, and night hunting is not ethical hunting and, again, does not represent what the majority of Montanans want. The wildlife is part of the public trust and you must listen to the public, not the politicians or the special interest groups that benefit financially from this legislation.

I urge you to consider what the people of this state are telling you and to listen to their concerns. You have a great responsibility and the public looks to you to understand and follow the science, examine the numbers within the big picture, and represent the values of this state.

Thank you for your time.

Taya Cromley

Clyde Park, MT

16. Dear Montana Fish Wildlife & Parks

As a person who spends time in your beautiful state of Montana...which also includes spending money which helps support the local communities I travel to. I love Montana not only for the amazing beautiful landscapes...but also and mostly why I love going there is the wonderful wildlife...the Gray Wolf being the number one animal I love to see and why I go there.

You all should embrace the return of these amazing animals and should be doing everything to protect them and to make sure they continue to thrive and grow in numbers. But instead it seems like more and more things are being added to help hunters to kill them and to kill more of them.

Killing wolves when they are pregnant is the most unethical thing to do...killing pups is also unethical, the long wolf hunting season on them is very wrong. Why is there such a long hunting season on them?...and not on elk or deer?

I ask you to please to not allow hunters to be able to kill more wolves with longer hunting season or any new rule that makes it easier for them to be killed. I am against any new rule that makes it easier or allows more wolves to be killed.

I hope you will consider how I feel..coming from a person that does not hunt..but just enjoys viewing wolves and all wildlife in their natural environment..they too have a right to live and be free..we have taken so much from them already....why can't we just let them live and watch them instead.

Please to not hurt them anymore....please give them more protection and not less protection
Thank you for your time

Anita Chittenden

17. As an individual who grew up in Montana I am appalled, disgusted and offended by the passage by partisan vote of HB224, which allows snaring of wolves! This will snare and destroy far more than wolves.

Snares are already legal year-round in Montana and the number one killer of trapped non-target wildlife. Within just 30 months, at least 23 dogs were also snared in Montana and at least 2 died.

I'm urging you to do everything possible to reduce the horrendous and indiscriminate damage snares, extending the wolf trapping season, liberalizing wolf quotas, and all of which will go well beyond unnecessarily and inhumanely exterminating wolves.

I respectfully Insist the Commission set the wolf season based on facts, biology, ecology, ethics, and responsible stewardship entrusted to them, not self serving special interests who dominated control in the Montana 2021 legislature.

We enjoy an ecosystem that is rapidly being destroyed! The eco system does not need humans but we need the ecosystem to survive. I urge you to respect that and take one step toward preserving it!

Vicki Cook, GRI

18. This is a disgusting result to a snare law!

#RelistWolves



Vicki Cook, GRI

19. Good morning,

Please find attached comments from Western Watersheds Project and WildEarth Guardians on the 2021-2022 wolf hunting and trapping season proposals. Contact me if you have any difficulty accessing the attachment, and thank you in advance for your time and attention.

Regards,

Joe Bushyhead

Western Watersheds Project and WildEarth Guardians



July 26, 2021

Montana Department of Fish, Wildlife and Parks
Fish and Wildlife Commission
P.O. Box 200701
Helena, MT 59620-0701

Submitted via email: fwpwd@mt.gov

Dear Commissioners,

On behalf of our thousands of members and supporters, Western Watersheds Project and WildEarth Guardians appreciate the chance to comment on the Montana Fish, Wildlife and Parks Department's ("MFWP") three proposed season and quota changes for gray wolves. For the reasons below, we urge the Fish and Wildlife Commission ("Commission") to take the "limited" proposed approach and decline the legislature's ill-informed invitation to manage gray wolves on the basis of politics rather than science.

Western Watersheds Project ("WWP") is a nonprofit environmental conservation group with 12,000 members and supporters. Founded in 1993, WWP has field offices in Montana, Idaho, Wyoming, Arizona, Utah, Nevada and California. WWP works to influence and improve public lands management throughout the West with a specific emphasis on the protection and preservation of western watersheds and wildlife.

WildEarth Guardians ("Guardians") is a regional non-profit organization whose mission is to protect and restore the wildlife, wild places, wild rivers, and health of the American West. Guardians has offices in Montana, Arizona, Colorado, Idaho, New Mexico, Oregon, and Washington, and over 7,000 members, including 885 in Montana. For over 30 years, Guardians has worked to restore and protect imperiled native carnivores, including gray wolves. Guardians works to protect wolf habitat in Montana and across the West, promote coexistence and fight lethal wolf "management," educate the public about the importance of wolves to maintaining healthy natural ecosystems, and advocate for protecting these iconic animals under state and federal law, including through listing under the Endangered Species Act.

I. The Commission retains broad discretion to disregard many of the legislature’s politically-driven suggestions for expanded hunting and trapping.

We recognize that the Montana legislature passed laws to guide this rulemaking, but must emphasize that few of the legislative “directives” in HB 224, HB 225, and SB 314 are binding, and none prevent the Commission from adopting a cautious, science-based hunting and trapping rule that largely reflects the status quo.

In the three bills, the legislature passed just two general mandates. SB 314 directs the Commission to reduce the state’s wolf population “to a “sustainable level, but not less than the number of wolves necessary to support *at least* 15 breeding pairs” (emphasis added). The legislature thus set a minimum on the number of wolves, preserving the Commission’s discretion to determine both a “sustainable” population and the timing of any subsequent reduction if it was deemed necessary based on the Commission’s determination of what a “sustainable” population is.

HB 224 requires the use of snares, but also in a way that preserves the Commission’s discretion. The bill requires that “[t]rapping seasons must allow for the use of snares by the holder of a trapping license,” yet leaves the Commission broad discretion to decide when and where to allow snaring.

The three bills’ remaining directives are entirely discretionary. SB 314 allows (“the commission may authorize”) unlimited wolf harvest on a single tag, the use of baits, and night hunting. But the Commission can, and should, reject these drastic, unsporting, and dangerous measures. HB 225 likewise allows, but does not mandate (again, “the commission may authorize”) an extended wolf trapping season. The Commission should decline this invitation as well, given the “increased potential for non-target capture of federally listed grizzly bears, lynx, and other wild and domestic species.”¹ All told, MFWP correctly recognizes that all three bills contain discretionary “legislative options,” not commands.²

The legislature’s options for gray wolf hunting and trapping are not only discretionary, they are unnecessary. According to MFWP estimates, wolf populations have remained steady in Montana since 2012, stabilizing at approximately 190 packs and 1,150 individual wolves.³ Increased wolf harvests can and have taken place under the current hunting and trapping rules. Hunters and trappers harvested an average of 242 wolves per year between 2012 and 2019, but that number jumped over 35 percent in 2020, when hunters and trappers killed 328 wolves.⁴ By itself, this level of hunting and trapping satisfies the legislative direction to reduce wolf populations in the state—MFWP predicts hunting during the past season lowered the wolf population to 900–950 individuals.⁵

¹ Montana Fish, Wildlife & Parks, Hunting Season-Quota Change Supporting Information (hereinafter, “Supporting Information”), at 2.

² *Id.* at 1

³ *Id.* at 8.

⁴ *Id.* at 13.

⁵ *Id.*

Importantly, the legislature has not overridden MFWP’s own directive to “implement conservation and management strategies to make sure that wolves continue to thrive and are integrated as a valuable part of Montana’s wildlife heritage.”⁶ This includes “principles of maintaining and enhancing Montana’s contribution to the overall northern Rocky Mountain gray wolf population and the gray wolf’s connectivity between contiguous populations in Canada, Idaho, Montana, and Wyoming.”⁷ These directives should continue to guide MFWP and the Commission’s decision here.

II. The Commission should take the precautionary approach outlined in “Limited New Tools” option.

MFWP recognizes considerable uncertainty about “how much additional harvest will be generated with the new legislative inputs.”⁸ In light of this uncertainty, the Commission should follow a precautionary approach and retain current season parameters with only minimal modification to allow snares pursuant to HB 224.⁹ And the allowance of snares should itself be limited. MFWP considers snares the most lethal of the legislature’s measures—“most anticipated to increase harvest” by virtue of their efficacy, low cost, and ease of placement.¹⁰ Snares also pose the greatest risk to domestic dogs and non-target wildlife, including federally-listed grizzly bear and Canada lynx.¹¹ While we urge the Commission to adopt MFWP’s proposal to limit the use of snares to private land, the Commission should further limit the areas and season for snares given their lethality and the risks they pose to pets and non-target species. Special consideration should be given to areas that may be considered lynx or grizzly habitat to minimize the possibility of capturing these non-target species.

The recent wolf hunt in Wisconsin illustrates the threat posed by liberal wolf seasons, such as those contemplated by the “Intermediate” and “Maximum” options before the Commission. In 2021, the Wisconsin Department of Natural Resources issued 2,380 hunting tags with an objective of killing 119 individual wolves over a one-week season.¹² In *less than three days*, hunters killed 218 wolves, contributing to a minimum 27–33 percent population decrease in one year.¹³

Reductions from the Intermediate and Maximum options could be far greater. Both options would increase the bag limit (from five to ten wolves) and allow hunters to kill five or ten wolves respectively on a single license. While both proposals contain a 450-wolf harvest trigger for initiating a commission quorum, the Wisconsin wolf season—where hunters exceeded the

⁶ Mont. Admin. R. 12.9.1301.

⁷ *Id.*

⁸ Supporting Information, at 1.

⁹ See Guidelines for Applying the Precautionary Principle to Biodiversity Conservation and Natural Resources Management, as approved by the 67th meeting of the IUCN Council 14-16 May 2007, *available at* https://www.iucn.org/sites/dev/files/import/downloads/ln250507_ppguidelines.pdf

¹⁰ Supporting Information, at 2.

¹¹ *Id.*

¹² Treves, A., Santiago-Ávila, F. J., & Putrevu, K. (2021). Quantifying the effects of delisting wolves after the first state began lethal management. *PeerJ*, 9, e11666. <https://doi.org/10.7717/peerj.11666>.

¹³ *Id.*

allowable quota by 83 percent before the state agency could halt the hunt—shows that such a safeguard is unlikely to prevent drastic and unintended reductions to Montana’s wolf population.

III. Decreasing the wolf population will hinder management flexibility, impair ecological health, and harm Montana’s economy.

The Commission should not risk significant declines to the state’s wolf population. To start, MFWP loses management flexibility as the wolf population decreases. “[A]t population numbers near to 15 breeding pairs the flexibility to address conflicts and provide harvest opportunities would become severely restricted.”¹⁴ Low wolf populations—and even the adoption of permissive hunting and trapping rules—also give cause for the U.S. Fish and Wildlife Service (“USFWS”) to relist the species under the Endangered Species Act (“ESA”), in which event MFWP will lose its management authority.

Moreover, less wolves mean less healthy ecosystems. As apex predators, wolves play a critical role in promoting ecosystem health and biodiversity. Targeting carnivores alters “processes as diverse as the dynamics of disease, wildfire, carbon sequestration, invasive species, and biogeochemical cycles.”¹⁵

For example, the presence of wolves changes the behavior of ungulates such as elk, which in turn prevents overgrazing and promotes aspen recruitment and improved riparian habitat for other species such as birds, beavers, and fish.¹⁶ Wolves also create carrion that benefits scavengers and even soil health.¹⁷ And while wolves certainly prey on deer and elk, this predation promotes healthy herds. By keeping deer and elk populations at sustainable levels, wolves prevent die-offs from starvation and other stochastic events and may help reduce chronic wasting disease, which spread to deer herds in Montana in 2017.¹⁸

Lastly, killing wolves will hurt Montana’s economy. Wildlife viewing produces significant revenue. According to a study conducted by the University of Wyoming, wildlife watchers in

¹⁴ Supporting Information, at 2.

¹⁵ See Estes, J.A. et al. (2011). Trophic downgrading of planet Earth. *Science (New York, N.Y.)*, 333(6040), 301–306. <https://doi.org/10.1126/science.1205106>.

¹⁶ Ripple, W.J., Beschta, R.L. (2004). Wolves and the Ecology of Fear: Can Predation Risk Structure Ecosystems?, *BioScience*, 54(8), 755–766. [https://doi.org/10.1641/0006-3568\(2004\)054\[0755:WATEOF\]2.0.CO;2](https://doi.org/10.1641/0006-3568(2004)054[0755:WATEOF]2.0.CO;2); Gaynor, K. M., et al. (2019). Landscapes of fear: spatial patterns of risk perception and response. *Trends in Ecology & Evolution*, 34(4), 355-368. <https://doi.org/10.1016/j.tree.2019.01.004>

¹⁷ Wilmers C.C., Getz W.M. (2005). Gray wolves as climate change buffers in Yellowstone. *PLoS Biol* 3(4): e92. Wolves modulate soil nutrient heterogeneity and foliar nitrogen by configuring the distribution of ungulate carcasses <https://doi.org/10.1371/journal.pbio.0030092>; Bump, J.K. et al. (2009). Wolves modulate soil nutrient heterogeneity and foliar nitrogen by configuring the distribution of ungulate carcasses. *Ecology*, 90(11), 3159-3167. <https://doi.org/10.1890/09-0292.1>; Christine Peterson, *25 years after returning to Yellowstone, wolves have helped stabilize the ecosystem*, National Geographic (July 10, 2020), available at <https://www.nationalgeographic.com/animals/article/yellowstone-wolves-reintroduction-helped-stabilize-ecosystem>.

¹⁸ See Wild, M.A. et al. (2011). The role of predation in disease control: a comparison of selective and nonselective removal on prion disease dynamics in deer. *Journal of wildlife diseases*, 47(1), 78–93. <https://doi.org/10.7589/0090-3558-47.1.78>; Jim Robbins, *Using Wolves as First Responders Against a Deadly Brain Disease*, New York Times (Nov. 12, 2020), available at <https://www.nytimes.com/2020/11/12/science/wolves-chronic-wasting-disease.html>.

that state in 2016 spent nearly twice (\$364,965,105) that of big game hunters (\$206,337,652).¹⁹ A 2008 study by University of Montana researchers calculated Yellowstone National Park visitor spending in the local economy due to the presence of wolves at \$35.5 million annually.²⁰ While the Commission should put primacy on the ecological importance of wolves, it should not lose sight of their economic importance as well.

IV. Expanded trapping rules—including the legislature’s snaring mandate—will create liability under the Endangered Species Act.

Expanded trapping will harm not just wolves, but also grizzly bears and Canada lynx, which are protected under the ESA. This harm is illegal: § 9 of the ESA makes it unlawful for “any person,” including state wildlife agencies,²¹ to “take” an endangered species.²² “Take” is defined broadly to mean “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”²³ It includes incidental take as a consequence of activities such as trapping, even when “trappers comply with all applicable laws and regulations in place.”²⁴ The take prohibition applies by regulation to many threatened species as well, including grizzly bears and lynx.²⁵

a. Grizzly bears

Grizzly bears occupy similar habitat types and geographic ranges as wolves across western Montana, putting them directly in the crosshairs of increased wolf extermination efforts. Grizzly bears are listed as “threatened” under the ESA, a listing that has been most recently reaffirmed by the courts in 2020.²⁶ Grizzly bears in the contiguous United States have been listed as “threatened” since 1975. At the time of listing, grizzlies had been “reduced to less than two percent of their former range in the lower-48 States...and the estimated population in the lower-48 states was 700 to 800 individuals.”²⁷ Currently, grizzly bears occupy approximately 6 percent of their former range in the lower 48 states, with much of this area being in Montana.²⁸ All or portions of four of the six grizzly bear recovery zones are in Montana. These include the Greater Yellowstone Ecosystem, the North Continental Divide Ecosystem, the Bitterroot Ecosystem, and

¹⁹ Wyo. Game & Fish Dept., Hunting, fishing and wildlife viewing are economic drivers for Wyoming (Mar. 5, 2018), available at <https://wgfd.wyo.gov/News/Hunting,-fishing-and-wildlife-viewing-are-economic>.

²⁰ Duffield, J, et al. (2008). Wolf recovery in Yellowstone National Park visitor attitudes, expenditures and economic impacts. *Yellowstone Science* 16(1): 20-25.

https://www.researchgate.net/publication/252937405_Wolf_Recovery_in_Yellowstone_Park.

²¹ “Person,” as defined by the ESA, “means an individual, corporation, partnership, trust, association, or any other private entity; or any officer, employee, agent, department, or instrumentality of the Federal Government, of any State, municipality, or political subdivision of a State, or of any foreign government; any State, municipality, or political subdivision of a State; or any other entity subject to the jurisdiction of the United States.” 16 U.S.C. § 1532(13) (emphases added).

²² *Id.* § 1538(a)(1)(B).

²³ *Id.* § 1532(19).

²⁴ *Animal Prot. Inst. v. Holsten*, 541 F. Supp. 2d 1073, 1079 (D. Minn. 2008).

²⁵ See 50 C.F.R. §§ 17.40(b)(1) (grizzly bear take prohibition), (k)(2) (Canada lynx take prohibition).

²⁶ *Crow Indian Tribe v. US*, 965 F.3d 662 (9th Cir. 2020).

²⁷ U.S. Fish and Wildlife Service (2021). Biological report for the grizzly bear (*Ursus arctos horribilis*) in the Lower-48 States. Version 1.1, January 31, 2021. Missoula, Montana. 370 pp., available at https://www.fws.gov/mountain-prairie/es/species/mammals/grizzly/20210131_V1.1_SSA_for_grizzly_bear_in_the_lower-48_States.pdf.

²⁸ *Id.* at 5.

the Cabinet-Yaak Ecosystem. Because of this, Montana is key to the recovery of a connected grizzly bear population.

According to the 2021 grizzly bear Species Status Assessment, “[g]rizzly bears in the lower-48 States need multiple, resilient ecosystems distributed across a broad geographic range in order to be redundant and withstand catastrophic events.”²⁹ The Species Status Assessment also notes that, “[t]he primary factors affecting grizzly bears at both the individual and ecosystem levels are excessive human-caused mortality and human activity that reduces the quality and quantity of habitats, which increases the potential for human-caused mortality, both directly and indirectly.”³⁰

The expansion of the wolf trapping season, and the inclusion of snares as a tool reduce the wolf population as the legislature desires, will also put grizzly bears at risk of incidental take. Trapping and snaring are inherently non-selective and often result in non-target take. Foothold traps and snares are indiscriminate tools that result in the capture and death of many non-target species. In a recent analysis performed by Wildlife Services-Montana it was found that 68 percent of animals that were unintentionally killed by the agency were killed in foothold traps and neck snares.³¹ Neck snares have been reported as being anywhere from 21 to 50 percent selective with foot snares being approximately 32 to 45 percent selective.³² This leaves a wide margin of error, and given the overlap of grizzly bear and gray wolf habitat, makes it extremely likely that grizzlies will be unintentionally captured in traps and snares meant for wolves. Researchers³³ have determined that:

- Snares do not operate humanely, either as restraining or as killing traps;
- The mortality and morbidity of animals caught in snares is higher than with most other restraining traps, such as box traps;
- Snares are inherently indiscriminate and commonly catch non-target, including protected, species;
- Snares can cause severe injuries, pain, suffering, and death in trapped animals (target and non-target species);

²⁹ *Id.* at 7.

³⁰ *Id.*

³¹ U.S. Dept. of Agric. (2021). APHIS Wildlife Services Predator Damage Control Final Environmental Assessment, at 280, available at https://www.aphis.usda.gov/wildlife_damage/nepa/states/MT/mt-2021-pdm-ea.pdf.

³² Iossa, G., Soulsbury, C.D., and Harris, S. (2007). Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare*, 16(3) 335-352.

https://www.researchgate.net/publication/228668169_Mammal_trapping_A_review_of_animal_welfare_standards_of_killing_and_restraining_traps. Citing literature.

³³ Rochlitz, I. (2010). The Impact of Snares on Animal Welfare. *OneKind Report on Snaring*.

https://onekindplanet.org/uploads/publications/onekind_report_on_snaring_chapter_1.pdf. The analysis by Rochlitz was focused on the use of snares in the United Kingdom, though most of the overall findings applicable to snare use in Montana due to similar snare types and trap check time.

- Stopping of snares may not prevent injury or death in trapped animals (target and non-target species);
- The free-running mechanism of a snare is easily disrupted and likely to fail, resulting in injury, pain, suffering, and death in trapped animals (target and non-target species);
- It is difficult to assess the severity of injury in an animal when the animal is caught in a snare;
- Animals that escape, or that are released, may subsequently die from their injuries, or from exertional myopathy, over a period of days or weeks;
- The monitoring of correct snare use is difficult, if not impossible; and
- Neck snares are open to abuse because they are cheap and require minimum effort to set and maintain.

Further research has found that “significant capture-related effects in ursids may go undetected at the time of capture, thus providing a false sense of the welfare of released animals.”³⁴ For example, grizzly bears captured in leghold snares more frequently exhibited biochemical indicators of muscle injury as compared with grizzlies captured by helicopter or barrel trap.³⁵ Additionally, the rate of movements made by bears decreased below normal levels immediately after capture and took between three to six weeks to normalize after release. However, researchers recorded that one grizzly died of capture myopathy—a physical reaction to the stress and trauma associated with snaring—approximately 10 days after being captured by a leghold snare, and a subadult male grizzly died from exertional myopathy after being trapped in 2019.³⁶

These risks to grizzlies would be heightened by an extension in Montana’s wolf trapping season. The new season would allow trapping from approximately December 1 to March 15, which does not account for bears who enter dens late, emerge early, or briefly leave a den during hibernation,³⁷ all of which are likely to increase as climate change decreases the periods during which bears are inactive. The previous season was set using science to avoid these unwanted impacts to grizzly bears, however HB 225 ignores this in favor of more time to kill more wolves. This past year provides an excellent example as to the variability of grizzly bear denning seasons. Famous grizzly bear 399 and her four cubs made their way to their den near Grand Teton National Park in early January 2021³⁸, a late den entry. Then, on March 13, 2021 was the

³⁴ Proulx, G., et al. (2020). Updating the AIHTS Trapping Standards to Improve Animal Welfare and Capture Efficiency and Selectivity, *Animals*, 10(8), 1262. <https://doi.org/10.3390/ani10081262>.

³⁵ Cattet, M. et al. (2008). An Evaluation of Long-Term Capture Effects in Ursids: Implications for Wildlife Welfare and Research, *Journal of Mammalogy*, 89(4), 973–990. <https://doi.org/10.1644/08-MAMM-A-095.1>.

³⁶ *Id*; Biological report for the grizzly bear, at 151

³⁷ Linnell, J. D., et al. (2000). How vulnerable are denning bears to disturbance? *Wildlife Society Bulletin* 28(2), 400–413.

https://www.researchgate.net/publication/261825744_How_Vulnerable_Are_Denning_Bears_to_Disturbance.

³⁸ See Mike Koshmerl, *Fanclub ushers grizzly 399 plus 4 on trek towards den*, Jackson Hole News & Guide (Jan. 6, 2021), available at https://www.jhnewsandguide.com/news/environmental/fanclub-ushers-grizzly-399-plus-4-on-trek-toward-den/article_5c2b404a-cfe5-5c2b-a3d0-26d8ef1b5f47.html

first grizzly bear sighting for the season in Yellowstone National Park³⁹. This variation in denning is natural, and allowing wolf snaring during this time when grizzly bears may encounter a snare would violate the ESA.

b. Canada Lynx

Canada lynx have significant habitat overlap with gray wolves in Montana as well. Lynx depend on abundant snow, a variety of high elevation habitats for hunting and denning, and primarily snowshoe hares for prey.⁴⁰ In 2000, the USFWS listed lynx as threatened in the conterminous United States. Critical habitat has also been designated for lynx across numerous states in the lower 48, including portions of northwest and southwest Montana. Lynx are well established in Montana as detailed in the USFWS 2017 Species Status Assessment.⁴¹ While wolves are less selective for specific habitat features than lynx, their territories tend to overlap due to wolf preference for territory with year-round ungulate presence and forest cover.⁴² Moreover, gray wolves occupy much of western Montana and thus tend to overlap significantly with lynx. USFWS has speculated that the overlap between lynx and wolves will only increase as the impacts of climate change increase, reducing snow depth.⁴³

The overlap between lynx and wolves can actually be beneficial for lynx by helping to increase food availability. Lynx rely on snowshoe hares for approximately 90 percent of their diet, but must compete with coyotes for their prey. Studies have found that wolves can depress coyote populations thereby increasing snowshoe hare populations, indicating a beneficial relationship between the species.⁴⁴

Experts have also found that lynx population sizes and distributions are likely to decline due to projected climate change and associated impacts.⁴⁵ These added stressors make it even more important for Montana to consider the impacts of expanded wolf trapping on lynx populations.

The USFWS recognizes the impacts of trapping on lynx stating, “lynx are more likely to survive, breed, and replace themselves in the breeding population if they occupy home ranges where trapping is prohibited or trapping pressure is low.”⁴⁶ Lynx are often captured in traps and snares meant for other species. Due to the non-selectivity of traps and snares described in the previous

³⁹ See National Park Service, *Yellowstone's first bear sighting of 2021* (Mar. 16, 2021), available at <https://www.nps.gov/yell/learn/news/21005.htm>.

⁴⁰ William J. Ripple, et al., Can Restoring Wolves Aid in Lynx Recovery?, 35 WILDLIFE SOC'Y BULL. 4, 514–518 (2011), <https://doi.org/10.1002/wsb.59>

⁴¹ U.S. Fish and Wildlife Service. 2017. Species Status Assessment for the Canada lynx (*Lynx canadensis*) Contiguous United States Distinct Population Segment. Version 1.0, October, 2017. Lakewood, Colorado, available at https://www.fws.gov/mountain-prairie/es/species/mammals/lynx/SSA2018/01112018_SSA_Report_CanadaLynx.pdf.

⁴² Oakleaf, J.K., et al. (2006). Habitat Selection by Recolonizing Wolves in the Northern Rocky Mountains of the United States. *The Journal of Wildlife Management*, 70(2), 554–563. [https://doi.org/10.2193/0022-541X\(2006\)70\[554:HSBRWI\]2.0.CO;2](https://doi.org/10.2193/0022-541X(2006)70[554:HSBRWI]2.0.CO;2).

⁴³ Species Status Assessment for the Canada lynx, at 71.

⁴⁴ Ripple, W.J. et al. (2011). Can Restoring Wolves Aid in Lynx Recovery? *Wildlife Society Bulletin* (35)4, 514–518. <https://doi.org/10.1002/wsb.59>.

⁴⁵ *Id.* at 4.

⁴⁶ *Id.* at 36.

section, the risks to lynx are severe. As with grizzlies, an extended wolf trapping season would increase the risk to lynx which is already high given their habitat overlap with wolves and winter activity. The use of snares will increase risks as they are cheap and easy to use, are non-selective, and can severely injure or kill lynx that are unintentionally caught. Injuries to trapped lynx may frequently go undetected such as dislocations, fractures, and mild freezing.⁴⁷ Additionally, “a substantial portion of lynx caught in foothold traps may experience injuries and foot freezing.”⁴⁸

V. Aggressive trapping rules will lead to increased conflicts with, and risks to, the public.

In addition to the threats posed to wolves, threatened species, and other non-target species, the aggressive approaches to reduce wolf populations in the state put people and pets at risk. According to an MFWP report,⁴⁹ between 2012 and 2017, 148 domestic dogs were accidentally caught in traps. This equates to approximately 25 dogs per year. Of these, seven captures resulted in the death of the dog. In 143 of the cases the injury level of the dog was reported with 28 percent of the incidents resulting in injury. For 95 of the incidents the target for the trap was recorded, with approximately 8 percent (8 total) of these incidental captures occurring in wolf traps. The number of dogs caught in snares vs foothold traps is not recorded, but were wolf snaring to be allowed, one could conclude that the number of dogs caught in such snares might increase.

In addition to the very real threat posed by traps and snares on public and private lands to dogs, is the likelihood of psychological trauma resulting to the owners of these pets, as well as to the public that might come across an animal in a trap. Many people feel deep connections to animals and travel to Montana to view and photograph these animals. Encountering these same animals caught in traps can be deeply shocking and disturbing.

CONCLUSION

Many members of the public have spoken out against the expanded wolf killing measures. These expansions are contrary to the highly-regarded science-based approach that MFWP has taken towards wildlife management historically. The Commission must consider the threats that the expanded wolf killing measures pose to the wolf population, threatened species and other non-target species, people and their pets, and the credibility of MFWP.

⁴⁷ *Id.* at 79.

⁴⁸ *Id.*

⁴⁹ Inman, R. (2018.) Incidental Captures of Wildlife and Domestic Dogs in Montana, 2012-2017. Montana Fish, Wildlife, and Parks. <https://myfwp.mt.gov/getRepositoryFile?objectID=87485>.

Sincerely,



Jocelyn Leroux
Washington and Montana Director
Western Watersheds Project
P.O. Box 8837
Missoula, MT 59807



Joe Bushyhead
Endangered Species Policy Advocate
WildEarth Guardians
3798 Marshall St., Suite 8
Wheat Ridge, CO 80033

20. Dear Montana Wildlife officials

I am writing in favor of wolves and writing against having a slaughter sanctioned for Montana outfitters and Guides to be able to kill wolves on sight as well as other hunters

A lot of what is proposed is totally unethical like killing a pregnant wolf ... this is not science based management .. Montana is commercializing the killing of wolves while elk numbers have never been better due to the wolves .. tourism will suffer because most folks don't want to visit a state where killing wolves is a nightmare scenario with snaring trapping and shooting near campgrounds and public lands is allowed and innocent bystanders could be injured or killed or their pets as well

Please stand up for Montana's wildlife and allow wolves to coexist and take their rightful role as a keystone predator allowing for healthy ecosystems

And we all know livestock depredation is extremely low and they are compensated for any loss, so that argument is not viable

Please Do the right thing and stand up for Montana wolves now

Thank you

Rebecca Vitale Mandich

21. Montana Fish and Wildlife Commission,

As a long term resident of Montana, I feel compelled to comment on proposals regarding the following legislation:

HB225- lengthening trapping seasons

HB224- allowing snaring of wolves

SB267- the reimbursement bill

SB314- wolf killing by unethical, unsportsmanlike means

Since the legislative intent of these bills is not based on sound science, Montana's reputation and tourism industries would be put at risk if extreme proposals are approved. This violation of public trust reveals a blatant abuse of power by legislators who crafted bills fueled by ignorance and fear tactics. Expanding when, where and how wolves are killed are issues that need to be mitigated by your commission. These bills, unrestrained, will also, lead to the indiscriminate killing of non- target wildlife and pets.

Wolves do not get chronic wasting disease, yet they help control the spread of the disease as they select infected wildlife and remove them from the herd. Wolves, as apex predators, hold a

crucial place in the delicate balance of our ecosystems. Please consider the wide reaching implications of contributing to our current global extinction crisis by allowing these pieces of legislation to dictate wildlife management in our state.

To avoid expensive litigation, I implore your commission to oppose all of these proposals. Thus, please try to reduce the mass carnage of wolves by considering the following regulations:

- Prohibit use of snares on public lands
- Require disclosure and warning signs for traps and snares on block management areas.
- Limit wolf trapping season dates to January 2- February 28 to attempt to avoid incidental grizzly trapping, as well as upland game dogs being trapped.
- Require trapping warning signage at high use recreational areas and at trailheads.
- Only allow one wolf per license.
- Prohibit the unsportsmanlike use of bait and night hunting of wolves.
- Require the reporting of all non-target kills.
- Prohibit the use of snares on public land.

Thank you for considering these issues and protecting our wolves as best as you are able, considering Montana's current political climate. Since trappers constitute less than 1% of our population, this legislation does not reflect the will of the people in regards to conservation.

Thank you for advocating on behalf of our citizens, our pets and the wolves.

Sincerely,

Nancy Mills

Missoula, Montana

22. I am writing to encourage the commission to set high standards for wolf trapping and in any consideration of increasing limits on the trapping of wolves in Montana.

Responsible and ethical trapping should always include 24 hour checks, sign postings at trailheads or wherever traps are set, no traps at least 150 feet from public trails and access sites.

The traps should be as humane as possible to the animals that are caught in snares or legholds etc. (Which includes the public's dogs.)

1 wolf per license/person is a respectful limit as there are also many known unlicensed wolf kills each season.

Trapping Montana wildlife should be as responsible and ethical as possible. Regulations and requirements for the taking of wildlife are far from government overreach but instead represent many studies, data, and compromises that also protect the public, other interests and wildlife.

I hope the Commission applies the best practice standards and works to decrease the wanton killing of wolves and other wildlife in setting the regulations for the upcoming wolf trapping season and beyond.

Thank you for your time and consideration,

Danielia Lemaich

Hamilton, MT

23. I am writing to express my outrage and horror in response to proposals that disregard the lives and future of our precious wildlife legacy and valuable biological diversity.

These measures are unnecessary, indiscriminate and unethical.

The vast majority of Montanans support protecting the unique and vital wildlife heritage of the state. So why is that not being reflected in public policy?

These proposals are scientifically unsound, socially unjust, and violate the public trust.

Please do everything in your power to lessen the far reaching and unnecessary war on wolves that will inevitably unfold and will adversely affect far more than wolves!

These proposals will kill many more river otters, wolves, beaver, all in INHUMANE fashion, in addition to any other creature who gets in the way.

These cruel exploitative and indiscriminate practices, do NOT place the state in a positive light!

Please note below the revisions that I and countless others, who care about the survival and well being of wildlife in Montana, wish to see enforced.

Thank you.

Sincerely,

Lisa Haut

PLEASE make the following revisions for the 2021 Montana Wolf Season:

- Require 24-hour trap checks.
- Prohibit the use of snares on public lands.
- Obtain written permission from the landowner for the use of snares.
- Require wolf trapping certification inclusive of snaring for anyone trapping for wolves.
- Require snares have diverters, relaxing lock, 275 lb. rated breakaway, a stop for a minimum loop size of 10", and the bottom of the loop a minimum of 18" above the surface.
- Limit the number of wolves who can be snared to one per certified trapper.
- Limit the number of snares and leghold traps a trapper can set.
- Require trappers keep maps of their snare locations.
- Prohibit power snares and the use of drags on traps and snares.
- Require disclosures and warning signs for traps and snares on block management areas.
- Revise wolf trapping season dates to January 2 - Feb 28 to try to avoid incidental trapping of grizzlies and upland game bird dogs.
- Prohibit the use of snares on high use areas of wintering elk and deer.
- Apply setbacks of minimum 150' to all public roads for traps and snares.
- Require trapping warning signage at trail heads and high use recreational areas.
- Establish 1 wolf quota or closure of the wolf season in units over elk management objectives, where elk shoulder seasons occur, where chronic wasting disease has been detected.
- Maintain a maximum quota of 1 wolf in units adjacent to national parks. Overage comes off the following year/s or adjacent applicable wolf management units.
- Allow 1 wolf per license.
- Present the hide and skull of all trapped or shot wolves in an unfrozen condition to designated FWP.
- Prohibit the use of bait and night hunting of wolves.
- Require the reporting of all non-target catches.
- Require annual reimbursement reports (SB267) for wolf trapping and hunting

Lisa Haut

24. Dear Sir or Madam:

I am not a resident of Montana but I am an American and am speaking as such. Montana is blessed with an immense natural beauty and intact wildlife communities which include apex predators like wolves and bears. These awesome gifts of nature bring many millions of visitors to Montana every year, supporting the people of Montana with their tourist dollars. I for one, am deeply troubled by recent laws that permit unmistakably, the annihilation of the state's wild wolf population. Such a decision is founded not on good sense and sound wildlife principles but rather on base emotions of fear and hate. I beg you to use every means available to you to minimize the terrible harm that changes in duration of seasons and methods of killing will cause to wolves, other carnivores, ungulates, birds, pets, and Montana's reputation. Specifically, I support the following and urge you to do the same. Thank you.

Require 24-hour trap checks.

Prohibit the use of snares on public lands.

Obtain written permission from landowner for the use of snares.

Require wolf trapping certification inclusive of snaring for anyone trapping for wolves.

Require snares have diverters, relaxing lock, 275 lb. rated breakaway, a stop for a minimum loop size of 10", and the bottom of the loop a minimum of 18" above the surface.

Limit the number of wolves who can be snared to one per certified trapper.

Limit the number of snares and leghold traps a trapper can set.

Require trappers keep maps of their snare locations.

Prohibit power snares and the use of drags on traps and snares.

Require disclosures and warning signs for traps and snares on block management areas.

Revise wolf trapping season dates to January 2 - February 28 to try to avoid incidental trapping of grizzlies and upland game bird dogs.

Prohibit the use of snares on high use areas of wintering elk and deer.

Apply setback of minimum 150' to all public roads for traps and snares.

Require trapping warning signage at trail heads and high use recreational areas.

Establish one wolf quota or closure of the wolf season in units over elk management objectives, where elk shoulder seasons occur, where chronic wasting disease has been detected.

Maintain a maximum quota of one wolf in units adjacent to national parks. Overage comes off the following year/s or adjacent applicable wolf management units.

Allow one wolf per license.

Present the hide and skull of all trapped or shot wolves in an unfrozen condition to designated FWP.

Prohibit the use of bait and night hunting of wolves.

Require the reporting of all non-target catches.

Require annual reimbursement reports (SB267) for wolf trapping and hunting.

Sincerely,

Rosamonde Cook, Ph.D.

Riverside, California

25. Good morning,

Thank you for the opportunity to comment on the 2021 wolf regulations. Attached is a copy of a comment letter on behalf of the Greater Yellowstone Coalition and its constituents. We appreciate you taking the time to listen to our concerns and all your hard work.

Take care,

Blakeley Adkins

Greater Yellowstone Coalition



July 26, 2021

Fish and Wildlife Commission

Montana Department of Fish, Wildlife and Parks
1420 E 6th Avenue
Helena, Montana 59601

Re: 2021-2022 Wolf Season

Dear Members of the Commission,

These comments are submitted on behalf of the Greater Yellowstone Coalition (GYC) and our 7,000 supporters in Montana. GYC's mission is to work with people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem now and for future generations. Our supporters have a strong interest in management decisions that impact wolves in Montana.

GYC is not opposed to science-based, regulated, fair chase hunting to manage wolf populations as well as the use of lethal control in high conflict areas. We are sympathetic to the pressure state and federal agencies are under and appreciate the hard work that goes into managing such a contentious species. We appreciate the department's efforts to outline options for limited implementation of bills passed during the 2021 Montana legislative session. These new laws undermine a commitment to science-based, fair chase principles and the North American Model of Wildlife Conservation.

We hope the Commission will avoid eliminating quotas in Wolf Management Areas (WMAs) 313 and 316 bordering Yellowstone National Park. Increased wolf harvest in these areas will undoubtedly cause international uproar. This could negatively impact the local economy, is counterproductive for wolf management, and could have substantial impacts on wolves established within the boundaries of Yellowstone National Park.

More people than ever are visiting Yellowstone to watch and research wolves. An annual average of 4.06 million people visited Yellowstone the past five years according to the National Parks Department and most of them are there to view wolves and grizzlies. Wildlife related tourism plays an important role in economies of Yellowstone gateway communities, and the wildlife research coming out of the park is invaluable. Maintaining a quota in WMAs 313 and 316 for such a high-profile species is a realistic and easy way to balance wolf hunting with other important community needs.

AMERICA'S VOICE FOR A GREATER YELLOWSTONE

Increased wolf harvest immediately adjacent to an international destination for wildlife tourism will tarnish the reputation of the hunting and trapping communities. The public has become less tolerant of hunting and trapping as the number of people involved in these activities slowly declines. When Yellowstone wolves are harvested the media typically puts the hunting and trapping communities in a bad light. This degrades public tolerance for consistent management and undermines the credibility of Montana and its wildlife managers. Legalizing snaring on public land outside the park would only instigate more negative press as it puts recreationists and their dogs at risk of injury or worse. Carving out places where wolf harvest is limited, and allowable tools are regulated demonstrates to the public that the state of Montana is committed to balancing the social and economic aspects of wolf management for the benefit of *all*. It is within Montana's best interest to maintain confidence among the general public in the state's wildlife-management decision-making.

Since 2011 there has been a harvest quota set in WMAs 313 and 316. Yellowstone wolf packs are more vulnerable to hunting pressure since they can be more habituated to human presence. Eliminating a quota in units bordering the park would target habituated wolves who venture outside the park and potentially wipe out certain packs. According to the Yellowstone Wolf Project annual plan, the Yellowstone wolf population has been relatively stable since 2016. We strongly encourage the Commission to maintain policy in units 313 and 316 that has played a contributing role in a stable Yellowstone wolf population. The northern range elk herd population has been stable or increasing since 2016 (published on the Yellowstone National Park website). According to Montana Fish, Wildlife, and Parks, unit 313 was above objective for elk in 2020 (and objectives are not set for unit 316). According to Livestock Loss Board statistics, wolf depredations have been low and decreasing in Park County in recent years. A stable Yellowstone wolf population is not contributing to elk numbers below objective or heightened livestock depredations in units 313 and 316. Maintaining wolf harvest quotas in these units will not negatively impact elk or livestock.

According to the MFWP's State Plan (also quoted in the MFWP 2019 Wolf Annual Report), "Long-term persistence of wolves in Montana depends on carefully balancing the complex biological, social, economic, and political aspects of wolf management." Managing a species with so many stakeholders in mind is difficult but we ask that you consider the value of wolves to Montanans as a whole and not just the hunting community when setting the 2021-2022 wolf season. Wolf managers need to balance population dynamics, social structure, ecosystem objectives, economic and intrinsic value of wolves, as well as hunting opportunities. We recommend the Commission maintain low harvest quotas in WMAs 313 and 316 and implement the limited options for new harvest tools. Thank you for your time.

Sincerely,



Blakeley Adkins
Wildlife Program Associate
Greater Yellowstone Coalition

I think it is wrong for politicians with a non science agenda to set the policy and procedures the FWP has historically done. I am against the increased killing of wolves with snares, night hunting and baiting! Thank you

richard T torkildson Clancy, MT

I've talked to several different Montana Wolf Specialists and they all noted that not enough wolves are being killed and the population keeps rising. There are a very small number of hunters/trappers willing to do the hard work to harvest a wolf and the state should do everything to make it easier on them. Such as one license to cover an unlimited number of wolves. At least then if they are lucky enough to get into a pack they can harvest as many as possible. Also, the trapping regulations should be as easy and liberal as possible. If you make the regulations more user friendly maybe you might reach your harvest target.

Rich Billiel Great Falls, MT

The new proposed rules for wolf are still entirely too strict. Open wolf snaring on public land!

Richard M Wildermuth Corvallis, MT

I don't see a problem with trapping especially snaring on private land. The wolf HARVEST can be adjusted yearly as need just let the fish and game do there job and quit making problems where there is none. I have trapped 14 domestic dogs in my trapping time and am proud to say all are alive and intact with no damage done to them. THATS A FACT, only two dogs where caught on forest service land. Time for dog owners to take responsibility for there actions. CONTROL YOUR PET.

Dan Thingelstad ronan, MT

NO to increased bag limits on a single license.

Pat Bartholomew Hamilton, MT

No to increased wolf take. No to increase of any kind of any kind of trapping or hunting.
Pat Bartholomew Hamilton, MT

NO to increased bag limits on a single license.
Sterling Way Victor, MT

NO to increased bag limits on a single license.
Scharyn Way Victor, MT

Don't make a festivity out of killing animals for plesure. If huntung down your family, you wouldn't laugh at it and try to prevend it as well. Even more, they are not in your way and trying to survive. At a certain point, you'll regret will be too late!! I'm writing this for all the hunting actions you're about to take
Benaerens Chicago, IL

Snaring for wolves was voted in and we should be able to snare on public ground as long as fwp requires proper training so there isnt wrong species catches
Levi M Carlberg, MT

Please reconsider your wolf proposal and utilize the new laws passed through legislation for all units without restrictions.
Norris Bryan Trout Creek, MT

PHONE COMMENTS ON THE 2021 WOLF PROPOSAL

July 26, 2021

2:11pm

I do not support the wolf culling measures or the extended shoulder season, it is not the 1820's. I have lived here 51 years and watched the wolf introduction in Yellowstone, which was a plus to the park; it created balance. The proposed baiting, night hunting, snaring, and increased bag limits are not fair chase and are an absolute assault on wildlife!

Jeanette Martin Bozeman, MT

July 20, 2021

Wolf Comment

Do as the State Legislature
intended.

Robert Flansaar
PO Box 1369
Trout Creek, Montana
59824

Robert