



November 3, 2023

Via email to:

fwpwd@mt.gov

Montana Fish and Wildlife Commission
Montana Department of Fish, Wildlife and Parks
Wildlife Division
PO Box 200701
Helena, Montana 59620

Re: ARM 12.9.1303 amendment

Dear Members of the Commission,

Thank you for the opportunity to comment on the amendment to ARM 12.9.1303 pertaining to control methods of the gray wolf. The Greater Yellowstone Coalition (GYC) is a regional conservation organization based in Bozeman, Montana. Its five field offices, strategically placed in Idaho, Wyoming, and on the Wind River Indian Reservation, create opportunities to work with all people to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem now, and for future generations. For more than 40 years, GYC and our 100,000 supporters from across the country have advocated for a science-driven, collaboration-focused, and forward-thinking approach to keeping lands wild, rivers free-flowing, and iconic wildlife moving throughout a connected and vibrant landscape. GYC's supporters have a strong interest in ensuring state wolf management is science-based and accounts for the valuable ecological role wolves play in our region.

GYC is concerned that removal of reference to the Montana Gray Wolf Conservation and Management Plan (hereafter 'Wolf Plan') within rule language renders the Wolf Plan ineffective in guiding wolf management strategies and actions in the state. It is critical that wolf control actions be consistent with statewide management direction outlined in the Wolf Plan. Presumably, the MEPA process creates an opportunity to develop a science-based Wolf Plan that is sensitive to the variety of social values connected to wolves. Removing reference to the Wolf Plan within administrative rule language governing control actions calls into question whether there is intention for control actions to diverge from the Wolf Plan and a science-based approach. Why invest substantive resources and time into revising the Wolf Plan if there is no intention for it to guide wolf management actions moving forward? We recommend maintaining the reference to the Wolf Plan within ARM 12.9.1303.

Sincerely,

Brooke Shifrin
Wildlife Conservation Coordinator
Greater Yellowstone Coalition