

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

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

TO: All Concerned Persons

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

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

3. The original Gray Wolf Conservation and Management Plan was born out of diverse stakeholder involvement. That involvement has waned in recent years as non-consumptive users have been left out of the process, and the Department has taken the position that a wolf advisory committee is unnecessary because advocates have the ability to make public comments. Those public comments, though, are not the same as an advisory committee, which brings diverse stakeholders together to collaborate on ways to best manage wildlife in the Montana. Montana has an obligation to manage wolves for all Montanans, not just consumptive users. An advisory group for wolf management would help the State do just that.

ADOPTION:

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

NEW RULE I WOLF MANAGEMENT ADVISORY COUCIL (1) The department shall establish a Wolf Management Advisory Council, to provide information and advise the department and Fish and Wildlife Commission on issues related to updating the Gray Wolf Conservation and Management Plan, including, but not limited to:

- (a) the means to ensure the wolf population in Montana remains above the level that would require reclassification as threatened or endangered under federal law;
- (b) the impacts of wolves on livestock and agricultural operations and ways to mitigate these impacts;

- (c) the impacts of wolves on natural prey populations and big game hunting and ways to mitigate those impacts;
- (d) the impacts of wolves on other aspects of the economy and lifestyles of Montana's citizens and ways to address those impacts;
- (e) the impacts of non-consumptive wolf users on the economy;
- (f) appropriate roles for state and federal agencies, tribes and private groups in wolf management;
- (g) appropriate funding sources including state, federal and private funds to be used in the management of wolves; and
- (h) legislative or fiscal proposals that should be proposed to the Montana Legislature.

(2) In its deliberations, the Council shall consider input from the citizens of the state and other interested parties.

(3) the Council shall consist of 12 members appointed by director of the Department. Members will represent a variety of interests, and shall include at least the following user:

- (a) 6 members of nonconsumptive user groups such as wildlife conservation groups, or wildlife based tourism groups.
 - (b) 3 members of consumptive user groups such as trappers or hunters;
- and,
- (c) 3 members of agricultural interest groups.

(3) The members of the wolf management advisory council shall be appointed within 30 days of the adoption of this rule, and shall serve at the pleasure of director of the Department.

(4) The members of the wolf advisory council shall elect a chair and a vice chair whose duties shall be established by the wolf advisory council.

(5) The wolf advisory council shall establish policies and procedures necessary to carry out duties.

(7) The department shall establish a time and a place for regular meetings of the advisory group, which shall meet at least four times prior to the adoption of any updates or amendment to the Gray Wolf Conservation and Management Plan.

(8) The advisory council shall exist for two years from the date of the adoption of this rule, unless extended as allowed under § 2-15-122, MCA.

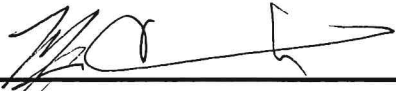
5. Persons known to petitioner to have an interest in the proposed agency action are:

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

Derek Goldman, Endangered Species Coalition, Missoula, Mt 59801

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

WHEREFORE, petitioner requests the Department of Fish Wildlife and Parks to adopt the proposed new rule creating a wolf management advisory council.



Marc Cooke
Wolves of the Rockies
October 19, 2023