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**From:** [Sherry, Jenny](#)  
**To:** [FWP Wildlife](#)  
**Cc:** [Pieske, Shawna](#)  
**Subject:** [EXTERNAL] 2021-2022 wolf hunting and trapping regulations proposal - NRDC comment letter  
**Date:** Monday, July 26, 2021 1:18:58 PM  
**Attachments:** [NRDC comment letter - MT Fish and Wildlife Commission wolf proposals 2021.pdf](#)

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Hello,

The Natural Resources Defense Council would like to submit the attached comment letter regarding the current wolf hunting and trapping regulations proposal. We hope the Commission will receive, review and carefully consider all comments submitted during this public comment period.

Kind regards,  
Jenny

**JENNIFER SHERRY, PhD**  
*Wildlife Advocate*  
*Nature Program*

NATURAL RESOURCES DEFENSE COUNCIL  
317 E. Mendenhall St., Suites D and E  
Bozeman, MT 59715  
(406) 556-9304  
[JSHERRY@NRDC.ORG](mailto:JSHERRY@NRDC.ORG)



July 26, 2021

Fish and Wildlife Commission  
Montana Department of Fish, Wildlife and Parks  
1420 E 6th Avenue Helena,  
Montana 59601  
[fwpwld@mt.gov](mailto:fwpwld@mt.gov)

Members of the Commission:

On behalf of our more than 4,000 members and online activists in Montana, the Natural Resources Defense Council (“NRDC”) submits the following comments regarding Montana Fish, Wildlife & Parks’ (“FWP”) proposed changes to the 2021-2022 wolf hunting and trapping regulations (“Proposal”).

The range of options under consideration in the Proposal center on increasing the tools and allowances for wolf hunting and trapping. Although we understand that the Proposal is a response to new state laws passed in the recent 2021 legislative session, we consider these laws to be unwarranted, politically motivated, and out of step with Montana’s long reputation for wildlife conservation leadership.

We recognize that the Fish and Wildlife Commission (“Commission”) must act in accordance with legislative intent but encourage you to employ the high level of discretion you continue to have as you work to implement the laws. The issues we raise in the following sections evidence the need to limit the tools and geographic scope of the proposed options.

**I. The Commission should consider input from diverse stakeholder groups in a fair and inclusive way.**

NRDC actively engaged in the legislative process to oppose SB 314, HB 224 and HB 225, as did many members of the public from diverse backgrounds. Hunters, scientists, wildlife professionals,<sup>1</sup> recreationalists, landowners and other Montanans have voiced their opposition to further liberalizing wolf hunting and trapping in the state. Many more individuals and groups have spoken up in opposition during the public comment sessions offered by the Commission—far outweighing those who spoke in favor of the more aggressive options in the Proposal.<sup>2</sup>

Montana’s 2004 Wolf Conservation and Management Plan includes the objectives to “Maintain positive and effective working relationships with stakeholders,” and “Increase broad public acceptance of sustainable harvest and hunter opportunity as part of wolf conservation.”<sup>3</sup> FWP’s stakeholders include those who value wildlife for reasons other than harvest opportunity, and their

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<sup>1</sup> See [https://www.nrdc.org/sites/default/files/media-uploads/wildlife-managers-letter-to-legislature\\_1.pdf](https://www.nrdc.org/sites/default/files/media-uploads/wildlife-managers-letter-to-legislature_1.pdf).

<sup>2</sup> See <https://missoulacurrent.com/outdoors/2021/07/wolf-hunting/>.

<sup>3</sup> See <https://fwp.mt.gov/binaries/content/assets/fwp/commissionagendas/june-24-2021-commissionmeeting/wildlife/2021-wolf/1-wolf-proposal-final-posted-06082021.pdf>, p. 14.

voices deserve equal weight as those of hunters and trappers. Allowing new wolf hunting and trapping tools that are largely considered unethical will decrease the public's acceptance of hunting as part of wolf management.<sup>4</sup> Wolf hunters and trappers—who represent less than .1% of the public in Montana—should not have a privileged position over wildlife management decision-making. Hunters and trappers will receive less and less support from the public as increasingly aggressive and unethical harvest measures are put into practice.

## **II. The Commission has the authority to further limit the options in the proposal while still adhering to legislative intent.**

The legislators who sponsored the new wolf laws repeatedly asserted during the legislative session that the language in their bills was crafted to leave authority in the Commission's hands and that commissioners would have a high level of discretion in deciding if, how and where new management tools would be allowed. As the proposal notes, the legislative intent for the new bills was characterized in large part as a response to alleged concerns about impacts by wolves on wild ungulate populations, particularly in northwest and western Montana.<sup>5</sup> As the Commission is aware, elk are at or over objective across most of the state.

A relevant exchange on the legislative intent of SB 314 took place on March 16, 2021, during the House Fish, Wildlife and Parks Committee hearing on the bill.<sup>6</sup> Representative Tom France asked Senator Bob Brown—the bill sponsor—what he thought about reducing wolf populations in parts of the state where elk populations are above management objectives. Senator Brown's response in that hearing was to say that (1) the Commission will have the discretion to decide how to manage wolves in different areas of the state; (2) he didn't believe the Commission would set liberal wolf seasons in those areas that were over elk objective; and (3) he expected the Commission would set more liberal seasons in the areas where elk are suffering more loss.<sup>7</sup>

According to FWP's 2020 Montana elk population counts, there are only 16 hunting districts in the state that were below objective in 2020.<sup>8</sup> Therefore, even if one believes wolves are to blame for declining elk populations, the majority of the options in the Proposal take an unjustified statewide blanket approach. This proposal should strictly limit the geographic scope for each of the tools under consideration and decline to allow more wolves to be killed anywhere that elk are meeting or exceeding objectives. As noted in the Proposal, there is some evidence that Montana's wolf population is already declining under current policies, negating the need for any increased tools in order to meet the legislative intent of SB 314.<sup>9</sup> Furthermore, the predator-prey relationship is extraordinarily complex (refer to the following section) and a focus on killing more wolves will divert people's attention away from the more significant and proven threats to sustained ungulate populations, which include environmental factors that are primarily driven by human causes.<sup>10</sup>

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<sup>4</sup> See <https://www.boone-crockett.org/hunter-and-conservation-ethics>.

<sup>5</sup> *Id.* at p. 13.

<sup>6</sup> See <http://sg001-harmony.sliq.net/00309/Harmony/en/PowerBrowser/PowerBrowserV2/20170221/1/41646?agendaId=206873> at 17:02:35.

<sup>7</sup> *Id.*

<sup>8</sup> See <https://fwp.mt.gov/conservation/species/elk/population-and-distribution>.

<sup>9</sup> See <https://fwp.mt.gov/binaries/content/assets/fwp/commissionagendas/june-24-2021-commissionmeeting/wildlife/2021-wolf/1-wolf-proposal-final-posted-06082021.pdf> at p. 1 & 2.

<sup>10</sup> Brodie, J., Johnson, H., Mitchell, M., Zager, P., Proffitt, K., Hebblewhite, M., ... & White, P. J. (2013). Relative

**III. The claim that wolves are having a negative effect on elk is misleading.**

FWP should avoid repeating unsubstantiated and misleading claims about the effect of wolves on ungulate populations and the Commission should use the best available evidence to guide their decisions. Killing wolves does not definitively lead to increased opportunity for hunting ungulates. The legislature did not hold space to consider scientific and objective evidence in their decision-making process. The Commission has a higher responsibility to consider the complexities, to weigh the risks, and to ensure decisions are backed up by credible evidence. We appreciate the Commissioner’s questions and requests for more information about the interactions of wolves and elk during the June 24<sup>th</sup> public meeting, and provide the following helpful information relevant to this topic:

According to FWP’s harvest data, elk hunter success has ebbed and flowed over the last 15 years, with a low of 18.74% in 2013 and a high of 27.14% in 2015.<sup>11</sup> Elk hunter success has remained very good in Montana, even compared to other states that don’t have established wolf populations.<sup>12</sup> The table on the right demonstrates Montana’s consistent elk hunter success rates, which are calculated by dividing the total elk harvested by the total number of elk hunters. These numbers demonstrate that a stable wolf population and hunter opportunity can effectively coexist.

During a legislative hearing for HB 224 on February 18, 2021, FWP’s Ken McDonald was called as an informational witness to answer the question of whether or not wolves have caused deer and elk populations to fall below population targets and, if they have, in which hunting districts. His response was, “We don’t have any firm information to address that and again, with ungulate populations, there’s so much variability, including weather, predation—wolves just being one of the predators—and other factors that lead to that, so we can’t say for certain for any hunting district.”<sup>13</sup> If FWP cannot produce any evidence that wolves are a primary cause of elk population declines in the few places in the state where that is occurring, then the Commission should re-evaluate its Proposal to ensure that wolves will not be killed needlessly on the basis of myths and fear mongering.

Importantly, wolf predation is not inherently “negative.” Renowned wolf expert David Mech stated recently, “Based upon everything I’ve seen over the course of my career, I generally stand behind the assertion that wolves make prey populations healthier. The evidence to support it is overwhelming.”<sup>14</sup> For example, studies indicate that wolves and other predators can reduce the

**Montana Elk Hunter Success**

Year	Elk hunter success rates, MT	Average success rates per 5-year period
2005	25.18%	23.38%
2006	25.15%	
2007	24.89%	
2008	21.10%	
2009	20.59%	21.41%
2010	24%	
2011	20.45%	
2012	19.99%	
2013	18.74%	24.70%
2014	23.90%	
2015	27.14%	
2016	21.60%	
2017	26.63%	
2018	25.30%	
2019	22.85%	

influence of human harvest, carnivores, and weather on adult female elk survival across western North America. *Journal of Applied Ecology*, 50(2), 295-305.

<sup>11</sup> See <https://myfwp.mt.gov/fwpPub/harvestReports>.

<sup>12</sup> See <https://www.backcountrychronicles.com/elk-harvest-comparison-western-states/>.

<sup>13</sup> See <http://sg001-harmony.sliq.net/00309/Harmony/en/PowerBrowser/PowerBrowserV2/20170221/1/41736?agendaId=198024> at 16:18:50.

<sup>14</sup> See <https://mountainjournal.org/predators-and-chronic-wasting-disease>.

prevalence of disease in prey populations by targeting sick or weak individuals.<sup>15</sup> The Commission should consider the benefits of wolves as much as any costs or burdens. Ungulate populations must not be measured in numbers alone, but also by the health and resiliency of the herds.

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**IV. The Commission should retain the quota areas and corresponding quotas in hunting districts that border national parks.**

Each year, millions of people travel to Montana to visit Yellowstone and Glacier national parks. The opportunity to see wolves and other wildlife in their natural habitats is a major attraction that is unparalleled across the nation. On any given day in Yellowstone this spring, it was not uncommon to see hundreds of people lined up on the side of road, hoping to catch even a fleeting glimpse of a wolf. According to the National Parks Service, hundreds of millions of dollars are spent annually by tourists visiting Montana’s national parks, playing a major part in the local economies of surrounding towns.<sup>16</sup> The Commission accurately predicts in the Proposal that “the elimination of quota areas around the national parks will also be strongly opposed by wolf advocates.”<sup>17</sup> This is because Yellowstone wolves spark the passion and concern of wildlife enthusiasts across the country. Killing these wolves damages Montana’s national reputation and causes intense pushback from the general public.

Yellowstone wolves also hold an outsized value to science at national and international scales. Their reintroduction and long-term monitoring have provided unique and important contributions to the field of ecology.<sup>18</sup> Killing wolves that step beyond the invisible park boundary—especially those that are collared—hinders scientists’ abilities to conduct on-going and long-term research.<sup>19</sup> Eliminating the quota areas or quotas in park-adjacent hunting districts would needlessly impact the state’s national reputation and harm an internationally-renowned research project.

**V. The Commission should reject options that incorporate night hunting, baiting, an extended trapping season and other tools that are not specifically required by legislation.**

NRDC strongly opposes the use of unethical and unnecessary tools such as snaring, night hunting, baiting, increased bag limits and the extension of wolf trapping season dates. Many of these tools became illegal in the state long ago because sportsmen’s groups recognized the importance of ethics and fair chase principles to the future of hunting. These tools also come with serious collateral damage, especially because the combination of snaring, a longer trapping season, and monetary incentives for killing wolves (through SB 267) would certainly lead to more traps on the landscape for longer, which poses a threat to non-target wildlife, including grizzly bears, wolverines and lynx.

In particular, extending the trapping season will increase overlap between trappers and grizzly bears. Researchers are taking note of bears entering dens a little later in the year and emerging earlier than they used to, in response to changing food availability and weather patterns.<sup>20</sup> Extending the wolf trapping

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<sup>15</sup> See <https://www.nytimes.com/2020/11/12/science/wolves-chronic-wasting-disease.html>.

<sup>16</sup> See <https://www.nps.gov/yell/learn/news/20025.htm>.

<sup>17</sup> See <https://fwp.mt.gov/binaries/content/assets/fwp/commissionagendas/june-24-2021-commissionmeeting/wildlife/2021-wolf/1-wolf-proposal-final-posted-06082021.pdf> at p. 16.

<sup>18</sup> See <https://onlinelibrary.wiley.com/doi/10.1002/eco.2048>.

<sup>19</sup> See <https://www.outsideonline.com/outdoor-adventure/environment/out-bounds-death-832f-yellowstones-mostfamous-wolf/>.

<sup>20</sup> See Pigeon, K. E., Stenhouse, G., & Côté, S. D. (2016). Drivers of hibernation: linking food and weather to denning behaviour of grizzly bears. *Behavioral Ecology and Sociobiology*, 70(10), 1745-1754.

season risks human safety, bear safety,<sup>21</sup> and the terrible publicity of grizzly bears wandering around with traps stuck to their bodies, as we have seen documented in Wyoming.<sup>22</sup> Any further liberalization of trapping should come with strict accountability measures, including increased reporting requirements, increased monitoring, and increased penalties for failing to follow regulations. FWP should also ensure

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greater transparency by making non-target capture information consistently available to the public. This is especially important in light of the proposal to allow snares on private lands, because snares are known to be highly indiscriminate and cruel.

## **VI. Conclusion**

For the reasons stated above, we oppose the intermediate and maximum options in the Proposal and urge the Commission to further limit the geographic scope of the Proposal. We also urge the commissioners to reflect on the recorded legislative hearings and consider the words of the legislators who vowed to leave regulatory decisions about wolf hunting and trapping in the hands of the Commission.

Thank you for considering these comments.

Sincerely,



Jennifer Sherry  
Wildlife Advocate

Natural Resources Defense Council  
317 E. Mendenhall St. Suite D  
Bozeman, MT 59715  
406-556-9304

cc:

Shawna Pieske, Commission Secretary  
Montana Department of Fish, Wildlife and Parks  
[Shawna.Pieske@mt.gov](mailto:Shawna.Pieske@mt.gov)

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<sup>21</sup> See, for example, <https://www.biorxiv.org/content/10.1101/2021.07.06.450999v1>.

<sup>22</sup> See <https://www.wyomingpublicmedia.org/post/grizzly-bear-trap-its-foot-still-not-found#stream/0>.

2.

[María Elvira Sagarzazu](#)

[FWP Wildlife](#)

[EXTERNAL] A chance for Montana's wildlife

**Date:** Monday, July 26, 2021 2:25:57 PM

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Dear Members of the Montana Fish & Wildlife Commission

Environmentalists and zoologists have considered several issues to protect Montana's wildlife (not the lobbyists). Please consider their plan to give your intervention the transparency required by Montanans (not by lobbyists).

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 - 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 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 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.

Sincerely

Marina Sagardua

Boston, MA



3.

----- Forwarded message -----

From: **Robert Sheppard** <[bob.sheppard@blackfoot.net](mailto:bob.sheppard@blackfoot.net)>

Date: Mon, Jul 26, 2021 at 11:43 AM

Subject: WOLF REGULATIONS

To: <[fwpdistrict4@gmail.com](mailto:fwpdistrict4@gmail.com)>

Commissioner Lesley Robinson

I will try to be brief in my comments. I am a resident trapper and hunter in Montana and have been a resident since I was born 70 years ago.

Regarding the wolf issues:

I have known from the start that snaring would be a tool to use in wolf management. I would really hope that before just opening it up to all that there would be a comprehensive wolf snaring education class in effect. We have snaring of other animals, but the wolf snares have potential to cause some real problems in uneducated hands. There are ways of addressing the by catch issue, but without an education format the potential for disaster that will affect all snaring could be extreme. I feel strongly about the education issue and have stated many times since the inception of the wolf regs', that once snaring became a law that we need to educate trappers about their proper usage. One regulation that I believe you could address is the breakaway on the wolf snare. Many, not all, of the trappers that I have gotten info from about use of snares in Alaska and Canada, recommend a 750-pound breakaway. I personally feel that 1000 pounds is too much.

You have Representative Fielders' info on other aspects of the wolf issue and for the most part, I agree with him.

I am in agreement with the proposal to increase the otter harvest in both proposed districts and all of the other trappers that I have personally talked to also agreed. I could give you a long dissertation on that subject also, as I have been observing the increase in otter for over 35 years. However, now is not the time.

I wish you the best, as I know that these are hot issues with the wolf.

Respectfully submitted by,

Robert Sheppard

PO Box 129

Ovando, Mt 59854-0129

4.

[Tom Gignoux](#)

[FWP Wildlife](#)

[EXTERNAL] Montana tourism \$\$\$ lost from trapping Otters

**Date:**

Monday, July 26, 2021 11:13:09 AM

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Otter populations in Montana are low from poorly controlled recreational trapping, which benefits only a handful of people. Wildlife viewing, the foundation of our multibillion dollar tourist industry, loses money when there is less wildlife to view.

The mandate of the FWP is to restore and maintain a robust wildlife population for the health of Montana's wildlife diversity. It is not to protect cruel practices which turned Montana into a wildlife desert in the 19th Century.

Modern trapping is too efficient and beyond the FWP ability to regulate with current funding levels.

Trapping activity should be returned to levels last seen before Lewis and Clark. Thank you for working on this, Tom Gignoux, Montana Geologist

5.

[María Elvira Sagarzazu](#)

[FWP Wildlife](#)

[EXTERNAL] Protect otters, not Trappers

Sunday, July 25, 2021 5:35:22 AM

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Dear FWPWLD

Please do what is best for Montana's wildlife, which is the opposite of what Montana Trappers Association and Montana Fur Harvesters have been suggesting to you. Your job is to protect wildlife, not trappers and fur harvesters.

All that the Montana Trappers Association and Montana Fur Harvesters want is business, they even try to "share" benefits with you...

Please FWPWLD, stand strong against these people and stick to your job, which is not in the private sector. Sincerely

marina Sagardua  
Boston,>MA.

6.

[Marilyn Leybra](#)

[FWP Wildlife; FWP Commission](#)

[EXTERNAL] Regarding River Otter Proposals

Saturday, July 24, 2021 10:34:46 PM

Date:

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Dear Montana Dept of Fish Wildlife & Parks,

"According to the FWP " Furbearer Program Statewide Harvest Management Report 2013-2014 Montana", the total number of trapping licenses sold over this 2-year period was **5,957**.

"An annual single \$28 trapping license purchase, awards Montana trappers the ability to kill countless animals."

\$28 per license paid for 5,957 licenses over a two year period, gains the state a net profit of \$166,796. The wildlife is a free commodity (state resource) costing the state nothing. There's no way for anyone to know how many otters there are, including each year's spring dependent young. To say that, "Montana river otters can handle it," is far too ashamedly flip, to have anything to do with "wildlife policy being informed by science."

Wildlife is supposedly 'held in trust for all citizens.' The fact that FWP has not 'stated any need' to reduce the otter population, means that selling-out these animals lives to a specialinterest group of 5,957 Montana trapper-citizens is an arbitrary decision & needs to be challenged on behalf of the remaining 1.03 million Montana citizens for whom the river otters are held in trust. Wild otters definitely do not 'belong' to 5000 trappers, a handful of 'protrapping' politicians & Commission appointees. What kind of business is this, if a 'wildlife' animal is on the ESA list, can still be killed in self defense or if accused of trying to eat a sacred cow. If not on the ESA list, can be killed just because they can handle it?

Sincerely, M Leybra

7.

[Michael Koeppen](#)

[FWP Wildlife](#)

[EXTERNAL] River otter proposal

Saturday, July 24, 2021 9:40:40 PM

Dear Montana Fish, Wildlife, and Parks,

Please DO NOT increase the killing of river otters by trappers.

As you are aware, this proposed increase has nothing to do with science, but simply trapper's requesting to kill more.

We are very avid outdoors people, and we spend months in the backcountry every year. Otters are scarce enough as it is, and shouldn't even be trapped at all.

Increasing the trapping of otters is simply irresponsible on your part, just to appease the trapping industry. We are among the vast majority of citizens that prefer to see these animals alive in the wilds. Otters do not need higher kill quotas.

Sincerely,

Michael and Lynn Koeppen

300 Bull Rum

Florence, Montana 59834

8.

[Victoria Angyus](#)

[FWP Wildlife](#)

**Subject:** [EXTERNAL] river otter proposal  
**Date:** Monday, July 26, 2021 2:35:09 PM

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Hello,

I am writing to let you know that I am against raising otter number  
for trapping. go well

Red Tail

9.

[Aol Server](#)

[FWP Wildlife](#)

[EXTERNAL] River Otter Proposals

Sunday, July 25, 2021 4:31:21 PM

**FWP has proposed for 2021** increasing the killing of 80 river otters from Region 1 and Region 2 in which there are ~ 58 trappers killing otters.

Change Northwest Montana (Region 1) quota from 28 to 40 otters.

Change Western Montana (Region 2) quota from 23 to 40 otters.

And increase the quota from 3 to 4 otters per trapper easing their ability to wipe out the otter family are any dispersing juveniles.

River otters are the apex aquatic predator and can only live along healthy watersheds. They are highly sensitive to water pollution being the first to disappear. Loss of habitat is the river otter's greatest threat. As Montana is under statewide emergency drought conditions, temperatures are high, water is low, fires are underway, the river otter is therefore under increasing threat.

**It is biologically, ecologically, and morally reprehensible to increase the wanton killing of river otters, or any creature, especially now, in Montana! Wildlife needs just the opposite!**

River otters are worth far more alive on the landscape and for many, then trapped and destroyed for a pittance and for the selfish few.

Thank you.



10.

[Jane Huff](#)  
[FWP Wildlife](#)

**Subject:** [EXTERNAL] River Otter proposals  
**Date:** Sunday, July 25, 2021 5:57:55 PM

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Again, something alive and bothering nobody and nothing is scheduled to die. To die by trapping is just about the worst thing I can imagine: drowning, being eaten alive while trapped, blood loss to injuries while lingering for possibly days for life to mercifully end.

No, and again, no.

Jane Huff

Helena Montana

11.

[SPICKARD, SARAH A GS-11 USAF USAFE 423 FSS/FSCN](#)

[FWP Wildlife; FWP Commission](#)

[EXTERNAL] River Otter Proposals

Monday, July 26, 2021 8:17:20 AM

Greetings,

During this opportunity for public comments regarding the river otter proposals, I would like to express my dissent to the proposal to allow trappers to kill 50% more river otters in western/northwestern Montana. It is completely incomprehensible to me that anyone would wish to maim or kill any innocent animal, so it seems deplorable that we should be considering an increase in the murder rate, when we should be discussing plans to curtail hunting altogether. There is simply no reason for it, except mindless, monstrous blood lust. In the meantime, the very least your state can do right now is to ensure that hunting rates are not allowed to increase. Animals, plants, habitats, and, indeed, our entire planet, is suffering significantly from irresponsible human activities. It is imperative to value what little wildlife remains and do everything we can to protect it, rather than promote its demise into extinction. It is egregious that the Montana Fish, Wildlife, and Parks (FWP) department, whose name implies it might be the defender of said entities, should advocate for murdering more of the state's amazing wild places and inhabitants. There is no excuse for such militant and cruel proposals as this one. It is barbaric, inhumane, archaic, and has no place in modern society. I have long admired the beauties that lie within Montana, and have visited there in hopes of attending university in Bozeman. I cannot believe there are people, governments, and factions, that actually create complicated, sophisticated agendas to kill and decimate animals and wild places. It is disgusting and must stop. The only thing that needs to die right now is this proposal.

Thank you,

Sarah Spickard

PSC 47 Box 1034

APO, AE 09470

12.

[Lisa Leah Haut](#)

**Subject:** [EXTERNAL] River Otter proposals  
**Date:** Monday, July 26, 2021 10:54:31 AM

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**I am against Montana's proposal to allow trappers to kill ~ 50% more River Otters in Western and Northwestern Montana.**

**It is biologically, ecologically, and morally reprehensible to increase the wanton killing of river otters, or any creature, especially now, in Montana! Wildlife needs just the opposite!**

**River otters are worth far more alive on the landscape and for many, then trapped and destroyed for a pittance and for the selfish few.**

**Sincerely,  
Lisa Haut**

13.

[Kate Geranios](#)

[FWP Wildlife](#)

[EXTERNAL] River otter proposals  
Monday, July 26, 2021 9:10:37 AM

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To Whom it May Concern:

I am writing to you from Missoula, Montana where I have been a resident for 28 years and I am writing in strong opposition to the proposal to increase the quota of trapping of river otters in Regions 1 and 2.

Please do not increase the quota for river otters. It is biologically and ecologically WRONG to increase the killing of these animals who are already threatened due to climate change, current drought conditions, and the fact that they already can be legally trapped. Wildlife need our protection. PLEASE do not increase the quota for river otters!  
Sincerely, Kate Geranios 23 Greenbrier Dr. Missoula, MT 59802

14.

[chrisalbertdvm@aol.com](mailto:chrisalbertdvm@aol.com)

[FWP Wildlife](#)

[EXTERNAL] river otter proposals

**Date:**

Monday, July 26, 2021 6:13:15 AM

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Dear Sirs:

I am writing to request that you do not increase the trapping quota of river otters. During this unprecedented time of heat stress and fires, the population of river otters might well be severely stressed. We do not need to add to that at this time.

Sincerely,

Chris Albert, DVM

15.

[Danielia Lemaich](#)

[FWP Wildlife](#)

[EXTERNAL] River Otter Trapping proposal

Monday, July 26, 2021 11:39:36 AM

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I am from Hamilton, MT.

I am writing to oppose the proposal to increase river otter trapping numbers.

This increase will only 'benefit' a few who want to profit off of Montana wildlife. The health of Montana's waterways and rivers do not need the indiscriminate taking of other wildlife in the process of killing river otters nor are the levels of river otters in MT a nuisance in any way to warrant the increase.

Otters are an integral part of the river ecosystems in MT.

Thank you for your consideration,

Danielia Lemaich

16.

[Marilyn Trenfield](#)

[FWP Wildlife](#)

[EXTERNAL] River Otter

**Date:**

Monday, July 26, 2021 2:21:02 PM

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It is critical that you oppose the increased trapping of river otters in Regions 1 and 2.

Otters are already challenged by drought, high temperatures, and fires.

It would be ecologically and morally irresponsible to increase trapping at this time.

Thank you, Gail Trenfield 30760 Mission Creek Road

St. Ignatius, MT 59865

4067453001 [57pogeno@gmail.com](mailto:57pogeno@gmail.com)

17.

[Eve danner-lentz](#)

[FWP Wildlife](#)

[EXTERNAL] river otters

**Date:**

Saturday, July 24, 2021 10:03:54 PM

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Hello to whom it may concern

Please do not allow more killings of the river otters. People from other places come to see Montana's wildlife and beautiful nature. Not only does more inhumane trapping harm the fragile ecosystem but it also kills and maims animals that are not meant for the traps. We are experiencing the effects of not managing our precious natural gifts, please do not add more trapping to the increasing threats.

Thank you for your time.

Sincerely,

Eve Danner Lentz



18.

[Tricia Etzold](#)  
[FWP Wildlife](#)

**Subject:** [EXTERNAL] Save the river otters  
**Date:** Sunday, July 25, 2021 6:41:53 AM

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We support reducing rather than increasing the river otter trapping quota for Region 1 and 2.  
Please do not raise the quota  
47 Alta Meadow Trail

Tricia Etzold  
**Mobile +1 732 261 1992**  
**tetzold001@gmail.com**

19.

[Jill Kyriakopoulos](#)

[FWP Wildlife](#)

[EXTERNAL] Stop the slaughter of Montana's River otters

Saturday, July 24, 2021 10:36:42 PM

Dear Sirs,

I am writing to you today to ask for your support to stop the slaughter of river otters in your state. Trapping these important animals must not be increased and actually should be greatly reduced. They have an important job in the environment and they are definitely worth more alive than dead.

I am concerned about the direction that Montana is going with regards to its wildlife. I have spent some time in your beautiful state and its wildlife is what draws me there. I feel that wildlife management is going in the wrong direction.

Please do the right thing and protect and cherish your River otters and other magnificent wildlife.

Thank you kindly.

Jill Kyriakopoulos  
150 Palo Verde Cir Sedona AZ 86351

20.

[Linda Turner](#)

[FWP Wildlife](#)

[EXTERNAL] Wolf & river otter legislation

Monday, July 26, 2021 3:46:59 PM

The desire of Montana's legislators to reduce wolf and otter populations to non-sustainable levels through an abundance of pro-trapping laws is unfathomable. Montana boasts of its wilderness as the last, best place. Wilderness is the only habitat available to large predators, critical contributors to a healthy ecosystem (note Sunday's Missoulian review of mustang overpopulation due to loss of predation). If Montana's wildlife are to survive within a wellbalanced ecosystem, these new laws must be revised in favor of all non- human species. I'm certain you've heard several valuable suggestions for favorable changes.

It should be clear to all of you that enjoyment of wildlife is a primary reason for living in Montana. For a few, that means killing wildlife for their heads or hides to hang on the wall. For most of us, that means seeing a herd of elk cross your pasture or hearing a wolf or coyote howl at night. If trappers and the hideous laws they embrace were removed from the equation, a balance between predator and prey would exist as it has for centuries. Current legal trends aim to destroy that balance and in an indiscriminate manner, since traps and snares can catch and kill any living thing.

I plead with you to require restrictions that limit the cruelty and torture to any bird or animal just trying to survive on a rapidly changing planet.

Linda Turner, Ph. D., D.V.M.  
Hamilton

21.

[Dave Pauli](#)  
[FWP Wildlife](#)

[EXTERNAL] wolf , river otter and trapping public comment submission  
Monday, July 26, 2021 2:57:59 PM

From: Dave, Diane & Katie Pauli ( 3 adult voters)  
4235 Zephyr Lane  
Billings, MT 59106  
406-652-3195

I, Dave Pauli, am drafting this letter as a past citizen volunteer on the 1999 and 2019 MFWP trapping advisory committees and a past president of a statewide trapping association. The last legislature while attempting to loosen all trapping and predator protection regulations really did not act in the best interest of our wildlife resources or science backed management.

We ( me, my wife and adult daughter( a UM trained wildlife biologist) ) truly hope the FWP Commission can apply some logic and science to the proposed regulations. Others will bring many sound suggestions to the commission that should probably be supported. But I am going to concentrate on one issue... wolf snares and snaring.

As I stated in legislative testimony the Allowing of using the Bigger wolf cable size , with Bigger loop diameters and set Bigger distances from the ground is going to cause BIGGER problems for all wildlife and livestock. Snaring is a historical poaching tool and snares of any size are non-selective and could quietly kill my dog while I am a few dozen feet away searching for it. But wolf snares can go the same to deer heads or elk and cattle noses. There are a high risk device on the landscape that we simply do not need.

We therefore support the commission on restricting all snares especially on public lands and especially to have a limit on the total number of these cheap devices that a licensed trapper can litter the landscape with. But all the below suggestions would help to minimize and mitigate the problems these aircraft cable devices will inflict to any moving creature.

- > **Prohibit the use of snares on public lands**
- > **Limit the number of snares and leghold traps a trapper can set.**
- > **The commission should designate TRAP FREE Zones on state lands in every District**
- > **Require disclosures and warning signs for traps and snares on block management areas.**

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

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

Thank you... Dave, Diane & Katie Pauli

22.

[Jeff Lonn](#)

[FWP Commission](#)

[EXTERNAL] Comments for June 24th meeting

Wednesday, June 23, 2021 9:10:14 AM

Dear FWC,

I have the following comments on your agenda items for the June 24<sup>th</sup> meeting.

### **Calf Creek**

While FWP addressed some of the many comments submitted, they still have not provided sound science showing that their project will improve wildlife habitat. I think the project should proceed slowly and cautiously to see if their activities really work rather than exacerbating the current knapweed problem, degrading the existing sagebrush-grassland habitat, or impacting the bull trout habitat in the already-impaired Willow Creek. Over 400 acres of commercial logging is still planned, with an excessive 7 miles of roads to be re-opened to accomplish this. In my visits to the project area, I could see no reason why commercial logging was necessary in any of it. Perhaps it is only included so the project can be funded by the Montana Forest Action Plan. Eliminating the commercial components will increase the chances that this project will be successful.

### **Otters**

Apparently, FWC will consider increasing otter trapping quotas. Where is the science behind this? Otters are identified as a sensitive species and are a part of healthy fisheries. Of course, they are also fearsome 25-pound predators. Nonetheless, please vote against increasing otter trapping.

### **Wolves**

Science does not support the measures passed by the Montana legislature to increase wolf and other predator killing. Is there a bigger group of anti-scientists than our politicians in Helena? I am particularly disturbed by the mandate to kill as many wolves as possible. I do a lot of backcountry skiing in the Bitterroot Mountains, and we frequently come across wolf tracks, occasionally hear their howls, and every now and then catch a glimpse of them. To me, these are the things that make living in Montana special. Do we really want to turn Montana into New Jersey? Maybe Greg Gianforte misses it. I'll leave you with the following essay written about Idaho, but that can just as easily be applied to Montana:

### **I Know Who is Scariest than the Big Bad Wolf, Do You?** by SAMANTHA BRUEGGER

*In 2021, following the loss of Endangered Species Act protections, we learned a lot about wolves and fear. In Idaho, wolves used their gigantic teeth to kill all of 0.00428% of the state's beloved cattle and sheep population. Cattle and sheep are so rare in Idaho that there were only 2,730,000 of them remaining in the state at last count. It must be truly devastating to ponder what kind of animal would bite into the flesh of a precious Idahoan cow.*

*In turn, Idaho legislators responded the way that folks, who would most definitely never eat a cow, would respond: they swiftly passed legislation to exterminate 90% of those terrible cattle and sheep eaters with a veto-proof majority. With the wave of his hand, Governor Bill Little signed this legislation, sentencing 90% of the estimated 1,500 wolves in Idaho to death. Night vision hunting is permissible. Gassing or burning wolf families in their dens is permissible, as is aerial gunning and hunting from snowmobiles and all-terrain vehicles.*

*I know who is scarier than the big bad wolf.*

*Wolves are so fearsome that Governor Greg Gianforte of Montana had no choice but to illegally trap*

*and kill one near Yellowstone National Park. Like any leader worth their snuff, Gianforte made sure the citizens of the state were safe from this particular wolf by poaching it. The legislature took note and passed their own set of laws to make it easier for all residents to kill wolves. For all the folks like Gianforte, who view wolf snaring as part of Montana's heritage, it just became legal to enjoy once again in the state. Never mind that it is a particularly inhumane way to kill members of the dog family, whose strong neck muscles cause them to suffocate slowly. Some wolves languish for days in a snares, some wolves attempt to care for trapped or snared family members, not understanding their fate is already sealed. One wolf even birthed her pups under the tree from which her butchered mate was hung.*

*I know who is scarier than the big bad wolf.*

*Beyond Montana and Idaho, states are ensuring that vicious wolves are permanently disposed of. After all, wolves do all sorts of unimaginable things. In the Colville National Forest, prime cattle habitat on public lands has ruined by wolves. Fortunately, the state of Washington killed 31 publicly owned wild wolves, on publicly held national forest, to ensure that privately held cattle don't need to worry about wolves roaming the woods. Other states have taken measures to ensure there are plenty of ways to keep non-native cattle safe on public lands. For example, it is legal to kill a wolf by chasing it to exhaustion with a snowmobile and then running over it repeatedly in Wyoming. In Wisconsin, 218 wolves were killed over a two-day period, after being pursued relentlessly by hunters who used teams of dogs to run them down. Meanwhile, conservative lobbying groups, including the National Rifle Association and Safari Club International, successfully filed to intervene in a lawsuit by conservation groups—including WildEarth Guardians—to return federal protection to wolves. The NRA must understand that wolves pose an imminent threat to humanity. Of course, it doesn't hurt that you need guns to kill wolves and use their bodies as trophies at the next Safari Club brunch.*

*Yes, I know who is scarier than the big bad wolf.*

*I am afraid. You should be too. Violent people who are afraid of what they cannot understand, or what they cannot control, are making choices from positions of power. It is scary. One only needs to spend a little time on social media to see that the people who hate wolves, also extend their hatred to other things they cannot understand. Civil protests, queer culture, and vaccines to name a few. You should be concerned about wolves. The NRA is. Even the Koch brothers know this issue is bigger than wolves, they are tied to funding the lawsuit that compelled the wolf slaughter in Wisconsin.*

*If you are staying silent hoping the wolf issue will pass, don't worry, it will. When all the wolves are gone, the wolf issue will be over. Then we will be left in a country that took silence as complacency. What species will be next? That day will be far scarier than the big bad wolf.*

While I've tried to put some humor in these comments, I hope you will consider them seriously.

Sincerely,

Jeff Lonn

Hamilton, Montana



23.

[Jen Nitz](#)  
[FWP Commission](#)

**Subject:** [EXTERNAL] F & W Commission Meeting Comments  
**Date:** Tuesday, June 22, 2021 1:25:54 PM

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I am writing to provide public comments for the Fish and Wildlife Commission meeting.

Wolf trapping and snaring season should not be expanded; it would put grizzly bears, lynx, all non-target wildlife and our companion animals at greater risk. FWP acknowledges there will be more killing of non-target animals, including livestock and pets.

Unlimited wolf killing is not supported by science or facts; it is an uneducated desire to destroy a keystone species.

Snares should be illegal on our shared lands; they inflict an unnecessary amount of pain and prolonged suffering for anyone trapped in them. They are inexpensive, so with the increase in availability, many more will be set near trails and on game trails. Wolf snares will lead to an increase of fatalities of family pets and non-target wildlife.

Night hunting would lead to an increase in nontarget hits including people and livestock.

Elk and Deer populations are at record levels, coinciding with the wolves returning and restoring the land. Motorized sportsmen claim all the elk are gone, educate them that game numbers in all parts of the state are at record highs or at least increased. In 1995 when wolves were reintroduced to Yellowstone, there were 109,500 elk in Montana. In 2020 there were 136,000 elk, 25 percent over objective.

Predators cause less than one percent of livestock fatalities, yet for compensation, ranchers receive three times the value of any cattle or sheep killed by predators.

Trapping does not belong on our public lands; it is destructive to the ecosystem, cruel, and endangers public safety. Less than 1% of our population are trappers, yet they are allowed threaten our safety on public lands. Montana's greatest treasure is its wildlife, but traps and snares kill indiscriminately, destroying the health and beauty of our diverse lands and undermining our important tourist-based economy.

River Otters are a US Forest Service "Sensitive Species" and are listed on Appendix 11 CITES endangered species list. There should not be a trapping season on a species classified as sensitive and endangered. Otters are a species with a slow reproduction rate. The pelt brings just \$20-30, therefore it costs more to trap an otter than the pelt's value. [https://urldefense.com/v3/https://www.telegram.com/news/20200413/outdoors-these-times-are-tough-fortrappers\\_!!GaaboA!9zf3J67PidDHqFjO5jvR2icyxeWDKHO2dvT5Ih2ECgnzuAq0oYaPu1J\\_qNu0sBIS](https://urldefense.com/v3/https://www.telegram.com/news/20200413/outdoors-these-times-are-tough-fortrappers_!!GaaboA!9zf3J67PidDHqFjO5jvR2icyxeWDKHO2dvT5Ih2ECgnzuAq0oYaPu1J_qNu0sBIS)

Fish, Wildlife and Parks states that no one knows how many otters are in Montana. No one knows when they breed, but probably in the spring every 2 to 3 years. Otters are frequently killed in beaver traps, and listed as endangered by CITES. It takes eight months for the young to be independent, which would be at the end of November or early December, trapping starts Nov. 1 and goes for almost half a year, trapping would begin before the young are on their own. Too much collateral damage occurs when an otter is trapped, a lot of young otters starve to death, in addition to those trapped.

Raising the quota on otters is shortsighted, especially when relying on anecdotal evidence from self-interested parties. Trapping river otters should be suspended for a decade to allow reproduction and a sustainable population. Consider lowering, not raising the quota for the otters', and for the majority who want to see them play in our waters.

Jennifer Nitz  
Missoula, MT

24.

[Kate Davis](#)

[FWP Commission](#)

**Cc:** [FWPDistrict1@gmail.com](mailto:FWPDistrict1@gmail.com)

**Subject:** [EXTERNAL] June 24 meeting comments

**Date:** Tuesday, June 22, 2021 2:27:31 PM

**Attachments:** [FWCommission letter.docx](#)

[ATT00001.htm](#)

[ATT00002.htm](#)

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To: Montana Fish and Wildlife Commission

I am very troubled, regarding the accelerated war on predators courtesy Gianforte and his friends in the Fish and Wildlife Commission. I have to keep reminding myself that it's the year 2021 and not 100 years prior, with the mentality driving this genocide. Trappers should go the way of milkmen and encyclopedia salesmen, vocations of the past, no longer a place in this day and age. Mercifully trappers are a very tiny minority of "sportsmen" and it's a wonder how they believe they can dictate who lives and dies across the landscape.

For thirty-three years I have been educating children and adults about the roles of predators in the environment, a delicate balance for birds of prey. I don't see any science in these new proposals, just a vindictive death sentence for all. Snares and bounties? Night hunting for any predator? Killing more otters? *What year is this again?*

This is not the message for our young people in this state. We owe it to them to show responsibility and insight. Theoretically, we should have grown up by now to not repeat mistakes we made, as well as those made long before us.

Sincerely,



Kate Davis  
Executive Director  
Raptors of the Rockies  
raptors@montana.com

25.

[TIM Wetherill](#)

[FWP Wildlife](#)

**Subject:** [EXTERNAL] Otter Trapping

**Date:** Tuesday, June 29, 2021 6:21:30 PM

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Please consider my strong opposition to otter trapping. Trapping is an inhumane method of destroying one of Montana's valuable natural resources thank you

Tim Wetherill MD  
Helena MT

26.

[M Sto](#)

[FWPDistrict1@gmail.com](mailto:FWPDistrict1@gmail.com); [FWPDistrict2@gmail.com](mailto:FWPDistrict2@gmail.com); [FWPDistrict3@gmail.com](mailto:FWPDistrict3@gmail.com); [FWPDistrict4@gmail.com](mailto:FWPDistrict4@gmail.com);  
[FWPDistrict5@gmail.com](mailto:FWPDistrict5@gmail.com)

**Cc:**

[FWP Commission](#)

**Subject:**

[EXTERNAL] Otterly Ludicrous

**Date:**

Monday, June 21, 2021 3:57:29 PM

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Dear Pat T., Pat B., KC, Lesley, & Brian:

After reading the proposed changes to wildlife mgmt and the supporting documentation on the agenda for June 24th mtg, here are my comments/feedback on the furbearers. I only hope you will actually read them with an open mind, as I have extended the same courtesy to you. Thank you.

Regarding quota changes for otters (Reg 1):

Why is the proposed change necessary? FWP answer:

*"A change in the harvest regulation for otters is **not necessary**; however, anecdotal information suggests that we could increase harvest without negatively impacting the otter population in Region 1. Currently, we have no evidence of overharvest, and more opportunity for harvest **may** exist. "*

My comment: So...my understanding is that this proposal is based entirely on anecdotal information without any hard scientific data from population surveys to corroborate it.

What is the current population status in relation to mgmt objectives? FWP answer:

*"Although we do not formally survey river otters, anecdotal information suggests that otters are relatively abundant across the region."*

My comment: So...my understanding is that this proposal is based entirely on anecdotal information without any hard scientific data from population surveys to corroborate it.

Describe the contacts you made with public organizations, landowners, and sportsmen.

FWP answer:

*"This proposal is a result of a joint meeting of Montana FWP, The Montana Trapper's Association (MTA), Montana Fur Harvester's (MFH), and trappers unaffiliated with either organization. This proposal was supported by both associations."*

My comment: So....you only sought out the opinion of the trapper side of the issue and there are no dissenting opinions from the other side? Further evidence that FWP has a history of being pro-trapping and now has a governor who has made a \$10k charitable donation to MTA (no conflict of interest there).

The Region 2 supporting document, prepared by Mike Thompson, is so thin and unprofessional that it does not deserve a response. Have you read it? You are essentially admitting that the only reason you'd like to increase harvest quota is because every year you have met your quota # before the end of season. And if "Public Satisfaction" is one of your markers for success, has this truly been achieved?

Mercifully, I will stop my commentary at otters. I see no reason to continue with every other species on the agenda as you can plainly see where this is going. I will never understand how the wishes of a fraction of 1% of Montana's population (trappers) get to

set the rules and regs for a larger population of folks who realize that trapping, a cruel barbaric 18th century "recreation" that indiscriminately kills many non-target species, is a dying industry whose economics are no longer viable. I suppose it pays to know the right people (Bob Brown/Paul Fielder). I naively believed that the mandate for your agency was to conserve and protect fish and wildlife species from exploitation. But it has become clear that the agency prefers to coddle the hunting and trapping industries and to provide vague anecdotal information to intentionally misrepresent the facts on the ground. If there existed evidence-based science that would back up your claims, I would not be so opposed to your proposed changes. But there simply is not. I only see self-serving soft science to justify self-interested parties.

I extend apologies for my failures at providing feedback while remaining polite. Trapping is a mercurial issue and its extremely difficult to maintain civil discourse while excluding all snarky comments. Yours is a difficult job to administrate and the true focus of my disappointment lies in the agency-wide failure (or lack of will) to protect species. For decades, the deck has been stacked against wildlife and they continue to be exploited by an extreme minority who happen to hold influential roles in Helena.

Respectfully,

Michael Stoerger

27.

**To:** [Kathy H](#)  
[FWP Commission](#)  
**Subject:** [EXTERNAL] Please lower quota on river otters  
**Date:** Monday, June 21, 2021 10:26:59 PM

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Dear Mr. Tabor, Mr. Byorth, Mr. Walsh, Ms. Robinson, and Mr. Cebull,

I am flabbergasted that river otters are trapped in Montana at all. Otters are a sensitive species. The FWP does not know how many otters we have in Montana. Otters can be trapped before the young are independent. Therefore, if a parent is trapped, the young starve. This means the trapping of one otter can kill multiple otters. Otters are already unintentionally killed in beaver traps. Finally, otter pelts bring very little monetary reward. They are not worth trapping.

I support fair-chase, scientifically based hunting. This is not fair chase and it is not scientifically based. Frankly, as a biologist, I can't see what it is based upon. Please lower, DO NOT RAISE, the trapping quota for otters.

Sincerely,

Katherine Heffernan  
3851 Duncan Drive  
Missoula, MT 59802  
406-552-5350



28.

[Jerome Walker](#)  
[FWP Commission](#)

**Subject:** [EXTERNAL] Proposed new hunting and trapping laws **Date:**  
Sunday, June 20, 2021 9:53:57 AM

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Dear Commissioners,

I'm a physician who moved to Montana in order to enjoy during retirement the recreational opportunities, beauty, and wildlife of my new adopted state. Before deciding to move here I had come to Montana many times as a tourist. Like most tourists, I was attracted by not only the exceptional beauty of our state but also the incredibly rich variety of animals who live in the state, which is no longer the case in my home state of Georgia and most other states. Having grown up on a farm, I was also attracted to the idea of living in a state whose economy is based on the twin pillars of agriculture and tourism. We must not make the mistake of putting one of these pillars — tourism -- at risk.

Unfortunately, some of the proposed changes in hunting and trapping in Montana would do just that. The negative reaction to these proposed changes has been widespread, even including a recent article in The Economist, a financial magazine published in England! Our state doesn't need this kind of negative publicity. The vast majority of the public outside Montana, and probably inside Montana as well, likes the idea of living in a place that people share with wild animals, and where there are opportunities to actually see many of these animals. This is one of the treasures of Montana that we must not take for granted. Current proposals put these concepts at risk. As you know, there was a great negative hue and cry from many when wolves were introduced into Yellowstone in 1995, yet elk numbers in Montana are now up 25% as of last year compared to 1995. Despite the complaints of ranchers, predators cause less than 1% of livestock fatalities and ranchers are generously compensated for any losses sustained in this way. The proposal to allow hunting of wolves at night is a really bad idea, which puts both people and livestock at risk. Snares and traps on public land are another dangerous idea. I enjoy very much hiking on public land with my yellow Lab, and shudder to think she might be harmed by a trap or snare. These devices also put livestock pastured on public land and other non-target animals at risk. The safety of the public, not trapping, should be the first concern of public officials. Targeting bears with hounds is not sportsmanlike and should not be allowed, and for the same reason bounties on wolves or baiting of wolves is an insult to the very idea of sportsmanship.

Another proposal I oppose is to raise the quota on river otters. Most folks enjoy watching them play in our waters and, if anything, it would be better to lower the quota. Trappers make up a tiny minority of Montanans and shouldn't be allowed to dictate to the majority of citizens who value our rich wildlife heritage, as well as the jobs and money that come with the tourists they attract. Thank you for taking my views into consideration.

Respectfully, Jerome Walker, MD

29.

[marianne ewing](#)

**To:**

[FWP Wildlife](#)

**Subject:**

[EXTERNAL] proposed trapping issue. i am writing to say your trapping issues arebazarre and say very little civilized attitudes. i will never return to your state if your laws are not changed. NO TRAppING OF ANYBODY

**Date:**

Monday, June 28, 2021 6:51:22 PM

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30.

[Lara Birkes](#)

[FWP Commission](#); [FWPDistrict1@gmail.com](#); [FWPDistrict2@gmail.com](#); [FWPDistrict3@gmail.com](#);  
[FWPDistrict4@gmail.com](#); [FWPDistrict5@gmail.com](#)

**Subject:** [EXTERNAL] PUBLIC COMMENT: 2021 Yellowstone Wolf Quotas et al **Date:** Thursday, June 24, 2021 10:48:12 AM

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Dear Montana FWP Commissioners,

As a Park County resident with family ties to Paradise Valley dating back to the late 1800's, I write to advocate on behalf of Montana's wildlife heritage.

As the Commission considers implementation of the anti-wildlife legislation passed in the recent legislative session today, I urge you to consider the widespread, diverse, strong and credible opposition to these unnecessary measures.

In addition to the points outlined below, please consider the increasing trend toward holistic landscape stewardship in the Greater Yellowstone Ecosystem (GYE) and beyond. Impressive strides have been made by innovators across Montana to consider ways to farm and ranch alongside wolves, grizzly bears and bison alike. From electric fencing and fladry around calving pastures, to range riding and corralling herds at dusk & dawn, carcass management, wildlife tracking, and increasingly the use of technology to detect stressed livestock or allow for the timely detection of a carcass. There is incredible opportunity for Montana in regenerative practices which include predator coexistence.

As citizens and lawmakers we are tasked with considering the policies and practices which will carry us into the future. Those realities cannot be grounded in snaring and trapping wolves, placing bounties on a hunt and allowing them at night, loosening stipulations for killing grizzly bears, limiting their relocation and hounding black bears. These laws do not represent the majority of Montana values and have clearly been proposed by a small group of special interests, creating barriers to responsible management, potentially resulting in Endangered Species Act re-listing, while also harming Montana's economy.

Key points to consider:

- There should be **no expansion of the wolf trapping and snaring season**; it puts grizzly bears, lynx, all non-target wildlife and our companion animals at greater risk. Even FWP acknowledges there

will be more killing of non-target animals including livestock and pets.

- **• Snares have no place on our lands**; they are dangerous and
- real torture for wildlife. They are inexpensive, so many more will be set near trails and on game trails. Wolf snares will lead to many more fatalities of family pets and non-target wildlife. **Night hunting endangers people and livestock.**

**Elk and Deer numbers are at record levels**, increasing after wolves returned and revitalized the land. Motorized sportsmen will claim all the elk are gone, so make clear that game numbers in all parts of the state are at record highs or slightly increased. In 1995 when wolves were reintroduced to Yellowstone, there were 109,500 elk in Montana. In 2020 there were 136,000 elk, 25 percent over objective!

- **Predators cause less than one percent of livestock fatalities.**

For compensation, **ranchers receive three times the value** of any cattle or sheep killed by predators.

- **Trapping has no place on our public lands**; it's destructive to the ecosystem, cruel and **endangers public safety, which should be the number one concern of all public officials.** It
- is **wrong for less than 1% of our population, trappers, to control our public lands** and threaten our safety.
- Unlimited wolf killing is **not supported by science or facts**; it is a misguided desire to destroy a keystone species.
- **Montana's greatest treasure is its wildlife**, but traps and snares kill indiscriminately, destroying the health and beauty of our diverse lands and undermining our important tourist-based economy.
- River Otters are a US Forest Service "**Sensitive Species**" and are listed on Appendix 11 CITES **endangered species list**. Why is there a trapping season on a species classified as sensitive and endangered? A species with a slow reproduction rate.
- Fish, Wildlife and Parks states that **no one knows how many otters are in Montana**. No one knows when they breed, but probably in the spring every 2 to 3 years. It takes 8 months for the young to exist on their own. Otters are frequently killed in beaver traps.

The challenge before us as Montanans is how to adapt, to create laws with the next generation in mind by taking a long view on responsible wildlife management. It is possible to recognize our history while designing for the realities of the future, and this includes our relationship with the large species which have defined the backdrop of the American West for millennia.

Thank you for your consideration and service.

Respectfully,

Lara Birkes  
31 Deep Creek Rd South Fork  
Livingston, MT 59047

31.

[Sarah Stewart](#)

[FWP Commission](#); [FWPDistrict1@gmail.com](#); [FWPDistrict3@gmail.com](#); [FWPDistrict4@gmail.com](#); [FWPDistrict5@gmail.com](#)

**Subject:** [EXTERNAL] Public comments as part of the Fish and Wildlife Commission Meeting on Zoom on June 24, 2021  
**Date:** Monday, June 21, 2021 6:52:16 PM

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Our overall opinion as residents of Montana is that we are strongly opposed to using our wildlife as a commodity and moreover as though they were not capable of feeling pain and suffering as they are very most certainly are.

In addition, we have the following set of opinions and would like them taken in, with above statement, as public comments as part of the Fish and Wildlife Commission Meeting on Zoom on June 24, 2021:

- There shouldn't be any increase of the wolf trapping and snaring season, both because it is a bad way to kill any animal and it will kill any animal many, many non-target animals. In addition, trapping is dangerous for people as well and their pets and should not be increased or be on public lands at all. Many people, pets, domestic and wild animals are on public lands. Snares and traps are dangerous and cruel to everyone. Snaring shouldn't even be allowed at all. It is cruel. I think that the dangers to innocent people and pets with trapping should make it obvious that it shouldn't take place on our public lands.
- Elk and Deer numbers are at very high levels and went up after wolves were reintroduced and revitalized the land. This is a recorded fact - In 1995 when wolves were reintroduced to Yellowstone, there were 109,500 elk in Montana. In 2020 there were 136,000 elk, 25 percent over objective. The elk and deer population is fine with wolves around as they are and have been for the last number of years, clearly!
- Night hunting is a dangerous practice and is dangerous to everyone, human and animals. It shouldn't be allowed.
- Another fact is that wolves kill less than 1% of livestock and people can be paid for that damage and this can be managed without these trapping expansions.
- Wolves are loved by many in Montana and the United States as a whole and are a national treasure which causes high tourism for viewing. - Baiting wolves encourages them onto property where we don't want them and is dangerous and unsportsmanlike.

It just seems like that there is a drive to hunt, trap and destroy wolves that isn't based on science, rational clear factual reasons and seems like a vendetta rather than common sense. We don't really understand this goal of wolf killing and studies bear out that the vast majority of both Montanans and people elsewhere really enjoy live wolves and that wolves have not hurt the overall ecosystem and where they do (1%) damage livestock there are sensible ways to address this. Wolves have been overall

good for the land and other wildlife and ecosystem and for tourist money to Montana. Please let us stop this emotional war on wolves and proceed with thoughtfulness and caution for human and animal safety and care.

- In addition, we are opposed to raising trapping quotas for other animals besides wolves. In particular river otters which breed slowly, are a much needed and "sensitive species" (US Forest Service), listed generally as endangered, and do not even bring in money to the trapper to cover the costs of trapping. We don't understand raising the quota on these animals.

Why and what is the rationale not based on self-interested circular reason? Could more thoughtful actual, factual evidence be produced before increasing trapping of otters, please?

Thank you for your attention to our comments.

Sincerely, The Stewart Family, PO Box 143, Gardiner, Montana, 59030

32.

[Shannon Thomas](#)

[FWP Commission](#)

[EXTERNAL] Public Comments for June 24th Agenda Items

Monday, June 21, 2021 6:22:11 PM

>

>

> To whom it may concern,

>

> I am writing this email as public comment on several agenda items for the June 24th meeting.

>

> Montana's economy relies on tourism. A huge part of the draw is the wildlife in this state. Recent legislative changes to benefit 1% of this state's population, trappers, will create numerous potential dangers on public lands that belong to all Montanans.

>

> #1. Expansion of the trapping season and allowing snares puts non-target wildlife and pets in danger on public lands. Snares are cheap, and will likely be set in greater numbers near trails and game trails- places where the public visits. They kill indiscriminately and torturously. When Fish Wildlife and Parks admits this will lead to increases in livestock and pet deaths, it becomes clear this should simply not be allowed.

>

> #2. Unlimited killing of wolves ignores science. Predation accounts for less than one percent of livestock losses and ranchers receive three times that value for compensation. Elk and deer numbers in our state are at record levels. Elk have risen by 25% since the reintroduction of wolves in the Greater Yellowstone area. Night hunting of wolves, again, is a danger to people and livestock.

>

> #3. River otters are listed as a sensitive species. They have a slow reproductive rate and the cost to trap an otter usually exceeds the pelt value. Why are we even considering expanding trapping of a sensitive species in this state?

>

> Please follow the science and not partisan politics to benefit a small segment of Montana's population. My family deserves to use public lands and resources and with recommendations based on safety for all.

>

> Sincerely,

> Shannon Kinsella Thomas

> Helena, MT 59602



33.

[Bev Beck Glueckert](#)

[FWP Commission](#)

[EXTERNAL] Re: upcoming meeting  
Thursday, June 24, 2021 8:07:28 AM

**Dear Mr. Tabor, Mr. Byorth, Mr. Walsh, Ms Robinson, and Mr. Cebull,**

I would like to add my voice- my opposition to raising the quota for trapping river otters. River otters are a sensitive species. FWP has stated that it does not know how many river otters are in Montana. Please lower or suspend the quota on river otters.

And please do not allow snares on public lands. Snares indiscriminately trap all animals, including endangered or sensitive species, pets, and livestock. Snares torture as they kill. Snares are not fair chase.

All of the recent focus on boosting trapping efforts is really concerning and depressing. Trapping is not a "sport"- there is no fair chase. The recent episode of the trapping of a collared research wolf and keeping it alive until a VIP could "harvest" it, then boast about it, is truly horrid. This is how others start to view our state. We should; be taking advantage of the huge array of wildlife we have here and how we can best manage it according to the biology and science. Instead we seem to be focused on helping outfitters and trappers make a profit with their killing.

Lastly, please do not allow hunting wolves at night. Night hunting is dangerous to people and livestock. There is a reason why it has been illegal for so long.

Thank you for your time an consideration,

Beverly Beck Glueckert  
636 Toole Ave  
Missoula, MT 59802

34.

[Kari I Gunderson](#)

[FWP Commission](#)

[EXTERNAL] River Otter Public Comments

Thursday, June 24, 2021 12:46:59 PM

To whom it may concern,

I am a third generation Montanan who grew up on a dryland grain farm in north central Montana. Our farm is still in the family and I am the farm corporation President. I've lived in the Swan Valley since 1978 and worked as a wilderness ranger in the Mission Mountains Wilderness for 35 seasons. I am writing to oppose raising the trapping quota for river otters.

River otters are a US Forest Service "Sensitive Species" and are listed on the CITIES endangered species list. Why is there a trapping a season on species classified as sensitive and endangered, much less a proposal to RAISE the trapping quota on otters?

Why is it that 1% of our population, trappers in Montana, control our public lands and threaten our safety? The majority of Montanans (99%) who want to be able to safely take their families and pets out on PUBLIC Land to recreate, but will be severely hindered & frightened by traps in the public lands they want to recreate in? How can the otter trapping quota be raised when the decision is not science-based but rather based on anecdotal evidence from self-interested parties? This smacks of partisan politics that favor trappers over the other 99% of Montanans who want to safely recreate on our public lands.

The politically appointed director of FWP thinks we have enough science to base these misguided policies on and has turned his back on all the contributions from wildlife biology students at MSU-Bozeman and UM-Missoula. We can NEVER have enough science to help make the best wildlie-related decisions. I know many career FWP employees whose morale has bottomed out due to the partisan political decisions being made under Mr. Gianforte and the Republican-controlled legislature. Montana's greatest asset is our wildlife and laws that passed in the 20201 legislature will kill animals indiscriminately and diminish the health and beauty of our diverse lands.

Thank you for your consideration.

Sincerely,

Kari Gunderson, PhD. Swan Valley, MT

35.

[Steve Bert](#)

[FWP Commission](#)

[EXTERNAL] Trapping in Montana

**Date:**

Thursday, June 24, 2021 2:49:09 PM

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I just hope your commission can be independent and consider wildlife first—not the Governor & his own self interest.

Wildlife, including wolves, bears, otters, etc. are a part of natural balance in Montana. Friends, family & tourists value much more than a few sheep or cattle lost. —Hikers, pets...people should not ever need to encounter open, baited traps on any of our public lands. As a landowner adjacent to Wilderness... it is an encroachment on our rights to move freely. Trapping to me is very evil—a coward's way to catch or torture. Please stop the madness & thank you for considering!

Hopefully,

Steve Bert

Rattlesnake area, Missoula.

36.

[TIM Wetherill](#)

[FWP Wildlife](#)

[EXTERNAL] trapping setbacks

**Date:**

Tuesday, June 29, 2021 6:27:18 PM

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Please consider my strong opposition to all trapping and trapping setback limitations. My family has ceased hiking on the Continental Divide Trail and other trails in and around Helena due to the risk of losing our dogs to traps. We have allowed one of the nation's greatest assets, our open public lands, to be held hostage by this unnecessary risk to the public. I understand and respect that trapping has a long tradition in this country but the current utilisation of public lands by non trappers far outweighs the interest in trapping. thank you

Tim Wetherill MD

Helena MT

37.

[Sandy Prantl](#)

[FWP Commission](#)

[EXTERNAL] Wildlife protection

Sunday, June 20, 2021 12:29:40 PM

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Please protect the precious wildlife currently threatened by the new laws that allow baiting, snaring and night shooting of wolves, a four week longer wolf trapping and sharing season, bounties up to \$1,000 on wolves killed and unlimited kills on one license. Gov. Gianforte's proposed changes, at best show a lack of understanding of the workings of an ecosystem and at worst are reflective of a soul less, killing for no reason psychopath. Also, please protect the river otters.

In case you are not aware, people travel to your state to see wildlife. I for one, will not spend one thin dime in your state as long as these sadistic practices are in effect.

C'mon man! Do the right thing. Save wildlife, save wilderness. Once they are gone, they are gone.  
Sandy Prantl Cincinnati, OH

38.

[Meglana Wahrlich](#)

[FWP Wildlife](#)

[EXTERNAL] Wolf and otter management proposals - comment

Tuesday, June 29, 2021 11:59:34 PM

Dear Commissioners,

I live in Billings, and I am writing you today because i am getting increasingly worried about the new proposals for wolf management options and other proposals for wildlife management.

My family loves the Montana outdoors, wildlife, hiking and exploring our Montana public lands.

I follow closely and it is very disturbing to see all of these newly proposed wolf and other fur animal management changes. I find the use of snares and traps horrific. Not only does it make me nervous about exploring public lands, i've read about numerous stories of people's dogs getting caught in them and dying, and also it is such a slow painful way and also non-selective way to try and exterminate these animals. As somebody who appreciates Montana for it's beauty, our unique and deverse wildlife, i don't consider this true wildlife management.

I don't understand why we are increasing trapping quotas, trapping season and the use of such barbaric methods, when this only goes against what science tells us, when this is destructive for many species and poses risks to public safety. And unlimited kills on one license??

Majority of us Montanas would rather see those in the wild, well and thriving for our enjoyment. These wildlife "management" proposals only benefit few in Montana who definitely don't have wildlife management in mind. The purpose of their trapping is something else but it's not wildlife management.

I ask you kindly to consider the actual statistics, science and scientific evidence and the voices of those who appreciate our beautiful state and understand how valuable our wildlife resources are.

Thank you,

Meglana

39.

[Ann Lauer](#)

[FWP Commission](#)

[EXTERNAL] wolf and otter trapping

Thursday, June 24, 2021 10:33:47 AM

Dear commissioners,

We feel strongly about the following points and hope you will consider these when reviewing the regulations on trapping wolves and otters.

- There should be no trapping on public lands because it is a great danger to hikers and their pets. How can the public have any idea where it is safe to hike?
- Snares should be illegal. They are a tortuous death and a huge danger to pets and non target wildlife.
- Eliminate the danger of night hunting.
- Since ranchers receive 3 times the value of any cattle or sheep killed by predators and predators cause less than 1% of livestock fatalities, this war on predators must stop. New rules will create an all out slaughter of wolves.
- River otters as considered a “sensitive” species, have a low reproduction rate and should not be trapped at all.

Thank you.

Ann Lauer  
4974 Prospector Gulch  
Helena, MT 59601  
406044302694

40.

[bjhoy@localnet.com](mailto:bjhoy@localnet.com)

[FWP Commission](#)

[EXTERNAL] Wolves, bears and otters

Sunday, June 20, 2021 8:34:28 PM

Dear Commissioner Byorth,

I am strongly opposed to you allowing the new laws on the killing of wolves and bears to take effect. If the horrible inhumane proposals are put into effect, all the work and progress on wolf reintroduction will be undone and wolves will go back to being endangered or extinct. Bear cubs will be orphaned and die from starvation when the mothers are chased by dogs and this is totally unacceptable. The long-term killing of wolves that is being proposed is unsustainable as you well know. The proposed trapping and snaring for months on end will kill untold numbers of pets and other wildlife, including federally protected birds. Shooting wildlife at night is not ethical hunting and is very dangerous. The methods of killing game animals passed by the Montana legislature to kill wolves and bears are not fair chase hunting and should be banned everywhere in the United States. These despicable actions will give Montana a bad name and affect the millions of dollars Montanan's receive from tourism.

All the studies and books on elk, mule deer, white-tailed deer and other wild grazing animals state that wolves did not cause and are not currently causing wild ruminant declines. Insecticides, herbicides and fungicides used by the farmers and ranchers who complain about wolves and own livestock have caused millions of cattle, sheep, goats and other domestic grazing animals to die each year. That is based on peer-reviewed studies of what herbicides and insecticides do to do to all grazing animals and especially their young. Wolves have only killed a few hundred. I have attached a link to an article about an important study done in South Dakota and published in Nature that showed what an insecticide, imidacloprid did to exposed white-tailed deer adults and fawns.

[https://urldefense.com/v3/\\_https://www.scientificamerican.com/article/as-pesticide-turns-up-in-more-placessafety-concerns-mount/?redirect=1\\_!!GaaboA!9lmeSzUpMGlgMIHPzzz-F3VIHpgpBzAsRs9EfuGqvgLsDmCmM1aeHgMppBt5bg\\$](https://urldefense.com/v3/_https://www.scientificamerican.com/article/as-pesticide-turns-up-in-more-placessafety-concerns-mount/?redirect=1_!!GaaboA!9lmeSzUpMGlgMIHPzzz-F3VIHpgpBzAsRs9EfuGqvgLsDmCmM1aeHgMppBt5bg$)

That study was based on two studies done on wild and domestic grazing animals in western Montana, which were shared with MDFWP in 2002 and 2011. The new study was brought to the attention of MDFWP personnel as soon as it was published, but no one did anything to save the wildlife, which is supposed to be MDFWP's primary job according to Montana's Constitution.

Interestingly, livestock owners are paid for their losses when their livestock is killed by wolves or bears. However, they are not paid when they themselves or their neighbors kill livestock with pesticide exposure. Why must the wolves and bears be punished with an unethical, nonsporting death for killing a few head of livestock, but the people who



kill millions of animals, wild and domestic and including newborn humans are not punished or even made to stop? Why do you think so many children were born with missing limbs, exposed intestines or exposed spine, Downs Syndrome, autism and heart defects since 1994? That was the year when imidacloprid was first used. Beginning the next year, in spring of 1995 and each year since, the use of imidacloprid has gone up. Not likely a coincidence, a high prevalence of newborn mammals (including human newborns) have had serious health issues, including the above mentioned birth defects, beginning in spring of 1995 and continuing through the present. None of that was the fault of the wolves, it was the fault of all the people who made, sold and used the chemicals that caused those serious health issues in mammals, especially grazing animals, as well as other vertebrate species.

I have had two different people call me this spring because they found what they thought was an abandoned white-tailed deer fawn. Since no dead female deer was anywhere near where the fawn was found, I told the people to put the fawns in a safe place near where it was found, so the mothers could care for them. I asked both parties to lift the lips of the fawn and check for an underbite, explaining how to tell an underbite from a normal bite. Both were aware of what an underbite was and both said the fawn they had did have an underbite. That is two for two.

It seems that if ordinary people can so easily see an underbite on a fawn, a trained wildlife biologist should be able to see an underbite. However, for some weird reason, the last person in the Helena MDFWP office with whom I communicated concerning underbite and overbite on big game animals stated emphatically that the MDFWP biologists were not seeing any deer, elk or other big game animals with such birth defects. He also stated that he considered what the South Dakota researchers called an underbite or an overbite in their study to be a "normal variation." All veterinarians, medical books, biology books and veterinarian websites on the Internet state that underbite or overbite, are serious birth defects, especially on grazing animals and most especially on domestic livestock. Thus, it appears to be the high prevalence of birth defects and the consequential health issues related to pesticide exposure that have contributed to the declines in wild grazing animals, not predation. Predators clean up our messes.

My website which has all of our studies concerning wildlife, the South Dakota study published in Nature and multiple photo documents showing what the birth defects look like and what normal looks like for big game animals, birds and rodents. It is ([https://urldefense.com/v3/http://www.judyhoy.com/!!GaaboA!9lmeSzUpMGIgMIHPz zzF3VIHpgpBzAsRs9EfuGqv-gLsDmCmM1aeHgMiL4i0Iw\\$](https://urldefense.com/v3/http://www.judyhoy.com/!!GaaboA!9lmeSzUpMGIgMIHPz zzF3VIHpgpBzAsRs9EfuGqv-gLsDmCmM1aeHgMiL4i0Iw$) ). Scroll down to PDFs to Download and click on that. The last four studies were studies I helped with, including the two studies on which the SD study was based. The SD study is included in the PDFs.

River otters are already low in population in Montana. River otters do no damage to humans, so there is no logical reason to inhumanely kill more otters each year. In fact, no river otters should be killed. Wildlife lovers and wildlife photographers love to see and photograph river otters. They are far more valuable alive than dying horribly in a

trap. Please continue protecting Montana's adorable and interesting river otters so future children will be able to see them. They are a very fun animal to watch alive, but not much good to anyone when they are dead.

Thank you for your consideration of my concerns. At the rate that some animals such as insects, birds and amphibians are declining, the biodiversity of wildlife and their contribution to the ecosystems on which we humans depend will soon be seriously threatened. Please do everything you can to slow this, rather than contributing to the extinctions.

Sincerely,  
Judy Hoy  
Stevensville, MT 59870

41.

**From:** [po\\_hall](#)  
**To:** [FWP Wildlife](#)  
**Subject:** [EXTERNAL] wolves, trapping  
**Date:** Thursday, June 24, 2021 12:03:49 PM

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hopefully, wolves, bears, mountain lions, lynx, and all the other wild animals in Montana can be protected from trophy hunters, and trappers who seem to not understand how much the wildlife means to most people in our state, or how important wildlife is to the diversity and health of the entire planet. the relationship between humans and wildlife is out of balance because too many humans treat wildlife as if it's here for their "sport." it is important to give wildlife space and time to maintain their populations and well being so all life on the planet can thrive. the disrespect and greed with which some people treat wildlife is an antithesis to sustaining the preciousness of all life, not just human life, and sustaining the balance and beauty of our state, the country, and the earth. animal rights are important to the survival of us all. Please do whatever it is in your power to do in order to protect them.

thanks for reading,  
po hall

42.

From: **Linda Holding** <[helding64@gmail.com](mailto:helding64@gmail.com)>

Date: Tue, Jun 29, 2021, 12:57 PM

Subject: comments

To: <[FWPDistrict4@gmail.com](mailto:FWPDistrict4@gmail.com)>

To: Montana Fish and Wildlife Commission

From: Linda Holding, Missoula retired business person, [helding64@gmail.com](mailto:helding64@gmail.com)

Re: Trapping issues

June 29, 2021

Hello Commissioners:

What most concerns me about the issues surrounding trapping in Montana is the direction the MT legislators tried to take in the most recent session. There was a bill that would have altered the MT constitution to include trapping. My real concern in that bill was the inclusion that took away management and control of animal populations from agencies like the Fish and Game and put it in the exclusive hands of citizens, some of whom trap. Now I realize that would have made it into the courts, but it points to something that is going on with work by Paul Fielder and other legislators. One of their goals is to destroy government agencies that oversee management of wildlife. Things like quotas, fees, harvest seasons, and legal gear should be controlled by agencies that have access to biological science, not with political motives.

These legislators are wolves in sheep's clothing. They basically admire wolves and furbearing animals – their skill and tenacity – want them stuffed and displayed in their homes, but they don't want to give control of management to agencies. They are the wolves, we are the sheep. Operating from a position of personal vanity, they would rather destroy that which they can't control. It's a political game; one which they are determined to win.

I urge you to use science based biology not politics in the issues of management, especially now concerning an extended wolf season and harvest numbers.

Thank you so much for your time and good luck,

Linda Holding

Recreating on public lands in Montana since 1946

43.

----- Forwarded message -----

From: **Lawrence Drummond** <[lawrence.drummond@att.net](mailto:lawrence.drummond@att.net)>

Date: Mon, Jun 28, 2021, 3:05 PM

Subject: Limiting Wolves, Otters

To: <[FWPDistrict4@gmail.com](mailto:FWPDistrict4@gmail.com)>

Ms Robinson

Regarding new legislation restricting Wolf and Otter Populations, please consider that alleged wolf predation numbers against cattle are (greatly) exaggerated. To reduce the wolf population will upset the balance of nature and ultimately, negatively affect cattle. Wolves are needed to counteract CWD amongst the Cervid population. And Otter pelt costs can't ever justify cruelly trapping this already endangered species.

Promote an Eco-Friendly Montana for the cattle industry and for the benefit of all of the People.

Thank you very much.

Lawrence J Drummond

<[Lawrence.drummond@att.net](mailto:Lawrence.drummond@att.net)>

Sent from my iPhone

44.

From: **Lawrence Drummond** <[lawrence.drummond@att.net](mailto:lawrence.drummond@att.net)>

Date: Tue, Jun 29, 2021, 4:34 PM

Subject: Fwd: Restricting wolves, otters

To: <[FWPDistrict4@gmail.com](mailto:FWPDistrict4@gmail.com)>

Sent from my iPhone

Begin forwarded message:

**From:** Lawrence Drummond <[lawrence.drummond@att.net](mailto:lawrence.drummond@att.net)>

**Date:** June 29, 2021 at 10:26:01 AM CDT

**To:** [citizensadvocate@mt.gov](mailto:citizensadvocate@mt.gov)

**Subject:** Restricting wolves, otters

Governor Gianforte,

Please consider contacting Stephen Capra @ 406.370.3028 or

<[Stephen@footloosemontana.org](mailto:Stephen@footloosemontana.org)>

regarding protecting wolves and otters rather than painfully limiting their numbers.

In the 1930s the Park Service in one or more national parks tried to wipe out predators to make the deer population explode—which it did! The deer consumed all grasses down to their roots—ending their food supply. The Park Service from then on, had to feed the deer to avert starvation. I believe the State of Montana will possibly have a similar experience with their new legislation against wolves, otters. Benefits from wolves controlling CWD amongst Cervids more than outweighs the very few (in fact) cattle deaths they may cause. And there is no justification for cruelly trapping the already endangered otter. It pays to be aware of the facts. Please consider the importance of these issues. Thank you very much.

Lawrence J Drummond

<[Lawrence.drummond@att.net](mailto:Lawrence.drummond@att.net)>

Sent from my iPhone

45.

**From:** Allen & Charlotte Hay <[achay23@msn.com](mailto:achay23@msn.com)>

**Sent:** Friday, June 18, 2021 9:13 AM

**To:** FWP Commission <[FWComm@mt.gov](mailto:FWComm@mt.gov)>

**Subject:** [EXTERNAL] June 24 meeting

To the Fish, Wildlife and Parks Commission:

I have very strong feelings about trapping in our state. I strongly disapprove of this barbaric practice which does not have a place in 21st century life. My worst nightmare is to have one of our dogs caught in a trap. I sent Mr. Gianforte a strongly worded letter regarding this disgusting practice after he shot a trapped wolf for a trophy. I received a form letter back that did not in any way address my concerns.

Rather than reinvent the wheel, I am attaching a copy of the guest column in today's *Missoulian* (below) which sums up my feelings as a citizen of Montana regarding the June 24 Zoom meeting that will address issues of trapping and wolf slaughter. Wolves play a place in our natural ecosystem and in fact contribute to our economy by bringing tourists to view them in their natural habitat.

I would like to go on record as NOT supporting the practice of trapping or the killing of wolves. I support the work of Footloose Montana which does a wonderful job representing the opinion of someone like myself. Please consider my opinion when making decisions. I am a retired teacher who has lived in Montana since 1978.

Charlotte Hay  
1204 Landons Way  
Missoula, Montana 59803

# Reality of new commission

On June 24, Montana Fish, Wildlife and Parks will hold a Zoom meeting. Despite the fact that businesses are open and life is returning to normal, the commission and our governor

**STEPHEN  
CAPRA**

have made sure this meeting is not in person. The reason is simple; this meeting will be held to discuss trapping and the slaughter of wolves that our legislature, governor and now the Fish and Wildlife Commission are planning for this fall. By putting it on Zoom, the commission can limit comments and control the time so that the voice of citizens is controlled to stifle opposition.

Last July, Footloose Montana, along with other conservation groups, at the request of the commission submitted a detailed proposal for removing trapping in the urban wildland interface of Missoula. We were told by the commission that they would rule on this vital public safety proposal at the meeting that will occur on the 24. In multiple calls with the agency prior to the election, we were told to expect about 80% of our proposal to be accepted. Now such thoughts are gone. The people at the agency give us word salad responses. The commission, made up of Safari Club International members,

oil and gas interests and radical private property rights members, newly minted by Gov. Greg Gianforte, ignored our request for our proposal to be part of the upcoming meeting.

What we are witnessing is a sham; we are poised to destroy wolves across this state to support the ranchers in this state who are compensated mightily for the rare wolf-cow or sheep depredations. The commission the governor hand-picked will march in lockstep with his desires; a man who illegally killed Max the Yellowstone wolf for fun, a killing that Fish, Wildlife and Parks have worked to backfill with flimsy justification.

With elk and deer populations at record levels, there is no need to kill any wolves, but this commission is likely to rubber stamp the slaughter of wolves to promote trapping and get people into our forests with the lure of a \$1,000 bounty on wolves. This action will make our public lands minefields of traps, snares and suffering. Your family pets and children are at risk, all so less than half of 1% of the people of this state can enjoy the suffering and killing of beautiful animals, to support their craven desire to torture wildlife.

Trapping is not a sport, nor is it fair chase. It is a sickness that lin-

gers in Montana, one that needs to be ended. Our proposal would have made areas that are high use recreational areas around Missoula off limits to trapping. We are working on similar proposals for other Montana communities. But this governor and commission have made sure our voice is stifled.

We must make clear that trapping has no place in our modern society, that the killing of wolves cannot be allowed to occur.

President Biden must act to relist wolves to prevent this slaughter, and he should go a step further and use his executive powers to ban trapping on public lands. The case is clear that our state cannot manage wildlife properly, it needs federal oversight and must be stopped from killing 1,000 wolves this coming fall.

This commission must hear from the citizens of this state on the 24th; they need to know that trapping and the slaughter of so many innocent animals will not be tolerated. So too should they know that the vast majority of people in Montana do not support trapping in any form.

Please make your voice heard on June 24.

Stephen Capra is executive director of Footloose Montana.



46.

**From:** Nick Gevock <ngevock@mtwf.org>

**Sent:** Wednesday, July 14, 2021 4:30 PM

**To:** FWP Commission <FWComm@mt.gov>

**Cc:** Worsech, Hank <Hank.Worsech@mt.gov>; Kujala, Quentin <qkujala@mt.gov>; McDonald, Ken

<kmcdonald@mt.gov>

**Subject:** [EXTERNAL] MWF comments on otter harvest increase

Dear Fish and Wildlife Commissioners,

Please accept these attached comments on the proposal to increase the river otter harvest in Regions 1 and 2.

Sincerely,

--

Nick Gevock

Conservation Director

Montana Wildlife Federation

PO Box 1175

Helena, MT 59602

Phone: 406.458.0227 ext. 108

Cell: 406.533.9432

[ngevock@mtwf.org](mailto:ngevock@mtwf.org)

<http://www.montanawildlife.org> [montanawildlife.org]



Protecting Montana's wildlife,  
land, waters and hunting & fishing  
heritage for future generations.

July 14, 2021

TO: Montana Fish and Wildlife Commission

RE: Commission decision to increase the otter take to 40 in both Region 1 and Region 2 and the per person limit from 3 to 4 otters

The Montana Wildlife Federation opposes the increase in the river otter trapping quota in both Region 1 and Region 2 and the increase in the per person limit from 3 to 4. Our opposition is based on the lack of any factual river otter survey data or information on river otter populations in either region. The proposal itself states that a change in the river otter harvest regulations is “not necessary”.

The proposal to increase river otter harvest is based on no biological information or data since there are no formal surveys of river otter abundance, trend, reproduction, or distribution. The only “data” available are the numbers of river otters taken by trappers. Trapper effort is a critical factor is how many river otters are taken and when the quota is reached, yet the proposals to increase the quota and the per person limit have no information about numbers of trappers involved in river otter trapping or trapper effort or change in trapper numbers over time.

This proposal will increase harvest of river others based on no actual information on river otter populations. The proposal itself states that information concerning river otters in Montana is “anecdotal”. Furthermore, the proposals say nothing about any effort or attempt to monitor the impact of the proposed increased trapping quotas on river otter populations. This is data-free wildlife management taking place in the dark – increase the river otter quota and hope for the best. We strongly suggest that Montana Fish, Wildlife and Parks can do better than this. If FWP wants to increase the river otter quota, then it should present factual information on the numbers, trend and distribution of river otters that justifies such a quota increase. Without such information, there should be no change in the quota.

We also question how this proposal was developed and the fact that (as stated in the proposal): “This proposal is a result of a joint meeting of Montana FWP, The Montana Trappers Association (MTA), and the Montana Fur Harvesters (MFH), and trappers unaffiliated with either organization. This proposal was supported by both organizations.” River otters are a trust species managed for the people of Montana, not just the river otter trappers. To ask trappers if there should be an increase in the river otter quota is like asking only coal miners if there should be an increase in coal mining. Why was this increase in the river otter trapping quota not brought

to the general public and to other wildlife groups and scientists beyond the one user group that would benefit from this quota increase?

In summary, the Montana Wildlife Federation believes that the proposals to increase the river otter quota in Regions 1 and 2 and the per person limit from 3 to 4 should be withdrawn because there is no factual information of any kind to support such increases in the numbers of river otters trapped. Furthermore, the public review and vetting of these proposed increases was fatally flawed because it was limited to the one user group that would benefit from this increase, leaving out the rest of the public.

Thank you for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Servheen", with a long horizontal flourish extending to the right.

Christopher Servheen

Vice President of Issues

Cc: Hank Worsech, Ken McDonald, Quentin Kujala

47.

**From:** Jerry Shively <flatiron@blackfoot.net>

**Sent:** Tuesday, June 29, 2021 7:19 PM

**To:** Pieske, Shawna <Shawna.Pieske@mt.gov>

**Subject:** [EXTERNAL] Otter & wolf comments to commissioners

Commissioners,

I tried to comment through the FWP web site but not at all certain my comments got through.

We fully support raising the otter individual limit & the total quota of otters in Regions 1 & 2. We spend a lot of time fishing both the Thompson Falls & Noxon reservoirs, & it is a rare day on the water when we do not see at least 1 otter & as many as up to 5 at one time. Otter are mostly caught in sets made for beaver, & with the amount of work & effort it takes to trap beaver with an almost nonexistent fur market, every trapper I know of in this area pulls his beaver traps as soon as the otter quota is reached. There is certainly no shortage of otters in Region 1 & 2.

WE have a major wolf problem here in north western Montana. Our legislators have given you the tools to help rectify this over population of wolves, & we very strongly urge you to use all of them.

I have been a trapper for 71 years now & have caught several wolves since they have been legal to trap, & a couple of others prior to this when I helped the Government Trapper remove some from this area. The hardest part of wolf trapping that I have found, is keeping traps working until a wolf finds them. Extending the season, especially the first part of season will help. Snares can be kept in working order much easier than foot hold traps, are MUCH lighter & easier to pack into more remote areas, for those in condition & able to do so. That leaves me out of that part of the picture.

Eliminating the personal limit of wolves, will enable the very few trappers actually have caught a limit of wolves to maybe catch a few more of them.

Wolves are very expensive & labor intensive to trap successfully, the USFWS estimates it costs them \$9000.00 per wolf to remove them, & this is using every method possible, several of which are totally illegal for licensed trappers. & this is also done during summer & early fall when wolves are much easier to trap.

Hunting at night with a predator caller may also help increase the take of wolves, but not likely very many of them.

I have been hunting this area since 1973, my wife since 1981. I also guided this area for over 35 years, 20 of them as a licensed Outfitter, 1988 – 2008. We have watched the collapse of the elk population since the wolves became the major Predator on them. Thankfully, I was able to sell the Flat Iron Outfitting business before the wolves would have wiped me out.

We also USED to have a very good population of Big Horn Sheep here. The highway & RR got a few every year but their population was growing, enter the wolves & the population crashed. No evidence of disease was ever found, but wolf turds full of sheep hair were not hard to find.

The tools given you, were given with 1 purpose in mind, REDUCE THE WOLF POPULATION. Please use them to the fullest extent possible.

Thank You

Jerry C. & Brenda L. Shively  
8 Golf Course rd  
Thompson Falls Mt 59873

406 827 3666

48.

**From:** CJ ROLPHE <cjrolphe@gmail.com>

**Sent:** Thursday, June 24, 2021 9:14 AM

**To:** FWP General <fwpgen@mt.gov>

**Subject:** [EXTERNAL] TRAPPING

YOU WILL BE STOPPED! If you don't stop these bills now....you will be stopped in court....this a PROMISE!!!!!!!!!!!!!!

49.

**From:** CJ ROLPHE <cjrolphe@gmail.com>

**Sent:** Monday, June 14, 2021 6:28 AM

**To:** FWP General <fwpgen@mt.gov>

**Subject:** [EXTERNAL] TRAPPING

PLEASE, on June 24th you have the chance to PROTECT our state against the slaughter of our wildlife....DO YOU HAVE THE COURAGE to stand against all the laws that have been passed to do that???? PLEASE DO NOT LET POLITICIANS SLAUGHTER OUR WILDLIFE!!!!!!!!!!!!!!

50.

From: Jeanne Shelsky <jeannes4home@gmail.com>  
Sent: Saturday, July 24, 2021 2:59 PM  
To: FWP General <fwpgen@mt.gov>  
Subject: [EXTERNAL] Otter, beaver trapping and wolf hunts

I oppose all trapping but especially the nearly unlimited seasons on beaver and otter and the impending hunting of wolves that will drive them to near extinction once again. A 90% reduction in population will ensure that deer and elk herds will be vulnerable to disease since apex predators like wolves take out the sick and dying. Your state's unending bloodlust to kill anything that moves will keep my tourist dollars out of your state.

sincerely,  
Jeanne SHELSKY



I oppose all  
WOLF slaughter  
regulations sponsored  
by Paul Fielder

Re: TRAP SETBACKS

I oppose changing  
Sanders County to  
trapping with no  
setbacks.

Shirley Meade

52. We oppose the increase in otter harvest based on the anecdotal information. We don't think they should be harvested at all.

***Jack and Rachel Potter Columbia Falls, MT***

53. We oppose the increase in otter harvest based on the anecdotal information. We don't think they should be harvested at all.

***Jack and Rachel Potter Columbia Falls, MT***

52. Why is less than .05% of the Montana population being turned loose to wreck havoc on our precious wildlife? If I did to a domestic animal what a trapper does to a wild animal, I would be brought up on cruelty charges. The wildlife belongs to ALL AMERICANS, as do the public lands. Trappers need a less cruel hobby. Perhaps they could take up ethics-based hunting, if such still exists after all of the anti-wildlife laws passed by the current Montana right-wing legislature.

***Linda Holtom Missoula, MT***

53. Once again we are pretending to regulate an activity (trapping) that relies on self-reporting by people who torture animals to death for fun. FWP has no idea how many pets, non-target animals and even target species are killed each year. I have personally tried to get this info from FWP and failed despite being a consultant to FWP for decades and a scientist with research skills. Trapping may have been an appropriate activity in the 1800s but has no place in the modern world. Less than 1% of Montanans and .001% of Americans torture animals to death in this manner. Trapping gives us a horrible name across the country and deflates our tourist industry. Many Montanans and most visitors have never seen the animals we allow trappers to kill. I have spent my professional and recreational career outside and have seen few myself. I would like to share the site of an otter, mink or marten with companions in the future. Montana wildlife should be managed by professionals using modern means and without widespread trapping. Please restrict and eliminate this evil.

***Barry Dutton Missoula, MT***

54. Opposed to the increased trapping of river otters. The proposal, itself, signifies that there is no reason to increase the quota on otters in Region 1 and Region 2 but, that they met with the MTA, the Montana Fur Harvesters, and other trappers, and that is what they want. River otters carry a high social appeal. Yet, they are very rare to see especially outside the protections of our national parks. Newly appointed FWP director has said, wildlife will become managed more on social tolerance and less on science. Many, and likely the majority, do not want river otters trapped and particularly not more. Certainly, we represent more than the 57 or so trappers who are killing our otters. Social tolerance for trapping continues to decline. Proposals such as these contribute to its demise and growing disdain. River otters are worth far more alive on the landscape and for many, then trapped and destroyed for a pittance of a cost and for the selfish few. According to FWP, the otter population estimates are based on harvest reports and anecdotal information. The trapping season on river otters runs Nov 1 - April, during their gestation, birthing, and season of dependent young. This collateral damage from trapping as well as the incidental otters killed in beaver trap sets are not taken into consideration. Recreational trapping of beaver is open 5 1/2 - 9 months out of the year and with no limits or reporting required. According to FWP reports, in 5 recent years, 35 otters were reported as incidental take. Almost 75% were from Region 1 and Region 2. Annually ~ 90 river otter are reported trapped across the state during the otter trapping season. This proposal would allow 80 otters from just our Region 2 and Region 1. Region 2 closed March 22, 2021, when it reached the 25-quota reported otter killed. Quota numbers published and reports received do not line up. This is not the first time. FWP presented no evidence that the river otters can withstand this additional trapping. Otters are the apex aquatic predator, dependent on healthy watersheds, and are the first to abandon polluted waters. Loss of suitable habitat is the river otter's greatest threat. As Montana is under statewide emergency drought conditions, temperatures are high, water is low, fires are underway, the river otters must be facing significant challenges as are all wildlife. It is biologically, ecologically, and morally inexcusable to increase the wanton killing of river otters, or any creature, especially now, in Montana! Wildlife needs just the opposite! Commissioners please oppose. KC York President/Founder TFMPL Trap Free Montana

***KC York Hamilton, MT***

55. I am writing to oppose the proposed regulation changes for trapping otters, to increase the number of animals trapped. FWP yourselves said the changes are not necessary, so why increase the number of otters taken ? I used to see otters frequently when hiking

along trails like Bear Trap Canyon, along the Madison River. I haven't seen one in years, which indicates to me their numbers are declining. Please decline this proposal to increase otter trapping. Apparently otter pelts didn't even sell in the 2020 largest fur auction, so why kill them.

***Sharon Sutherland Belgrade, MT***

56. Between the legislature and FWP, 2021 has been the biggest assault by our state government on wildlife a long time. As someone with an advanced degree in biology it is obvious that they have nothing to do with trying to follow the most advanced science. It is quite the opposite - antithetical to science. Here, FWP is bowing to a very small element in our society to further destroy our state's wildlife. How utterly pathetic.

***Wesley Miles Hamilton, MT***

57. I am opposed to increasing the harvest quotas for River otters. These are special animals that bring great joy to the lucky observer. I live in the Blackfoot drainage in FWP R2. For the last 40 years there has been a successful effort to improve the total health of this river system including clean water and native fish. There is no need to kill more River Otters, they have a great value alive to me.

***Rod Bullis Lincoln, MT***

58. I urge the commission to maintain the river otter harvest quotas, not increase them. There is no accurate count of river otters in Montana--populations are based on harvest reports and anecdotal information. Therefore, increasing the quota would be irresponsible. Governor Gianforte has declared Montana to be in a state of emergency due to the megadrought occurring in the Western US. Temperatures are up and water is down statewide. Wildlife are struggling. In light of this, otters should not be subjected to increased mortality through increased trapping. Please do the ethical and scientifically defensible thing and do not increase otter harvest quotas. Thank you for your consideration.

***Dylan Paul Flather Hamilton, MT***

59. It is critical that you oppose the increased trapping of river otters in any region. Otters are already challenged by drought, high temperatures, and fires. It would be ecologically and morally irresponsible to increase trapping at this time. Thank you,  
Gail Trenfield 30760 Mission Creek Road St. Ignatius, MT 59865 4067453001  
57pogeno@gmail.com

***Gail Trenfield St. Ignatius, MT***

60. I am appalled that this legislation set to kill wolves and river otters is even being discussed. These proposals are inhumane and threatened other animals. Please remember that wildlife belongs to all of us not just the 1% of trappers and most hunters do not approve of the legislation passed in the 2021 session. Thank you, Myni Ferguson

***Myni Ferguson Columbia Falls, MT***

61. trapping should be outlawed.

***John Oetinger Missoula, MT***

62. I am completely against the increased trapping of river otters! You do not have the data to support this but rather you are basing this on the special interest of a small percentage of our state population, less than 0.5% of Montana's population is driving this non-scientific self interest slaughter. What about listening to the remaining majority population of the state of over 99.5% of our people?

***Shelley J. Coldiron Whitefish, MT***

63. I love and cherish our Montana outdoor lifestyle. I enjoy the outdoors with my two dogs. The presence of public lands is a major draw for residents, small businesses and the visitors who come primarily to view wildlife. Our public lands comprise roughly only 1/3 of Montana. We should be able to safely enjoy our public lands free from hidden traps and snares whose whereabouts are known only to the trapper. No warning signs

are required and traps and snares are not marked in Montana. Dogs hunting, accompanying cross country skiers, or going for a swim are not leashed and can easily fall victims to traps and snares. Trapping is legal year round in Montana. We should not have to compromise peace of mind and child and pet safety when using public land. Unattended traps, especially with no setbacks, indiscriminately catch, maim, and kill unintended victims from pets to protected species, such as eagles and Canada lynx. Trapping Is Not Fair Chase: Trapping does not follow the time-honored principles of Fair Chase. Animals are lured with bait. It is illegal to leave a fishing pole unattended in Montana but trappers set and leave an average of 50,000 traps and are not present when their quarry is caught. Not sure that I understand a taking of the safe enjoyment of our public lands from the vast majority that do not trap, for a very few. Please reconsider this proposal.

***Nik Geranios Missoula, MT***

64. I do not support any trapping on public lands. Regulations are not upheld and too many non target species are inhumanely caught in traps.

***Susan Lanning Clyde Park, MT***

65. I am strongly opposed to trapping on public land due to its indiscriminate killing of public and private animals. The days of earning a living by trapping are over, and this is a horrible hobby for people to practice. I have hiked and skied in Montana for over 40 years and I mourn the continuing decline of furbearing animals. There are some species, like River Otter, that should never be trapped. Others should not be trapped on public land until there is conclusive evidence that their population is so large that it is negatively impacting other species. I understand ranchers need to protect their livestock, and so predator control needs to be done on private land only, as is already allowed in law. The recent legislature obviously believes no predators should exist, or exist only in very small numbers. They are wrong and the FWP commission should use every tool they have to walk back the legislative impulse and use science and compassion and public input to allow interacting with live animals on public land to the greatest extent possible for all Montanans. These animals do NOT belong just to the trappers. They rightly belong to ALL Montanans. Please do what you can to preserve and enhance our wildlife on public lands. Thank you.

***Roger W. De Haan Victor, MT***

66. I am strongly opposed to the proposed increase to the number of otters allowed to be trapped in Region 1 & 2. The increase will, in the context of the existing ratio of the number of otters to trappers, effectively lead to a complete decimation of the otter population. What can possibly be the motivation for this? Otters are a Montana native aquatic apex predator, they keep our rivers healthy, they are joyful animals, and there is no economic benefit, as the pelts are worth very little. So, why is this new quota being proposed? We cannot allow the destruction of our native wildlife for the benefit of a tiny majority of the population. Public sentiment is against trapping otters. Please do not allow this to go forward.

***Lisa Robertson Missoula, MT***

67. I believe ALL trapping of wildlife in the state of Montana is unnecessary, morally wrong, inhumane, and should not be done at all unless there is no other solution to a big problem caused by too many of a particular group of wildlife. Again, it seems these decisions are not being made in support of the animal, the scientific community, and the general public. I am guessing that the people who enjoy trapping and snaring animals are a small minority of the population and I believe they should not be catered to, even if the most prominent member of this group just happens to be our governor.

***Kathy Taras Butte, MT***

68. We need legislation based on real data. Trappers opinions on management rarely involve science, just a bloodlust. What is happening with trapping in Montana right now is just plain ignorant. People come visit Montana from all over the world to be in the wild and to feel the presence of wildlife. It would a joke to allow these measures if it wasn't so detrimental. I say to the Governor and to FWP leadership, GROW UP! You are playing with our animals like you are children in a sandbox. Cowardly and grossly childish leadership affects us all.

***Brian Jenkinw Missoula, MT***

69. Like it or not, wildlife in Montana is a public trust, and you, the commission, the legislature and the governor are part of the trustee group that oversees management of

ALL of Montana's wildlife for ALL the citizens who hold many more different values in wildlife than just killing it for fun and sport or to protect livestock. As trustees, you are bound by fiduciary duty to use your best judgement based on actual scientific facts and knowledge of any species to make decisions about how, when, why, and for what reason wildlife can be taken from the common environmental assets. The recent proposal to increase the take of river otters based on heresy information gleaned from staff attendance at the recent trapper's annual convention is a perfect example of an egregious breach of fiduciary duty that requires that any decision on trust assets be based on facts and not on statement from self-interested parties who want to kill more river otters. Gathering pertinent data on a species as an asset of the trust in this manner would be like a financial trustee going down to the local tavern and asking the guy sitting next to him if he has any hot stock tips. This is totally unacceptable trustee behavior for any species. If you do not have accurate and up-to-date data based on science and actual field studies made by impartial wildlife professionals, then you certainly cannot make a rational decision about any proposal to take any animals from the commons. This is a breach of trust and not to be tolerated. Management of trust assets is not an exercise in majority rule. Assets must be managed in accordance with the wishes of ALL citizen/beneficiaries and their diverse values and desires for the trust assets, in this case, the wildlife of the state and, in particular, river otters. Based on your public information about the extent of your research on river otters, I do not believe that you have sufficient information to set any limit or season on these animals, much less to approve an increase in quotas on them. Please reject the increase in quotas for river otters and, better yet, cancel the trapping of river otters until such time as you can fund impartial, objective, well-funded, science-based data collection for this species and its habitat. And then base decisions taking into account the values of ALL Montana citizens, not just license holders who fund you. That practice in itself is a gross violation of fiduciary duty. Holding a trusteeship is a sacred honor that is not to be trifled with. You as a commission and the legislature are in constant and continuing breach of trust in regard to most of the state's wildlife. Reform is urgently required. Why not start here and now? Will you be a vanguard for change or cling stubbornly to past practices and traditions that violate the public trust in wildlife?

***Rocky Sehnert Clinton, MT***

70. The Montana Wildlife Federation opposes the increase in the river otter trapping quota in both Region 1 and Region 2 and the increase in the per person limit from 3 to 4. Our opposition is based on the lack of any factual river otter survey data or information on river otter populations in either region. The proposal itself states that a change in the river otter harvest regulations is not necessary. The proposal to increase river otter



harvest is based on no biological information or data since there are no formal surveys of river otter abundance, trend, reproduction, or distribution. The only data' available are the numbers of river otters taken by trappers. Trapper effort is a critical factor is how many river otters are taken and when the quota is reached, yet the proposals to increase the quota and the per person limit have no information about numbers of trappers involved in river otter trapping or trapper effort or change in trapper numbers over time. This proposal will increase harvest of river others based on no actual information on river otter populations. The proposal itself states that information concerning river otters in Montana is anecdotal. Furthermore, the proposals say nothing about any effort or attempt to monitor the impact of the proposed increased trapping quotas on river otter populations. This is data-free wildlife management taking place in the dark – increase the river otter quota and hope for the best. We strongly suggest that Montana Fish, Wildlife and Parks can do better than this. If FWP wants to increase the river otter quota, then it should present factual information on the numbers, trend and distribution of river otters that justifies such a quota increase. Without such information, there should be no change in the quota. We also question how this proposal was developed and the fact that (as stated in the proposal): This proposal is a result of a joint meeting of Montana FWP, The Montana Trappers Association (MTA), and the Montana Fur Harvesters (MFH), and trappers unaffiliated with either organization. This proposal was supported by both organizations. River otters are a trust species managed for the people of Montana, not just the river otter trappers. To ask trappers if there should be an increase in the river otter quota is like asking coal miners if there should be an increase in coal mining. Why was this increase in the river otter trapping quota not brought to the general public and to other wildlife groups and scientists beyond the one user group that would benefit from this quota increase? In summary, the Montana Wildlife Federation believes that the proposals to increase the river otter quota in Regions 1 and 2 and the per person limit from 3 to 4 should be withdrawn because there is no factual information of any kind to support such increases in the numbers of river otters trapped. Furthermore, the public review and vetting of these proposed increases was fatally flawed because it was limited to the one user group that would benefit from this increase, leaving out the rest of the public. Thank you for the opportunity to comment on this important issue. Sincerely,  
Christopher Servheen Vice President, Montana Wildlife Federation

***Christopher Servheen Missoula, MT***

71. Trapping is archaic and unneeded. No expansion of trapping seasons or quotas.  
Trapping river otters has no biological purpose and should be banned.

***Mike Bader Missoula, MT***

72. I am opposed to the unlimited trapping of beavers on public lands, except for protection of road culverts. Beavers create riparian areas that are critical for a large percentage of wildlife. The otter trapping season during their gestation and birthing season of November -April is another poor wildlife management decision, based on greed and not science.

***Joseph W Kipphut MISSOULA, MT***

73. Protect River otters, in Montana. River otters have needed protection because of past trapping practices. These protections must be kept in place forever. Our biodiversity depends on wildlife to balance our planet. Please , thank you

***Candice Stewart Noxon, MT***

74. Do not trap River Otters in Montana. River Otters are a valuable part of our wildlife heritage in Montana. Nothing will be gained in destruction of this beautiful and necessary animal. No one needs to trap and kill this unique animal that the public loves to see and enjoy.

***JAMES E. COYLE Rollins, MT***

75. Please consider public safety as a priority in making these trapping decisions, rather than the small percentage of Montanans that these regulations represent. We all have rights to public lands and this shouldn't be jeopardized by allowing trapping, snares, etc, in these areas. The pushes to increase quotas on these furbearers is not backed by science and data and we stand to eliminate entire species that contribute to our ecosystems. For wolves- do not allow snares on public land, don't allow baiting and

night hunting, do not increase quotas. Do require 24 hour trap checks. For otters- we are in a drought and water temperatures are increasingly high, don't add stress to this species by allowing more trapping, for no reason at all. Beavers- the lack of regulations around trapping beavers is embarrassing. Unlimited harvesting should NOT be allowed. Swift fox- don't allow trapping to extinction. Generally speaking, if we need wildlife management of these species, we can do better than inhumanely trapping and torturing these animals. Montana continues to disregard public safety at all costs and our wildlife management resembles something of the time of cavemen. It's disgraceful and we should be ashamed. Please do better people.

***Amy Szacilo Bozeman, MT***

76. I live in Region 1 and have to seriously question the abilities of your biologists. We are having a major drought and you want to increase the otter quota when the animals already have it hard enough to survive. Do not increase, instead lower the number or just hold off for one season so the animals have a chance. Best, Margareta

***Margareta Marro Whitefish, MT***

77. To Members of the Montana Fish & Wildlife Commission, This is to register my opposition to the proposal that would allow trappers to kill 50% more river otters in Western and Northwestern Montana. They are an apex predator and require healthy watersheds to live. Since their systems are highly sensitive to water pollution, they are the first to leave, making them a natural indicator that there is a pollution issue. Because Montana is experiencing emergency drought conditions statewide, river otter habitat is declining rapidly. River otters were almost extinguished due to the fur trade. They are often caught in beaver traps which can be set without limits up to 9 months of the year. Because these are unaccounted for, there are untold numbers of bycatch, non-target species killed. Due to these conditions, it is irresponsible to authorize the killing of more otters that are already struggling to survive. Montana is known for its wildlife and millions of visitors flock to our borders on the chance they might see species in their natural habitat. This is substantial contributor to Montana's revenue and economy, bringing in millions annually. That is a far cry from the paltry revenue generated from trappers (less than 1% of Montana's population) paying for an annual single \$28 trapping license which allows them to kill countless animals. For some species, a trapping license is not even required. It's time for Montana to get its

priorities straight: preserve and protect wildlife before it is too late. Thank you for the opportunity to comment. Sincerely, Dorothy Filson Bozeman MT 59771

***Dorothy Filson Bozeman, MT***

78. ~ Hello ~ I am seriously opposed to the increase in otter trapping quotas ~ and there is no legitimate reason at all, why otters should even be killed, for recreation, and their pelts ~ And since they are sometimes caught in beaver traps, it makes no sense to endanger the otters any further, especially when the incidental catches are not fully regulated ~ and our ecosystems are going through enough danger, as it is ~ I truly wish that our Fish, Wildlife, and Parks honestly cared about preserving our natural ecosystems, and only the ethical sustenance hunting of elk and deer ~ It is so wrong that most of Montana's FWP commissioners are submitting to the selfish will of the low number of trappers and trophy hunters in our state, rather than the majority of us, who have no reason to go out and torture animals, who are surely worth more alive, than dead... Thank You for listening...

***Heidi Handsaker Billings, MT***

79. Trapping seasons should be SHORTENED not lengthened. Trapping advantages a very small percentage of Montana's population and makes wilderness less safe for 99% of native Montanans and all of Montana's 42 million dollar tourism industry (who do not come here to trap, and less than 15% come here to hunt) Speak up for Montana's tourism industry and for native Montanan's and Do NOT increase the trapping season.

***Pat Bartholomew Hamilton, MT***

80. Trapping seasons should be SHORTENED not lengthened. Trapping advantages a very small percentage of Montana's population and makes wilderness less safe for 99% of native Montanans and all of Montana's 42 million dollar tourism industry (who do not come here to trap, and less than 15% come here to hunt) Speak up for Montana's tourism industry and for native Montanan's and Do NOT increase the trapping season.

***Sterling Way Victor, MT***

81. Trapping seasons should be SHORTENED not lengthened. Trapping advantages a very small percentage of Montana's population and makes wilderness less safe for 99% of native Montanans and all of Montana's 42 million dollar tourism industry (who do not come here to trap, and less than 15% come here to hunt) Speak up for Montana's tourism industry and for native Montanan's and Do NOT increase the trapping season.

***Scharyn Way Victor, MT***

82. I Oppose increasing any trapping on otters! I enjoy watching them in the streams and they deserve better. Do not allow more trapping of otters. Thank you.

***Karet Tatiana Boise, ID***

83. I am a landowner and farmer. I live near Troy MT located in Region 1. Unfortunately, Montana's estimated river otter populations are based on harvest reports and anecdotal information rather than on scientific, biological or empirical data so allowing increased quotas based on subjective and imprecise criteria seems flawed from the onset. Under the public trust, river otters, like other wildlife species, belong to ALL U.S. citizens. Fifty- three trappers of river otters operate in Regions 1 & 2. These few trappers should not control the fate of otters. Montana trappers report killing around 90 river otters across the state each season. It is blatantly wrong for FWP to prioritize the wants of the few over the needs of the many by allowing an additional 80 otters to be trapped in Regions 1 & 2. As an apex aquatic predator, the river otters live only along unpolluted watersheds. Like a canary in the coal mine, river otters serve as an indicator species of water pollution and are the first to disappear when rivers and streams become unhealthy. The greatest threat to river otters is loss of habitat. Currently, Montana is in a state of emergency due to severe drought conditions; water tables are low, temperatures all over the west including MT are reaching record highs, numerous wildfires threaten additional loss of habitat meaning that river otters are under increasing environmental threats. Otters will be dying and should not be subjected to increased mortality through increased trapping. It is inexcusable the FWP plans to increase quotas on river otters or any creature in MT especially when it is ecologically, biologically and ethically wrong to do so! FWP needs to support MT wildlife now more than ever. Otter pelts averaging \$15 failed to even sell in the largest fur auction in 2020. It is not hard to see that river otters are worth far more alive on the Montana landscape, for visiting tourists, for me as a wildlife voter and for the general public, than to be trapped and destroyed for a small pittance by the selfish few. The Montana

trapping season on otter runs from Nov 1 - April 15 unless a quota is reported. Quota overages occur with 75% coming from Region 1 and Region 2. The trapping season is during the otter gestation, birthing, and period of dependent young. River otters are commonly killed in beaver trap sets which can be set unlimited 5 1/2 - 9 months out of the year. All this collateral damage is unaccounted for and an oxymoron to the tired false mantra that trapping is highly regulated. No one knows the true toll trapping takes and fewer who should, like FWP, even care about all the collateral damage trapping causes year in and year out. When will we learn that our wildlife is not an infinite supply and cannot be used and exploited with zero consequence to us? All Montanans and certainly the wildlife we love deserve better from FWP. I live in Region 1 and oppose increased quotas for river otter.

***Barbara Booher Troy, MT***

84. Montana has the last of the continental United States wilderness areas and natural wildlife in those areas. Preserving and protecting them must be the top priority of Montana citizens. It is Montana's greatest resource. Hunting and trapping is cruel and not sound science based wildlife or wilderness preservation practice. It is the practice which led to the extinction of the passenger pigeon and nearly the extinction of bison, wolves, grizzlies, and the permanent loss of wilderness areas. Fur trapping is no longer a viable business; it is cruel and inhumane and indiscriminate in its killing. Ban this hunting and trapping and killing season. Follow the science, not the politics.

***Judith A Baxter Grand Rapids, MI***

85. I oppose the R1 and R2 otter quota changes proposed. These proposals did not include discussion or comment from the public and were based only on the desires of select interest groups who would be the only beneficiaries - i.e., the Montana Trappers Assoc., Montana Fur Harvesters, and unaffiliated trappers. Stated in the proposals is that the request for increase is based on anecdotal information, not scientific population surveys. The economic benefit to trappers is negligible, given the price of pelts, and is detrimental to the economic benefit to the general Montana population who enjoy wildlife. Otters and other furbearing animals are under great stress with the drought and wildfires. Further pressure on these wildlife by increased trapping will harm the populations.

***Sandra S Murray Helena, MT***

86. I Oppose increasing any trapping on otters! I enjoy watching them in the streams and they deserve better. Do not allow more trapping of otters. Thank you.

***Karet Tatiana Boise, ID***

87. Some of these requested changes were due to a legal ruling from FWP based on the Biological Opinion Agreement with The USFWS that FWP signed back at the start of the Lynx Protection suite. This is the same agreement that Idaho fought and won and our Montana legal team did not fight and agreed to. Hard to appreciate what our legal team has done in the past and are still pushing. Set backs are not needed in most areas, don't add more.

***TOM FIEBER Polson, MT***

88. To provide some relief for the undulates, trapping is more important to target wolves in the lower areas. I have set on committees in both Regions One and Two and worked on setbacks with both FWP and the Anti's. I have taken surveys from others who use areas during those winter months. Most areas we surveyed did not see very much winter use if any by recreationist. Some very large areas could have all setback restrictions removed without threat to anyone. The areas that we do see occasional use was listed and most are avoided. Almost all of those areas were not moved forward in this proposal.

***TOM FIEBER Polson, MT***

89. Now days deer and elk are wintering more and more on private lands in western Montana due to heavy predation by wolves. If they stay in the traditional south facing winter areas on public lands the wolves run them out. It doesn't take a highly educated person to see that, just look at the shoulder seasons that have caused so much controversy. We who are out on the landscape on a daily bases from December through February, we visually see the herd numbers decline and forced out of those wintering grounds. To see the herds be able to return to the public grounds in reasonable numbers during the winters, a more aggressive wolf management goal is necessary.

***TOM FIEBER Polson, MT***

90. PLEASE do not allow trapping of precious river otters. They are indicators of a healthy stream and are extremely desirable as a wildlife species to see and are no threat whatsoever to humans. Also, how many other beings would get caught in those traps?! Awful idea.

***Libby Langston Missoula , MT***

91. I oppose extendind the 2021 Furbearer & Trapping Season. I purpose reducing the Furbearer and Trapping Seacon by 25%.

***Arnold Sowa Helena, MT***

92. There is no need to increase the quota for trapping otters.

***Pam Little Hamilton, MT***

93. I strongly object to the increase of trapping of all OUR wildlife. Wolves, river otters and other wildlife are worth far more alive on the landscape and for many, then trapped and destroyed for a pittance and for the selfish few. It is biologically, ecologically, and morally reprehensible to increase the wanton killing of river otters, wolves, or any creature, especially now, in Montana! Wildlife needs just the opposite! To be clear, I oppose ALL trapping of wildlife for their fur. It is immoral, cruel, barbaric and unethical. I would have expected Montanans to be rid of this abhorrent practice. It's trophy hunting - not hunting for food. BIG DIFFERENCE. There are fewer apex predators than prey animals and they must be protected and I am ashamed of my state for continuing this despicable activity masquerading as hunting. Montana counts on millions of dollars from tourists who came here to view our wildlife and will think twice supporting a state that allows trapping. Yours truly, Joan Alison Daniels

***joan alison daniels Stevensville, MT***



94. Please do not increase the trapping limit for River Otters. I live on the river and don't ever see river otters. And the few trappers want to kill more? What possible reason would a trapper have to break up family groups and kill these beautiful creatures. You are supposed to be protecting our wild life. FWP can't possibly be getting enough from trapping licenses to make enough difference. Who are you catering to? Certainly not the general public, the majority of outdoorsmen, or the wildlife you are empowered to protect. Thank you.

***Jan Carr Huson, MT***

95. We are entering a record drought with rivers at historic lows and river otter habitat under threat. Please do not give in to greed and cruelty as river otters face unprecedented natural threats without increased trapping pressure. As someone who spends many days per year floating and fishing on the Yellowstone and other Montanan rivers, otters sightings have plummeted over the last 10 years with numbers already declining. A trapper alone gets to benefit from killing an otter, leaving it to live allows hundreds the pleasure of watching these amazing little animals. Reduce, don't increase, the number of otter kills permits. Wildlife is not a partisan commodity or for individual gain, but a rather PUBLIC resource.

***Genevieve Reid Livingston, MT***

96. What is wrong w you heartless murdering ignoramuses? NO MORE torturing n murdering these wonderful beings! Just STOP IT Altogether! You guys have gone way too far with slaughtering our beautiful animals!

***Pat Bowers Polson, MT***

97. I would like the trapping quotas for Otter reduced, not increased. I like seeing them in the rivers and have not seen any for a few years.

***Mac Donofrio Hamilton, MT***

98. Is FWP just an offshoot of the Montana Trappers Association? Your proposals are made in collusion with them, the non-trapping public who far outnumber trappers, are never considered or included in these decisions. Certainly no science is involved. When is enough dead wildlife enough? Wildlife belongs to all Montanans, not just the minority who trap. I am a gun owner, an ammunition purchaser, a land owner tax payer and voter and I strongly oppose this proposal.

***Carla Bonetti Missoula, MT***

99. No changes should be made to existing regulations

***Chester Watson Missoula, MT***

100. To Who it May Concern: The current proposed increase in trapping limits is the wrong direction for Montana. In a period of significant drought and wildfires like we are now seeing across Montana, destroying beaver populations that create wetlands and temporize drought is a baffling direction for wildlife management. Because beaver ponds create wetlands that are important habitat for many other mammals, birds, fish and amphibians, native Americans called this species the sacred center and scientists call them a keystone species. Besides providing critical wetland habitat, Beaver dams slow the water's flow, which reduces erosion and decreases flood damage downstream. Water sinks into the ground, replenishes the water table, and increases riparian vegetation. Beaver dams also cleanse the water by filtering out silt, nutrients and other pollutants. Trapping is an antiquated method of hunting and population control. As conservation and animal rights causes continue to make inroads, the days of trapping are numbered. Expanding this (in regards to beavers and river otters and other species) is ecologically irresponsible. As more mainstream Montanans become aware of trapping the voices of dissent will continue to get louder.

***Jacqueline Linton Billings, MT***

101. Please do not allow more setbacks or areas closed to trapping. While we were meeting, working with these groups, they were running negative TV Ads and putting up

negative Billboard behind our backs. Not what I would call honest or sincere bunch of people.

***TOM FIEBER Polson, MT***

102. After serving on committees, in regions one and two, for setbacks I am more, firm, in my standing on relaxing more areas from setbacks. At present there is an astounding number of areas that are already closed or restricted that, recreationists use. Their wish is to exclude other users from more public land. Appeasement has failed to stop this attack in the past and will fail in the future.

***TOM FIEBER Polson, MT***

103. Please do not allow more setbacks or areas closed to trapping. We almost lost trapping on all roads, even closed, a few years ago at a commission meeting. It came down to a tie vote with the last vote coming after a long pause. Luckily, the last vote favored the trappers. Let's not allow this to come back because of emotional pleas. We need to be going the other direction to control wolves. The loss of setting traps on roads would be a severe loss to wolf management. That is why the anti's push it.

***TOM FIEBER Polson, MT***

104. Dear Commissioners: I am absolutely against increasing harvest quota and personal quota on river otters in Districts 1 & 2. This recommendation is only based on light anecdotal information and has no supporting scientific basis. Thank you.

***Michael Stoerger Livingston, MT***

105. I am in favor of and increase in the quota as otters are abundant in the areas I trap. It is not uncommon to see multiple at a time.

***Josh Jurek Plains, MT***

106. Please - eliminate trapping in all forms in the state of Montana.

***Joan Hoedel Missoula, MT***

107. As conservationists we believe increasing trapping in MT without scientific evidence of need and without population data is wrong. Trapping is indiscriminate, causes extreme pain, is inhumane and diminishes our precious native wildlife heritage. It rewards a few thousand trappers at the expense of the rest of us who would rather see live animals. Thus, we recommend the shortest seasons possible with the most restrictions possible for all wildlife subject to trapping.

***Gail and John Richardson Bozeman, MT***

108. Please remove any limits on housepets year long. I am starting a Cat and Dog taxidermy service, hoping to branch into small children and entire families. Then I can sell dog fur coats and cat fur hats to Republican governors. Real men kill everything and don't set limits. Greg

***Greg Gunningforte Missoula, MT***

109. I believe the time of trapping has passed. It's time to update our methods. Trapping is not a fair hunt & too many accidental takes are allowed. Let's move our state beyond this archaic approach.

***Kasey Felder Laurel, MT***

110. Please do not allow more setbacks or areas closed to trapping. 1 Setbacks have only been required since the mid 2000 teens in Montana. Up till that time how many people, dogs, skiers or hikers were injured, captured or killed by traps. During most of that time, bear traps, snares, larger than what are in use today, were also used. I did a google search and could not find hardly any other than dogs. Here in Montana, more

dogs are killed each year by wolves than in traps. The size restrictions today prevent serious injuries.

***TOM FIEBER Polson, MT***

111. I do not support expanding quotas as they are based on flawed reasoning.

***Patrick Colbert Missoula, MT***

112. I support the increased quotas for Otter in regions 1 and 2. I attended both FWP meetings and have seen the data that the quotas are filling early and that is justification enough to say that there are plenty of Otters available. Thank you.

***Larry D Rattray Proctor, MT***

113. As a Montana resident and an advocate for wildlife, their future and OURS, I value the presence of healthy wolf populations in Montana. The proposals before the Commission are not ethical, science-based, sustainable, or needed and are inhuman. I urge the Commission to reject proposals to extend wolf hunting seasons or to approve new and deadly wolf killing tactics such as hunting at night or using bait to hunt or trap wolves. WHY are we catering to 1% or less of our population, this is wrong what is proposed and should NOT be allowed to go forward. Our animals are a Major part of our heritage and this legislation is stealing it from our children and grand children for a cruel dollar in a few pockets. Keeping nature balanced is part of our ecosystems greatest chance of recovery and this does nothing more than offset the natural balance of our State. Please stop this cruelty now.

***Steve Krum Laurel, MT***

114. Please allow the wolf trapping season to open Dec1, 2021. Legislation was passed to do this . So please follow through on your end. The extended season should

help us harvest more wolves in Region 1,2,and 3. I support the Wolf snaring on private land. I hope you also support the Otter increase in region 2 as requested.

***John R Wilson Bonner, MT***

115. As a hunter and fisherman who enjoys the wilds in my home state of Montana, I am FULLY against increasing the trapping limits for otter. We are NOT overloaded with wild otter and the trapping of this (all all) species should be gradually phased out. But for now, on this proposal, DO NOT increase the quota of trapped otter in my Montana.

***paul grove Eureka, MT***

116. The idea to increase the otter quota is completely insane and brought to you by a few obtuse individuals who want nothing more than an excuse to kill more species. The price of fur pelts continues to drop as more and more apparel companies, etc. go fur free so why on earth would Montana need to increase trapping of an animal whose pelt only brings \$16.00? (average price in 20') What is the real objective to increase the quota on these harmless animals other than to cater to a few individuals who want to extend their heartless trapping hobby? There is no science behind the need to increase a quota on otter and the notion to do so needs to be thrown out! NO to any increase on their quota!

***Valarie Krum Laurel, MT***

117. I do not support a trapping season for River Otter, at all. I do not think there are sufficient populations of these rare mammals to support a trapping season. Annually, I spend hundreds of hours in the wild places of Montana, hiking, hiking, camping, boating, and I have never even seen an otter. Please allow them to recover to all waters that they originally and historically occupied. Thank you for your consideration.

***Steven Kloetzel Ovando, MT***

118. No trapping on Public Lands. No trapping period. Trapping is not sport! Trapping is torture! Trapping maims domestic and wild animals. It is brutal, senseless, sadistic, and stupid. Why do this? The practice is disgusting. End all trapping now.

***Toni Otello New York, NY***

119. I am in opposition to any increase in otter harvest in all regions.

***Jason Van Hying Florence, MT***

120. Please change the occupied dwelling CR Wording to no lethal set within 1,000 ft of any occupied dwelling Lethal ground set excluded anything smaller than a ground squirrel set.. Please word this however you'd like but change it as it's a invasion of privacy on private property,

***Scott Dittmer Alberton, MT***

121. Trapping is a disgusting and hurtful way for any animal to die or be caught. So barbaric you only care about the few people who just want to make money at another living beings expence.

***Linda Carlson Billings, MT***

122. Increasing otter trapping is unacceptable

***Jessica Hill Livingston , MT***

123. Director and Commissioners \* I support raising the otter quota in Region Two. I have worked with Regional Wildlife managers from both One and Two this spring at their Trappers Meetings. Each meeting holds talks on multiple subjects

concerning species and our concerns. Last year it was decided by trappers in Region Two to reduce quotas on bobcats. Region One trappers asked to set a quota on Martins for the first time. This year in both Regions, trappers asked that FWP start keeping martin samples of DNA for future studies. FWP in Region Two asked trappers their thoughts on otter populations. The quotas were filling fast, what was our observations. It was decided that we could increase the quota in the region. As past events show, we are working closely with Fish Wildlife and Parks on managing wildlife.

***TOM FIEBER Polson, MT***

124. I oppose the proposals that call for increases to the number of otters trapped and killed. The otter is an indicator species of healthy waterways - they need to be protected for many reasons. Many more otters are killed in the unregulated beaver trapping season. Also this trapping occurs during the otter gestation and birthing season. I urge you to stop this cruel unnecessary killing of many more animals that only serves the desires of a small percentage of our collective citizenry. The otter does not belong to a selected few who see trapping as a profitable sport.

***Susan Kronenberger Helena, MT***

125. Perhaps I am misinformed, but from everything I have read about this proposal, it is being driven by a small population of people (Trappers) rather than the science that should be the force behind all wildlife management. But since the FWP appears to be going by anecdotal evidence, then let me throw in my two cents. Twenty years ago, it was not uncommon for me to see otters in the wild, but I have not seen one now in at least three years, maybe five. While this is a species that doesn't get a lot of attention, it would be a tragedy to see them brought to the brink of a threatened or even endangered species just because of poor management. I implore the FWP to do studies that show the population (and long term trends) of otters before making a decision like this that could have an irreversible impact on this species. Thank you for your time.

***Rebecca Barkley Bozeman, MT***



126. I don't agree with the increasing otter trapping

***Bridgar Hill Livingston , MT***

127. I support the modifications proposed by agency staff.

***Keith Fisk PIERRE, SD***

128. Stop à la cruauté et l'exploitation animale. Stop à la bêtise humaine. Stop à la destruction de la biodiversité

***Alexandra Aix-les-bains , NY***

Translation from Google Translate, cannot guarantee accuracy:

Stop cruelty and animal exploitation. Stop human stupidity. Stop the destruction of biodiversity

129. I support in increasing the otter quota in regions 1 and 2. The quota for the season fills up extremely fast during the season.

***Brett Graybeal Hall, MT***

130. The numbers of many of our beloved Montana mammals keep decreasing. The demand and prices for fur is continually decreasing. I urge you to take a science and evidence based approach and not keep increasing quotas. Montana makes way more money on tourists and locals who want to see our wildlife. Plus trapping is not fair chase and ethical taking of game.

***Steven Barkley BOZEMAN, MT***

131. Please continue to expand otter seasons and bag limits across montana! Thank you for your consideration!

***Robert Wigton Clancy, MT***

132. Trapping wild animals is inhumane and barbaric. Feeding the greed and desire for recreation of humans who participate in these activities at the expense of beautiful sentient beings strays far away from the path God wants us to hike. If it is within your power to stop this, please listen to that higher voice of compassion. Let us hear the cries of these animals. Responding to that speaks volumes.

***Gwen Donovan South Burlington, VT***

133. The Occupied Dwelling Rule must be changed to only apply only to public land and not private property. As written, the Occupied Dwelling Rule has caused me unnecessary problems and heartache with my neighbors and it infringes on my private property rights. I recently hired a trapper to eradicate some skunks and racoons from my fenced yard using live cage traps. He was told by a Missoula area FWP Worden that the Occupied Dwelling Rule required him to notify all dwellings within 1,000 feet of my property. His notifications have caused quite a stir with several neighbors who have contacted the trapper demanding to know where the traps are set. I even had one neighbor come to my home and ask me if I was the person who had traps set. These are live cage type traps set on my private, fenced in property. This rule has caused me to fear for my safety and the safety of my family and my property. If I choose to trap nuisance skunks and racoons on my private property, it should not be anyone else's business, even if I were to use kill traps. The Occupied Dwellings Rule is being interpreted differently by different FWP Wordens. I have spoken with the Worden Captain here in Missoula. He said that the rule does not apply to live cage type traps nor does it apply to non-fur bearing animals even though one of his Wordens said the opposite. As written, the regulations appear to apply to non-fur bearing animals. On page 4 of the 2020 Montana Furbearer and Trapping regulations, the rule says, Occupied Dwellings (CR)– Ground sets, including all snares, are unlawful within 1000 feet of an occupied dwelling without written notification to the inhabitant. On page 3 of the 2020 Montana Furbearer and Trapping regulations, Ground sets are defined as Any trap originally set in or on the land (soil, rock, etc.). This includes any traps elevated less than 48 inches above the natural ground or current snow level. I cannot find anything in the regulations that eliminate live traps from being considered ground set traps. Under

Laws and Rules on page 3 of the 2020 Montana Furbearer and Trapping regulations, it states: These laws and rules apply to trapping of furbearers, predatory animals, and nongame wildlife. They do not apply to trapping that is regulated by Title 81 (Livestock), Montana Code Annotated. MCA 87-6-101 defines furbearing animals as beaver, otter, muskrat, mink, marten, fisher, wolverine, bobcat, swift fox and lynx. Clearly, the Occupied Dwellings Rule as written requires notification even for live trapping of predatory animals such as skunks and racoons on private, fenced property. Right now, the Worden says the rule applies to my private property, but the Worden Captain says the rule does not apply to live trapping of predatory animals. There is nothing in the FWP regulations that say that. So, what will happen down the road when a different Worden Captain is in place and interprets the rules differently? Clearly, some changes need to be made to the rule. The Occupied Dwelling Rule must be changed to only apply to public land and not private property. Thank you.

***Keith Koprivica Missoula, MT***

134. There is absolutely no scientific basis to increase the otter quotas and Ken McDonald said as much during the public meeting. The state does not keep a record of population numbers of otters nor do surveys of otter numbers. Using anecdotal information from trappers to increase otter quotas overall is not using the best available science (or any science for that matter) in decision making for wildlife management. As an aside, trapping has been banned in nearly 100 countries because it is considered inhumane and cruel. Here in North America, we started trapping because it was a tradition carried over from Europe. Most fur was sent overseas back to England and France. Now, those European countries have banned trapping and many have banned fur. Shouldn't we follow suit at this point? There's no reason to think that an animal in North America suffers any less than in Europe. Trappers are a very small subset of the population of the West but are profiting off of a resource that belongs to us all for a very minimal fee. Otters are a vital component to healthy, functioning ecosystems that benefit all citizens. Please don't raise otter quotas just to please a few people that will gain financially and rob the people of the chance to see these incredible creatures in the wild.

***Kristin Combs Victor, ID***

135. Support

***Kristopher George Great Falls, MT***

136. Trapping is man's attempt to manage wildlife. Man does not control wildlife...dare I say man is but a strand in the web of life. Clear evidence is in display that man is destroying the planet so why would we sign up for a fur bearer and trapping season?...to bring in more revenue...?...I see alot of don't tread on me' being spewed but aren't these proposed season another deceptive way fo the government to set the rules in favor of revenues and an exploitation of the natural resource?...

***Michael Morin Petersburg, IL***

137. I feel strongly that beavers should be removed from the list of Montana furbearers..The market for beaver fur is basically nonexistent , trappers are not trapping them and their numbers are exploding.The damage their causing to lakes . rivers , and streams will take decades to recover. Relist them as a nuisance animal. In some areas their border line invasive species. Thank You, John Keeley, Havre.

***John Keeley Havre, MT***

138. I fully support raising the quota on otter in both region 1 & 2. I spend a lot of time fishing every year on both the Thompson Falls & Noxon Reservoirs. There is no shortage of otters, as it is unusual to be out fishing for the day & not se at least one otter & sometimes as many as 5 at one time. most otters are taken in traps set mainly for beaver. Beaver are a pain in the ass to trap especially as the fur market for them is almost non-existent. I personally pull my beaver traps as soon as the otter quota is reached . raise the quota & the personal limit on otter. Thank you Jerry C. Shively

***Jerry C. Shively Thompson Falls, MT***

139. 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***

140. Occupied dwellings: ground sets please re-word to lethal ground sets bigger than a ground squirrel are prohibited within 1,000 feet of any occupied dwelling.

***Scott Dittmer Alberton, MT***

141. I think the proposed increases are too large. Maybe increase it by 5-10 otters and see how it goes for a year or two and revisit. By almost doubling the limits as proposed it will be hard to reverse this decision if to many otters are killed off.

***Heather Great Falls, MT***

142. As a Montana Resident with a strong agriculture background, a hunter with over 50 years of experience, and a certified Montana Master Hunter I am opposed to trapping of all types. I do purchase a trapping permit every year but that is because I enjoy calling in bobcats (although I have yet to harvest one) while coyote hunting. Trapping is a cruel manner in which to take a life and should not be allowed under the Big Sky.

***Joel Cusker Helena, MT***

143. Trapping should not be allowed for sport. Too many non-targeted animals (wild & domestic) are getting hurt and killed. You need to increase your efforts to rehab wildlife and not kill for profit. It doesn't help that we have a governor that wants to run the state as a business. I do not support one ounce of this plan.

***Henry Potter Craig, MT***

144. Trapping is a management tool that is part of the Montana heritage. I support the departments proposal to increase otter harvest in regions 1 and 2.

***Tom Radandt Libby, MT***

145. Follow the science, not the politics of a few people. Bad Idea.

***Jack McCormick BUTTE, MT, MT***

## Trapping Comments

I am an avid hiker and have always had a good dog by my side. I have enjoyed the vast and beautiful landscape of Montana's public lands for the last 26 years. Thousands of Montanans highly value their canine companions. As a woman, I feel somewhat safer hiking with a dog who could help defend against human aggression. Over the last several years I have learned a lot about the extensiveness and cruelty of the trapping practices in this state. Because I must be ever alert about the fact that my dog could be harmed or killed by one of thousands of hidden traps – the hiking experience is no longer a fully enjoyable experience. These weapons are lethal and cruel. The public's safety continues to be ignored and the wishes and whims of licensed trappers who are less than 1% of the population, take precedence. For years, my voice and the voice of women, has been ignored. Public lands, including wildlife, are for all, not just a few. Per the Montana 2021 legislature and FWP Director Worsech's assurance, trapping of dogs would be properly assessed through Montana FWP Citizen's Advisory Councils. There is no evidence this is coming to fruition.

I ask you to fully assess the type and number of indirect kills and harming not only of dogs but all other species. Each year we know that numerous 'unintended' animals are killed – including endangered species. However, I don't not want just another report – BUT TRUE ACTION TO STOP THE TRAPPING ON PUBLIC LANDS.

**Sue Kronenberger**    [kronesue@bresnan.net](mailto:kronesue@bresnan.net)

It has recently been announced that Montana FWP is considering a proposal that would require No Setbacks from roads and trails for traps in much of Lincoln and Sanders Counties. Such a radical departure from historic practice, common sense, and professional wildlife mgmt. would be bad enough if it merely favored the 0.5% of Montanans who are trappers. But this provision seems to be a special sweetheart deal to please Reps. Paul and Jennifer Fielder. If approved, this provision will signal that Montana has abandoned sensible, ethical, science-based wildlife management, and joined Wyoming and Idaho on the Lunatic Fringe.

The 99.5% of Montanans who are not trappers, but are hikers, joggers, pet owners, hunters, fishermen, campers, and wildlife enthusiasts deserve to have their safety and enjoyment of our public lands take precedence over this misguided special interest proposal favoring the tiniest of minorities.

Please give this proposal the 1 second of consideration it deserves, followed by a quick and well-deserved burial

**R. Brian Peck**    [gicrbear@centurytel.net](mailto:gicrbear@centurytel.net)

Seriously!!! You allow genocide of innocent animals, and pick on the Wolves. Any animal and human will feel excruciating pain and torture, abuse of the barbaric metal traps.

You allow this, to bring money to your state, and your states' reputation is ruined due to your obsession with killing for money.

Are you scared of the subhuman genocide murderers that have no self-esteem and get off on watching and committing these horrific acts?

Get you limb, your family, your kids stuck in one, do you think it would hurt, how can you represent this division and instead of protecting innocent animals and Montana now seen as a murderous state of animals.

Do something that matters before you leave this place.

Bad karma to all that murder the innocent.

STOP TRAPPING, THAT IS NOT HUNTING!!!!!!

**Laurie Henkel** [wolfwatch4pack@hotmail.com](mailto:wolfwatch4pack@hotmail.com)

Do not allow snares or extended seasons and these atrocious new legislations trump good scientific research data about eco systems and the balance of nature-that would be a short-sited mistake for those involved.

**Bruce Young** [cosmosmt@icloud.com](mailto:cosmosmt@icloud.com)

I hike, often with my dogs on lands paid for with my tax dollars. The common good requires those lands to be safe for all citizens. Stop trapping on public lands. It's too dangerous and does not protect the vast majority of our citizens.

**Chris Charles** [caseycharles50@hotmail.com](mailto:caseycharles50@hotmail.com)

Concerning SB314, HB224, HB 225 which were thoroughly debated by both OPPONENTS and SUPPORTERS went through 2 House Floors with the Majority Legislative Members SUPPORTING these BILLS and were sent to Governor Gianforte signing them into LAW.



So the FWP 's wolf trapping proposal on June 24th is basically NO CHANGE of regulations in the Western 1/3 of Montana where 90 % of wolves are located. This IS where the New Laws are NEEDED MOST. WHAT'S UP!!!?

FWP COMMISSION NEED To IMPLEMENT these LAWS that have been passed so that the LEGISLATIVE INTENT of those Laws are COMPLIANT! Please support the increase in the otter quota in R1 and R2.

**Dave Campbell**      [dcampbell@blackfoot.net](mailto:dcampbell@blackfoot.net)

As a past resident of MT, now in CA, I strongly object to all trapping, legal or not, of wolves, beavers, fishers, lynx, etc.. I also object to cattle grazing on Public land (BLM and NF) and note as a retired USFS employee that you are abusing NEPA, mostly under-scheduling the type and ignoring problems, such as using a CE when you need an EA or EIS. Worse, just doing it and ignore public scoping or input. As a retired USFS GS-11 of 35 years service, grad of UM school of Forestry in 1970, and most early training in MT, I remember these places very well in West MT. When I visit relatives, I am astounded at the increase in subdivisions and development in key wildlife areas, not to mention road building, pollution, and fishing impairment. I think I will stay here in CA this year....its not great, but they try. You give corporats what they want...the money. These are VERY sad cases that the state officials are pushing, to madly develop and consider \$\$\$\$\$ as the primary focus. Its bad enough here in CA! Please get some wisdom. Economically I think fish and wildlife is worth more as a tourist draw than a pelt for a rich garment. What do you think of the MORALITY OF WHAT YOU ARE DOING to the future? I don't think God approves of your proposals. What would Jesus do about this creation? The world is more beautiful and inspiring for all, (at least on PUBLIC land) than as a warehouse of exploitable resources. The land is even more valuable as a tourist economic attractant than a few rich guys profiteering and leaving the public land as a torn-up eyesore.

These anti-environment proposals are so bad I think I must quit being a republican if you hate the land so much. It is downright unpatriotic to abuse our public land as you propose.

**Francis Mangels**      [bioguy0311@sbcglobal.net](mailto:bioguy0311@sbcglobal.net)

I am strongly against the absolutely crazy proposal to eliminate trap setbacks in Sanders and part of Lincoln County. Your cruel changes to regulations on wolf trapping are bad enough, but this just reeks of insanity! Dogs and kids may be injured or killed with this no setback proposal.

If you are trying to discourage anyone but trappers from using these public lands, you are succeeding! But such a small minority of public land users should not be allowed to jeopardize the health and safety of the other citizens who want to recreate on these lands.

Please stand up to the trappers and do what is ethical and moral!

**Roger Holtom**     [holtom@icloud.com](mailto:holtom@icloud.com)

I have lived in Missoula for 26 years. I hunt and fish. I am writing to oppose the new wolf regulations. Before I get into some details, I will address the complaints of low elk numbers in R1, where all of these new legislative bills originated. Our perception of where elk should be and how many there are is based on populations that developed during historically low predator numbers, due to their persecution over the past 100 plus years. Elk and deer are by nature grassland animals that occasionally use mountain habitats, where there are grassy meadows or valleys. Since the prairie was destroyed for agriculture and top predators were killed to near extirpation, and human hunting was regulated, deer and elk have been forced to live more in the mountains. Humans occupy most valleys and have converted most of the rich grassland habitat into ranch rangeland, replacing most winter habitat with grasses and hay fields that are worthless to ungulates in the winter. Habitat quality and quantity are the real issues with lower than desired elk and deer populations. As Chuck Jonkel taught me, habitat, habitat, habitat is always where our focus should be. Animals know how to live, but we must give them space. We have wisely allowed some predators to come back on the scene, and there has been a shift in elk and deer population numbers and how they use the landscape. We should expect hunting to be more difficult. It is not the job of FWP to make hunting easy or guarantee success. We should be focused on bringing back native grasslands to support elk and deer, not killing predators. Deer and Elk have lived successfully with predators for tens of thousands of years, and imbalances we see are due to our own actions, not any animal just trying to carry on in a radically changed ecosystem. R1 is the home of heavy, dense conifer forests, and it has never been a habitat that supports large elk herds, and so it is not reasonable to think that killing more wolves is going to cause a boom in elk numbers or distribution. Idaho has for decades had very liberal regulations around killing all kinds of predators in the Clearwater and Nez Perz forests, which are dense and heavy. There is still no significant increase in ungulated populations in those areas, because it is a habitat issue. The forest use to create good pockets of ungulate habitat with fire, but that is another issue entirely, or is it? It is all connected through habitat.

Due to the legislation recently passed, there will be more killing of wolves. As the commission, you have the power to ensure that we do not take an extreme approach to implementing these new measures. There should be mandatory 24 hours trap checks. Snares should be allowed only by written permission from a private landowner, and should require release devices, a

275lb breakaway, a stop for min. loop size of 10", and the bottom of the loop should be 18" above ground. Trapping Montana's public trust held wildlife is a privilege and should be treated as such in the regulations. Trappers should map where snares and leg hold traps are set and should be limited in number of traps set. No power snares or drag lines on traps. Wolf trapping season should be from Jan to the end of Feb to avoid grizzly bear and black bear incidents in traps. Setbacks must remain in place to protect people and pets. Signs should be posted where trapping is happening. A one wolf quota should be established near national park boundaries and where elk and deer numbers are above quotas, allowing wolves to fulfill their role in the ecology of population control of ungulates and disease control, especially CWD. All non-target catches should be reported and a report on payments for wolves killed should be maintained.

Wolves play an important ecological role and should have a place on the landscape. They are smart and social. Have we learned nothing from our past extreme actions? We need to allow for some natural ecological function among the domination of the landscape humans have executed. Animals are trying live the same as they have for tens of thousands of years, and we came in and rearranged the landscape and habitats that animals depend on to benefit only us. Please allow these creatures to exist without constant persecution. Some management is required in the modern setting, but it does not have to be so extrem as some would like. Use your power wisely and do not cave to the loud voices of a few folks in R1. I request that swift fox trapping cease in Montana, due to low populations and fragmented habitat. As a keystone species of the prairie, with a low population, it makes zero sense to continue to kill this animal. It is not acceptable that we kill any animal for no good reason. Recreational killing is not a good reason, especially considering how few swift foxes remain on the landscape. Thank you for the opportunity to comment.

**Gregory Price**    [gardengriz@hotmail.com](mailto:gardengriz@hotmail.com)

I am absolutely opposed to the new rules being contemplated for no setbacks for traps on public lands. I have dogs and grandchildren. And, I would not feel comfortable taking them or myself onto public lands where trappers are allowed to put disgusting traps that maim, torture, and kill wildlife that has the right to live free. DO NOT ALLOW TRAPPING ON OUR MONTANA PUBLIC LANDS!!!

**Nancy Pickhardt**    [jannabets@hotmail.com](mailto:jannabets@hotmail.com)

Increasing the kill quota for River otters not even knowing their numbers lacks scientific and common sense. River otters are apex aquatic predators who need healthy watersheds. They are sensitive to water pollution and Montana is experiencing fires, drought, low water levels, elevated temperatures, all of which threaten their and all wildlife survival without barbaric, unnecessary human killing schemes. Many of us enjoy watching OUR "water dogs" and don't want more of them slaughtered.

Since the Montana Trapping season runs November 1- April 15, overlapping otter gestation, birthing and time the young are most dependent, the kill rate is ALREADY increased because the young are killed or not even born! They are also frequently killed in beaver traps, as a reminder that traps and snares are inherently NOT species specific. Proof that trapping is NOT highly regulated as we are too often told. Please do NOT increase their quotas in any region. While snares and traps are barbaric and unnecessarily cruel, and hunting wolves is not necessary, but actually detrimental to the ecosystem, including elk herds whose numbers are high enough that you are increasing their shoulder hunting seasons and killing more wolves will gut ecotourism, I ask that you keep the carnage to a minimum utilizing the following guidelines.

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

Require trapping warning signage at trailheads and high use recreational areas.

Establish 1 wolf quota or closure of 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.

Thank you,

**Dr. Allyson Dallmann**     [AllysonRDallmann@outlook.com](mailto:AllysonRDallmann@outlook.com)

In this time of drought Beavers help our water supply for wildlife, agriculture and fire mitigation.

Stop unlimited and unreported trapping of beaver for 5.5-9 months out of the year. All trapped beaver must be reported.

Beavers are critical for our water resources.

The following trapping regulations affect me in the ways listed below:

1. Limit the number of snares and leg hold traps that a trapper can use.
2. Prohibit power snares and the use of drags on traps and snares.
3. Because I walk and hike and often have a dog with me there should be trapping warning signage at trailheads and areas where many people recreate.
4. Setbacks of a minimum of 150' for all public roads for snares and traps should be enforced.
5. Snares for wolves should be only one for a certified trapper.
6. Dates for wolf trapping season should be January 2nd to February 28 to keep from trapping pregnant wolves and bears.
7. No snares on public land.
8. No bait or night hunting for wolves.

9. There must be 24 hour trap checks so the suffering is lessened.
10. One wolf per license.
11. A must is to require reporting all non-target catches.

**Suzanna McDougal** [sumac99@icloud.com](mailto:sumac99@icloud.com)

I had hoped that in my lifetime I would see trapping banned. Sadly this state has gone back 200 years to allow more horrendous killing of our NATIVE wildlife. No ethics, no science based programs. All of this I blame on the Republican mandate & our governor.

The drought & heat will take a toll on our wildlife & fisheries. Humans just keep going forward with our ignorant, senseless ruination of this beautiful planet called Earth

**Joan McKeown** [shadowsburglar@yahoo.com](mailto:shadowsburglar@yahoo.com)

I just recently learned of this assault on public land use. I write in hopes that comments are still being taken.

Anyone who follows the legal shenanigans of right-wingers knows that such a change is to steal public lands from the public to be used by the minutely small number of people who trap. If they can scare other users away from the land by threatening harm to them, their pets, and even their children, then the trappers feel like they will gain wide swaths of land in which to ply their grisly hobby with no oversight.

But have they really thought this through. They won't scare everyone away; and they set themselves up for some nasty public relations. The traps, with no set backs, will be in full view to anyone in the area. The evil-looking jaws that mangle and torture animals, the snares right there in full view! Perhaps someone may even come up on an animal recently trapped still screaming in pain -- or dead. That's not a good look!

Imagine if you ordered a hamburger and the frightened steer was brought up to you and killed right there in front of you. That's not going to get the restaurant much favorable publicity! I can't imagine why trappers want to put their nasty business right up in people's faces. But then I have never (and never will understand) understood people who derive pleasure from torturing animals. If someone did to a domestic animal what trappers do to our precious wildlife, that person would be brought up on legal charges.

**Linda Holtom** [holtom@me.com](mailto:holtom@me.com)

With climate change, ongoing severe drought and raging wildfires upon us, wild animals should not be killed but protected. Wolves and all other wild animals are crucially important to maintain ecosystem resilience and play important ecological roles that no hunter and trapper can replace.

I strongly oppose the proposed increase in the kill quota of otters. You do not even know how many otters exist or will survive the current crisis of drought and destructive wildfires. Now, more than ever, we need otters, beavers and others alive to help us maintain water sources.

Trapping is radical violence against innocent and unsuspecting wild animals. You are teaching young people that a wild animal has no other value than being killed at a time when the public should be engaged in helping to protect wild animals. Killing nonhuman animals is “lazy thinking” as evolutionary biologist, Marc Bekoff has noted.

With a rapidly growing human population, pollution and other human factors that cause habitat fragmentation and loss, pollution etc., it is high time to end the killing of Montana’s wild animals for frivolous reasons such as trophies, commerce, recreation and so-called ‘management.’

The proposed liberalization of wolf killing is in stark violation of nearly all seven tenets of the North American Model of Wildlife.

Over 115 scientists have expressed their opposition to the liberalization of the proposed wolf trapping and hunting for good reasons: <https://s3-us-west-2.amazonaws.com/s3-wagtail.biologicialdiversity.org/documents/Wolf-ESA-relisting-letter-5-13-21.pdf> [s3-us-west-2.amazonaws.com]

The FWP Commission has been taken over by outfitters and trophy hunters, and with a Governor, who displays violence by body-slammng a journalist and shooting a trapped wolf in violation of trapping regulations, science-based management by FWP no longer exists, if it ever has. Furthermore, the proposed mass killing of wolves is driven by a small group of emotional extremists, and should you give in, you risk FWP’s claim of making science-based decisions.

I strongly oppose the proposal of eliminating trap setbacks in Sanders County, the home of Rep. Paul Fielder (Thompson Falls), a wolf hater, wildlife torturer/trapper, with questionable wildlife biology experience, who is married to Jennifer Fielder, CEO of the American Lands Council, whose sole mission is to transfer public lands to private hands. This outrageous proposal is yet another worrisome and appalling step in the take-over by private individuals with commercial and trophy interests and turning Montana into a ‘playground’ where wild animals are being used as props for the ‘elite.’

I get nauseous each time I hear so-called ‘sportsmen’ making their nonsense claim that there are no elk left for them to kill, and that wolves kill too many elk. FWP’s own data show that elk are at or above objectives in most wildlife ‘management’ districts. Also, likely many more

ungulates are killed by cars than by wolves and end up at the Montana Department of Transportation's road kill compost sites. I have heard that FWP arrives at private property and forces elk off back onto public lands in the early morning hours of the begin of hunting season.

In summary, I strongly oppose:

--- the mass killing of wolves by hunters and trappers as proposed for 2021-2022 kill season via an extended trapping season, allowing snares, baiting and night shooting, expanding the 'bag' limit, eliminating quota and quota areas.

--- the proposed increase of killing of otters by trappers;

--- the proposed elimination of trap setbacks in Sanders County.

---any trapping and shooting of wild animals for any reason.

At a time when one million plant and animal species are projected to go extinct, it is high time to end your business-as-usual killing of wild animals, and instead, start protecting ecosystems and the wild animals who live there. I also suggest that you start engaging the public to garner support for valuing wild animals alive.

**Anja Heister, PhD** [loxodonta66@gmail.com](mailto:loxodonta66@gmail.com)

No killing 50% more river otters. Usfws, is supposed to protect wildlife. Instead, the dept. has decided to kill innocent animals. Usfws needs strict oversight and restructuring. Our taxpayer's money is being misused.

**Jane Collins** [janecollins1952@gmail.com](mailto:janecollins1952@gmail.com)

I am adding these comments to my earlier comments, as I have become aware of a proposal you are trying to sneak in. I strongly oppose your proposal to eliminate set backs in Sanders County and Lincoln County. I frequently recreate in these areas, usually hiking or bird watching. You will be putting us, the public, at risk with this proposal. We will not be safe to recreate with our children and dogs if you proceed with this egregious proposal. Your proposal only serves a tiny number of extremists. Four generations of my family have been born and raised in Montana.....your proposal doesn't reflect what the vast majority of Montanas want for our public Lands. We expect you, the Commissioners, to uphold your mission to be stewards over our Public lands and protect wildlife and the Public. Your job should not be to cater to a very



small minority of extremists. I oppose this proposal, as it would set a very bad precedent, and put children, dogs and the public in danger

**Patricia Ames**    [lunaswan415@gmail.com](mailto:lunaswan415@gmail.com)

Please don't allow more killing of river otters.

**Myphon Hunt**    [myphon1@gmail.com](mailto:myphon1@gmail.com)

I am very ashamed to call myself a Montanan right now, and HB 224, HB 225, SB267, and SB314 are a huge part of that. The war on wildlife in general, and wolves in particular, is not ecologically sound, and it will undermine the health of Montana's greatest habitats. The backsliding of Montana's conservation ethic has led me to believe that relisting gray wolves on the Endangered Species Act is the best hope we have, because our state has lost my trust in its ability to manage wildlife. Until that relisting takes place, however, I urge the Commission to please ensure the following in regards to the wolf proposals:

- Require 24 hour trap checks.
- Prohibit the use of snares on public lands.
- Require written proof of landowner for snaring on private lands.
- Require wolf trapping certification inclusive of snaring for anyone trapping wolves
- Prohibit power snares and the use of drags
- Revise wolf trapping dates from Jan 2 - Feb 28 to avoid incidental take of grizzlies.
- Allow 1 wolf per license.
- Require reporting of all non-target catches
- Require trappers carry maps of trap locations
- Maintain a maximum of 1 wolf quota adjacent to National Parks
- Prohibit the use of bait and night hunting of wolves
- Present the skull and hide of all wolves taken in an unfrozen condition for confirmation from FWP
- Require trapping warning signage wherever traps are set.

- Require the publication of all wolves trapped on the FWP website
- Require snares to have diverters, relaxing lock, 275lb rated breakaways, a stop for minimum loop size 10", and the bottom of a minimum loop 18" above the surface.

Also, there is no reason why more otters should be trapped. Please refuse all proposals to increase their quota.

And speaking of semi-aquatic mammals, we need to protect beavers more than ever. It is ecologically and morally unconscionable to allow unlimited, unreported beaver trapping for 5.5-9 months of the year. In incredible hot, dry times like these, we need these keystone species immensely. Please see the attached article I have written on why beavers are so important, and take urgent action to drastically reduce (or better yet, eliminate) beaver trapping in our state.

**Rob Rich**      [rlrich3@gmail.com](mailto:rlrich3@gmail.com)

What is the scientific justification of killing more river otters? I think we need to kill less river otters. There is no need.

**Richard Zeisse**      [jivan.avrata@gmail.com](mailto:jivan.avrata@gmail.com)

Most wildlife species are under stress right now due to heat, drought and habit changes due to Climate Change. It is premature to increase ANY trapping quotas until population quotas have been established for several years under these conditions. FWP, typically, in the past, has seemed to be very careful to base quotas for hunters, folks who fish, and those who trap on solid factual information about populations and their ability to withstand population reductions.

Increasing quotas before we see how populations cope with the changing climate and drought stresses is inappropriate as it is not based on sound data. The data has to be collected first. Increasing quotas needs to be based on proven population durability, and should thus be decided after adequate data is collected - maybe in 2-3 years, or what is typically done for this situation in Wildlife Biology.

It does not serve anyone, neither hunters, trappers nor the general public, if population decreases occur prematurely. We know all too well the difficulty of bringing populations back to healthy population numbers. This costs money, time and instability in the ecology in which the animal species serves a function.

We are all counting on our trained wildlife biologists and administrators to help our wildlife through these difficult times. There's a lot yet to be learned before we reduce populations further.

**Ellen Trygstad**      [eltjupiter@gmail.com](mailto:eltjupiter@gmail.com)

Please accept my comment in opposing / OPPOSITION increasing quotas on river otters in Montana.

The increased otter trapping proposal is happening when Montana is under a statewide declared drought emergency. During record breaking, water is way down, and fires are underway. Wildlife is already under stress.

River otters help and are a natural part of rivers. They were not put on this earth for trappers to sell their fur or destroy their habitat.

Experts says the worst is yet to come, i.e. August. The trapping season on otter begins Nov 1.

« FWP writes because they met with the Montana Trappers Association, other trappers, and the Montana Fur Harvesters in Region 1 and Region 2 and the trappers want to trap and destroy more river otters. » That's why.

In the largest auction in the world, river otters either didn't sell or sold for \$15 last year. These highly sensitive animals to water pollution are worth far more alive and to many, than dead for the selfish few.

The increased quota proposals are:

Region 1 (NW Montana) from 28 to 40 otters.

Region 2 (Western Montana) from 25 to 40 otters.

and

Increase individual otter kills from 3 to 4 per trapper.

This is insane. Don't decimate river otters.

Problem with increased trapping numbers: Trapping season starts Nov 1st and closes April 15 unless quotas are met. The "incidental" accidental trapping of otter, which is common, do not come off the quotas.

Don't let hunter groups and unethical Montana politicians betray Montana's wildlife.

The passage by partisan vote of HB224, allows snaring of wolves, 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 snared in Montana and at least 2 died.

Commission please accept my comment: I oppose HB224. I urge all wolf proposals that sets the wolf season be 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.

When you don't have wolves, you have overpopulations of other animals. That unbalances ecology and brings diseases like Lyme disease by too many deer. I know hunters want the luxury of being to easily kill when they wish, but this is a very sel-centered view. Humans don't own nature. We do have the responsibility to be moral and ethical.

**Ester Gonzalez**      [ester.gonzalezlax@yahoo.com](mailto:ester.gonzalezlax@yahoo.com)