

**MONTANA FISH, WILDLIFE & PARKS**  
**PUBLIC COMMENT ON NONGAME CHECK-OFF PLAN**

1. The proposal asks for approval of "\$30,000 for Inventory, monitoring, and conservation work on Montana Species of Concern and species in need of inventory as determined through a formal ranking process and minimize the negative impacts of Endangered Species Act listings to landowners, recreationists and user groups." Yet not mentioned in the program report, is a listed species of concern, the swift fox, who was eradicated in our state before and whose low numbers are unknown. Given the severe drought, heat, fires, and with expert predictions it will worsen, swift fox could tip over the edge and necessitate ESA listing. According to the research, aside from mortality due to trapping, shooting, poisons, and from vehicles, the little 5 pound swift fox are found to be negatively impacted further by agriculture, topography, predation, drought, severe winters, loss of prey, and climate change. Other species, porcupine, spotted skunk, aka civet cat, who FWP has publicized concern for in the past, go unmentioned in the proposed attached report. In 2017, FWP featured an article, "Where have all the porcupines gone?" "This species has undergone significant and possibly catastrophic declines in conifer forests west of the Continental Divide. The cause of these declines is unknown, and there is considerable uncertainty what effect this will have on the persistence of the species within this region of the state." Montana Field Guide - Porcupine - US Gov. Yet they are still legally trapped, unlimited, unreported, year round, and what is being done to help them and assess their population health? Western Spotted Skunks are listed as a Montana species of concern "because of the limited number of records and limited distribution within the state." FWP's voluntary trapper harvest survey does not even bother to distinguish between the striped skunk and the rare spotted skunk. Beginning in 2018, Furbearer coordinator, Dr. Inman, assured TFMPL that this would be corrected. However, population estimates based on harvest reporting are not upholding scientifically. \$5,000 "for Wildlife viewing and outreach projects that encourage more Montanans to appreciate Montana wildlife." Yes, but to continue to allow the unlimited trapping and un-reporting of beaver for 5 1/2 months - 9 months out of the year, is disingenuous to this goal and to the goal to preserve fish and wildlife. Beaver create the habitat that the majority of species depends upon including the rare, threatened and endangered. In your nongame program report attached to this proposal it states, "beaver may be one of the most important species for the non-game program because of their ability to dramatically modify Montana's most biologically rich yet threatened ecosystems to the benefit of a wide range of species." It is beyond time to step it up for all the species, support biodiversity, focus especially on the most critically important ones and those most in need of establishing and maintaining their healthy populations before it is too late. With that, more funds and widespread support would be achieved. Thank you, KC York President/Founder TFMPL Trap Free Montana References: <https://trapfreemt.org/wildlife-species/swift-fox>  
<https://flatheadbeacon.com/2017/02/16/where-have-all-the-porcupines-gone/>  
<http://fieldguide.mt.gov/speciesDetail.aspx?elcode=AMAJF05020>  
<https://trapfreemt.org/wildlife-species/beaver>

***KC York Hamilton, MT***

2. This is hopelessly underfunded. How can you sit there with as straight face and believe that a paltry \$40,000 will suffice to manage all state wildlife that is not hunted, trapped, or fished for. You must go to the legislature and demand that at least 10 times the amount collected from tax

forms be allocated to this work. Anything less is a gross breach of your fiduciary duty to carefully manage Montana's wildlife as the public trust that it is.

**Rocky Sehnert Clinton, MT**

3. I propose to continue the nongame check-off workplan to be continued as it was prior to the 2021 legislature's changes to the workplan.

**Arnold Sowa Helena, MT**

4. Dear FWP: Right on. As far as I'm concerned the Non-Game Check-Off Plan could double its budget and that would be great for me. Cheers!

**Bill Buckley Bozeman, MT**

5. Micro manage the program and NOTHING will happen. My grandsons have a saying: "Grandpa what can you buy with that?" I was offering them \$100. The same is true with a \$5000 grant etc. What can you do with that? AND it it proposed to be competitive. How much time is a student going to put into a \$5000 grant. Writing up the summary will cost \$5000. Just give the money to MSU or UofM for nongame research. They are making some very interesting discoveries at Yellowstone Park and algae. This sense of micro management is going to result in the same result as the FWP computer software fiasco - there will be no bidders. \$30,000 is not going to go very far, won't even pay for a full time employee - not to mention the dollars needed for support & supplies - again, give it to MSU or UofM and hopefully they will parley it into a viable program. All of this monkey business for a lousy 30k.

**Randall Knowles great falls, MT**

6. I fully support the nongame check-off workplan. I would like this program and its staff to have more financial support and commitment from FWP. This is a critically important program of FWP, that has excellent educational benefits for all Montanans.

**Steven Kloetzel Ovando, MT**

7. I think that this is a good use of the spending I would support it, making sure that species of concern don't become extinct in Montana is very important for future hunters and anglers!

**Jacob Hutchens Kalispell, MT**

8. Habit improvement is not in a vacuum. If you improve the Habit for big game, small game, or NON-Game you improve the habit for all creatures which may or may not use the site. Non game check off allows for improvements or researcher of species which improve the intrinsic value of our state.

**Michael McGouldrick Hamilton, MT**

9. I support

**Kristopher George Great Falls, MT**

10. **Willard D. Ulry Olympia, WA**

11. I support the department's proposed nongame check off workplan. this plan will promote species diversity with in the state of Montana.

**Tom Radandt Libby, MT**

**12. From: Clayton Elliott <clayton@montanatu.org>**

**Sent: Tuesday, July 6, 2021 2:05 PM**

**To: FWP Wildlife <fwpwld@mt.gov>**

**Cc: Worsech, Hank <Hank.Worsech@mt.gov>; Temple, Dustin <dtemple@mt.gov>; Ryce, Eileen <ERYce@mt.gov>**

**Subject: [EXTERNAL] MTU public comments, Nongame Check-off Workplan**

To Whom It May Concern:

Please find attached written comments from Montana Trout Unlimited regarding the proposed nongame check off workplan pending before the Fish and Wildlife Commission. Do not hesitate to contact me if you need additional information or have questions. Thank you for your consideration.

Respectfully,

Clayton Elliott

**Clayton Elliott**

*Conservation and Government Affairs Director*

**Montana Trout Unlimited**

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July 6, 2021

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

*Sent by email to: [fwpwld@mt.gov](mailto:fwpwld@mt.gov)*

**Re: Public Comment on the Nongame Check-Off Workplan pending before the Fish and Wildlife Commission**

To Whom It May Concern:

Thank you for the opportunity to provide written comments on the proposed nongame check-off workplan that is pending currently before the Fish and Wildlife Commission. We have reviewed the proposed expenditures suggested by the Department, including authorization of \$30,000 for inventory, monitoring, and conservation work on Montana Species of Concern, and we wish to go on record supporting this investment.

Founded in 1964, Montana Trout Unlimited (MTU) is the only statewide grassroots organization dedicated solely to conserving, protecting, and restoring Montana's coldwater fisheries and their habitats. MTU is comprised of 13 chapters across the state and represents approximately 4,500 TU members. Many of our members are conservation-minded anglers who have an active interest in the health and recreational values of our state's rivers and streams.

Investments in the better understanding and unique challenges of managing many of Montana's Species of Concern, specifically the multitude that depend on cold, clean, complex, and connected aquatic and riparian habitats, has a direct benefit for the overall ecosystem health that coldwater fish depend on for survival. In fact, many of these species serve as important indicators of the integrity of these ecological systems. We know that when we better understand the science of these ecosystems and the species that they support, we can make better informed decisions in their management now and into the future. The investment provided through the nongame check off program is critical to that effort. Additionally, MTU works with countless landowners, recreationists, and user groups to pioneer creative and durable solutions to fish and water conservation statewide, making the continued investment in long-term game and nongame species conservation essential in solving some of the most challenging management decisions in

our state. In fact, our only frustration is that there is not more money available for these efforts to support nongame and game species alike.

We urge your support for the nongame check off program. Please do not hesitate to contact us with any questions, or if you need additional information regarding the comments that we have submitted (via email at [clayton@montanatu.org](mailto:clayton@montanatu.org) or by phone at 406-543-0054). Again, we thank you for the opportunity to comment.

Respectfully,



Clayton Elliott  
Conservation and Government Relations Director  
Montana Trout Unlimited

cc:

Mr. Hank Worsech, Director, Montana Fish, Wildlife, and Parks

Mr. Dustin Temple, Deputy Director, Montana Fish, Wildlife, and Parks

Dr. Eileen Ryce, Administrator, Fisheries Division, Montana Fish, Wildlife, and Parks