

#1

COMPLETE

Collector: 2023 (Web Link)
Started: Wednesday, July 20, 2022 9:37:57 PM
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Page 1

Q1

Please provide the following information:

Name: **TREY CATHEY**
City/Town: **BILLINGS**
State/Province: **MT**
Email Address: **reconep@yahoo.com**

Q2

Please comment on the Proposed 2023 Nongame Check-off Workplan

I support trapping in Montana.

I support the trapping of wolves in Montana.

I support predator management as a tool to protect our ungulate populations.

I support doing away of the WMU's and going to the use of the Trapping Districts. Also, when reporting a wolf take the only location that should be reported is the trapping district that the wolf was taken, except for the 313 park district.

#2

COMPLETE

Collector: 2023 (Web Link)
Started: Thursday, July 21, 2022 9:25:47 AM
Last Modified: Thursday, July 21, 2022 4:51:22 PM
Time Spent: 07:25:35
IP Address: 69.145.22.63

Page 1

Q1

Please provide the following information:

Name: KC York
City/Town: Hamilton
State/Province: MT
Email Address: info@trapfreemt.org

Nongame Check-off Workplan

Q2

Please comment on the Proposed 2023 Nongame Check-off Workplan

Chair Robinson, Commissioners.

While we are in support of the nongame tax check off and the appropriations from the marijuana tax funding the nongame program, some very important things are amiss.

As FWP stated in the cover letter for the proposal, they are "responsible for managing about 500 species, the majority of which are nongame wildlife." The Montana Furbearer and Trapping Regulations handbook defines "Nongame" wildlife as "any wild mammal, bird, amphibian, reptile, fish, mollusk, crustacean, or other animal not otherwise legally classified by Montana statute or regulation." Some examples are badgers, raccoons, and red fox whom trappers often target. However, trapping is non-selective and indiscriminate.

There is no resident trapping license required to trap nongame. They can be trapped unlimited, unreported, year-round by residents, and without trapper education. Only those trappers who purchase a trapping license receive the trapper survey. Roughly 1/3 of licensed trappers bother to do the voluntary survey. The overwhelming majority of nongame species are not listed on the survey. Trappers are under no obligation to report them, even as incidental nontarget catches, unless they are listed under the ESA or the trapping season is closed, i.e. wolverine. Thus, the trapping of nongame wildlife is highly unregulated.

So how does this unregulated trapping fit into the planning and monitoring of nongame populations, the recovery of sensitive species, and avoidance of the ESA?

To continue this protocol and ignore the nongame trapped wildlife is disingenuous to the goals of the program.

Additionally, the department and the Fish & Wildlife Commission remains absent in addressing and rectifying the unlimited, not required to report, recreational and commercial trapping of beaver 5 1/2 - 9 months out of the year, with most of state being the latter. This contradicts the Montana State Wildlife Action Plan and is a huge disservice to the species you are entrusted to manage.

Beaver are scientifically shown to be the most important wildlife species in North America. Beaver are a keystone species who play a critical role for the species in Montana's nongame wildlife program. Beaver are nature's hydro-engineers creating habitat for these very species, for water resources, in providing fire breaks, and for battling the impacts of climate change. 50% of North America's threatened or endangered species rely on beaver created wetlands for their survival. They are worth far more alive than the \$11 to a trapper. Beaver need your support!

In closing, the proposed Nongame Tax Check-Off Workplan puts "emphasis on finding ways to minimize impacts of Endangered Species Act listings on landowners, recreationists, and other user groups." This should not be the focus of the nongame workplan. It is past time the concentration be in the best interests of the wildlife, promoting biodiversity, substantiated with data and scientific research, supportive of their natural and integral role in the ecosystem, and through any recovery and population stabilization for present and future generations to come.

Please let this be your legacy.

Thank you,
KC York, president Trap Free Montana, and on behalf of the board of directors