August 4, 2025

Via: https://fwp.mt.gov/aboutfwp/commission/august-2025-meeting

Montana Fish, Wildlife, and Parks Commission

Re: Safari Club International Comments on Fall 2025–Winter 2026 Furbearer and Wolf Trapping and Hunting Seasons and Quotas

Dear Commissioners:

Safari Club International ("SCI") appreciates the opportunity to comment on the proposal by Montana Fish, Wildlife, and Parks ("FWP") to revise furbearer and wolf trapping and hunting regulations.

SCI believes that wildlife management decisions should be made based on science, in support of management objectives, by wildlife management professionals. We do not necessarily support legislative directives to reduce wildlife populations. But Montana's legislation is based on continued wolf population growth, well in excess of management objectives. SCI acknowledges the negative impacts that expanding wolf populations have on ungulate species and livestock. And SCI strongly supports responsible management of game populations, including at levels that promote balance among predators and prey, maintain harvest opportunity, and reduce conflicts between humans and wildlife. SCI supports the proposal because it will provide additional flexibility to manage wolves in Montana and comply with state law that requires greater management of the wolf population.

Safari Club International

SCI, a nonprofit I.R.C. § 501(c)(4) corporation, represents approximately 100,000 members and advocates worldwide, many of whom live or hunt in Montana. SCI has many members who outfit and guide hunts in Montana and depend on this for their livelihoods. SCI has four chapters in Montana and multiple chapters in the surrounding states. SCI has litigated science-based wolf management for decades. We are currently part of six cases addressing the Endangered Species Act status of gray wolves, in Montana and the rest of the lower 48 U.S. States. SCI has submitted scores of public comments regarding wolf management federally and in States, like Montana, with expanding wolf populations.

SCI Supports the Proposed Revisions to Wolf Hunting and Trapping Regulations

SCI supports the proposal for the following reasons. **First**, it is mandated by Montana law. Montana statute requires the Commission to establish hunting and trapping seasons for wolves "with the intent to reduce the wolf population in this state to a sustainable level, but not less than

the number of wolves necessary to support at least 15 breeding pairs."[1] Given this directive, the Commission should reinstate the statewide quota and expand methods of harvest as appropriate to reduce the wolf population in areas where wolves are overly abundant, thereby reducing the overall state population.

Second, Montana's wolf population has remained well above the recovery threshold identified by the U.S. Fish and Wildlife Service in the 2009 delisting rule (reinstated by Congress in 2011).[2] The current estimate of almost 1,100 wolves in Montana alone aligns with all the population estimates since delisting. But it is well above the management objectives of Montana's Wolf Management Plan.[3]

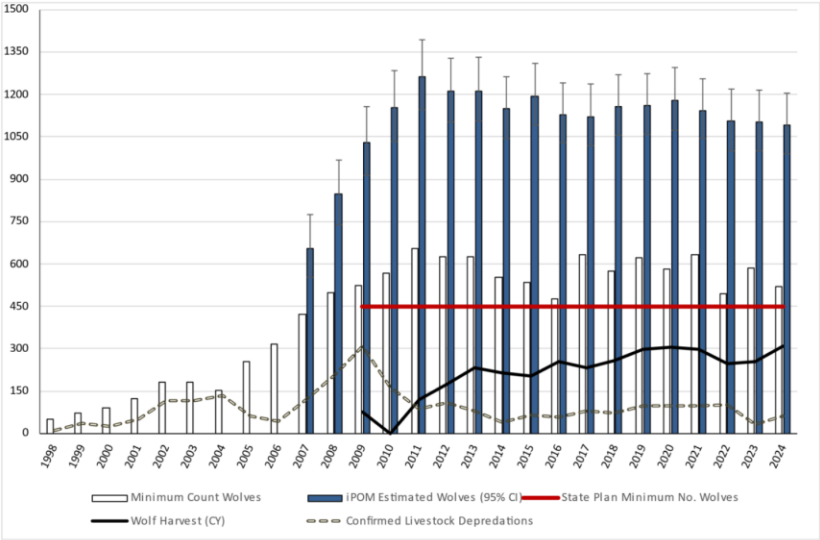


Figure 1. Integrated Patch Occupancy Modeling (iPOM) estimated number of wolves in Montana (including 95% confidence intervals) and verified minimum number of wolves residing in Montana in relation to 2025 Montana wolf plan requirements along with trends in wolf harvest and confirmed livestock losses due to wolves, 1998 – 2024.

That large wolf population is impacting prey populations, especially moose,[4] but also elk and mule deer. For example, in 2001, there were close to 20,000 head of elk in southern Montana, in the Yellowstone ecosystem. Today there are fewer than 5,000. That decline is primarily due to wolf predation.[5] Further, the wolf population is seen by many Montanans as expanding well outside core habitat. As one example, wolves killed and consumed an elk on the Gardiner High School football field last year.[6] This type of expansion warrants further management actions that

[1] Mont. Code Ann. § 87-1-901.

[2] https://www.fws.gov/species-publication-action/final-rule-identify-northern-rocky-mountain-population-gray-wolf.

[3] https://fwp.mt.gov/conservation/wildlife-management/wolf.

[4] https://fwp.mt.gov/binaries/content/assets/fwp/conservation/moose/mfwp_moose_w-157-r_finalreport.pdf.

[5] Decl. of Matt Lumley, submitted in Case No. 24-CV-42 (D. Montana).

[6] https://www.bozemandailychronicle.com/news/environment/gardiner-public-school-yellowstone-national-park-wolf/article_107ac996-a5d5-5ba2-9a70-df99208e3f4d.html.

will allow for greater flexibility to manage wolves, particularly in densely populated management units.

Third, the FWP and Commission's responsibilities are to conserve all species, not just wolves, and to promote hunting opportunities.[7] In fact, Montana law requires the FWP to manage wolves "to preserve citizens' opportunities to hunt large game species," which includes deer, elk, mountain sheep, moose, antelope, and mountain goats.[8] Responsible predator management is a critical component to ensuring balance between predators and prey. Montana's current localized quota allocation has been insufficient to manage the wolf population. Research shows that wolf populations continue to grow unless harvest rates reach 29-53% of the population.[9] Even then, the wolf population remains essentially stable. Current offtakes of fewer than 300 wolves are simply not high enough to control the wolf population effectively. An expanded quota is necessary to provide some potential effective management. While it may be unlikely that this adjusted quota will be completely filled, allowing for greater harvest across the State (except in select wolf management units) should allow for higher offtakes, at least in the most abundant areas.

Fourth, SCI supports the conservative and adaptive nature of the FWP's proposal. Wolf hunting and trapping quotas remain very low (three wolves) in the Wolf Management Units adjacent to Yellowstone National Park (to respect the desire to maintain high wolf numbers within the Park). All quotas are adjustable year-to-year, following adaptive management principles. Despite the rhetoric of anti-hunting advocates, neither State law nor the FWP's proposal seeks to eradicate wolves in Montana. This proposal and the law are about balance.[10]

In sum, the proposal will provide greater opportunity and the ability to more effectively manage the wolf population across the State. This is consistent with State law and the FWP's and Commission's missions. SCI urges the Commission to adopt the FWP's proposal.

Respectfully,



W. Laird Hamberlin
Chief Executive Officer
Safari Club International

[7] Mont. Code Ann. § 87-1-201; § 87-1-107; § 87-1-301.

[8] Mont. Code Ann. § 87-1-217.

[9] *E.g.*, L.G. Adams et al., Population Dynamics and Harvest Characteristics of Wolves in the Central Brooks Range, Alaska, Wildlife Monographs (2008) (29%); J.A. Gude et al., Wolf population dynamics in the U.S. Northern Rocky Mountains are affected by recruitment and human-caused mortality, Journal of Wildlife Management 76:108–118 (2012) (53%).

[10] As explained in the proposal, "[t]he statewide quota including area-species quotas in WMUs 313 and 316, if met, would ensure the statewide wolf population does not fall below 550 wolves during that season."