

September 19, 2023

Montana Fish Wildlife & Parks
1420 East Sixth Avenue
P.O. Box 200701
Helena, Mt 59620-0701

Re: Wolf Plan—Public participation opportunities

Dear Director Temple,

All people of Montana have significant interest in engaging in wolf management planning. As such, the perspectives, knowledge, and views of all Montanans should be considered in Montana Fish, Wildlife, and Parks' ("FWP") gray wolf management planning process. In that spirit, we request that FWP provide several avenues, outlined below, for robust and meaningful public participation in the ongoing wolf management planning process.

The planning process began on January 12, 2023, when Governor Gianforte directed FWP to form a new wolf plan for the first time in over 20 years. On March 22, FWP notified the public of its intent to begin developing a new wolf plan and opened a 30-day 'scoping' period. During scoping, the public submitted comments to FWP to identify issues the agency should consider when drafting the new plan. When the draft plan and environmental analysis are eventually released, the public will have as little as 30 days to provide comments before the agency finalizes the plan.

Wolf management in Montana has garnered significant interest and engagement for the past several decades, and the wolf management planning process should reflect that. Thus far, it has not. Below, we outline several means by which FWP can ensure that diverse public viewpoints are fully considered—in line with FWP's mission to steward wildlife for the public—as it makes critical decisions about the management of wolves. In short, we request that FWP (1) assemble a citizen advisory council to guide formation of the plan; (2) plan at least 15 meetings for the public to comment on and discuss the plan; and (3) provide at least 60-days for the comment period for the draft plan and environmental analysis.

First, we ask that FWP establish a structured, collaborative process in which citizens who fairly represent the public can advise FWP in the development of the wolf plan. The management of our wolf population has social, ecological, cultural, economic and other implications for citizens across the state and it is crucial to engage these perspectives in a planning process. Therefore, it is imperative that FWP consider the interests of not only those engaged in ranching, hunting, and outfitting in the state, but a broad cross-section of the population whose interests will be impacted by wolf management. FWP could achieve 'fair' representation by ensuring that various stakeholder groups are provided a so-called "seat at the table" at such a citizen advisory council.

As FWP has demonstrated previously with the Wolf Conservation and Management Plan approved in 2004 and more recently with the Draft Elk Management Plan, creating a citizen advisory council is a crucial first step towards developing a sound wildlife management plan. The Wolf Management Advisory Council was assembled in 2000 by Gov. Racicot (and reconvened by Gov. Martz) to guide FWP's development of the 2004 wolf plan. The Council was a mix of educators, conservationists, outfitters, livestock producers, hunters, tribal members, and other citizens who collaboratively developed guidelines for the wolf management plan. Likewise, the recent elk management planning process began in April 2020 with formation of the Elk Management Plan Initial Guidance Citizens Group. FWP described this group as "diverse, independent, and represent[ive of] multiple stakeholder perspectives." In 2022, FWP assembled a second Elk Management Citizen Advisory Group. We implore the agency to follow a similarly robust procedure here.

Concerningly, an FWP representative recently explained at the August 17th Fish and Wildlife Commission meeting that FWP has not yet engaged such a council because they are mining the previous wolf plan. However, reliance on citizen perspectives from two decades prior—that may or not have been incorporated into a final plan—does not abide by the spirit of including the public in a current planning process. FWP has an obligation to manage wolves and other wildlife for the state's current citizenry.

We also request that FWP provide the public at large with many opportunities to comment on the draft plan by hosting numerous public meetings—at least 15—across the state while it develops the wolf plan. During the formation of the previous wolf plan, FWP held 14 community work sessions across the state over several months to allow the public to provide oral comment. Similarly, FWP held nearly 50 meetings across the state as it formed the recent draft elk management plan, and provided public comment opportunities on the guidelines and recommendations released by both citizen advisory groups. So far, FWP has provided two virtual scoping meetings and a 30-day public comment period. We hope to see many more opportunities for engagement in the coming months.

Lastly, we ask that FWP give the public at least 60 days to comment on the draft plan when it is eventually released to ensure that people have enough time to adequately engage, as the agency did for the previous wolf plan. Overall, we hope to see FWP develop the new plan with at least the same rigorous public involvement as it did the last plan.

The people of Montana deserve to meaningfully engage in the management of one of our most iconic species, and they deserve to be fairly represented in the upcoming planning process. Merely providing opportunities for written public comment is not enough—such limited engagement does a disservice both to wolves and the many Montanans who care about how they are managed. Thank you for considering these suggestions.

Sincerely,

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