

**From:** donotreply@legmt.gov  
**Sent:** Thursday, January 18, 2024 6:50 AM  
**To:** LEG Cmte-EQCcomment  
**Subject:** Public Comment for EQC

## Public Comments for the Environmental Quality Council

**Date:** 18th January 2024 06:50

**First Name:**  
KC

**Last Name:**  
York

**Email Address:**  
info@trapfreemt.org

**Subject:**  
State Drought Plan

**Comment:**

To address draught, strive to build resistance, and have a state management plan accordingly, this must involve nature's hydro-engineer, the beaver. They are critical to the success of healthy watersheds and for species ranging from moose to songbirds, as well as the creation of natural firebreaks and overall healthy watersheds. Replenishing aquifers is crucial to Montana's agriculture and communities. Beaver dams slow the flow of water and decrease rapid run off from heavy rains and snow melt. Restored aquifers produce storage for millions of acre feet of water along the 60,000 miles of mountain creeks in Montana, and would increase the water supply imperative during droughts. Beaver can "deliver significant geomorphic modifications and result in changes to nutrient and sediment fluxes," write the researchers, "limiting negative downstream impact" of agricultural pollution. Beaver are "master river engineers" and cost a fraction as much as conventional stream restoration projects. The beaver's impact on water reservoirs is unlike any others. "Instead of (water) racing downstream and flooding, it's slowed down and stored and you have all these areas of savings accounts being filled up." "And those "savings" influence more than just surface water, as they can percolate through soil to become groundwater and recharge aquifers." This is of up most importance in our arid west for creating and maintaining wetlands, for wildlife, agriculture, drinking water, global warming and reducing fires! As the most severe drought in the nation continued to pummel ranchers and farmers in northeastern Montana, in 2017, taking them by surprise, after fall rains and floods, untold numbers of beaver were still legally trapped 9 months out of year in eastern and central Montana and for almost 6 months in the rest of the state for recreation! Outside the lengthy beaver trapping season, damage trapping permits can be easily obtained within just days. Several years ago, from less than 1/3 of licensed Montana trappers voluntarily reporting, they, alone, killed almost 20,000 beaver in our state in 3 years! Today, beaver are one of the most popular to trap and kill. However, they are worth far more alive for many, and for many reasons, then for the less than 1% in our state who trap. More than half of the state was reported to be in a drought, in 2017, with nearly 86% of the state experiencing "abnormally dry" conditions. Yet, studies found that "even during drought, where beaver were present, there was 60 percent more open water than those same areas during previous drought periods when beaver were absent." We cannot address drought and continue to ignore the critical role

of beaver in mitigating it. We must support the beaver's natural ability to preserve our vital water resources. Thank you,  
KC York Trap Free Montana PO Box 335 Hamilton, MT 59840 406-218-1170

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**Songer, Jolanda**

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**From:** donotreply@legmt.gov  
**Sent:** Thursday, January 18, 2024 4:51 PM  
**To:** LEG Cmte-EQCcomment  
**Subject:** Public Comment for EQC

## Public Comments for the Environmental Quality Council

**Date:** 18th January 2024 16:51

**First Name:**  
James

**Last Name:**  
Bell

**Email Address:**  
mttroutbum@littleappletech.com

**Subject:**  
MTFWP Commission

**Comment:**

The 2023 draft Wolf Conservation and Management Plan/EIS relies on the iPOM to give a timely and accurate estimate of statewide wolf abundance to prevent over harvest that could lead to re listing under the Endangered Species Act. The Yellowstone Ecological Research Center has pre-released a research paper, published 29 November 2023, that documents statistical problems with the iPOM. One of the conclusions " we demonstrated iPOM has an inherent severe overestimation bias, which inflates ( the number of packs) and abundance by a factor of 2.5 times ( 150 %) by this one effect alone". If this is correct when the FWP thinks the wolf population is at 450 it is likely that the real statewide number of wolves is at 150 or less. In December 2023 Wolves of the Rockies drafted a petition for resolving this stunning error. The petition was titled " Wolf Population Calculations". At the December Fish and Wildlife and Parks Commission meeting Wolves of the Rockies was denied the opportunity to SUBMIT this and two other petitions. Montana is the only state that citizen groups cannot submit a petition to their respective wildlife Commissions. My question for the Environmental Quality Council is 1) Why was Wolves of the Rockies denied the opportunity to SUBMIT a petition to the MTFWP Commission ? 2) How do we restore the right of the public to participate with the Montana Fish and Wildlife and Parks Commission? Thank You James Bell

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