Wild Livelihoods Public Comment on 2025-2026 Wolf Hunting and Trapping Quotas & All Proposed Amendments posted on/before August 12, 2025

Dear Commissioners,

The Wild Livelihoods Coalition represents businesses throughout the Greater Yellowstone Regions whose bottom line depends on healthy wildlife populations and sustainable tourism. We write to provide public comment on the proposed 2025-2026 wolf hunting and trapping regulations and amendments currently before the Commission.

We **support the Commission's proposal to maintain quotas of 3 wolves each in WMUs 313 and 316**. This measured approach recognizes the unique economic value of wildlife viewing in areas adjacent to Yellowstone National Park, where wolf-specific tourism generates $82 million annually for gateway communities alone. These conservative quotas protect the wildlife viewing opportunities that sustain our businesses while allowing for continued management.

We strongly support amendments to the wolf hunting and trapping season rules that would preserve Regional quotas to maintain consistency in population monitoring. Regional quotas are essential to allow for spatially varied and more targeted wolf management across Montana's large area, diverse habitats and land uses. To preserve the integrity of local regions and accomplish goals, we recommend maintaining Region 3's previously existing quota and focusing any wolf reduction efforts on the regions where change is needed, and can be measured for success.

However, we respectfully **oppose setting the Region 3 quota at 80 wolves and urge the Commission to decrease this quota to 52 wolves**. The wolf population in Region 3 continues trending downward even with last year's quota of 52 wolves (Figure 1, from the 2024 Montana Wolf Report), indicating that current harvest levels may already exceed sustainable thresholds for this region. Increasing quotas in the face of declining populations contradicts principles of adaptive management and threatens the long-term economic sustainability of wildlife-dependent businesses.

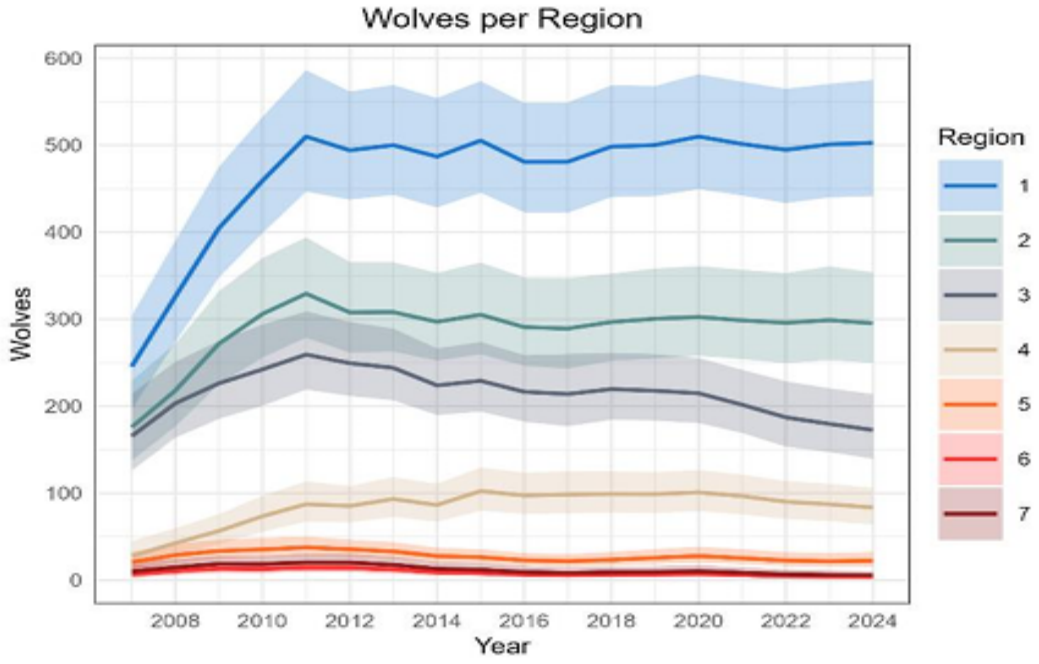

Figure 1 - Estimated number of wolves in Montana FWP Administrative Region, 2007 – 2024. Ribbons indicate 95% credible intervals.

We also **oppose any extension of the wolf hunting season, as such changes would directly impact the wildlife tourism that drives our local economy**. Extended hunting and trapping seasons create safety concerns and uncertainty for people recreating and tour operators, reduces wildlife viewing reliability, and undermines the visitor experience that brings tourists to our region year after year.

The economic reality is clear: wildlife generates significant value for Park County and the state of Montana. Yellowstone wolf tourism alone contributes $82 million annually to gateway communities, while Park County's wildlife tourism economy produces $500 million annually. The broader Greater Yellowstone tourism economy generates over $1 billion annually for Montana, with Park County bed taxes averaging $8 million yearly flowing to state coffers—funds that directly benefit FWP operations.

The systematic omission of these substantial economic figures from policy discussions presents an incomplete cost-benefit analysis that biases decisions toward consumptive uses while ignoring the significant non-consumptive economic drivers sustaining rural communities. Our businesses provide thousands of jobs across hospitality, guiding, retail, and service sectors, representing a sustainable, renewable economic resource that depends on consistent wildlife viewing opportunities.

Science-based wildlife management must account for economic as well as biological sustainability. The documented population decline in Region 3, coupled with the substantial

economic contributions of wolf tourism, supports maintaining conservative quotas and rejecting season extensions. Policy decisions that undermine wildlife populations threaten not only conservation goals but also the economic foundation upon which thousands of Montanans depend for their livelihoods.

We urge the Commission to consider the full economic impact of these regulations on Montana's tourism economy, maintain quotas that ensure sustainable populations, and reject amendments that would extend hunting seasons. Wildlife management must recognize that healthy wolf populations represent both sound conservation policy and essential economic policy for communities throughout the Greater Yellowstone ecosystem.

Thank you for your consideration of these economically informed comments as you deliberate on regulations that will significantly impact both wildlife conservation and economic longevity in our region.

Respectfully,
Wild Livelihoods Steering Committee

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