



*footloosemontana.org*

October 12, 2023

Fish, Wildlife and Parks (FWP)  
Nathan Kluge, Furbearer Coordinator  
1420 East Sixth Avenue/ P.O. Box 200701  
Helena, MT 59620-0701

***RE: Translocation of Marten to the Bridger, Snowy, and Crazy Mountains Draft EA***

Submitted via: [nathan.kluge@mt.gov](mailto:nathan.kluge@mt.gov)

Dear Mr. Kluge:

Thank you for the opportunity to submit a comment on behalf of Footloose Montana and our thousands of supporters in Montana. Footloose Montana is a nonprofit organization dedicated to the protection of all wildlife, including predators, with a special focus on ending trapping on Montana's public lands.

We strongly oppose the relocation of martens into the Bridger, Snowy and Crazy Mountains with the plan to eventually resume trapping them in these new locations. We ask you to adopt a new, third alternative for the public to choose from that allows for translocation of martens to the proposed locations but does not allow them to later be trapped.

Trappers kill an average of 60,000 furbearing wild animals ('furbearers') every year, including approximately 1,000 pine martens. Fish, Wildlife & Parks (FWP), promotes and financially benefits from administering the "Furbearer Trapping Program" for recreation.

PO Box 8884 — Missoula, MT 59807 — P: 406-282-1482 — E: [info@footloosemontana.org](mailto:info@footloosemontana.org)

## Trapping opportunities are the driving reason for this marten translocation proposal:

According to FWP, this project intends to restore or augment self-sustaining pine marten populations in the Snowy, Crazy, and Bridger Mountains. “If successful, pine marten would resume their historic roles in the host ecosystems, provide additional wildlife viewing opportunities, and potentially provide [an] additional recreational trapping opportunity.” Trapping opportunities are the driving reason for this translocation proposal. This is made abundantly clear by *the project funders: Montana Trappers Association, Wildlife Restoration, Furbearers Unlimited, Fur Takers of America, Safari Club International (SCI)* chapters of Great Falls and Southwest Montana and a general wildlife management grant.

## FWP’s Flawed Proposal:

FWP is proposing to live-trap, process, and release between 40-80 pine martens into each of the Bridger, Snowy and Crazy Mountain ranges for the next 10 years. Historically thriving in these mountainous areas, pine martens were trapped and poisoned by “wool growers” and other wildlife exterminators, which resulted in their extirpation in these areas.

Legally required to restore native wildlife populations in their historical ranges, FWP now claims that these repeated translocations of pine marten are necessary because a) there is still no evidence of pine marten presence; and, b) pine martens do not like to cross open, non-forested areas and thus it is unlikely that they will naturally repopulate the three isolated mountain ranges.

Unlimited recreational trapping of pine martens would continue in the two areas from which the 60+ martens would be taken for translocation to the proposed mountain ranges. It is likely that pine martens will be taken from the southwestern part of Montana that borders Yellowstone National Park (YNP), a “source” population for trappers, who set traps and snares just outside the park’s boundary. Indeed, as one FWP study showed, recreational trapping of martens could only be sustained because of martens coming from YNP.

FWP asks the public to choose between their “Alternative 1/ No Action”, which would mean just that, the project would not go forward at all, OR their “Alternative 2/ Proposed Project”, which entails the live-capture of pine marten in southwest and west-central MT, sedating them and extracting a blood sample for DNA, reversing sedation, and moving them into the isolated mountain ranges with apparently excellent habitat for martens, where they can be later trapped for fun and profit. **Neither of these alternatives are good enough.**

We ask that FWP consider the following:

- There should be an additional alternative for this proposal: Alternative 3: translocate the pine marten as described and do not allow pine marten to be trapped in their new locations.
- The true motivation of the proposed translocation of martens, as FWP even states, is to provide additional opportunities for recreational trappers. So the cycle continues: trap them out, reintroduce them at public expense and trap them out.
- FWP will rely on the input from trappers to determine when the populations of marten are stable. Self-interested trappers should not be the sole source of information.
- Trappers like pine martens, they like them so much that they can't trap enough of them. As one trapper stated last year, "To me, pine martens are the most beautiful creatures in the forest. I've trapped 47 of them so far this season."
- Trappers are a tiny minority of Montana's population. They have historically been the major cause of the extirpation of pine martens in the proposed mountain ranges and would now benefit again from an additional opportunity to trap these wild animals who belong to all Montanans.
- Why is there unlimited trapping of pine marten in MT when the result has been the disappearance of this small creature that is known to be important to the health of the forest in five mountain ranges? **End trapping of pine marten.**
- Trappers get about \$40 for a pine marten pelt now. Each pine marten trapper can kill an unlimited number of pine marten during the furbearer trapping season for a \$20 license. This project continues the extirpation of a valuable forest species for the pleasure and profit of a handful of trappers who do not adequately compensate the state or its citizens for this animal cruelty and loss of wildlife.

Sincerely,

Anja Heister, PhD on behalf of the Footloose Montana Board