IDAHO FISH AND GAME GOLDSHEET

March 2026 Commission Meeting ***Agenda Item No.:*** *5B*
Agenda Item: *Petition for Rulemaking: Establishment of Sacred Resource Protection Zone* ***(Action)*** ***Supervisor Approval:*** *JF*
Presented by: *Amber Worthington*
Position/Title: *Deputy Director of Programs and Policy*

Background:
The Commission and the Department received the included petition notice for rulemaking on August 8, 2026, asking to recognize their petition to Montana and take up the same request. Their request is to add a 50 kilometer 'Sacred Resource Protection Zone' around all national parks and to make it illegal to shoot game animals with radio collars, neck bands, ear tags and/or other markers. The petition also requests "Adding section to Wolf Hunting Regulations for Varmint hunting as well as to ban the Use of Predator Calls within 15 miles of protective Corridors, refuges, or Sacred Resource Protection Safety Zone."

The press release, which was included with the petition, explains that the request is in response to Mollie's Pack - a well-known wolf pack out of Yellowstone National Park - now living outside of the Park's boundaries and no longer under National Park protection. The release goes on to say that Protect the Wolves (the petitioner) formally petitioned Montana, Wyoming, and Idaho in 2017, requesting the same rule changes and never received a response. Staff could not find any record of a formal petition from 2017.

Statutory Authority and/or Policy Issues:
Under Idaho Code 67-5230, any person may petition an agency requesting rulemaking. The agency must: deny the petition in writing, stating its reasons for denial, or initiate rulemaking. The Commission must act on the petition no later than its first regular meeting scheduled seven (7) or more days after submission of petition.

Public Involvement Process:
Department staff received this petition as a written letter.

Justification:
Idaho Code 67-5230 requires the Commission to act on petitions for IDAPA rulemaking, either by initiation of rulemaking or by written petition denial.

Staff Recommendation:
Staff have no recommendations.

Sample Motion #1:
I move the Department initiate negotiated rulemaking to consider placing a safety zone around the stretch of Yellowstone National Park that lies in Idaho, make it illegal to shoot

game animals with identifiable markers, and ban the use of predator calls within 15 miles of the safety zone, protective corridors, and refuges.

Sample Motion #2:
I move to deny the petitioners' request for rulemaking that considers placing a safety zone around Yellowstone National Park, makes it illegal to shoot game animals with identifiable markers, and bans the use of predator calls within 15 miles of the safety zone, protective corridors, and refuges.

From:	Director Of Tribal Cultural Resources
To:	rules; Commissioner, Panhandle; Commissioner, Salmon; Commissioner, Southwest
Cc:	Erik Molvar; Samantha Miller
Subject:	Indigenous Founded Advocacy Group Renew Call to establish "Sacred Resource Protection Zone" To protect Sacred Resources The Mollies Pack
Date:	Saturday, August 1, 2026 2:09:31 PM
Attachments:	Sacred-Resource-Protection-Zone-Montana-petition.pdf

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Good Afternoon,
Attached is our Press Release as well as initial SRPZ petition Submission. We will be re-presenting our petition in Person at your next scheduled meeting November 17-18, 2026 in Lewiston under **Legal Authority:** Submit under **Idaho Code § 67-5230**, which allows any person to petition an agency to adopt, amend, or repeal a rule. was initally submitted in 2017 with zero response from you!!!!!! We are Submitting Once again with more support!!! We are past tired of the Wasichus lawmakers ignoring our Religous resources as well as our Religous freedoms sand beliefs!!!

Roger Dobson
Director of Tribal Cultural Resources
Protect The Wolves™
714-750-6878

For Immediate Release
July 17, 2026
Contact:
Roger Dobson, Protect the Wolves™, (714) 750-6878, roger@protectthewolves.com
Erik Molvar, Western Watersheds Project, (307) 399-7910, emolvar@westernwatersheds.org
Dr. Bridgett vonHoldt, Princeton University, 609-258-7021, vonholdt@princeton.edu

Indigenous member founded wolf conservation group renew call for Sacred Resource Protection Zone, banning wolf hunting and trapping to protect Mollie's Pack

HAILEY, Ida. – Mollie's Pack, one of Yellowstone National Park's most well-known and fabled wolf packs, recently was recorded living outside the protective boundaries of the National Park. This development has triggered a fresh call for the states of Wyoming, Idaho, and Montana to establish a Sacred Resource Protection Zone to encompass non-park lands within 50 km (31 miles) of the boundaries of Yellowstone and Grand Teton

National Parks. In 2017, Protect the Wolves, an Indigenous-led wolf advocacy group, officially petitioned the state governments of Montana, Wyoming, and Idaho to create this Sacred Resource Protection Zone to ban wolf hunting and trapping on lands surrounding the National Parks.

"We have waited patiently for the states of Wyoming, Montana, and Idaho to respond to our petition to create a Sacred Resource Protection Zone around these parks, but the state wildlife agencies have yet to even respond,]" said Roger Dobson, a Cowlitz Tribal Member and Director of Tribal Cultural Resources with Protect the Wolves. "It's long past time for the states to implement wolf protection for the lands surrounding Yellowstone and Grand Teton. Wolves are sacred to our culture and religions as Indigenous peoples, as are the lands of Yellowstone and Grand Teton National Parks, yet state governments have so far failed to grant park wolves the essential protections they need to fulfill their natural role in the Yellowstone ecosystem."

A recent study shows that wolves living inside National Parks – protected from killing and harassment by humans – are suffering a high incidence of social disruption and pack disintegration due to human-caused wolf-killings outside park boundaries. Across five National Parks (Yellowstone, Grand Teton, Voyageurs, Yukon-Charley, and Denali), 82% of wolves that died of human causes over the previous 35 years died at the hands of trophy hunting and state and federal agencies' officially-sanctioned killing outside park boundaries. In some cases, entire packs were wiped out, according to the research. Of the five National Parks, Yellowstone and Grand Teton had the highest proportion of their wolves killed by humans.

"The gray wolves of the northern Rocky Mountains represent one of North America's most important wild wolf populations, both ecologically and genetically," said Dr. Bridgett vonHoldt, wolf geneticist and lead author of the study. "Maintaining connected, socially intact packs is essential for preserving genetic diversity and the long-term resilience of the population. Establishing a buffer zone around Yellowstone and Grand Teton National Parks that limits hunting and trapping would significantly help reduce unnecessary mortality of Park-associated wolves and better protect the genetic and ecological processes that these iconic populations support."

"The science is clear that state management of wolves outside these crown jewel National Parks has not shown sufficient restraint or responsibility to keep Park wolves alive," said Erik Molvar, a wildlife biologist and Executive Director with Western Watersheds Project. "The dispersal of Mollie's Pack – unusually large, beloved to the public, and also ecologically unique due to their penchant for specializing in bison as a primary prey – moving outside the Park boundaries into wolf habitats where trophy

hunting is allowed, it puts a fine point on the need to establish the Indigenous-led Sacred Resource Protection Zone to give National Park wolves the protections they need to survive."

Another recent study found that wolves in the broader Yellowstone population are beginning to lose their genetic diversity due to the overall population in the Parks and the surrounding region being too small to meet Minimum Viable Population thresholds.

Indigenous leaders have long called for wolf protections. Numerous tribal groups have signed an international Wolf Treaty, which recognizes a sacred relationship between wolves and Indigenous peoples, criticizes trophy hunting and lethal control in response to livestock losses, and calls for further expanded recovery of wolf populations with connectivity linkages in currently unoccupied parts of their historic range.

"The state governments should have listened to Indigenous voices and created this Sacred Resource Protection Zone around Yellowstone and Grand Teton National Parks, to prevent the killing of National Park wolves,]" said Dobson. "[In this new study, we now have definitive proof that the failure of state governments to protect wolves on the lands surrounding Yellowstone and Grand Teton are causing serious unnatural disruptions for wolf packs and preventing these wolves from living out their lives in a natural and undisturbed way."

"State governments in Idaho, Montana, and Wyoming have had their chance to grant National Park wolves a zone of protection around these National Parks, but they were irresponsible, and ramped up wolf-killing instead," said Molvar. "Now that the federal government has lost its court battle to keep wolves off the endangered species list, it's time to end the killing by extending federal protections throughout the lower 48 states. In the meantime, the states surrounding Yellowstone and Grand Teton need to establish this Sacred Resource Protection Zone around the Parks to stop the loss of National Park wolf packs."

"The killing of wolves and disruption of wolf packs living in in Yellowstone and Grand Teton National Parks is completely unnecessary and preventable, and with Mollie's Pack now living outside Yellowstone, the federal government should step in to prevent it," said Dobson. "It is imperative that government agencies including fish and game departments begin to recognize our sacred cultural beliefs, like the beliefs of all other religions, and our special relationship to the species that Native Americans hold as sacred."

In recent decades, numerous famous wolves like "06," the breeding female of the Lamar Canyon Pack, killed in 2012, and her daughter "Spitfire," who succeeded her as the Lamar Canyon breeding female and was killed in 2018, were shot by trophy hunters outside Yellowstone. Scientific research shows that wolf-elk-bison interactions are complex, and the alteration of predator-prey dynamics from trophy hunting outside the Parks could interfere with the ecological recovery of Yellowstone that has been

accomplished as a result of wolf reintroduction.

Roger Dobson
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Protect The Wolves
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MFWP Tracking Number:05232017

To request a change to regulations under the authority of the Montana Fish, Wildlife & Parks
MFWP We are requesting that this Petition be considered at the Meeting either June 7th, in Kalispell, or August 10th in Helena.

SECTION I:

1. Person or organization requesting the change
Organization: Protect The Wolves™ Pack a Native American Group

Name of primary contact person: Roger Dobson, Director of Media.
Patricia Herman, President
Address: 27946 Henry Mayo, Castaic CA 91384
Telephone number: 406-219-8690
Email address: roger@protectthewolves.com

2. Rulemaking Authority – Petition to the Montana Fish, Wildlife & Parks Commission pursuant amend hunting regulations and hunting areas pertaining to wolves pursuant to the Montana Gray Wolf Management Plan.

3. Overview – To amend the Sections/ add Sections

Add 50 km Sacred Resource Protection Zone surrounding all National Parks within Montana.

Marked or Radio-Collared Animals – To be changed from Legal to Illegal. It is illegal to shoot game animals that have radio collars, neck bands, ear tags and/or other markers,
Making it illegal to take an animal with a collar on it.

Adding Section to Wolf Hunting Regulations for Varmint hunting as well to ban the Use of Predator Calls with 15 miles of protective Corridors, refuges, or Sacred Resource Protection Safety Zone.

4. Rationale – To save taxpayers the cost of collaring wildlife an expense that MFWP finds necessary to install new collars each year, in addition to prevent the human-caused mortality of humanized wildlife, legal or otherwise (wildlife that have become accustomed to human presence, such

as in Yellowstone, or Glacier etc, wherein they are unaware of human threat due to hunting or otherwise) that venture outside of National Parks. Those Resources are not only state but they are federal resources; they are sacred tribal resources, as well as public resources. As Such, need their Federal Protections within the SRPSZ. These Wildlife reside within National Parks are not State Resources and fall under National Park Protections regulations which include Sacred sites and resources for the Indigenous.

SECTION II:

5. Date of Petition: Will be emailed to Montana Fish Wildlife and Parks

6. Category of Proposed Change

☐ Hunting/Trophy areas surrounding all designated National Parks including Yellowstone and Glacier etc. The Sacred Resources in these areas have been humanized. Wildlife that are used to being near Humans as the resources of all the people of the United States, Tribes included, due to these being sacred resources.

7. The proposal to Amend Montana Fish Wildlife and Parks Wolf Hunting Regulations

☐ Amend Wolf Regulations to add Section that includes establishing A SACRED RESOURCE PROTECTION SAFETY ZONE of 50km surrounding All National Parks within Montana including Yellowstone and Glacier National Parks, etc and that wolves within this zone must be protected from any and all human-caused mortality to the greatest extent possible. Further banning the use of Predator Calls within 15 miles of established Sacred Resource Protection Zone

☐ Add new line item designated National Park Resources adding the following: Wolves in the greater Yellowstone ecosystem, or other National Park ecosystems are resources of the public of the United States of America, and as such will not be managed by Montana Fish Wildlife and Parks as Trophy Game Animals. (These Public Resources are Protected under not only the Indian Trust, but the Public Trust, as well as National Park Policy and cannot be managed at the hands of special interest hunter or rancher groups

Wolf Regulations shall be amended to ban all hunting of predators in the SRPSZ; this is defined as thirty minutes after sunset to thirty minutes before dawn or sunrise. The hunting and the killing of predator animals including Coyotes is likely to result in the mistaken ID take of predatory animals and of gray wolves. It has already been used as an excuse in illegal takes in various states prior to making this request.

A Further Amendment Montana Wolf Regulations shall preclude and ban the use of the “Calls” of Predatory Animals within 16 miles of the established SRPSZ. Hunters shall not be allowed to call the Grey Wolf and other predators from closer than 15 miles of the SRPSZ the safety zone of the National parks and refuge boundaries.

Montana Wolf Regulations shall also be amended to preclude the use of bear bait in the SRPSZ zone. This practice has resulted and does result in the mistaken ID shooting of Grizzly Bear a threatened and federally protected species. It is not legal for hunters to feed or chum wild animals with bait other than permitted bear bait sites. Many of these bear bait sites are in the SRPSZ and directly adjacent to cattle ranches. Bear Bait shall result in attracting the Gray Wolf to inappropriate locations. This shall not be allowed in the SRPSZ

8. Effective date This proposed change requires either immediate implementation,
or a delay in the setting or initiation of any wolf hunting season in Montana. Montana Fish Wildlife and Parks is attempting to manage federal public resources without involving all parties that should be included in the management of our federal, public and Indian trust
resources under mentioned trusts with those sacred resources (Indigenous Sites are but 1 of our Sacred Resources) within Yellowstone National Park, or other National Parks are being currently federally protected.

9. Supporting documentation: See Attachment A

10. Economic or Fiscal Impacts: Continued hunting as Trophy Animals, or as Predatory Animals will impact greatly the ability of not only Yellowstone National Park, but also all National Parks, and National Wildlife Refuges (being a designation to protect and preserve their natural heritage for the use and enjoyment of the people), impair the ability of

these National Parks and National Wildlife Refuges to continue drawing visitors for the viewing of wolves and other wildlife.

11. Definitions. For the purpose of this regulation, definitions shall be as set forth in Montana Statutes and we petition the Commission also to adopt the following definition:
(a) “Human-caused mortality” means any legal or illegal human-caused gray wolf death that occurs during an open gray wolf hunting season or at any other time, including gray wolves taken by the Department, gray wolves taken under that authority or taken under Lethal Take Permits and known natural and accidental gray wolf deaths. Shall be represented in Montanas target quotas.

12. Should Montana Fish Wilflife and Parks refuse to give this matter the Public Comment Period worthy of a national resource, not merely a state resource, then Montana Fish Wildlife & Parks will be in direct conflict with the mandates placed upon them by the Trusts as a Trustee.
(a)Further The State of Montana needs to acknowledge the death of the female wolf known as “The White Lady” that Yellowstone National Park officials had to euthanize due to the actions of a poacher. Necropsy results prove this human-caused mortality was from gunshot wounds. While this crime most likely occurred in Montana, current lax regulations in Wyoming make this type of event likely in Wyoming as well. Wyoming Trustees need to be accountable for including resource loss and reflect such in their trophy areas.

The Grey Wolf Management Plan Shall include adequate regulatory mechanisms to ensure the preservation of the grey wolf species in the (SRPSZ). This requirement includes and is not limited to regulations, which clearly define each element of the crime of illegal take of a Gray Wolf. This shall include clear definition of the penalty for said illegal take which shall be a clear deterrent to a violation of this law. It is mandatory that the deterrent include a loss of hunting license/privilege for an appropriate period of time and restitution in the amount to be determined from public input and from the science of wolf management to date. The laws shall be clear and irrefutable if you kill a wolf illegally you will lose your ticket to hunt and you will pay. You may go to jail depending upon the gravity of your offense. The mandatory jail term offense shall be clearly defined

SECTION 3: WGF Commission Staff Only

Date received:

MFWP staff action:

MFWP authority

Tracking Number:

Date petitioner was notified of receipt of petition and pending action:

Meeting date for MFWP consideration: