

MINUTES

MONTANA SENATE
51st LEGISLATURE - REGULAR SESSION

COMMITTEE ON FISH AND GAME

Call to Order: By Chairman Severson, on March 14, 1989, at 1:00 p.m. in Room 402 at the State Capitol.

ROLL CALL

Members Present: Sen. Elmer Severson, Sen. John Anderson, Jr., Sen. Judy Jacobson, Sen. Al Bishop, Sen. Paul Rapp-Svrcek, Sen. Loren Jenkins, Sen. Bill Yellowtail.

Members Excused: None

Members Absent: None

Staff Present: Andrea Merrill, Legislative Council

Announcements/Discussion: None

HEARING ON HOUSE BILL 383

Presentation and Opening Statement by Sponsor: Rep. Orval Ellison stated that this bill was requested by MT FWP and he turned it over to Ron Marcoux.

List of Testifying Proponents and What Group they Represent:

Ron Marcoux, Department of Fish, Wildlife & Parks

List of Testifying Opponents and What Group They Represent:

None

Testimony:

Ron Marcoux left his testimony. See Exhibit #1.

Questions From Committee Members: None

Closing by Sponsor: Rep. Ellison stated that this bill passed the House unanimously.

DISPOSITION OF HOUSE BILL 383

Discussion: None

Amendments and Votes: None

Recommendation and Vote: Sen. Anderson moved to pass the bill. It passed on a voice vote. BE CONCURRED IN.

DISPOSITION OF HOUSE BILL 307

Discussion: Sen. Jenkins offered a set of amendments. (See Exhibit #2) Sen. Jacobson suggested an additional set of amendments. (See Exhibit #3) Sen. Rapp-Svrcek offered support for Sen. Jenkin's amendments. Sen. Jacobson mentioned that the legislature should not be involved in the internal affairs of their board. Sen. Jenkins stated that part of the problem FFOAM has is getting representation into the existing board which they feel they don't have now. Sen. Jacobson said if we adopt an amendment that says "Five members must be licensed outfitters who are actively involved in the outfitting business" it means that the Governor, by law, will have to choose one of the fishermen for the board. That would take care of the problem.

Amendments and Votes: Sen. Jenkins moved his amendments (See Exhibit #2). A substitute motion was made by Sen. Jacobson to move her amendment (See Exhibit #3). The substitute motion was passed on a voice vote with Sen. Jenkins voting "No".

Recommendation and Votes: Sen. Jacobson moved the bill as amended. The bill passed unanimously on a voice vote. AND AS AMENDED BE CONCURRED IN.

DISPOSITION OF HOUSE JOINT RESOLUTION 26

Discussion: Sen. Severson questioned the need for this resolution.

Amendments and Votes: None

Recommendation and Votes: Sen. Jenkins moved to table the resolution. It was TABLED on a voice vote with Senators Rapp-Svrcek and Yellowtail voting "No".

HEARING ON HOUSE BILL 283

Presentation and Opening Statement by Sponsor: Rep. Harper stated that this bill was prompted by a situation that happened here in Montana. A man was trying to ranch beavers for the fur which was for a tax write-off. Due to some difficulties with the law, the MT FWP could not come in and shut the operation down. The beaver died by the hundreds. They were found in different states of decomposition as well as different states of hunger.

After I introduced this bill the fur-farm organizations found out about it. I was contacted by national fur-farm organizations. They have a regulatory arm which is the Fur Farm Welfare Animal Coalition. They promulgate rules to all of their fur farmers. All of their fur farmers are fox and mink farmers. We found out that some years ago when laws were being written to address fur-bearing animals, the animals fox and mink were left out of the definition of fur-bearing animals. They are also not included under the auspices of the Department of Fish, Wildlife & Parks. The reason is because fox and mink, in almost every case, are raised for fur-bearing purposes on a farm and are domesticated animals. That means the mink weigh over three pounds and the fox are huge. They are stock animals, raised by ranchers on ranches.

The people from the national organization got together a number of the fur farmers in Montana and met with me. They said that the "exotics" (all other fur bearers) ought to be protected by FWP but the fox and mink are stock animals and should be covered under Department of Agriculture and I agree with this. Rep. Harper suggested some amendments. See Exhibit #4 and 4a.

List of Testifying Proponents and What Group they Represent:

Lorna Frank, Montana Farm Bureau
Judy Fenton, Federated Humane Societies of Montana
Robert Buckler, Mink & Fox Farmers of U.S.A.
Barbara Dahlgren, Pres. Federated Humane Societies of
Montana
Leanne Kurts, Senior, Montana State University
John Skufcen, Department of Livestock

List of Testifying Opponents and What Group They Represent:

None

Testimony:

Lorna Frank left her testimony. See Exhibit #5.

Judy Fenton left her testimony. See Exhibit #6.

Barbara Dahlgren passed around photos of abuse at beaver farms. During November and December of 1985, 1,100 animals died at this farm from starvation. Every time we inquired about it we were told that it had been taken care of. But it hadn't been. We also learned that 200 animals had died at a beaver in Orem, Utah. So it isn't just Montana where this happens. In November 1986 Dennis Crum, President of International Furs, Inc., applied for economic development bonds for \$4 Million to put into place 5,000 new pens and 850 more pens in Missoula and Ravalli County. This plan passed the county, the city and the State Economic Development Board. During all of this we were not allowed on the property because it is private. The MT FWP office in Missoula said they could not help. Later we obtained a court order to take care of these animals. The caretakers were not being paid and would only stay for a period of about six weeks. The corporation was in three different locations. In March of 1988 we went to trial and the corporation was charged with cruelty to animals and found guilty. They were given a judgment of over \$2,000. On March 14, 1988 we learned that the corporation had filed bankruptcy. We then had the court order transferred. We also were not being paid to take care of these animals.

Leanne Kurts came representing herself. I think this bill is the least we can do to avoid the situation we just mentioned. The animals need to be fairly treated and destroyed humanely. I urge your support of HB 283.

John Skufcen left his testimony. See Exhibit #7.

Les Graham was unable to be at the meeting and left a letter stating his opinion. See Exhibit #8.

Ron Marcoux left his testimony. See Exhibit #9.

Robert Buckler sent his testimony to the committee. See Exhibit #10.

Questions From Committee Members: Sen. Rapp-Svrcek asked Rep. Harper the reason for making this a misdemeanor. Rep. Harper stated that they wanted some degree of regulation.

Sen. Jenkins asked Rep. Harper what is used for humane laws for the rest of the animals. Rep. Harper stated that there is a law that relates to cruelty to animals on the books which has been used very seldom in Montana.

Sen. Jenkins asked Barbara Dahlgren why this law wasn't used. She stated that in March of 1988 cruelty charges were filed against the corporation. There was a trial and they were found guilty. That was a \$500 fine. They were also asked to pay \$2,000 to the Humane Society for the expenses they incurred. But, nothing ever came of it. Ravalli County did not get the \$500 and the Humane Society did not get the \$2,000.

Sen. Severson asked Rep. Harper when did fur animals get separated and mink and fox become livestock. It happened in 1983. The wild animals don't weigh much because they live off the land. The livestock, or domesticated animals, are fed and weigh more.

Sen. Jacobson asked Rep. Harper how you can tell if a mink or fox is happy. Rep. Harper said their coat shines and shiny fur is worth a lot more.

Closing by Sponsor: Rep. Harper thanked the committee for hearing the bill.

ADJOURNMENT

Adjournment At: 2:20 p.m.


ELMER D. SEVERSON, Chairman

LAB/FISMIN.314

FISMIN.314

SENATE STANDING COMMITTEE REPORT

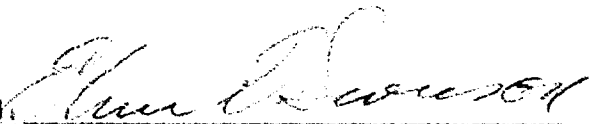
March 15, 1989

MR. PRESIDENT:

We, your committee on Fish and Game, having had under consideration HB 383 (third reading copy -- blue), respectfully report that HB 383 be concurred in.

Sponsor: Ellison (Jacobson)

BE CONCURRED IN

Signed, 

Elmer D. Severson, Chairman

Y.C. 189
3/15/89
11:26 am

HB 383
March 14, 1989

Testimony presented by Ron Marcoux, Department of Fish, Wildlife & Parks

The department supports HB 383. This bill is to revise and clarify the hunting and fishing license statutes regarding 15-year old waterfowl hunters and submitting multiple applications for special permits.

The current statutes, by omission, seem to exclude 15-year old hunters from hunting waterfowl. Section 87-2-103 makes it unlawful to hunt any game bird without a license. Section 87-2-805 provides for 12 through 14-year olds to hunt game and migratory game birds with only a \$2 conservation license. Section 87-2-411 requires any person 16 years of age or older to purchase a waterfowl stamp to hunt waterfowl.

This bill amends Section 87-2-411 to read 15 years of age, clarifying that 15 year olds can hunt waterfowl with a valid state waterfowl stamp.

Our age and license requirements will be the same for upland and migratory game bird hunters.

The proposed amendments to Section 87-2-104 will specifically prohibit applicants from submitting more than one application per species for special license and permit drawings. Each year we receive multiple applications for elk, deer and other big game licenses and permits from individual hunters. Current statutes are vague as to this practice being unlawful and a misdemeanor. Therefore, multiple applications from a single applicant are presently limited to removal from the drawing process.

Charges of violation of this act may be filed in the county of origin, if unknown or originating outside Montana, charges may be filed in the county where the application was received by the Department of Fish, Wildlife & Parks.

Amendments to HB Bill No. 307
3rd Reading Copy

Requested by Sen. Jenkins
For the SENate Fish and Game

Prepared by Andrea Merrill
March 8, 1989

*Jacobson's
amendment
will be
added to bill*

1. Page 2, line 7.
Following: "board."

mail-in

* Insert: "The board shall also prescribe a procedure for selecting persons to be nominated by mail-in ballot."

2. Page 3, line 15.
Following: "council."

mail-in

Insert: "The council shall also prescribe a procedure for nominating persons to be elected by mail-in ballot."

SENATE STANDING COMMITTEE REPORT

March 15, 1989

MR. PRESIDENT:

We, your committee on Fish and Game, having had under consideration HB 307 (third reading copy -- blue), respectfully report that HB 307 be amended and as so amended be concurred in:

Sponsor: Hoffman, R. (Jacobson)

1. Title, line 6.

Strike: "NOMINATION OR"

2. Title, lines 6 and 7.

Following: "THE" on line 6

Strike: remainder of line 6 through "AND" on line 7

3. Title, line 9.

Strike: "ANNUAL MEETING"

Following: "NOMINATION"

Strike: "OR ELECTION"

Insert: "PROCESS FOR APPOINTMENT TO THE BOARD OF OUTFITTERS"

4. Title, lines 10 and 11.

Following: "THAT" on line 10

Strike: remainder of line 10 through "APPOINTMENT" on line 11

Insert: "ONE MEMBER OF THE BOARD OR COUNCIL BE ENGAGED IN THE FISHING OUTFITTING BUSINESS"

5. Page 1, line 21.

Following: "business."

Insert: "At least one of the outfitter members must be a person primarily engaged in the fishing outfitting business."

6. Page 1, lines 23 through 25.

Following: "2-15-3402(2)."

Strike: "Two" on line 23 through "district" on line 25

7. Page 2, lines 5 through 10.

Following: "outfitter"

Strike: "by" on line 5 through "ballots." on line 10

8. Page 3, line 9.

Following: "districts."

Insert: "At least one of the members must be a person primarily engaged in the fishing outfitting business."

AND AS AMENDED BE CONCURRED IN

Signed:

Elmer D. Severson

Elmer D. Severson, Chairman

SENATE FISH AND GAME

EXHIBIT NO. 3

DATE March 14, 1989

BILL NO. HB307

4/16
3115189
R. P. M.

Amendments to House Bill No. 283
Third Reading Copy

Requested by Representative Harper
For the Committee on Senate Fish & Game

Prepared by Doug Sternberg, Legislative Council Staff
March 13, 1989

1. Page 5, line 11.

Following: "COALITION."

Insert: "The department may by rule adopt a fee of not more than \$50 for each mink and fox farm, to provide for administration of this section."

permit dogs to run free in fields that have not been carefully flushed. The application must be presented to the director not less than 20 days prior to the date proposed for the field trial.

(3) The director may refuse any application that he determines is not in the best interests of the protection, preservation, propagation, and conservation of game birds in this state. Any denial by the director of such application must state the reasons therefor and must be mailed to the applicant within 10 days of receipt of the application.

(4) No applicant receiving a permit to conduct a field trial may violate or authorize violation of any of the terms of the permit.

(5) All live game birds used in a field trial must be tagged before being planted or released and may be planted or released only in the presence of a representative of the department. If an untagged bird is shot during any field trial, the person to whom the permit was issued must immediately replace it with a live bird.

(6) (a) Dogs may be trained in open fields at any time without permission of the director only if:

(i) no live game birds are killed or captured during training; and
(ii) the training is more than 1 mile from any bird nesting or management area or game preserve.

(b) A person may train dogs with a method that will kill birds acquired from a game bird farm only after receiving a written permit from the department and only in compliance with the terms of the permit.

History: En. Sec. 34, Ch. 570, L. 1983.

87-4-916. Revocation of license. (1) A game bird farm license may be revoked for failure to operate the game bird farm according to provisions of this part or rules adopted under this part.

(2) Upon discovery of a violation, the department shall give notice of such violation to the licensee, with a statement of a specific time by which the violation must be corrected.

(3) Upon failure of the licensee to correct the violation, the department may institute revocation proceedings. If the department institutes revocation proceedings, it shall provide reasonable notice and opportunity for a hearing to the licensee. After hearing, upon proof of violation, the department may revoke the game bird farm license.

History: En. Sec. 35, Ch. 570, L. 1983.

Cross-References

Contested cases — Montana Administrative Procedure Act, Title 2, ch. 4, part 6.

Part 10

Fur Farms

Part Cross-References

Minimum wages for fur farm employees, 39-3-402, 39-3-404, 39-3-406.

Unemployment insurance coverage — agricultural labor, 39-51-206.

Rabies control — restrictions on possession of wild animals, Title 50, ch. 23, part 1.

Fee limitation for multiple licenses, 87-1-606.

Fur dealers, Title 87, ch. 4, part 3.

87-4-1001. Definition. For purposes of this part, the following definitions apply:

(1) "Furbearer" means a marten or sable, otter, muskrat, fisher, ~~beaver~~ lynx, wolverine, or beaver. The term does not include ~~fox or mink~~ ^{which furbearers} be kept for purposes of obtaining, rearing in captivity, keeping, and selling furbearers or parts of furbearers as authorized under this part.

History: En. Sec. 36, Ch. 570, L. 1983.

87-4-1002. Fur farm license required — applicability. (1) Except as provided in subsection (2), no person may own, control, or propagate furbearers unless he holds a current fur farm license from the department.

(2) This part does not apply to the ownership, control, or propagation of furbearers if the ownership, control, or propagation is not for the sale or conveyance of furbearers or parts thereof.

History: En. Sec. 37, Ch. 570, L. 1983.

87-4-1003. Application for license. (1) Any person desiring to obtain a fur farm license shall make a written application to the department. The application must specify:

(a) the name of the applicant;

(b) his address;

(c) species of furbearers and any plan to propagate them;

(d) the legal description of the lands to be included;

(e) the type of fence that the applicant contemplates erecting;

(f) the source of furbearers.

(2) (a) A fur farm license shall be issued only to a responsible applicant who owns or leases the premises on which the operations are to be conducted and who has properly fenced the place where such fur farm is to be located.

(b) Any fur farm owned by a nonresident must have a resident agent who is responsible for the daily operation of the fur farm and who is authorized by the nonresident owner to receive service of process.

(3) Within 30 days of receiving the application, the department shall notify the applicant of its decision to approve or deny the application. If required fencing has not been completed, the department shall approve the application subject to the fencing being completed. If the application is denied, the department shall specify the reasons for denial.

History: En. Sec. 38, Ch. 570, L. 1983.

87-4-1004. License and renewal fee — deposit. (1) Fur farm license and annual renewal fees must be set by department rule.

(2) The fees must be deposited in the state special revenue fund for the use of the department for purposes of this part.

History: En. Sec. 39, Ch. 570, L. 1983; amd. Sec. 48, Ch. 281, L. 1983.

Cross-References

Fee limitation for multiple licenses, 87-1-606.

87-4-1005. Term of license — conditions — changes in operation. (1) A fur farm license is valid only for the license year in which it is issued. The licensee shall apply for renewal annually, and the department shall renew the license if the licensee has not violated any provision under which it was granted.



MONTANA FARM BUREAU FEDERATION

502 South 19th • Bozeman, Montana 59715
Phone: (406) 587-3153

BILL # HB 283 ; TESTIMONY BY: Lorna Frank
DATE March 14, 1989 ; SUPPORT Yes ; OPPOSE _____

Mr. Chairman, members of the committee, for the record my name is Lorna Frank, representing 3600 Farm Bureau members throughout the state.

Farm Bureau supports HB 283 as it has been amended to exempt the mink and fox from the Department of Fish Wildlife and Parks. We also support the amendment which allows the Department of Livestock to adopt a fee for administration of Section 8 of this bill.

Under current status 87-4-1001 addressing fur farm animals in the fish and wildlife regulations, the term fur bearer does not include fox and mink and they should not be included in this bill, except to put them under the authority of the Department of Livestock.

In most other states they are already under the authority of the Department of Livestock, this would bring Montana inline with surrounding states.

Presently there are approximately 70 mink and fox farms in the state, with the majority of them being west of the mountains in the Ronan area.

Allowing the Department of Livestock to adopt the fee for administration would give the Department the money they need to write rules.

Farm Bureau has long supported the humane treatment of farm animals, therefore we support HB 283 and urge this committee to concur as amended.

SENATE FISH AND GAME

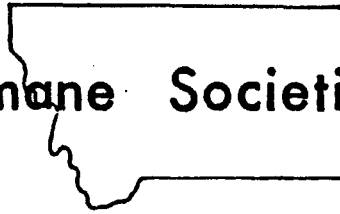
EXHIBIT NO. 5

DATE March 14, 1989

FILE NO. HB 283

SIGNED: Lorna Frank

Federated Humane Societies of



Testimony in support of HB 283
Senate Fish and Game Committee
March 14, 1989 at 1 PM

By Judith Fenton, Blue Sky Heights #26, Clancy, MT 59634
Owner of Kanine Kondo, 390 Norris Road, Helena, MT 59601
Sec./Treasurer of the Federated Humane Societies of Montana

These changes in our State laws concerning the licensing of fur farms by the Department of Fish and Game are necessary because at the present time the only important requirement before a license is granted is that the property be fenced. The current law has no provision to require even minimal humane care of the animals. The changes proposed provide for minimum standards for operating any fur farm. Any legitimate fur farm owner will have no difficulty meeting these standards. It is only good business to protect the health and welfare of the animals on which their business is based.

The inadequacy of the present laws came to our attention several years ago, even before a beaver farm moved into the State near Hamilton. Our animal welfare organizations were notified that this particular company had a reputation in other states of letting their animals die in order to take a tax write off for them. We watched hundreds of animals slowly die, while everyone in authority told us there was nothing they could do. Even after we had won a cruelty case against the company, nothing changed. The animals were still dying and the Bitterroot Humane Association never received one cent of the over \$2700 court judgement. Those were expenses that this Humane Society had incurred feeding and taking care of the beavers that were left. The time and the mental anguish that many humane society volunteers suffered trying to save these animals was all to no avail.

Hopefully if this legislation is passed, never again will the people who should have some responsibility in a case like this, be able to tell us that there is nothing they can do.

Thank you for your attention to this matter which is very important to all of us who value the quality of every animal's life.

A handwritten signature in cursive script that reads "Judith Fenton".

(406) 933-5922

March 14, 1989

Senator Elmer Severson, Chairman
Fish & Game Committee

RE: H.B. 283

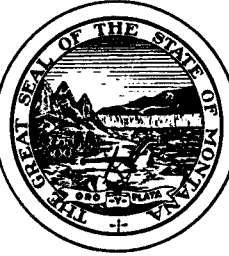
Although the Department of Livestock does not appear as proponent or opponent of H.B. 283, we do have some concerns regarding this legislation.

Attached is a map showing our alignment of districts within the Animal Health Division, where H.B. 283 would be administered if passed. As you can see, they are large districts, only three statewide. We have one District State Veterinarian in each district to cover the area. In addition, the Central District Veterinarian is only half time, since he also works out of the main Helena office. Also, the Eastern and Western District Veterinarians come into the Helena office on assignments.

The Department is concerned that we simply will not be able to devote much time and/or money to any problems that may arise, since our budget is tight and our personnel limited.

If H.B. 283 were amended to include some type of funding it is doubtful that enough revenue could be realized to cover the Department's costs, especially if an investigation and/or litigation should arise in the future.

DEPARTMENT OF LIVESTOCK



STAN STEPHENS, GOVERNOR

CAPITOL STATION

STATE OF MONTANA

BRANDS ENFORCEMENT DIV. 406-444-2045
ANIMAL HEALTH DIV. 406-444-2043
BOARD OF LIVESTOCK - CENTRALIZED SERVICES 406-444-2023

HELENA, MONTANA 59620

March 13, 1989

TO: Representative Hal Harper
FROM: Les Graham, Executive Secretary
To the Board of Livestock
RE: H.B. 283

Attached is a map showing our alignment of districts within the Animal Health Division, where H.B. 283 would be administered.

As you can see, they are large districts. We have one F.T.E. (State Veterinarian) in each district to cover the area. Additionally, the Central District Veterinarian is only 1/2 time since he also works out of our main office. The Eastern and the Western District Veterinarians come in to the Helena office on assignments.

Since our budget is so tight, our personnel limited, I really feel I have to point this out to the Senate Fish & Game committee.

I don't want to appear as an opponent of the bill, but more in the role of explaining our position.

Thank you.

Attachment

c. Bob Buckler
405 Sibley Street
Suite 120
St. Paul, MN 55101

SENATE FISH AND GAME

EXHIBIT NO. 8

DATE March 14, 1989

BILL NO. HB 283

Call Montana Livestock Crimestoppers 800-647-7464

HB 283
March 14, 1989

Testimony presented by Ron Marcoux, Department of Fish, Wildlife & Parks

The department supports the humane treatment of all fur-bearing animals being raised commercially. Most Montanans, and the entire game and fur farm industry, suffered unduly from the unfortunate situation that occurred in Stevensville last year.

Because the Montana fur farm statutes do not address the humane treatment and care of such animals, this incident became a cause for People for the Ethical Treatment of Animals. This incident was publicized nationally.

Fish, Wildlife and Parks officers would enforce humane standards on marten or sable, otter, muskrat, fisher, bobcat, lynx, wolverine, beaver, raccoon, coyote, badger or any other furbearer held in captivity for commercial purposes.

Violations of HB 283 prosecuted by the department will be a misdemeanor, with a penalty of \$50 to \$500 and could subject the licensee to denial or revocation of his fur farm license.

Relative to enforcement, we do not have the personnel available to schedule regular inspections, but do conduct occasional spot checks. This bill will provide the state some authority to act, and should prevent the type of unfortunate event that occurred in Stevensville.

The department supports HB 283 as amended.

Suite 109, 13965 Durleigh Road, Brookfield, Wisconsin 53005 • (414) 786-4242

March 13, 1989

Senator Elmer D. Severson, Chairman
Senate Fish and Game Committee
State Capitol
Helena, Montana 59620

Dear Senator Severson:

I am writing on behalf of Montana fur farmers to request your support for H.B. 283 as it passed the House of Representatives. The National Board of Fur Farm Organizations represents mink farmers and fox farmers at the state legislatures and Congress.

There are approximately 70 mink and fox farmers in Montana, providing approximately 150 jobs and an annual contribution of about \$2,500,000 (pelt value) to the state economy. Because March is the breeding season for mink, it is doubtful that fur farmers will be able to testify at the committee's hearing on March 14, but testimony on H.B. 283 was given to the House Fish and Game Committee on February 9.

Mink have been raised on farms in the United States since the 1860s; commercial fox breeding began in the 1880s. The animals that now comprise the domestic furboarer herds have evolved to be quite different from their counterparts in the wild. They are larger, more docile, and well suited for farm raising. Fur farmers strive to provide the finest veterinary and nutritional care, and the success of American fur farmers in this regard is consistently proven by the market. In this country and abroad, the superior quality of American produced fur is always recognized with the highest market values.

Farm raised mink and fox are livestock in every sense. Montana fur breeders deserve to be recognized in law as livestock breeders, and to be treated and protected accordingly. Fur breeding falls under the jurisdiction of agriculture and livestock in states where it is regulated. At the federal level, jurisdiction is within the U.S. Department of Agriculture.

Representing the Mink & Fox Farmers of the United States

SENATE FISH AND GAME

EXHIBIT NO. 10

DATE March 14, 1989

BILL NO. HB 283

Page 2
Senator Elmer D. Severson
March 13, 1989

The current version of H.B. 283 represents a carefully crafted compromise between fur farmers and animal welfare interests to ensure that fur farming can continue as a viable, humane part of animal agriculture in Montana. Under the bill, mink and fox farms would be regulated by the Department of Livestock according to comprehensive humane care standards promulgated by the Fur Farm Animal Welfare Coalition, the self-regulating arm of American fur farmers. Mink and fox farms represent the vast majority of all fur farming in the United States. The raising of other species, which occurs on a limited basis, would be regulated by the Department of Fish, Wildlife and Parks. Under this efficient approach, Montana regulations would be based on the most current humane care standards, without requiring periodic legislative or administrative amendment.

As there would be a need initially for the Department of Livestock to promulgate rules and to inspect fur farm operations when appropriate, Montana fur farmers recognize that an annual fee of up to \$50 per farm might reasonably be imposed.

If I can provide any additional information or answer any questions, please call me at (612) 293-0054. I can also be reached by fax at (612) 293-9470.

Thank you for considering the views of Montana fur farmers and the National Board of Fur Farm Organizations.

Sincerely,



Robert Buckler
Executive Director

RB/dw

