

# Policing Natural Resources: Issues in a Conservation Law Enforcement Agency

Stephen L. Eliason

Scant research has been directed toward the study of conservation law enforcement organizations. This research took a qualitative approach to data collection and examined issues in a western wildlife law enforcement agency. Five main issues facing contemporary conservation law enforcement officers were identified: inadequate funding, low salaries, non-wildlife law enforcement duties, lack of support from the court system, and a changing social and political climate. Findings contribute to a greater understanding of wildlife law enforcement agencies and the conservation law enforcement occupation.

**Key Words:** Conservation • game wardens • game warden duties • conservation law enforcement issues • wildlife law enforcement

The purpose of this study was to identify, from the perspective of game wardens, contemporary issues facing a state wildlife agency. Given the lack of research on the topic and the importance of natural resources for a healthy and sustainable environment, the development of a knowledge base on this type of specialized law enforcement agency is crucial. This information is of utility for both agencies and policymakers and may be used to address problems and improve the working environment for individuals employed in these agencies, thus enhancing the effectiveness of these organizations.

## Literature Review

In contrast to the vast literature on urban crime and policing, relatively little research has been directed toward the study of crime and law enforcement agencies in rural areas (Bachman, 1992; Bristow, 1982; Smith, 2010). Conservation law enforcement is a type of specialized policing that is carried out mostly in rural areas (Lawson, 2002; Lawson, 2003; Palmer & Bryant, 1985). In the United States, there are wildlife

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Stephen L. Eliason is an associate professor of sociology at Montana State University Billings in Billings, Montana. He is also a member of the Police Board for the City of Billings.

laws at both the state and federal levels (Freyfogle & Goble, 2009). Game wardens, or conservation officers as they are sometimes called, are specialized law enforcement officers employed at both state and federal levels to enforce wildlife laws (Calkins, 1970; Tobias, 1998). The primary responsibility of game wardens has been, at least historically, to enforce fish and game laws and to apprehend violators (Forsyth, 1993a; Forsyth, 2008; Palmer & Bryant, 1985), but changing times bring expanding roles and responsibilities in wildlife law enforcement. Some scholarly evidence suggests that conservation law enforcement is in the midst of a transition, and that game wardens are becoming more like their traditional urban police officer counterparts (Eliason, 2007a; Falcone, 2004; Shelley & Crow, 2009; Sherblom, Keranen, & Withers, 2002).

Some studies of conservation law enforcement officers mirror those conducted on urban law enforcement officers such as apprehending criminals (poachers) (Eliason, 2008; Forsyth, 1993a; Forsyth, 2008), the use of discretion (Eliason, 2003; Forsyth, 1993b), policing styles (Forsyth, 1994), community oriented policing (Patten, 2010), job satisfaction (Eliason, 2006b), motivations for entering the occupation (Eliason, 2007b), stress (Oliver & Meier, 2006; Walsh & Donovan, 1984), and search and seizure powers (O'Connor, 1985; Stearns, 2004). As with traditional policing, the job of game warden is a dangerous occupation (Eliason, 2006a; Forsyth & Forsyth, 2009) that can be deadly as evidenced by the numerous wardens who have been killed in the line of duty (Baird, 1983; Eliason, Forthcoming; Grosz, 1999; Long, 1985; McIver, 2003; Warren, 1997).

Previous studies have addressed general topics related to rural policing but not all have addressed specialized law enforcement agencies or the particular law enforcement requirements of specific locations. This is especially true with respect to rural areas of western states. In addition, previous studies have not asked game wardens to describe in their own words the challenges they face.

Montana can be characterized as a rural state. Although it is the fourth largest state in the United States in terms of land area, it has one of the smallest human populations of all states and contains fewer than 1 million residents. In terms of landownership, a total of 59.3% of Montana is private, 35.2% is in the public domain, and 4.3% is Indian trust land (Montana's Official State Website, 2010). Hunting and fishing are popular recreational activities in which thousands of residents and nonresidents alike participate (U.S. Department of the Interior, 2006)

Environmental and wildlife issues are important both to Montana residents and those who visit each year for the sole purpose of enjoying Montana's vast natural resources. Politically, wildlife issues in Montana are important policy issues that generate considerable public debate and receive extensive media attention both locally and nationally (Brownell, 1987; Kelley, 2001), with key examples consisting of wolf reintroduction (Scarce, 1998; Scarce, 2005) and bison management (Bidwell, 2010; Shanahan, McBeth, Tigert, & Hathaway, 2010).

Wildlife law enforcement in Montana is the responsibility of state game wardens who are employed by Montana Fish, Wildlife, and Parks in the law enforcement division. Game wardens perform a variety of duties that are essential to protecting the state's wildlife, which Montanans value highly. Game wardens are responsible for patrolling the state's forests, prairies, rivers, and lakes and enforcing the state's wildlife laws. Examples of their duties include conducting compliance checks of hunters and anglers to make sure they possess the proper hunting and fishing licenses and ensuring that these individuals adhere to possession limits of harvested game and fish. The new reality show called *Wardens* appears on The Outdoor Channel and provides viewers with a glimpse of the diverse tasks Montana game wardens perform (Montana Fish, Wildlife, and Parks, 2011).

### Methods

This research took a qualitative approach to data collection and sought to provide perspective on current issues facing conservation law enforcement officers. With this goal in mind, the study presents quotes from game wardens. Game wardens were allowed to speak for themselves to identify and elucidate core issues facing the conservation law enforcement profession. The author provides summarization and interpretation of game warden comments.

Data for this study were gathered in two phases. In the first phase, a mail survey was sent to all Montana state game wardens ( $N = 84$ ) in 2005. It consisted of mostly open-ended questions about the job of game warden, including a question that asked respondents to describe issues in the wildlife law enforcement field: "What are some of the important problems or issues wildlife law enforcement is facing?" Wardens were allowed to answer in their own words so the issues could be captured in detail (Fowler, 1993). A total of 22 game wardens completed the survey. In addition, one warden agreed to a telephone interview but did not want to complete the survey.

In the second phase of the study, phone interviews were conducted with 16 wardens who completed the survey and also agreed to an interview. The purpose of phone interviews was to clarify information from the survey as well as to elicit additional information on the job of game warden. Extensive notes were taken during the interviews, and relevant quotes on contemporary wildlife law enforcement issues were written down verbatim.

To analyze data, the author poured over all the wardens' written responses in the survey as well as statements they made during interviews, with the intent of identifying common themes. Data were placed into categories according to themes that emerged with respect to issues confronting game wardens. Written comments from game wardens are reproduced here exactly as they were written, retaining any errors in spelling, punctuation, and syntax.

## Results

In terms of demographic characteristics, all the wardens in the study were male. The average age of game wardens was 42, and they had an average of nearly 17 (16.76) years experience on the job.

Comments from game wardens in the study revealed five major issues confronting conservation law enforcement officers: inadequate funding, low salaries, non-wildlife law enforcement duties, lack of support from the court system, and a changing social and political climate.

### *Inadequate Funding*

The most common issue game wardens identified was inadequate funding. Wardens reported consistently that the funding situation in the department was grim. The perceived lack of funding to fulfill their obligations is important because it may also contribute to low morale in the department. Statements made by game wardens shed light on the scope of the problem:

*Given the importance of recreation economically to the state, wildlife law enforcement operations is underfunded.*

*Proper funding to accomplish yearly work. Both in operations and time. Legislative and legal changes in warden powers and duties!*

*1. Funding. Paying a decent wage and operations money. New equipment. 2. Morale. Internal bickering can kill us. 3. Good recruitment. That's the future.*

*Competition with biological divisions for funding. ...the dilution of wildlife enforcement effort by legislative mandates to spend time doing other things.*

*Legislatures cutting budgets. Political influence on policies lessening your effectiveness.*

*Lack of funding and support from administration.*

*Funding. Lack of support from the department.*

*Lack of money.*

*Funding!*

*Funding.*

Some respondents were more specific in their comments and noted that the funding shortfall hampered their ability to be out in the field in pursuit of violators. These wardens expressed frustration with constraints the budget imposed and claimed that once their patrol budget ran out, they were relegated to spending significant amounts of time in the office performing other duties:

*My total budget for the year has only increased \$500 over twenty years. I don't think funding is a priority for this department. We will spend months in the office when the budget runs out (December to March). We are the fourth largest law enforcement agency in the state and have no dispatch system. On the 1-800-TIP-MONT poaching hotline, one woman answers the phone from 8 to 5 Monday through Friday for nine and a half months of the year, and it rolls over to the highway patrol [dispatcher] on weekends. When there is*

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*spotlighting, they will send us a report three days later. For road kill, they will call me at three in the morning.*

*Lack of money. I patrol 2,000 square miles with an operations budget of \$9,700. By the end of hunting season I'm forced to park [the] patrol vehicle.*

*Funding is the biggest challenge. I don't have enough operations budget to get in the field as much as I should. You don't catch poachers behind a desk.*

#### *Low Salaries*

Related to the problem of inadequate funding was low pay. The state of Montana has been noted for low paying jobs in general (Fritz, 2002; Malone, Roeder, & Lang, 1991), but the problem is particularly acute with respect to game warden jobs. Inadequate remuneration was identified by respondents as a major impediment to recruitment and retention efforts of the organization because it adversely affects the ability of the department to attract and retain wardens:

*The profession is quickly approaching a crucial time. It's hard to attract people to the profession because of the low pay. Montana is the fifth lowest paid state. Some game wardens have left the state to go to other states where the pay is higher.*

*Salaries are not keeping up with the new demands of the job.*

*It's a great job. They just need to get the pay up.*

*Budget shortfalls, pay issues/overtime.*

*Poor recruitment due to low pay.*

*Losing officers. Internal politics. [There is] very poor pay in Montana!*

#### *Non-Wildlife Law Enforcement Duties*

Some of the respondents indicated that the job of game warden in Montana was changing. They reported non-wildlife law enforcement duties that had traditionally

been the domain of city policing or animal control were being imposed on them such as administrative tasks and dealing with urban/problem wildlife:

*The field game warden is being taxed to death with duties other than wildlife law enforcement. The administrative duties we are being saddled with. Being bogged down with urban wildlife and game damage.*

*The job has changed. There is more money, more affluent hunters. White collar violators get multiple tags, hunt behind locked gates. They are hunting seven, eight, nine states a year. You do more of a traffic cop mentality, urban wildlife problems, etc. A skunk eating out of a garden.*

*We have a richer society and they are going into the outdoors more. You get more people out there and the dynamics have changed. We have to deal with issues like child abuse, domestic violence, and gang activity. ... We get trained routinely in drug detection.*

*The nationwide trend is less emphasis on traditional wildlife law enforcement. There has been growth in administration. Dealing with off highway vehicles, wolves, nongame wildlife. They [Montana Department of Fish, Wildlife, and Parks] excessively solicit public involvement...we overemphasize it.*

*Urban wildlife/human conflicts are taking up more and more time. Assisting other law enforcement agencies with backup and investigative expertise.*

*De-emphasis by the agency and re-directing our time and resources to non-law enforcement issues and to non-wildlife enforcement like parks and boats.*

*Inability to devote time to wildlife law enforcement.*

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*Lack of Support From the Court System*

Some wardens expressed frustration with the response of the justice system toward cases of wildlife law violation and felt that some actors in the process undermined their efforts to prosecute offenders. In particular, they indicated that a great deal of time and effort may be spent building a case against a violator, only to have a judge or prosecutor dismiss the case or go extremely lenient on the violator:

*It's frustrating. It's not catching the violators that's the hard part, it's getting them through the system. Dealing with county attorneys and judges. You can work on a case for four years, and the county attorney can get rid of it in twenty minutes.*

*Judges and attorneys will put our cases aside and prosecute other cases because there is a victim.*

*Poor court systems, judges that don't fine them enough or let them go.*

*Poor judicial decisions.*

*Lack of meaningful sentences from judges. Lack of interest from prosecutors to prosecute.*

Exacerbating the problem are private property laws in the state, including a state Supreme Court decision that restricts game wardens from entering private property for patrol purposes unless they have a warrant or permission from the landowner (*State v. Bullock*, 1995). Wardens indicated that a tremendous amount of trophy wildlife poaching takes place on private land behind locked gates. This is a significant issue because, as previously noted, almost two-thirds (59.3%) of land in the state is privately owned (Montana's Official State Website, 2010):

*Ability to go on private land to enforce laws.*

*Private property issues like the Bullock Decision.*



*Changing Social and Political Climate*

The final category that emerged from the data had to do with changes occurring in the state that were associated with newcomers, urbanization, and public perceptions of the game warden job. In recent decades Montana has witnessed an influx of new residents from other states who relocate for the spectacular scenery and tranquil environment it provides. Game wardens indicated that the values and lifestyles of newcomers sometimes conflict with the local rural culture found across much of the state, which can be problematic for them in the performance of their job:

*The changing demographics of the state and country are going to make it a more difficult job. I'm near the end of my career, but it's going to be difficult for the young officers. It is getting more and more contentious, controversial, emotional. It used to be we'd deal with violators, now its animal rights activists, etc.*

*Out of state people buying up property in Montana.*

*An ever changing social environment and legislature and many new faces moving into the state of Montana.*

*Educating people about laws. Its hard for people to understand why we do those things. The public is willing to accept a certain amount of poaching, such as an extra deer for food. In urban areas people will report, in rural areas people will not report.*

*The public perception of what game wardens do is completely different from what we really do. We want to educate people about what we do.*

### **Conclusion**

The findings of the present research suggest that Montana wildlife law enforcement officers face several challenges. These include some challenges that are common to all law enforcement agencies as well as some that appear to be unique to wildlife law enforcement. Inadequate funding was the most frequent issue game wardens in Montana identified. Financial constraints impose severe hardships on the agency and

render it less effective in terms of protecting the state's wildlife resources. The problems it causes manifest in inadequate money for organizational operations such as patrolling for violators. Game wardens need to be visible and maintain a presence in the field to deter would-be wildlife law violators.

Inadequate funding also has an effect on recruitment and retention efforts, as low salaries deter otherwise qualified and committed individuals from embarking (or remaining) in a conservation law enforcement career. Wildlife conservation and enforcement efforts are recognized as integral to healthy ecosystems, but wildlife law enforcement tends to occupy a subordinate status among law enforcement agencies and provides lower salaries to officers than other branches of law enforcement (California Fish and Game Wardens Association, 2011).

Historically, the state of Montana in general has been noted for low paying jobs (Fritz, 2002; Malone et al., 1991), and, unfortunately, it doesn't appear that the situation will improve anytime soon. It should be noted that the problem of low salaries for wildlife law enforcement officers is not unique to Montana. For example, California has also experienced problems with low game warden pay that seriously hamper the ability of the California Department of Fish and Game to recruit and retain high quality law enforcement officers (California Fish and Game Wardens Association, 2011).

The findings of this study suggest the job of game warden is changing as these individuals are increasingly asked to assume tasks associated with traditional police work. This finding corroborates the work of scholars (e.g., Eliason, 2007a; Falcone, 2004; Shelley & Crow, 2009; Sherblom et al., 2002) who have provided evidence that the job of game warden is undergoing a transition in this direction. The increased emphasis on non-wildlife law enforcement tasks and non-law enforcement tasks is troubling to game wardens, most of whom entered the profession with a desire to engage in law enforcement work. Some types of policing have less prestige in the status hierarchy of law enforcement occupations, including campus police, animal control officers, and conservation law enforcement. In addition, the following statement by Falcone (2004, p. 64) succinctly describes the central role of law enforcement activities with respect to status within the police officer culture and how an emphasis on other activities can result in a loss of status:

[T]here is a long-standing officer culture that holds the more narrow law enforcement mission of policing in higher regard than other policing activities, and within the greater police community

conservation police can only lose status by involving themselves in policing tasks not centered on law enforcement.

Results of the present study suggest changes need to be made at the judicial level. Wardens noted that individuals in the judicial system such as judges and prosecuting attorneys often fail to appreciate the seriousness of wildlife offenses. As a result, cases end up getting dismissed and offenders get light sentences. This is consistent with prior research that has noted that poaching offenses are not taken as seriously as other offenses by personnel in the judicial system (Musgrave, Parker, & Wolok, 1993).

Describing the importance of education in changing attitudes, Musgrave et al. (1993, p. 1010) state, "Through effective judicial education about the rapid depletion of wildlife resources combined with education about innovative sentencing techniques, the attitudes of judges and prosecutors may change." This suggests that educational training programs should be developed and implemented for prosecutors and judges to make them aware of the seriousness of poaching offenses and to help them understand the deleterious effect these offenses have on the state's natural resources. If such a program successfully generated greater concern toward wildlife offenses by these actors in the legal system so these crimes were taken as seriously as other offenses, it would serve to increase the morale of game wardens.

As the job of game warden is changing, so is the social and political milieu in which these officers work. The majority of individuals who pursue a career in conservation law enforcement come from rural areas (Lawson, 2002; Lawson, 2003; Palmer & Bryant, 1985; Sherblom et al., 2002). Montana is a rural state that is rich in open areas and wildlife but has a small human population. It is similar to other western states in that it is also experiencing population growth and change as individuals relocate there from other regions of the U.S. (Hines 2007; Robbins, Meehan, Gosnell, & Gilbertz, 2009). This influx of newcomers has also resulted in changes in landownership patterns, with newcomers buying up ranches that have been in families for generations. Some of the new landowners close their land to hunting, which results in loss of access to hunting land for Montana residents.

Many of the individuals settling in Montana are from urban areas and have values different from native Montanans, which can lead to social conflict over conservation and wildlife management. Further compounding the problems is that some of the newcomers are more concerned with animal rights and endangered

species than with traditional hunting and fishing practices. For example, the recent controversies over wolf reintroduction and management (Scarce, 1998; Scarce, 2005) as well as bison management (Bidwell, 2010; Shanahan et al., 2010) have been particularly intense given the symbolic importance of these animals to different segments of the population.

Education and public relations are traditional components of the game warden job (Palmer & Bryant, 1985) and are likely to increase in importance as the Montana population and culture become more heterogeneous. Some newcomers to the state may be unfamiliar with game wardens and the job they perform. Game wardens are highly visible representatives of state wildlife agencies (Palmer & Bryant, 1985) and must be able to work collaboratively with a variety of individuals with different interests.

The results of the present study illuminate some of the issues affecting conservation law enforcement officers in Montana. Additional research should be carried out in other states and geographical regions of the U.S. to enhance our understanding of the issues confronting those employed in the wildlife law enforcement profession further. It is hoped that findings from the present study will be useful to criminal justice scholars and practitioners interested in policing issues and generate interest in issues concerning this unique type of specialized law enforcement.

### References

- Bachman, R. (1992). Crime in nonmetropolitan America: A national accounting of trends, incidence rates, and idiosyncratic vulnerabilities. *Rural Sociology*, 57(4), 546–560.
- Baird, D. (1983). An Idaho tragedy: What can we learn. *Proceedings of the Western Association of Fish & Wildlife Agencies*, 63, 65–68.
- Bidwell, D. (2010). Bison, boundaries, and brucellosis: Risk perception and political ecology at Yellowstone. *Society and Natural Resources*, 23(1), 14–30.
- Bristow, A. P. (1982). *Rural law enforcement*. Boston, MA: Allyn & Bacon.
- Brownell, J. L. (1987). *The genesis of wildlife conservation in Montana*. Unpublished Master's Thesis. Montana State University, Bozeman, MT.
- California Fish and Game Wardens Association. (2011). *Inland wardens*. Retrieved June 29, 2011, from <http://www.californiafishandgamewardens.com/inland.htm>

- Calkins, F. (1970). *Rocky mountain warden*. New York: Alfred A. Knopf.
- Eliason, S. L. (2003). Throwing the book versus cutting some slack: Factors influencing the use of discretion by game wardens in Kentucky. *Deviant Behavior, 24*(2), 129–152.
- Eliason, S. L. (2006a). A dangerous job? An examination of violence against conservation officers. *The Police Journal, 79*(4), 359–370.
- Eliason, S. L. (2006b). Factors influencing job satisfaction among state conservation officers. *Policing: An International Journal of Police Strategies and Management, 29*(1), 6–18.
- Eliason, S. L. (2007a). From wildlife specialist to police generalist? The scope of nonwildlife violations encountered by conservation officers. *Southwest Journal of Criminal Justice, 4*(2), 120–132.
- Eliason, S. L. (2007b). Motivations for becoming a state conservation officer. *Police Forum, 16*(3), 1–11.
- Eliason, S. L. (2008). Wildlife crime: Conservation officers' perceptions of elusive poachers. *Deviant Behavior, 29*(2), 111–128.
- Eliason, S. L. (Forthcoming). Death in the line of duty: Game warden mortality in the United States, 1886–2009. *American Journal of Criminal Justice*.
- Falcone, D. (2004). America's conservation police: Agencies in transition. *Policing: An International Journal of Police Strategies and Management, 27*(1), 56–66.
- Forsyth, C. J. (1993a). Chasing and catching "bad guys": The game warden's prey. *Deviant Behavior, 14*, 209–226.
- Forsyth, C. J. (1993b). Factors influencing game wardens in their interaction with poachers: The use of discretion. *Free Inquiry in Creative Sociology, 21*, 51–56.
- Forsyth, C. J. (1994). Bookers and peacemakers: Types of game wardens. *Sociological Spectrum, 14*, 47–63.
- Forsyth, C. J. (2008). The game of wardens and poachers. *Southern Rural Sociology, 23*(2), 43–53.
- Forsyth, C. J., & Forsyth, Y. A. (2009). Dire and sequestered meetings: The work of game wardens. *American Journal of Criminal Justice, 34*(3–4), 213–223.
- Fowler, F. J., Jr. (1993). *Survey research methods*. Newbury Park, CA: Sage.

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- Freyfogle, E. T., & Goble, D. D. (2009). *Wildlife law: A primer*. Washington, DC: Island Press.
- Fritz, H. W. (2002). Montana in the twenty-first century. In H. W. Fritz, M. Murphy, & R. R. Swartout, Jr. (Eds.), *Montana legacy: Essays on history, people, and place* (pp. 341–358). Helena, MT: Montana Historical Society Press.
- Grosz, T. (1999). *Wildlife wars: The life and times of a fish and game warden*. Boulder, CO: Johnson Books.
- Hines, J. D. (2007). The persistent frontier & the rural gentrification of the Rocky Mountain West. *Journal of the West*, 46(1), 63–73.
- Ives, E. (1991). The poacher as hero: The Graves case as exemplar. *Forest and Conservation History*, 35(1), 24–28.
- Kelley, J. M. (2001). Implications of a Montana voter initiative that reduces chronic wasting disease risk, bans canned shooting, and protects a public trust. *Great Plains Natural Resources Journal*, 6, 89–109.
- Lawson, H. M. (2002). Wildlife managers: Boundary workers between the human community and the wilderness. *International Review of Modern Sociology*, 30(1), 46–64.
- Lawson, H. M. (2003). Controlling the wilderness: The work of wilderness officers. *Society and Animals*, 11(4), 329–351.
- Long, J. B. (1985). *Outlaw: The true story of Claude Dallas*. New York: William Morrow.
- Malone, M. P., Roeder, R. B., & Lang, W. L. (1991). *Montana: A history of two centuries*. Seattle: University of Washington Press.
- McIver, S. B. (2003). *Death in the Everglades: The murder of Guy Bradley, America's first martyr to environmentalism*. Gainesville: University Press of Florida.
- Montana Fish, Wildlife, and Parks. (2011). *Law enforcement reality show "WARDENS" to debut on Outdoor Channel*. Retrieved June 23, 2011, from [http://fwp.mt.gov/news/newsReleases/headlines/nr\\_3932.html](http://fwp.mt.gov/news/newsReleases/headlines/nr_3932.html)
- Montana's Official State Website, Natural Resource Information System. (2010). *Landownership in Montana counties*. Retrieved August 3, 2010, from [http://nris.mt.gov/montanafacts/county\\_own.asp](http://nris.mt.gov/montanafacts/county_own.asp)

- Musgrave, R. S., Parker, S., & Wolok, M. (1993). The status of poaching in the United States: Are we protecting our wildlife? *Natural Resources Journal*, 33, 977–1014.
- O'Connor, M. T. (1985). Fishing for evidence: The expansive warrantless search powers of fish and game wardens. *Hastings Constitutional Law Quarterly*, 13, 119–145.
- Oliver, W. M., & Meier, C. A. (2006). "Duck cops," "game wardens," and "wildlife enforcement:" Stress among conservation officers. *Applied Psychology in Criminal Justice*, 2(1), 1–25.
- Palmer, C. E., & Bryant, C. D. (1985). Keeper's of the king's deer: Game warden's and the enforcement of fish and wildlife law. In C. D. Bryant, D. W. Shoemaker, J. K. Skipper, Jr., & W. E. Snizek (Eds.), *The Rural Workforce: Non-Agricultural Occupations in America* (pp. 111–137). South Hadley, MA: Bergin & Harvey.
- Patten, R. (2010). Policing in the wild: The game wardens' perspective. *Policing: An International Journal of Police Strategies and Management*, 33(1), 132–151.
- Robbins, P., Meehan, K., Gosnell, H., & Gilbertz, S. J. (2009). Writing the new west: A critical review. *Rural Sociology*, 74(3), 356–382.
- Scarce, R. (1998). What do wolves mean? Conflicting social constructions of *Canis lupus* in "bordertown." *Human Dimensions of Wildlife*, 3(3), 26–45.
- Scarce, R. (2005). More than mere wolves at the door: Reconstructing community amidst a wildlife controversy. In A. Herda-Rapp & T. L. Goedeke (Eds.), *Mad about wildlife* (pp.123–146). Leiden, The Netherlands: Brill.
- Shanahan, E. A., McBeth, M. K., Tigert, L. E., & Hathaway, P. L. (2010). From protests to litigation to *YouTube*: A longitudinal case study of strategic lobby tactic choice for the Buffalo Field Campaign. *Social Science Journal*, 47(1), 137–150.
- Shelley, T. O., & Crow, M. S. (2009). The nature and extent of conservation policing: Law enforcement generalists or conservation specialists? *American Journal of Criminal Justice*, 34(1–2), 9–27.
- Sherblom, J. C., Keranen, L., & Withers, L. A. (2002). Tradition, tension, and transformation: A structuration analysis of a game warden service in transition. *Journal of Applied Communication Research*, 30(2), 143–162.
- Smith, R. (2010). Policing the changing landscape of rural crime: A case study from Scotland. *International Journal of Police Science and Management*, 12(3), 373–387.

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*State v. Bullock*, 272 Mont. 361, 901 P.2d 61 (1995).

Stearns, M. J. (2004). It's good to be the game warden: State v. Boyer and the erosion of privacy protection for Montana sportsmen. *Montana Law Review*, 65(1), 187–216.

Tobias, M. (1998). *Nature's keepers: On the front lines of the fight to save wildlife in America*. New York: John Wiley.

U.S. Department of the Interior, Fish and Wildlife Service and U.S. Department of Commerce, U.S. Census Bureau. (2006). *2006 national survey of fishing, hunting, and wildlife-associated recreation: Montana*. Retrieved January 6, 2010, from <http://www.census.gov/prod/2008pubs/fhw06-mt.pdf>

Walsh, W. F., & Donovan, E. J. (1984). Job stress in game conservation officers. *Journal of Police Science and Administration*, 12(3), 333–338.

Warren, L. S. (1997). *The hunter's game: Poachers and conservationists in twentieth-century America*. New Haven, CT: Yale University Press.