

Hellgate Hunters & Anglers

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Montana Fish, Wildlife & Parks

Attn: Hunting Regulations Public Comment

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To Whom It May Concern:

On behalf of Hellgate Hunters & Anglers, a local rod and gun club representing approximately 400 members in the Missoula area, I write to provide comment on the regulation changes proposed across much of the state. While we recognize the need to amend some regulations to improve enforcement and encourage consistency between various hunting districts, the process here is not commensurate with Montana Fish, Wildlife & Parks' mission to manage our big game species based on the best available science. Joining multiple hunting districts together into large, geographically and topographically diverse mega-units removes the ability of our wildlife biologists to effectively manage elk and deer herds on a local scale. Over the last decade, FWP biologists in Region 2 have repeatedly been able to address population trends by adjusting harvest quotas in individual units for the upcoming season, thereby allowing herds to recover from threats by predators, development and other human-caused pressures, harsh winters, and drought. This kind of management is what is needed to sustain healthy wildlife populations as well as what Montana hunters need to enjoy repeated success in our local districts.

In addition to the issues noted above, we have concerns with the following individual unit changes:

- Joining HD 261 with HD 270 will impact many hunters in western Montana who have dedicated years to applying for this coveted mule deer tag. While we understand that tag numbers will be increased to reflect the increased size of HD 270, the lack of clarity on this point is concerning. These are disparate units and have been treated as such for years. Furthermore, the elimination of adjacent units managed under a permit system for mule deer bucks in HD 240 and HD 204 could significantly increase the number of applications for the coveted mule deer buck permit in HD 270, reducing the drawing odds even further. The department has not considered this in the proposed changes. There is no clear reason to remove HD 261, and we oppose this change.
- Removing the HD 260-20 whitetail deer B tag is at odds with the science put forth by the biologist in charge of that unit. Missoula has an urban deer problem. Consequently, we're at a very high risk of a CWD outbreak, as seen in the Libby and Troy area. Whitetail bucks, due to their movement, present the highest risk of CWD spread. Allowing hunters to harvest a whitetail buck in HD 260 in addition to their deer A tag allows FWP an additional tool in their management toolbox to manage Missoula deer numbers.

Additionally, many hunters in the area rely on this tag as a source of local hunting opportunity.

- Removing the unlimited bull tag in HD 270 will result in increased pressure on an elk herd that is of significant value to Montana hunter in the region. This tag is extremely popular with local hunters and helps maintain quality archery and general season opportunities. Moving to a general season for brow-tined bull elk in HD 270 will reduce quality hunting opportunities for locals who know that country well and who repeatedly put in for that tag.
- Conjoining HD's 210, 211, 212 and 216 into one unit will result in reduced hunting opportunity for local Montanans and will make elk management more difficult for our wildlife managers. HD 210 is a highly prized mule deer tag, because it holds higher quality bucks than the other districts named here. Conjoining these units will result in increased pressure on HD 210, while also limiting opportunities for local residents to hunt mule deer each year in HD's 211, 212 and 216. We urge FWP to consider keeping these units separate to preserve their unique and highly valued backcountry hunting opportunities.
- HD 240's limited mule deer buck permit, 240-50 provides a unique opportunity for hunters to pursue mule deer within the Selway-Bitterroot Wilderness boundary. There is no justification for removing this opportunity and we oppose this change.
- The newly created HD 222 creates a mega-district comprising the districts formerly known as HDs 215, 213, 291, and 298. This is a very large region with distinct elk and deer populations which will be subject to overly broad management. For example, the elk herds which have historically been found in HD 215 near Deer Lodge are distinct from those found in HD 298 near Helmville and the upper Blackfoot valley. If one herd is significantly reduced due to overharvest, other herds in the new district could buoy the population objective in the entire HD, giving a false sense of appropriate herd management in a large portion of Region 2. It's too broad of a brush stroke when FWP often needs focused management tools. Our concern is that we may revert to historically challenging legal boundary guideline restrictions to manage deer and elk herds, which is the antithesis of clarifying our regulations.
- Combining parts of HD 283, HD 203, & HD 240 to create the new HD 201 is grouping the most urban HDs in Region 2. Tag allocation for big game populations in these HDs have needed emergency manipulation at times when herds move significantly or decline dramatically. By combining these HDs that receive a lot of urban pressure impacting wildlife populations, this is a key example of where these regulation changes decrease a biologist's ability to quickly respond to a significant population change, as happened with Missoula's Evaro-North Hills elk herd in 2019. We would propose splitting this unit along the Highway 93 boundary to provide for greater management flexibility into the future.

- We are pleased to see that HD 282 has been maintained and also support the removal of youth opportunity and PTHV opportunities in HD 285 as a means to reduce excessive public land harvest of elk. We do have some concern with harvest that may occur on the Blackfoot Game Range with a longer season offered.
- Regarding elk management region wide, we are concerned these changes will challenge the ability for the Department to collect fine scale harvest data with the creation of these mega hunting districts. We strongly recommend the Department updates their harvest surveys to include more geographically specific data so biologists are able to determine where harvest is occurring.
- In general, we are concerned about mule deer management in Western Montana and mule deer populations across the west are hurting. With the changes proposed in these regions, such as the newly proposed HD 201 or 210, we would like clarification as to how a three-week season (thus avoiding the rut when the bucks are most vulnerable) be a better way to allow biologists to effectively manage this species. We support shortening the rifle seasons to protect older age class bucks during the rut in some districts where populations are declining. In others, moving to an even more restrictive limited entry permit system would be better to achieve management goals and improve management goals for Montana's mule deer hunting.

As FWP has anticipated, these sweeping changes will not be well received by Montana hunters who know these units and the big game populations within. Though we take issue with a number of these regulation changes, we also recognize a need to modernize regulations to address the constantly growing pressures, both biological and social, to manage wildlife across the state. There have been major advances in technologies that help hunters understand where they are in a landscape and the regulations that exist there, but many of these changes are not helpful in making the regulation easier to comprehend. We believe it is the responsibility of a hunter to educate themselves on the regulations. The changes proposed here are momentous and represent a departure from the structure that local Montana hunters have grown accustomed to. Knowing that changes this significant are challenging to comprehend and respond to, we ask the Department to extend the comment deadline by another 60 days, so that hunters can familiarize themselves with the changes and comment on any issues of concern. This will allow working Montanans with commitments to spend their spare time out filling tags, not poring through extensive regulation changes in the middle of hunting season.

Thank you for the opportunity to comment.

Sincerely,



Walker Conyngham
President
Hellgate Hunters & Anglers