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January 21, 2022

Montana Fish, Wildlife & Parks
Attn: Hunting Regulations Public Comment
PO Box 200701
Helena MT 59620-0701

Dear Commissioners:

On behalf of Hellgate Hunters & Anglers (HHA), I write to comment on the season setting proposals for fiscal years 2022 and 2023. HHA is an all-volunteer rod and gun club based in Missoula, and we boast over 500 members in Western Montana. Our mission is to protect, enhance and restore wildlife habitat; promote sound, science-based management of all wildlife species and their habitat; educate and inform hunters, anglers and others about good, ethical hunting and fishing and the biological, cultural and spiritual values of hunting and fishing; ensure that future generations will experience similar, if not better, opportunities to experience wildlife, wild places, hunting, fishing and other outdoor activities; and protect and promote the public trust, ensuring that all people, regardless of wealth or social stature, have fair, equitable access to our public lands, waterways and wildlife.

HHA has been deeply invested in the conversation surrounding elk management in Montana, and we are also engaged in issues surrounding upland birds, turkeys and changes to Montana's deer season structure and objectives. Since our organization's founding, HHA has worked closely with the Department to ensure that the voices of Western Montana's sportsmen and women are reflected in our state's wildlife management policies. Montana's tradition of public engagement in wildlife management and natural resources decisions runs deep, and I hope that the Commission will pay close attention to the concerns and priorities of Montana hunters in considering these sweeping changes to our regulations.

Elk

Broadly, we ask the Commission to avoid any significant changes to our elk units and regulations until a new Elk Management Plan, grounded in science and biological understanding, can be established. Ratifying and implementing sweeping changes to our elk management policies before this new plan is complete will inevitably result in headaches for the Department and Montana hunters. Furthermore, it will reduce the public's faith in the Department and the Commission if changes are made before we have a new Elk Management Plan. Montana hunters

bought into the public process of creating a new plan — moving forward in the interim with broad changes is an affront to this process and will degrade the trust hunters place in the Department to effectively manage our elk populations.

HD 204 - North Sapphire

HHA requests that the antlerless elk harvest with a general license be permitted on private land only in 204. This hunt district is immediately adjacent to Missoula and experiences significant, year-round recreational pressure from all types of users. If cow elk experience more pressure on publicly accessible land in this hunting district, it will further force these elk to seek refuge on private lands. Many private landowners in this area do not allow public hunting access to the extent necessary to sufficiently disperse the elk back onto publicly accessible land.

Unlimited Region 2 Elk Permits

HHA agrees hunters should not be able to hunt another district for bull elk if they have a permit for HD 217, HD 270, or any of the other units where this is applicable.

HD 900-20

This is an incredibly valuable tag for Montana hunters seeking a quality bow hunt in limited entry units. Making these tags over the counter for private lands only will result in a reduction in public land hunting opportunities and trophy quality for Montanans. This will also promote commercializing wildlife as landowners will be able to sell access to the highest bidders. We ask the Commission to hold off on this change until unit objectives are changed under a new Elk Management Plan.

HD 201

For HD 201, HHA still supports splitting this district along Highway 93. We believe the population dynamics are much different with the North Hills, Grant Creek and Mount Jumbo elk herds. The North Hills herd saw a significant crash recently and liberal private land opportunity during the late season could result in significant harvest in a population that is fairly stable. Elk tolerance is generally much higher in the North hills and the Grant Creek area than on private lands around Frenchtown, where elk numbers have exploded.

Upland Birds

Proposal to Extend Upland Game Bird Season

Montana boasts quality habitat and land management in many parts of the state to support healthy populations of wild game birds. Many of these species can be hunted for four full months out of the year, some of the longest seasons in the country. Lengthening the season by a month could result in negative population consequences pressuring these birds in the harshest months in addition to pushing landowners enrolled in public access programs to continue to allow hunting longer than they may tolerate. Without biological evaluation of population dynamics from increased hunting opportunity, this proposal is premature. Any extension of our current upland

bird hunting season must incorporate consideration of bird populations and landowner participation.

Migratory Birds

Light Goose Conservation Order

We support a Light Goose Conservation Order for snow and Ross's geese in the Central Flyway that occurs from March 1 to May 15.

Turkeys

Proposal to Change Turkey Regulations Statewide

We support the proposal to shift and lengthen the turkey hunting season from April 10-May 16 to April 15 – May 31.

Proposal to Change Turkey Regulations Statewide in Region 4

We support the proposal in Region 4 to establish a spring general season and eliminate the fall season for turkey hunting.

Proposal to Allow Air Rifles for Upland Bird Take

We oppose the proposal to allow air rifles for turkey or any other game bird's harvest. Allowing the use of air rifles as legal means of take of turkeys during the fall season is an excellent way to maim and not recover this large game bird. It is an unethical and unnecessary change. Air powered rifles are also not taxed under Pittman-Robertson. Allowing wildlife to be harvested with a weapon from which the state receives no excise tax does nothing for wildlife management funding and is antithetical to the principles of responsible, conservation-minded hunting.

Deer

HHA supports the transition to a three week general hunt in the Region 2 districts formerly available to mule deer hunting only through unlimited tags. This decision is supported by the Department's data re: harvest rates in these units. We see this change as a harbinger of necessary future changes to Montana's mule deer hunting season structure across the state. We ask the Department to consider further changes to mule deer regulations in Montana to reduce hunting pressure, improve herd age structures and allow for better resident hunting opportunities, including: excluding mule deer bucks from the December muzzleloader hunt, reducing season length, instituting antler point minimums for individual units, reducing nonresident opportunities and other changes necessary to maintain quality over-the-counter mule deer hunting opportunities in the state for Montana residents.

Considering last-minute proposals that have had no consideration by FWP's science and biological staff is a poor practice increasingly undertaken by the Commission. The upland game bird season length and air rifle proposals are examples of this. These types of proposals waste the agency and the public's time to appease the whim of one or two individuals.

We appreciate the deadline extension from Jan. 14 to Jan. 21st. This helped working Montanans engage with these regulation changes after the holidays.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Walker Conyngham". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Walker Conyngham
President
Hellgate Hunters & Anglers