



P.O. BOX 7792 MISSOULA, MT 59807 (406) 529-5754
www.hellgatehuntersandanglers.org

Fish and Wildlife Commission
FWComm@mt.gov

Re: Proposed Commissioner Amendments from Commissioner Cebull

To Whom It May Concern:

I submit the following comments on behalf of Hellgate Hunters & Anglers, a Western Montana-based organization that represents over 500 sportsmen and women across the state. We are grateful for the opportunity to comment on Commissioner Cebull's proposed amendments.

HHA provides the following comments on Commissioner Cebull's Proposed Amendment to the proposed 2024 and 2025 black bear regulations:

1. Set a statewide spring hunting season closure for Black Bear to June 15.

HHA generally does not have an issue with this amendment on a statewide level. However, HHA does have some concerns with relation to potential impacts on grizzly recovery zones, along with historic elk calving habitat. The potential for hunter related conflicts with grizzlies is very high in units in the grizzly recovery zone. This risk is exponentially increased in areas where hound hunting or chasing is allowed. Further, allowing bear hunting activity later into the season could potentially have negative impacts on calving elk. As such, HHA would like to see the Fish and Wildlife Commission take a cautious approach and consider retaining the current season closure date of May 31 in grizzly recovery zones and historic elk calving habitat. Further, HHA generally supports each item in the department response to this proposal regarding quotas, and not changing any units that already extend to June 15.

2. Expand to statewide the Region 1 pilot that allowed hunters to submit extracted teeth instead of having to present a head and carcass. Also require that each hunter submit 2 molars instead of 1.

HHA generally agrees with and supports the department response to this proposal. If the department would prefer a second year of data to determine the adequacy of the pilot program, the commission should follow the department's wishes. HHA also agrees that if this amendment were adopted, physical inspections should remain mandatory in Regions 5, 6, and 7. Finally, the



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48-hour harvest report requirement should remain in effect in any regions where hunters are no longer required to present their harvested bear.

Regarding Commissioner Cebull's remaining proposed amendments, along with the amendments proposed by the other commissioners, HHA would like to make a general comment on this process as whole. The season setting process now allows the commissioners to have a second opportunity to provide input that the public does not have adequate time to vet. The public should have the same opportunity to comment that the commissioners do. The timeline involved in responding to commissioner proposed amendments such as this does not provide the public sufficient time to adequately analyze and understand the proposals. This undercuts the public's ability to participate and has the potential to put the general public on unequal footing with third party interests who may be influencing the commissioners to make changes after the season setting process is finalized.

Thank you again for the opportunity to comment on these proposed amendments.

Sincerely,

Andrew Gorder
President
Hellgate Hunters & Anglers