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Elizabeth Bradley
Regional Wildlife Director
Montana Fish Wildlife & Parks-Region 2
3201 Spurgin Rd
Missoula, MT 59804

Re: 2024-2025 Season Setting Public Comment Opportunity

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 the 2024-2025 Season Setting Draft Regulation Proposals for Region 2 and statewide. As part of this process, we greatly appreciate the detailed explanations and justifications from the area biologists for the proposed changes in each district, and we hope this remains an integral part of the season setting process. In addition, while we appreciate the Department's efforts to solicit public comment and hold public meetings statewide during the summer of 2023 to gather input from Montana citizens, we'd encourage FWP to adjust the timing of the public comment window. It's unrealistic to expect much of the hunting public to provide feedback and/or attend public meetings on proposed regulations during general season for big game, but a slightly earlier start (perhaps during the week between archery and rifle seasons) would provide for a more meaningful and robust public process.

HHA submits the following comments regarding the draft proposals for Region 2:

Elk

- We encourage FWP to maintain restrictions in HD 201 and limit B license harvest east of HWY 93. This population has yet to fully recover, and B license opportunity is inappropriate at this time.
- We support the addition of more antlerless elk opportunities in HD 204.
- We support the addition of another antlerless elk permit for private lands in HD 210.



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- We support the change to move cow elk opportunities to a permit instead of a general license in HD 217.
- We support the addition of rifle bull elk limited quota for HD 262 and ask that the Department continue its work to expand public hunting opportunities within this district. Harboring of elk is a significant issue in this district, and this opportunity will hopefully redistribute late season bulls from private to public lands.
- We oppose a further increase in the number of 270-01 B-licenses. This is the second quota increase in as many years and may indicate that more tags (without more access) is not having the desired impact on elk populations.
- We remain opposed to the addition of a limited HD 281 B-license opportunity because data indicates this population has not experienced a significant recovery and may still be in decline.

Deer

- We support the elimination of antlerless mule deer B-licenses in HD 240 and ask that the Department continue and expand its study of mule deer declines in Western Montana.
- We support the reduction in mule deer buck tags in HD-260.
- We take no issue with reducing the general season dates for either sex whitetail deer tags in some districts but encourage the Department to ensure these changes are adequately noticed to prevent confusion.

Bighorn Sheep

- We support all the draft proposals for sheep hunting opportunities in Region 2, and thank the Department for its responsiveness to population declines. While we understand the need for population control, risk of disease contact, and other safeguards regarding the East Fork herd, we would implore the department to explore opportunities for additional transplants in lieu of ewe hunting opportunities.



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HHA submits the following comments for the statewide regulation proposals:

- HHA is concerned with proposals to 'eliminate quota ranges for all permit license-permit types' for elk and deer. This proposal could lead to drastic increases (or reductions) in limited-entry permit districts. We ask that the quota ranges for both deer and elk permit license-permit types be kept in place to provide sideboards and allow for the appropriate input from FWP's biologists.
- We strongly support antlered buck only hunting opportunities in those hunting districts where mule deer populations are in decline. This should be a governing principle for deer management in our state, and not subject to the whims of the hunting public. We are witnessing a severe decline in the quality of Montana's mule deer hunting opportunities, which already ranked below those of our neighboring states.
- HHA supports eliminating significant opportunity for non-resident doe hunting, as lined out in SB 281 from 2023. We encourage FWP to err on the side of resource protection than hunter opportunity. When and where appropriate, FWP has the authority to void any antlerless licenses that may have already been issued and issue refunds. We encourage this in areas where winter kill has been especially harsh on mule deer.

Thank you again for the opportunity to comment. We look forward to continuing to engage in the season setting process.

Sincerely,

Andrew Gorder
President
Hellgate Hunters & Anglers