

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 28, 2023 3:45:21 AM
Last Modified: Thursday, December 28, 2023 3:58:26 AM
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Q1

Contact information:

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Q2

Please comment on Block Management ARM Rule - Final Adoption

AGAIN Please wake up.

Some of these so called BLOCK Management areas you are so proud of have not seen any wild game for a 100 years. Your wasting your money and most of these type areas were signed up to make some ones quote. Quantitie versus qualitie.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, January 20, 2024 7:58:57 AM
Last Modified: Saturday, January 20, 2024 8:10:58 AM
Time Spent: 00:12:01
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Q1

Contact information:

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Q2

Please comment on Block Management ARM Rule - Final Adoption

I do not support proposed.

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 23, 2024 12:21:35 PM
Last Modified: Tuesday, January 23, 2024 1:52:16 PM
Time Spent: 01:30:41
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Q1

Contact information:

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Q2

Please comment on Block Management ARM Rule - Final Adoption

Chair Robinson, Commissioners -

On behalf of the Montana Chapter of Backcountry Hunters & Anglers, we submit the following comments on both the EHA and Block Management ARM Rule proposals.

Our concerns with the proposed motions and agency recommendations for both the EHA and Block Management ARM Rule proposals stem from our previous (assumably unaddressed) worries with the substance and perhaps unintended consequences of previous iterations of these, but also from the process.

Today, January 23rd, the stated comment deadline on these agenda items, there appears to be nothing of substance to comment on. The public cannot see what the draft rules are, or if any changes were made stemming from previous concerns aired during the November and December meetings and comment periods.

The coversheet - the only documentation attached to both the EHA and Block Management ARM Rule proposals - explains that "at least two weeks prior to the commission's Feb. 16 meeting, the department will post on its website, all comments in their original form, any edits the department proposes to the rules in response to comments received, and a draft rule adoption notice that includes summary responses to the comments received."

But for now, without any of that, what exactly are we commenting on using this comment portal during the stated comment period that ends today?

Assuming that nothing has changed since this fall - which is an inappropriate assumption for the public to have to make - we again ask that a third Alternative be considered which allows some of the ARM rule changes to EHA and Block Management to proceed, while others that unnecessarily move things out of statute to unenforceable and potentially out-of-the-public-eye administrative policies are not. We're happy to again elaborate, but feel it is inappropriate to do so now when we don't even know what the current draft rule adoption notice looks like.

Thank you for considering our concerns and taking our comments,

-The Montana Chapter of Backcountry Hunters & Anglers

#4

COMPLETE

Collector: Web Link 1 (Web Link)
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IP Address: 69.144.253.243

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Q1

Contact information:

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Q2

Please comment on Block Management ARM Rule - Final Adoption

The Montana Wildlife Federation recognizes that the Red Tape Relief project is meant to streamline processes and make agency work more efficient, but we strongly oppose moving Block Management ARM Rules to Departmental Policies. In speaking with Block Management cooperators, we've found that the transparency, accountability, and consistency afforded in the current ARM rules are precisely the reasons that this program is so popular with cooperators. By moving these ARM rules to Departmental Policy, it is our concern that the bedrock foundation of Block Management would lose these elements of transparency and accountability. We also have not been provided information on where the public can see these policies and regularly check them for accountability reasons. These are public dollars funding the vast majority of BMA's implementation. The public, and Block's cooperators, deserve to have ARM rules in place to ensure that cooperators and decision makers are accountable. As has been mentioned before, "Departmental Policy" is an ambiguous term, and provides too much discretion without safeguards that ensure public notification or a guarantee in the public's ability to participate. While we agree that flexibility is good for FWP to have, the degree of flexibility and discretion is not defined. This ambiguity could lead to cooperators disenrolling from Block, due to losing the transparency and accountability that they've had since the Block Management program was created.

MWF believes that more evaluation is needed before such wholesale changes are made to the foundation of such a popular and widely used program. We would like to see more communication on this issue with cooperators, hunters, and groups like PLPW who have a vested interest in the management of this program, before the Commission makes these changes. The way that Block Management is run has worked for decades. Most of the hunters I know hunt Block management, and it would be a shame to have a decision made now that negatively affects the future of such a great program.

Thank you.
