

# #1

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, January 20, 2024 8:13:03 AM  
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**Time Spent:** 00:01:16  
**IP Address:** 107.191.166.238

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Page 1

## Q1

Contact information:

**Name:** Shawn Ray-Delmas  
**City/Town:** Libby  
**State/Province:** MT  
**Email Address:** shawnkray@yahoo.com

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## Q2

Please comment on Elk Hunting Access ARM Rule - Final Adoption

I do not support the proposed.

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#2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 23, 2024 12:21:35 PM  
**Last Modified:** Tuesday, January 23, 2024 1:52:44 PM  
**Time Spent:** 01:31:08  
**IP Address:** 69.145.141.23

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Page 1

**Q1**

Contact information:

**Name:** Jake Schwaller  
**City/Town:** Billings  
**State/Province:** MT  
**Email Address:** montana@backcountryhunters.org

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## Q2

Please comment on Elk Hunting Access 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

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#3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, January 23, 2024 11:08:41 AM  
**Last Modified:** Tuesday, January 23, 2024 4:46:36 PM  
**Time Spent:** 05:37:54  
**IP Address:** 69.144.253.243

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Page 1

### Q1

Contact information:

Name:	<b>Jeff Luks</b>
City/Town:	<b>Missoula</b>
State/Province:	<b>MT</b>
Email Address:	<b>jeff@mtwf.org</b>

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### Q2

Please comment on Elk Hunting Access ARM Rule - Final Adoption

The Montana Wildlife Federation supports Alternative B but would like to see Montana's EHA program updated in accordance with HB 596. We realize that FWP must update the EHA program due to legislation passed in the 2023 Legislature, but that is the only change proposed by FWP that we support. Similar to how Block Management would change, we do not support moving portions of EHA management to Departmental Policy. This particular program requires the full transparency and accountability afforded by an ARM rule, rather than the ambiguous nature of a "policy". While we do feel that the EHA program could be slightly improved, this program requires trust from the public that comes from unambiguous rules and the transparency/accountability that is currently afforded them. This is precisely the type of program that needs utmost daylight and transparency to maintain buy-in from the public. We propose that the Commission makes the necessary changes in relation to HB 596, and leaves the rest of the management of EHA in their current ARM rules. Thank you.

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