

From: [Jason O'Rear](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] 2022-2023 Statewide Proposals
Date: Friday, January 21, 2022 4:24:53 PM

Laurel Rod and Gun Club with its 400+ family members would like to take this time to comment on the proposed 2022-2023 Biennial Season Setting proposal. We are deeply saddened by the lack of input and ideas of not only the FWP's own professional Biologists but from any other public trust group in the State. In meetings on this proposal, meetings that should of included hunters, farmers, ranchers, outfitters, guides, and conservationists from all across this great state that are all apart of the public trusts guardians, with that said, herein lies our comment.

This proposal is marred with inaccurate data and proposals that changed in matter of hours and were hard to follow, and deadlines that kept moving from date to date, meetings canceled, or moved at the last minute, all of this making the Department and Commission look incompetent, and thus in the end damaging the one thing it is here to protect, the public trust.

It has been said that something needs to change in the matter of over objective elk numbers, in all the talks and discussions in the past 17 years all that has changed is that elk, preferably bull elk, are now the prized possession of numerous wealthy landowners hazing and harboring them, and the resident local elk hunter is a nuisance and a pest for asking to help and do his part and harvest the over objective species, the before mentioned plan was to go for a couple of years and if no change in numbers was found the areas affected where agreed to turn into antlerless area's only, yet we have never went or even tried that approach.

In the past members of the hunting community have helped form and explain these changes, and the reasons for it. Normally we greatly endorse needed changes, however this year it seems like money and special interest have been at the forefront of these changes. These changes seem short sighted and are more of a warning of how the top will continue to force our public trust ever closer to privatization.

On the topic of Elk: We oppose the use of Unlimited tags wither it be either sex or antlerless elk, all more tags will do is further push elk into harboring safe havens to be harvested at a fee by the rich and out of state hunters, We oppose the moving of shoulder seasons onto public land, we should concentrate our effort on private land with ranchers that have allowed some form of public hunting during the regular season. We support trying the last elk plans idea of shutting down areas in over objective numbers to antlerless hunting only, until a new elk plan is written and in place. We are strongly against any form of giving or selling elk tags solely for purpose of use on private lands!

On the topic of Deer: We accept that mule deer numbers in certain areas are plummeting and are in need of special management, shortened seasons and limited tags to help these populations recover is what we as conservationist are about. The merging of super districts as in the combination of 597, 598, and 599 with some 5200 antlerless whitetail tags in the middle of and CWD outbreak, a horrible drought, and the blue tongue and ran up the tributaries last fall seems reckless, and dangerous with a large city like Billings at the edge of it, where are most people going to hunt, in the surrounding area or at the other edge like Harlotown, these area already had a liberal amount of tags for each area,

On the topic of Black Bear: We are strongly against the new self reporting proposal, and are concerned with the larger range and greater numbers of Grizzly bears the new hound hunting may cause more conflicts between grizzlies and hunters.

On the topic of spring turkey season: Why would the department move the season later in the spring when the eggs are hatching and toms would be less likely to answer and react to a call, we would ask the Commission to reconsider this as well

On the topic of Upland Game Bird: The Upland season is already stretching over 4 months and offers great opportunity to harvest birds already extending it later still in the year when the grasses are flattened by the snow feed is hard to come by, and they are already doing everything possible to survive, much less the greater risk of hurting bird dogs in the extended season with trap sets and snares, this we as a club are against as well.

In closing, we, being not only members of the Laurel Rod and Gun club, but conservationists, hunters, and fisherman hope that the Commissioners read these comments and chose to give greater involvement to all aspects of the guardians of our public trust, and return to real data and science backed ideas instead of political influence when making further changes, and would like to express our appreciation for our opportunity to comment on this current proposal.

From: [Jeff Herbert](#)
To: [FWP Wildlife](#)
Cc: [CommissionerRegion6@mtfw.org](#); [CommissionerRegion1@mtfw.org](#); [CommissionerRegion3@mtfw.org](#);
[CommissionerRegion5@mtfw.org](#); [CommissionerRegion7@mtfw.org](#); [CommissionerRegion2@mtfw.org](#);
[CommissionerRegion4@mtfw.org](#)
Subject: [EXTERNAL] Public Comment 2022-23 Hunting Regulations
Date: Monday, January 17, 2022 9:19:52 PM
Attachments: [MSA Comments Jan 2022 BGHR"s.docx](#)

The Montana Sportsmen Alliance submits the attached comments in reference to the proposed 2022-23 hunting season frameworks to be considered by the MT Fish and Wildlife Commission at their meeting scheduled for February 4, 2022. Thank you for the opportunity to comment.

MSA Leadership Group:
Joe Perry - Conrad
John Borgreen - Gt Falls
Don Thomas - Lewistown
Doug Krings - Lewistown
Steve Schindler - Glasgow
Andrew McKeen - Glasgow
Dale Tribby - Miles City
JW Westman - Park City
Jeff Herbert - Helena
Ray Gross - Dillon
Robert Wood - Hamilton
Tim Thier - Eureka

January 16, 2022

Chair Robinson; Vice Chair Tabor; Commissioners: Byorth, Cebull, Lane, Waller,
Walsh
Montana Fish, Wildlife and Parks
PO Box 200701
Helena, MT 59620

Dear Chair Robinson, Vice Chair Tabor and Commissioners,

Montana Sportsmen Alliance, a coalition of resident hunters, anglers and conservationists, appreciates the opportunity to provide comment on the proposed 2022-23 hunting regulations. As we have stated previously, robust public engagement in these processes that impact public trust resources and public opportunity is absolutely critical. With that in mind, we are obligated to express an extreme level of frustration with the 2022 season setting process used by the Department at the behest of the Director and the Deputy Director.

From the outside looking in, this year's process has operated under a top down directive that chose to ignore professional expertise and experience, reduced public involvement, resulted in the posting of inaccurate information for public comment and changed proposals and timelines at the last minute. Unfortunately, this approach has harmed the credibility of the Department and the Commission and jeopardized the public trust. It has created a transparency issue as there are few if any criteria for the Department, the Commission or stakeholders to monitor and assess progress towards objectives.

We have repeatedly heard that something needs to be done differently when it comes to over objective elk numbers. We agree. However, when that "something" further privatizes and commercializes bull elk harvest at the expense of actually addressing the problem of reducing antlerless elk numbers, it calls into question the motives behind the proposed regulations and the lack of understanding of how to do this effectively. Public trust resources and all stakeholders deserve more, especially in Montana.

While we would normally provide support for changes we endorse, given the level of changes in district boundaries, district regulations and species- specific regulations, we are going to focus our comments on large-scale changes that we consider short sighted or poorly justified.

Elk: We oppose the use of Unlimited either sex or brow-tined bull/antlerless elk permits in areas previously employing limited permits. After lengthy debate, Limited permits were employed years ago in the Missouri River Breaks and other areas to reduce significant crowding issues and the proportionally increasing harvest of bull elk by nonresident hunters. One only has to look at current proposals

to move away from unlimited MD Buck permits to recognize these same problems will resurface with this proposal. Status quo in these HD's should be maintained.

We disagree with proposed 50% increase in ES Elk permits in the districts listed as being 200% over objective. This level of increase will only compound the issue of hunting pressure, hunt quality and elk distribution on accessible public lands and private lands enrolled in access programs. Again, status quo should be maintained. Finally, if the goal is to reduce elk populations and the antlerless segment in particular, moving to an antlerless only season is the most direct tool to accomplish that objective. The intent is not punitive but to do "something" different that actually makes a significant difference.

Mule Deer: We have real concerns with the R2 proposal to move to a 3-week general season for bucks in place of the traditional 5-week general season. In our minds, this sets a dangerous precedent relative to what has been a foundational element in Montana's big game seasons. Given the implications, we question why this specific season proposal was not vetted more rigorously and why the option for very limited permits during the final 2-weeks of the general season was not considered?

Black Bear: Given the scrutiny of black bear hunting seasons nationwide and in light of new hound seasons for black bear in Montana, we question the advisability of moving to a self-reporting harvest method for successful black bear hunters. Recognizing some of the biases that occur with self-reporting and the extensive database Montana has on record, it would be prudent to continue with the existing protocol of Department staff monitoring each harvested bear, at least for the next several years.

Upland Game Birds: Montana currently has a very liberal upland game bird hunting season that extends from Sept 1 to Jan 1. That is a considerable length of time for hunters to be on the landscape and for landowners to accommodate those activities. Extending the season through January will increase the potential conflict with trapping seasons, particularly where snares are in use. And last, winter conditions can impose additional physiological demands on game birds, especially following a significant drought. Let's give everyone a break and maintain the status quo.

Montana Sportsmen Alliance Leadership Group

From: [Bonnie Rice](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Sierra Club Comments on Black Bear Hunting Regulations
Date: Thursday, January 20, 2022 1:29:55 PM
Attachments: [Sierra Club comments on black bear hunting regulations - Jan 2022.pdf](#)

Please accept the attached comments on behalf of more than 3,100 Sierra Club members in Montana.

Thank you,

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Bonnie Rice
Pronouns: she/her
Greater Yellowstone/Northern Rockies Senior Campaign Representative
Sierra Club
P.O. Box 1290
424 E. Main Street, Suite 203C
Bozeman MT 59771
Phone (406) 582-8365 x1
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bonnie.rice@sierraclub.org
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To: Montana Fish, Wildlife and Parks Director Hank Worsch
Montana Fish, Wildlife and Parks Commission
Re: Black Bear Hunting Regulations
Date: January 20, 2022

Via fwpwld@mt.gov

Dear Director Worsch and FWP Commissioners,

I am writing today on behalf of more than 3,100 Sierra Club members across the state of Montana regarding the proposed black bear hunting regulations. Thank you for this opportunity to comment.

I. Black Bear Mandatory Harvest Reporting Requirements

Sierra Club urges the Commission not to adopt the proposal to eliminate inspection of black bear carcasses by qualified Fish, Wildlife and Parks (FWP) staff. Inspection of all black bear carcasses by trained personnel is critical to accurately assess population demographics. FWP personnel have the necessary expertise to properly identify age, sex and other characteristics of black bears that are killed. Additionally, only requiring the hunter to submit a tooth to FWP will not ascertain whether the bear killed was a lactating female with cubs. With so many changes being adopted by the Commission to hunting regulations for many species, we need more, and accurate, data – not less – to ensure the long-term health and viability of Montana’s wildlife populations.

II. Hound Hunting of Black Bears

We oppose hound hunting of black bears. With the passage of House Bill 468, it appears that the Legislature and the Commission are intent on taking us back 100 years in allowing hound hunting of bears. Montana has not allowed hunting of black bears with dogs since 1921, for good reason. As noted in a letter signed by dozens of wildlife professionals including former Montana Fish, Wildlife and Parks (FWP) officials, biologists and commissioners opposing House Bill 468 during last year’s legislative session, “Hound hunting of black bears can result in cub abandonment, chronic stress, heat exhaustion in warm weather, and abandonment of home ranges.”¹ Hounding, or using packs of dogs to pursue bears, is considered unsporting even among many hunters because it gives unfair advantage to the hunter.²

¹ <https://hungryhorsenews.com/news/2021/apr/21/legislature-oks-spring-black-bear-hunting-hounds-c/>

² Beck et al., "Sociological and Ethical Considerations of Black Bear Hunting."; M. C. Boulay, D.H. Jackson, and D.A. Immell, "Preliminary Assessment of a Ballot Initiative Banning Two Methods of Bear Hunting in Oregon: Effects on Bear Harvest," *Ursus* 11 (1999).

Hound hunters may not be able to properly identify the sex of the bear before the kill, or determine whether the bear was a lactating female with cubs nearby. Emerging in the spring with their mothers, cubs are completely dependent on their mother and will likely starve to death if she is killed.

Proponents of hound hunting of black bears argue that treeing bears results in better close-range identification of age and sex. However, researchers who have done empirical study contend it is difficult for hunters to determine the age and sex of a treed bear.¹ Inman and Vaughan (2002) found that houndsmen accurately determined the sex of treed bears just 67% of the time. **In other words, approximately one-third of treed bears were wrongly sexed by houndsmen.**³

Hound hunting may result in killing of federally-protected grizzly bears

As noted by numerous wildlife professionals, "...[g]rizzly bears can be found throughout western Montana and hounds will chase grizzly bears who will fight and kill hounds. This will result in hound hunters shooting grizzly bears to defend their dogs or themselves when chased grizzly bears are encountered."⁴

Recognizing this issue, FWP has proposed not to allow hound hunting of black bears in occupied grizzly bear habitat. We support that proposal; however, we do not believe it goes far enough. If hound hunting of black bears is allowed in Montana, we urge the Commission not to allow any hound hunting of black bears in:

- Occupied grizzly bear habitat;
- Habitat where grizzly bears 'may be present' according to the U.S. Fish and Wildlife Service⁵; and
- The entirety of hunting districts 200, 240, 301 and 316, to allow grizzly bears the best chance of connecting with other grizzly bear recovery zones in Montana and Idaho.

Thank you for your meaningful consideration of these comments.

Sincerely,



Senior Representative
Greater Yellowstone and Northern Rockies Regions

³ K. H. Inman and M. R. Vaughan, "Hunter Effort and Success Rates of Hunting Bears with Hounds in Virginia," *ibid.* 13 (2002).

⁴ <https://hungryhorsenews.com/news/2021/apr/21/legislature-oks-spring-black-bear-hunting-hounds-c/>

⁵ https://www.fws.gov/mountain-prairie/es/species/mammals/grizzly/20210111_MayBePresent_GB%20map_website.jpg

From: [Erin Edge](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] DOW to FWP Commission Comments on Black Bear Hunting Season
Date: Friday, January 21, 2022 11:50:01 AM
Attachments: [220121 DOW to FWP Black Bear Hound Hunting Comments.pdf](#)

Hello,

Attached are Defenders of Wildlife's comments on the 2022/2023 black bear hunting proposal.

Thank you for the opportunity to comment.

Erin



Erin Edge

Senior Representative, Rockies and Plains Programs

DEFENDERS OF WILDLIFE [\[defenders.org\]](https://defenders.org)

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[\[defenders.org\]](https://defenders.org)!



Missoula Office

P.O. Box 1858 | Missoula, Montana 59806 | tel 406.728.9436

www.defenders.org

Re: Montana Fish, Wildlife and Parks (FWP) 2022-2023 black bear hound hunting regulations and mandatory harvest reporting requirements.

Submitted electronically at: fwpwld@mt.gov

Dear Montana Fish and Wildlife Commission,

Thank you for the opportunity to comment on Montana Fish, Wildlife and Parks (FWP) 2022-2023 black bear hound hunting regulations and mandatory harvest reporting requirements. We submit the following comments on behalf of our more than 9000 members and supporters in Montana.

Defenders of Wildlife (Defenders) is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our on-the-ground coexistence program. Our conflict prevention projects have often been in cooperation with Montana Fish, Wildlife and Parks.

Defenders recognizes the immense effort that Montana's bear management specialists have put into grizzly bear recovery, outreach and education and on-the-ground conflict prevention. We are concerned that the recent changes made to grizzly bear management, wolf management and hound hunting of black bears in Montana will negatively impact long term recovery and connectivity of grizzly bear populations in the state, setting back decades of recovery efforts.

Hound Hunting Black Bears

Allowing hound hunting and a chase season for black bears will likely result in orphaned cubs and will stress females with nursing young. It may also increase the risk of take of grizzly bears and result in potentially dangerous interactions between grizzly bears, dogs, and hunters in Montana.

Grizzly bears remain a federally listed species. Section 9 of the Endangered Species Act (ESA) largely prohibits take of a listed species. 16 U.S.C § 1538: Take is defined under the ESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct." 50 C.F.R. § 17.3: "'Harass' in the definition of 'take' in the Act means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering." "'Harm' in the definition of 'take' in the Act means an act which actually kills or injures wildlife. Such act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering." It is important to note that hound hunting could lead to harassment and/or harm of grizzly bears which would be "take" as defined by the ESA.

According to the U.S. Fish and Wildlife Service, grizzly bears may be present in a much larger area than identified as “occupied” grizzly bear habitat. In their proposal FWP recommended not allowing hound hunting of black bears in occupied grizzly bear habitat. At the December 14th, 2021, commission meeting, FWP discussed with the Commission the rationale for not recommending hunting of black bears in occupied grizzly bear habitat. This included legal reasoning and consideration of the need for Montana to secure adequate regulatory mechanisms before federal delisting can occur. FWP was correct in proposing no hound hunting in occupied grizzly bear habitat. We noted however, that the Commission continued to push the department on the issue and asked for locations where hound hunting could be allowed in occupied grizzly bear habitat. This is a risk not worth taking. Defenders adamantly opposes hound hunting in occupied grizzly bear habitat and in areas where grizzly bears may be present.

2022-2023 Mandatory Harvest Reporting Requirements

Defenders asks the Commission to reject the proposal to eliminate the requirement that hunters must present their harvested bear to FWP. Only requiring submission of a tooth means there will be no ability to check for the harvest of lactating females or potentially even confirm the species of the bear harvested. In general, this loosening of restrictions will reduce the data gathered about the harvest effects of a newly revised black bear hunting season. With such big and recent changes occurring around hunting and trapping in Montana, the department should be striving for more information, not less to assess long term impacts to our wildlife populations.

In conclusion, it is critical that Montana utilize science-based decision making when addressing hunting regulations and collect enough data for timely and accurate wildlife population monitoring to occur. Allowing hound hunting of black bears in occupied grizzly bear habitat or areas where grizzly bears may be present is not based in science and is risky and irresponsible. We ask the Commission to not allow hound hunting of black bears in occupied grizzly bear habitat, areas where grizzly bears may be present and in black bear management units 200, 240, 301 and 316.

Thank you for the opportunity to comment,

A handwritten signature in dark ink, appearing to read "E Edge", with a stylized flourish at the end.

Erin Edge
Senior Representative, Rockies and Plains Program
Defenders of Wildlife
eedge@defenders.org

From: [Frank Szollosi](#)
To: [FWP Wildlife](#)
Cc: [Marcus Strange](#); [Worsech, Hank](#); [Tom and Gerri Puchlerz](#)
Subject: [EXTERNAL] Re: MWF season setting comments
Date: Thursday, January 20, 2022 11:21:33 AM
Attachments: [MWF 2022-2023 BIENNIAL SEASON SETTING Comments Final Committee Edits.pdf](#)

Please disregard the previous attachment and use this final version. Thank you.

Frank

On Thu, Jan 20, 2022 at 9:58 AM Frank Szollosi <frank@mtwf.org> wrote:

Dear Chairwoman Robinson and fellow Commissioners,

Please find attached season setting comments from the Montana Wildlife Federation.

Thank you for your consideration. Please contact either myself or Marcus Strange with any questions. Thank you as well for your service.

Frank Szollosi

--

Frank Szollosi
executive director he/him
montana wildlife federation
established 1936
call or text me at 406-417-9909
engage on [facebook \[facebook.com\]](https://www.facebook.com), [instagram \[instagram.com\]](https://www.instagram.com) & [twitter \[twitter.com\]](https://twitter.com)
and at www.montanawildlife.org [[montanawildlife.org](http://www.montanawildlife.org)]
or drop us a line at P.O. Box 1175 Helena, Montana 59624



Protecting Montana's wildlife, land, waters, and
hunting & fishing heritage for future generations.

21 January 2022

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

RE: 2022–2023 BIENNIAL SEASON SETTING *FINAL VERSION*****

Dear Director Worsech,

The Montana Wildlife Federation (MWF) is Montana's oldest and most active state-based wildlife conservation organization. We were formed in 1936 when hunters joined landowners to restore depleted wildlife in our great state and, for the last 85 years, we have spoken up for Montanans and advocated in their best interests. In that spirit, we share these comments regarding the upcoming 2022–2023 Biennial Season Setting proposals. Additionally, we would strongly encourage the Department of Fish Wildlife and Parks (Department) to heed the feedback from our local affiliated organizations, given the breadth of their local knowledge and experience.

Overview

While we embrace the opportunity to provide public comment and collaborate with our friends and allies in the Department, MWF is still greatly concerned about the motivation and purpose behind what is being communicated as changes to simplify hunting regulations. We have heard many times from all Department levels that these changes are because the current regulations are too complex for sportspeople to understand. We feel this is a poor justification for changing what has taken decades to develop. Montanans know that with complexity comes opportunity, both in terms of harvest and quality wildlife management. If there truly is a challenge for the public when it comes to an understanding of the regulations, we respectfully suggest that this challenge be addressed through improvements in the way the Department communicates these regulations, not through a wholesale overhaul of our hunting districts.

Additionally, Montana has had traditionally long seasons based on hunter satisfaction and abundant game. This season structure has served Montanans well for decades. Family traditions have been formed around opening days, Thanksgiving hunts, and hunting camps. However, maintaining those traditions and those long seasons becomes more challenging as legislation creeps in for special weapons seasons, attacks on the archery seasons, and the continued push for late seasons which now extend upon public lands.

MWF recognizes the many challenges facing the Department. Therefore, we would like to offer the following feedback as you review the proposed season setting proposals:

Deer and Elk Statewide issues:

1) *Updated Elk Management Plan*

- a) We believe the proposed 2022-2023 elk regulations are not protecting and preserving game animals primarily for the citizens of Montana. We strongly recommend that the Department not make any changes that are not in line with the guiding principles developed by the Department's Elk Management Plan Initial Guidance Citizens Group. This group put forward the sideboards that will allow us to create a quality, updated EMP that represents the best interests of all Montanans.

2) *Archery-only permit proposal*

- a) We strongly oppose the unbundling and removal of the 900-20 archery-only either-sex permits HDs 401, 403, 411, 412, 426, 447, 450, 455, 500, 502, 510, 511, 520, 530, 570, 575, 580, 590, 701, 702, 704, and 705. This permit opportunity was developed collaboratively with input and compromise from the resident hunters and landowners and supported by our current elk management plan. Removing this permit will increase pressure, push to elk and keep them on private property, and reinforce the perception that the Department does not listen to science or their constituents.
- b) We feel that sweeping changes, such as this proposal, should not be made until we have a new elk management plan. If a time-sensitive management challenge is driving this change, the Department should use the existing tools in the current Elk Management Plan (EMP).

3) *Either-sex elk permit proposal*

- a) We strongly oppose increasing either sex elk firearm permits by 50% in hunting districts 411, 417, 426, 535, 590, 702, 704, 705. We question the biological viability of this proposal as the Department has not shared the science and data that is driving this decision. Additionally, if the purpose of this proposal is to decrease the number of elk in these districts, we would recommend increasing the number of antlerless licenses. Such a move would be backed by data and science and would align with our current EMP.

4) *Antlerless B license proposal (200% above objective HDs)*

- a) This proposal is unnecessary, and we oppose it. The management challenge in these districts is not hunter opportunity. Instead, they stem from access issues. Throwing more tags at the problem does little to bring elk number to objective. In units where elk numbers are higher than desired, the Department should refer to the tools in our current EMP, such as going to cow only opportunities.

5) *Elk permit proposal (hunt where you draw)*

- a) MWF is opposed to this proposal. In general, hunters that pull a limited entry tag in Montana will focus their time, energy, and effort on a coveted tag rather than seek to kill an elk closer to home. In that event, we believe that the extra options of B licenses can provide a general tag opportunity in some areas. However, we would like to make sure that if this option moves forward, deer and elk are split to accommodate hunters with separate deer and elk hunting traditions that come along with our long seasons. We recommended a provision that does not restrict a limited entry tagholder to a single area for archery.

6) *Length and timing of archery & rifle seasons*

- a) Other states with higher harvest levels during their general seasons often split deer and elk, change seasons based on hunter distribution and ensure that conflicts in the field are at a minimum. We support looking at structuring seasons in a way to maximize hunter harvest success as well as maintain long seasons and bountiful opportunities.
- b) Mule deer populations across the west are hurting. Changes to the season structure to shorten seasons to protect older age class bucks during the rut are good in some districts. In others, moving to an even more restrictive limited entry permit system would be better to achieve management goals and improve management goals for Montana's mule deer hunting. In areas where whitetails are heavily pressured and have similar season structures, the three-week rifle season also helps ensure that mature age class animals remain in the population by limiting rut hunting. We do not suggest the three-week season across the board, as Thanksgiving hunting traditions are an integral part of our culture. However, moving to a three-week season or to a limited entry makes sense in some areas.
- c) Season length should be tailored around opportunities and ensuring that animals are not constantly pressured through six months of hunting. Hunting should not be structured to essentially teach animals that public lands and open private lands are not safe places to reside. This will habituate wildlife and likely ensure what hunters and landowners do not want; more elk and deer seeking safe habitat on off-limits private lands which do not allow hunting or commercialized hunting to provide private clients a harvest of trophy animals.
- d) Changing archery and general rifle seasons for a more extended break may make sense at some level. Luckily, the agency has that discretion since those seasons are not set in statute, unlike the muzzleloader season that is legislatively mandated regardless of biology or social tolerance. However, given that even more pressure is being brought to bear on ungulate populations between increased legislative interference and the agency's desire to kill about 40,000 elk swiftly, we question the purpose. We need to drastically change seasons, split or combine districts, move hunting dates around, etc., until a new EMP is put in place to address elk management adequately.

7) *Late season and extended seasons*

- a) MWF supports efforts to get over objective elk populations to objective by focusing on harvest of the antlerless segment of the population. We realize that population issues and adequate hunter access to those elk are the biggest elk management challenges facing us today and that these issues too often lead to contentious, polarizing, divisive conflict. We further realize that such conflict will not abate until populations are at objective. The new elk plan is anxiously awaited and will provide us with updated objectives. However, until we have new objectives, late seasons may be needed and may have to continue if elk numbers are egregiously over the new objectives. Although hunting elk in winter is distasteful to some hunters, it may be necessary. Harvest during general and shoulder

seasons has been successful in reducing elk numbers in districts where landowners and hunters are able to work together to improve access to elk.

b) Late seasons, when necessary, should be applied prudently and with stated goals and timelines. Harvest should be focused on private lands with the understanding that public land hunting may be necessary in some instances and may have to continue if elk numbers are egregiously over the new objectives. Excessive hunter pressure and harvest on public lands due to less restrictive access than on private lands is of concern and may be counterproductive.

c) Furthermore, if elk are grossly over objective and access to those elk is significantly restricted, we suggest the following: 1) Antlerless-only 'cow' hunting as outlined in the current Elk Management Plan for all or a major portion of the five-week general rifle season. Such 'cow' seasons will focus harvest where it is needed most and if enough cows are taken may make late seasons unnecessary. 2) Consider implementing an "Earn a Bull" program where hunters are required to harvest a cow in order to harvest a bull. Such programs have been implemented in other states with over objective deer populations. 3) We recommend considering limited late season antlerless licenses on public lands within over-objective hunting districts. Such licenses would be used to manage hunter pressure and harvest on public lands where elk are encouraged.

d) Montana is statutorily mandated to hold a muzzleloader season in early December. Intermingling a late rifle season with a muzzleloader may lead to conflicts between hunters and with landowners. Similar conflicts between early shoulder seasons and archery hunters have been successfully mitigated by informing hunters and by making landowners aware that they can control who is on their property and when. We trust that any such conflicts between muzzleloaders and late rifle hunters can be similarly minimized through an information campaign or by holding the late rifle seasons after the muzzleloader season has ended.

8) *Limiting deer and elk permits to first choice only in the drawing*

- a) We do not see why this would need to be implemented or how the current system does not work. Selecting three districts is not complicated, and since point creep is a growing concern relative to drawing a limited entry permit, we are unsure why FWP would limit the second and third choice options. More importantly, this illustrates how the point system results in the undemocratic allocation of licenses based on points rather than an actual random draw.

Region 1

1) *Region-wide recommendations*

- a) Change antlerless elk permits to antlerless elk B tags
- b) Remove antlerless whitetail hunting the last week of the season. Manage whitetail abundance through additional B tags.

2) *District specific recommendations*

- a) Combine HD 101 and HD 109, retaining the three-week general and two-week limited permit regulation for mule deer bucks.
- b) Combine HD 102 and HD 103 into HD 103, retain the HD 103 regulations, and eliminate the limited entry mule deer buck permit in the northeast portion of the district.
- c) Combine HD 150 and HD 280. Adopt HD 150 regulations.
- d) Keep HD 123, HD 124, and HD 200 separate and as currently managed. Combining districts would result in a loss of antlerless elk and whitetail deer hunting opportunities for Region 1 and Region 2 hunters.

Region 2

- 1) *HD 213*
 - a) We recommend HD 213 be removed from HD 222 proposal.
- 2) *HD 240, 261, 270*
 - a) We oppose the elimination of HD 261 (into HD 270 -our two most coveted mule deer units in the state) and changing HD270 to a general license.
 - b) We oppose the elimination of river bottom archery either-sex whitetail opportunity that is widely popular for archery hunters.
 - c) We oppose eliminating the west side Bitterroot HD 240 limited draw mule deer buck permit.
- 3) *HD 204, 261*
 - a) We support the proposal for elk but recommend the creation of a sub-unit for mule deer bucks. This sub-unit would be from Burnt Fork Creek south to Willow Creek. We support raising the proposed permit level from 15 to 25 for mule deer bucks. This area is highly sought after by mule deer buck hunters due to the number of mature bucks. Breaking out this sub-unit is essential to maintain large bucks.
- 4) *HD 262*
 - a) We strongly oppose the use of rifles on private lands in the river bottom due to safety issues, especially south of Stevensville. Some of these areas are highly developed, thus creating a human safety issue.
- 5) *HD 270*
 - a) HD 270 antlered elk permits
 - i) We support the proposal for adding the south portion of HD261 into HD 270. However, MWF is highly concerned about the low bull numbers in HD 270, especially south of Rye Creek. Therefore, we support unlimited browline bull permits south of Rye Creek. The north portion of the HD would include browline bull hunting with a general license. We also recommend adding HD 334 to HD 270.
 - b) HD 270 antlered mule deer permits
 - i) We strongly recommend mandatory Chronic Wasting Disease (CWD) testing from all bucks harvested by these permit holders. This season was sold to the public for controlling CWD. As of this fall, there's no positive CWD tested deer in HD 270; however, mandatory testing would allow us to collect the data to know if CWD is present.
 - c) HD 270 either-sex white-tailed hunting
 - i) We recommend the removal of either sex hunting of white-tailed deer with a general license on private lands due to the low numbers of whitetails.

Region 3

1) HD 293, 343

- a) MWF opposes the expansion of HD 343 to include the portion of the public lands of HD 293. HD 293 public lands provide a refuge for elk during hunting season. Many of these elk will migrate to the winter range on the east side of the Continental Divide in HD 343 after the rifle season ends. This refuge is responsible for HD 343 maintaining an elk population at the management objective. If we combine these districts and allow cow elk harvest on public lands in the current HD 293, we will experience a decline in elk numbers in HD 343 and HD 293.

Region 4

1) *Elk and Deer*

a) HD 421

- i) We support combining HD 421 and HD 423, given that they are currently managed as the Birdtail elk management unit (elk management plan) and are managed in combination with each other related to elk. Spike harvest is minimal on a general license and will not significantly impact bull numbers/age structure.

b) HD 415, 441

- i) We support changing these HDs from either-sex elk to browtine bull or antlerless elk in Bob Marshall Wilderness Area within the HD for the general season as it will provide consistency with browtine bull or antlerless elk regulations in the Bob Marshall Wilderness Complex EMU among regions where elk harvest opportunity exists on a general license.

c) HD 413, 416, 418, 448, 452, 454

- i) We support changing these HDs from either sex to browtine bull or antlerless elk regulations to create consistent regulations within the Little Belt/Castles/Big Belt complex and be consistent with adjacent R3 HDs.

d) HD 411

- i) We oppose eliminating the 497-00 white-tailed deer B license as there would be a negative impact on hunter opportunity and would not improve resource management.

e) HD 416, 454

- i) We support merging deer and elk HD 416 and HD 454 into larger HD 416 as there would be no adverse impact to hunter opportunity or management of the resource.

f) HD 413, 432

- i) We support merging deer and elk HD 413 and HD 432 to create a new, larger deer and elk HD 413 as there would be no adverse impact to hunter opportunity or management of the resource.

2) *Antelope*

a) HD 413, 430

- i) We oppose combining HD 413 and HD 430 as there would be a negative impact on hunter opportunity and would not improve resource management.

b) HD 490, 491

- i) We support combining HD 490 and HD 491 as there would be no adverse impact to hunter opportunity or management of the resource.

Region 5

1) *Deer and Elk*

- a) HD 506
 - i) We support renaming HD 510, HD 506 and aligning the southern boundary to match the south boundary for deer and elk district boundary. There would be no adverse impact to hunter opportunity or management of the resource.
- b) HD 515
 - i) We support combining HD 570 and HD 500 to create HD 515 and combining 500-00 and 570-00 mule deer B licenses to be consistent with the new district. There would be no adverse impact to hunter opportunity or management of the resource.
- c) HD 525
 - i) We support combining HD 520 and HD 560 for deer and elk to create HD 525 and adding the HD525 either-sex mule deer youth. There would be no adverse impact to hunter opportunity or management of the resource and will provide a new youth hunting opportunity.
- d) HD 540, 575, 580
 - i) We opposed adding a late shoulder season.

2) *Antelope*

- a) HD 526
 - i) We support renaming HD 511, HD 526 and aligning the northern boundary as there would be no adverse impact to hunter opportunity or management of the resource.
- b) HD 536
 - i) We support renaming HD 530, HD 536 and aligning the southern boundary as there would be no adverse impact to hunter opportunity or management of the resource.
- c) HD 546
 - i) We support renaming HD 500 HD 546 as there would be no adverse impact to hunter opportunity or management of the resource.
- d) HD 586
 - i) We support renaming HD 590 HD 586 as there would be no adverse impact to hunter opportunity or management of the resource.
- e) HD 596
 - i) We support renaming HD 540, HD 596 and realigning the boundaries as there would be no adverse impact to hunter opportunity or management of the resource.

Region 6

1) *HD 622, 631*

- a) We support the Unit Boundary modification of 631/622 and moving it east towards Burke Ranch/Ridge Road. Over the years, a large population of elk that reside during the summer and fall in 622 moved east into 631 during the winter months. This leads to trouble counting and difficulty trying to manage a healthy population. This boundary change would help address

these issues and simplify management as we move into a new management plan. This boundary change will also allow better management in the new 630 under an updated management plan.

Region 7

1) HD 701

- a) Given that there have been no formal long-term elk surveys in HD 701, making it challenging to measure biological implications, we oppose the proposed changes.

2) HD 702, 704, 705

- a) We support the combination of these districts to manage herd dynamics and hunter pressure better.

Mountain Lion

1) Quota vs. hybrid system

- a) MWF opposes going to either of these systems. One size fits all does not fit all. Many Regions with scattered lion populations and not as many hound hunters have been closing after 4-6 weeks. We question the need to change given the success of harvest from our current system and lack of biological evidence compelling this proposal.
- b) Quota systems create a free-for-all as lion hunters scramble to tree and kill a lion before the season closes. This is particularly true for outfitters who get paid around \$3,000-\$5,000 per lion. Because FWP can close a season on 24 hour notice and this creates a push to harvest lion as soon as possible. When good conditions hit, such as fresh snow, the success rates can go 200% or more over quota in 24 hours. In the past, under these conditions, 50% to 90% of the harvest was by nonresidents.
- c) Region 1 instituted a permit system that has been successful. We strongly urge the Department to maintain this system. The proposals to go to a hybrid or quota system is an obvious attempt to create hunting opportunities for outfitters whose nonresident clients can get no more than 10% of permits.
- d) We would encourage the department to maintain the current system until the science compels us to do otherwise

Black Bear

1) Mandatory Harvest Reporting Requirements

- a) We do not support removing the requirement for hunters to physically bring a harvested black bear for inspection by department personnel. This requirement is a common-sense measure that allows biologists to gather data from the bear while also ensuring that the correct species was harvested. The requirement to bring in a harvested black bear also allows FWP personnel to identify lactating females. Since it is illegal to shoot a female black bear with cubs, identifying a lactating bear provides law enforcement with information to prosecute such illegal kills and attempt to locate orphaned cubs.

- b) Additionally, removing teeth from a recently deceased bear is extremely difficult without breaking off the root of the tooth which is root is necessary to age the bear. Asking hunters to remove teeth instead of experienced FWP biologists will often result in broken teeth and no accurate age on the harvested bear. Accurate age information on harvested bears is necessary for credible management of bear populations. We urge you to continue the requirement to have all harvested bears brought to FWP offices for inspection. There are only about 1500 bears killed in Montana each year with numerous check-in points so this is not an onerous requirement.
- 2) *Hound Hunting Regulations and Season Structures*
- a) The authorization to allow hound hunting of black bears in Montana will result in conflicts with resident grizzly bears in any area where any grizzly bears are present. While there has been an attempt to exclude hound hunting from occupied grizzly bear habitat, the current hound hunting regulations are still flawed and continue to place hound hunters into known areas of occupied grizzly bear habitat.
 - b) Hound hunting will likely result in harm, harassment, and death for grizzly bears in any areas where there are grizzly bears. Hound hunting for bears should not be allowed in any of the areas already excluded in Regions 1 and 2 in the tentative. Specifically, allowing hound hunting of black bears in black bear hunting districts 316, 200, and the west side of 216 will place resident grizzly bears at risk of mortality and will hinder the possibility of natural movements of grizzlies between the existing grizzly bear ecosystems. This will threaten the eventual recovery and delisting of the Greater Yellowstone and Northern Continental Divide ecosystems.
 - c) Finally, removing the requirement for nonresident landowners to purchase a Nonresident Class D-4 license is direct affront to nonresidents who don't own land. This sets up a two-tiered system of wildlife management where wealthy out of state landowners and their "guests" get to hound hunt on their private lands and on surrounding public lands without buying licenses while nonresident hound hunters who don't own land must buy licenses. This is blatantly inequitable.

Upland Game Bird Hunting and Turkey

- 1) *Spring Turkey*
 - a) We have no concerns about moving the season to a fixed date, so long as quotas remain sustainable both on the top end and bottom end of population swings. We suggest starting the season on April 1st to give hunters a better hunting experience. The later the start of the season, the more hens nested, and the less likely it is that toms will come to calls.
 - b) We support the inclusion of air rifles as a legal means of take for turkey and mountain grouse as outlined and within the stated specifications.
- 2) *Season Extensions*

- a) We oppose extending the upland game bird seasons for mountain grouse, pheasant, partridge, and sharp-tail grouse to January 31st. We see no biological or social need for this change. Additionally, we have concerns about safety as this date will overlap with trapping seasons. We are also concerned that this extension will create conflict between hunters and landowners as block management access closes and land managers need a break for coordinating hunts. We feel that this additional month does more harm than good.

Conclusion

As the trustee of our public wildlife resources, we recommend that the Department maintain the agreements made with the public and ask that the Department follow its own criteria. To do this, we strongly recommend that the Department base these decisions on the best available science and current data. Finally, we encourage the commission to rely on the public, collaborative process of the Elk Management Plan revision process to continue, utilizing this process to identify issues and potential solutions.

We are grateful and thank the Department for this opportunity to comment. In summary, we support strong protection for robust wildlife, quality habitat, and meaningful access for outdoors people. We appreciate the Department's effort to seek public input and now ask that you heed the sound recommendations you receive. We appreciate the complexity of these issues and look forward to being a partner with landowners, hunters, wildlife enthusiasts, and the Department as we seek to find the best solution for the resource and all Montanans.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal flourish extending to the right.

Marcus Strange
Director of State Policy and Government Relations
Montana Wildlife Federation

From: [Mike Dygert](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Bear registering, elk changes in 411
Date: Thursday, January 20, 2022 4:52:38 PM

I feel the reporting is important now more then ever because we are allowed to use dogs. There will be more killed but not that maney more. I think its important to keep track for a few years.

I have been trying to push the idea that if you draw a permit thats the only place you can hunt in the state for years. I believe it will give locals a better chance at tags and it will make those tags be used where they should be. Im not sure i like the unlimited permits in 411 cuz of the overrun issue and the outfitters leasing more land which will make the numbers rise even more but i also dont like seeing the nbar get free tags. It is a double edge sword.

I am a cat hunter and i watch for all kinds of track while im looking for cat tracks. The 410 area is in alot of trouble when it comes to mule deer. I think it needs to be a permit area until the elk and predator problem is taken care of.

Sent from my T-Mobile 5G Device
Get [Outlook for Android \[aka.ms\]](#)

From: mkorn@bresnan.net
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Comments on 2022-23 Season-Setting Package
Date: Friday, January 21, 2022 9:33:55 PM

January 21, 2022

2022-23 Season Setting Comments

Montana Fish & Game Commission

Montana Fish, Wildlife & Parks

1420 East 6th. St.

Helena, MT. 59620

Members of the Commission,

What follows are my comments regarding the proposals for the 2022-2023 Biennial Season structures. My comments are based on my personal experiences afield as a Montana hunter & angler for more than 50 years as well a career with Montana Fish, Wildlife & Parks that spanned almost 30 years. During that time, I worked with and in every resource division in the agency and was specifically responsible for fish, Wildlife, Parks and law enforcement programs for the Helena Area Resource Office of Region 3. I ended my FWP career as Deputy Chief of Law Enforcement in 2015, at which time included oversight of almost 120 field staff, many of which were sworn officers. During my FWP career, I was involved in- and, on a number of occasions was responsible for leading- at least 60 recommendations and season-setting public processes for both fish and wildlife.

I will not attempt to address each of the wide ranging and multiple changes the current Season Setting package includes as there are others who have taken on that effort. I will say, however that never during my career with FWP did I see such a poorly crafted, convoluted set of proposals and as hurried, complex and ill-executed a process as with the current package that has been put out for public review. Although supposedly predicated on the "...best science" it is based on anything but that. Many of the revisions reflect misunderstanding and even misrepresentations of the current status of wildlife, access and social concerns that affect hunting across the state. These changes are being proposed without the direction and scientific foundations of current elk and deer management plans, not to mention a comprehensive evaluation of local hunting district issues (access, landowner participation in FWP programs such as Block Management, etc.) As such, I question the basis—and need for these massive revisions. Professional staff were ordered to "simplify regulations" through the consolidation of districts and changing permit types, an exercise which was forced upon them under an unrealistic timeframe that provided little opportunity to thoroughly evaluate and discuss their potential effects. Were such an effort undertaken as well-conceived, thought-out initiative, operating on a reasonable timeline, based on solid data, and providing more clarity for hunters and landowners, internal and public review, such a revision could be to the benefit of Montana's wild resources as well as hunters and landowners. Instead, we are confronted with a mass of changes, forced to try to drink out of a fire hose. Many of the proposed changes are internally contradictory and present regulations far more confusing than the status quo they seek to "solve", all with the appearance of little more than change for change's sake.

In short, I do not support the adoption of the 2022-23 Hunting Season package. I suggest the Commission abandon this current Season Package and re-adopt the existing 2020-21 package. Following that, that the F&W Commission direct FWP to do a comprehensive, thorough, well-planned science-based review of the regulations (beginning immediately,) with the goal of a presenting a revised package to the Commission and the public for the 2024-2026 season setting process. This would provide ample time for the completion of a new Elk Management Plan as well as well as a complete gathering and review of data, and allow for informed public review and input.

There are two other issues of concern to me. First, I oppose eliminating the in-person checking of harvested bears. My experience, both as an area administrator and a state game warden has shown that this is an important function. It may be viewed by some as an imposition, however, the value here lies in tracking bear harvest, gathering age data as well as being a deterrent to unlawful activity. There are ways that bear checks can be accomplished with a minimum of burden on both hunters and department personnel, still fulfilling the requirements. Those can be easily implemented and I urge that requirement remain in place.

I unequivocally oppose the extension of the upland game bird season. The season as it currently stands is long enough to provide adequate opportunity for hunters. Another month will most likely not be particularly successful inasmuch as by January, birds are wary and almost impossible, except under certain circumstances, to find and flush. Additionally, and perhaps more important, that extension would definitely tax the goodwill of landowners to allow hunting on their land, both in the bird season and perhaps into the following year's other hunting seasons. To burden landowners with an additional month of hunting is simply wrong.

I also object to how the Upland Game Bird Season Extension proposal was adopted for public review. One letter from an individual, submitted and put into the mix at the 11th hour does and should not drive such a major revision as this. It strikes to the heart of the Commission's responsibility to operate in line with accepted and legal public process and decisions based on a thorough understanding of driving issues as well as provide for the greatest good. I urge you to deny this proposal and hope that the Commission refrains from acting in this fashion in the future.

I understand that the work of the F & G Commission is difficult and, at times overwhelming. I worked with many commissioners over the years and respect the position that you are in. I sincerely hope you choose to take a bold step here and to initiate the process from the beginning. Thank you for the opportunity to offer my comments.

Sincerely,

=s=

Mike Korn

167 Saddle Mountain Rd.

Clancy, MT

mkorn@bresnan.net

From: [justin.lex](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Public Comment
Date: Friday, January 21, 2022 1:05:09 PM

Dear Commissioners,

As demonstrated by Montana's recent acquisition of a second Congressional Representative, many folks are moving to this wonderful state. I would guess that Montana natives and transplants alike, do not choose to live here for limited opportunities to world class dining, professional sports teams, and other cosmopolitan traits, but rather for abundant opportunities to recreate on public land and water as sportsmen and women, hikers, backpackers, and river runners.

I am strongly opposed to any management decision to decrease elk herd sizes by increasing bull elk (either-sex) harvest. This goes against all known and accepted biological and ecological evidence.

Specific to the 411 proposal, wildlife managers in Region 4 understand that access is the reason elk are over-objective. Increasing public land pressure will not alleviate this situation. A quote from the December briefs presented to the Commission, "This is not a season-type or quota issue; it is an access issue... Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season."

In order to increase access, I am supportive of increased payments and/or incentives to maintain and create BMA's or other opportunities. The latter option should include sideboards and oversight to ensure sportsmen's access received is commensurate with what the public trust relinquishes.

I am generally supportive of the Region 1 proposals. Although it was not addressed in this season setting opportunity, I would like to see increased public land white-tailed doe harvest explored within Region 1. I would also like to see reduced mule deer pressure. Region 1 biologists did a solid job with the proposals.

I believe the current standards for black bear mandatory reporting should be preserved. In my experiences removing a single-rooted ungulate incisor without damaging the root is difficult enough and it seems likely that many pre-molars will be damaged and unusable. The physical inspection is an appropriate 'burden' for harvest of a black bear.

I recognize that the Commission has recommended some restrictions on recently passed predator management opportunities (wolf snaring, hounds), but I am also concerned that without stringent guidelines, there will be an increase in incidental grizzly bear death, thus resulting in further delaying the delisting of grizzly bears.

Looking at the “Black Bear Management Units and Grizzly Bear Areas Map,” there are documented and confirmed Grizzly Bears in areas that MFWP has not defined as Grizzly Bear Habitat, including the Sapphire, Bitterroot, and Big Belt Mountains. These areas should be included in the habitat layer and subject to limitation or prohibition.

Looking back at “Montana’s Public Trust Responsibility: A Guide for FWP and Montana’s Conservation Community,” produced by Montana Fish, Wildlife, and Parks in December 2020 (<https://issuu.com/montanaoutdoors/docs/thepublictrust> [issuu.com]), a few quotes from page 4 seemed apt to share:

“No individual can own public trust resources (for example, wildlife, fish, and state parks); they cannot be privatized.”

“All public trust resources are in trust by the state for the public (the trust’s “beneficiaries”).”

I appreciate Commission Waller addressing public trust back in December.

Thank you for the opportunity to comment,

Justin Lex

Columbia Falls, MT