

Comment deadline Dec. 7 items:

**Commissioner Brooke's SPONSORED amendment:**

MWF supports Commissioner Brooke's sponsored amendment to change the HD boundaries for HDs 336 and 421.

**Commissioner Burrows' amendment:**

MWF applauds Commissioner Burrows for listening to his constituents and following through with the regional biologist on this issue. This is a small tag change, and because the local biologist has confirmed what the tag holder saw on the landscape, MWF supports this change.

**Commissioner Cebull's amendments:**

**Modify quota ranges for LPT 555-00 from 15-50 to 15-100. Add LPT 005-00 elk b tag for non national forest lands:**

MWF supports an increase in LPT 555-00 quota ranges from 15-50 to 15-100 to address the drastic increase in elk populations resulting from the Robertson Draw fire. Due to brucellosis and CWD concerns from elk that migrate out of Wyoming into Montana, we understand the need to keep this hunting district within objective ranges. It is currently more than triple the objective range so increasing the quota range is justifiable. One concern is that once the post fire habitat for elk becomes less robust, there could be far fewer elk on the landscape in this HD than there are now, so we urge FWP to be open to adjusting the quota range back down to reflect the numbers of elk seen on the landscape if or when that occurs. B tags for non national forest lands is a good tool for managing elk on private lands, and we support issuance of LPT 005-00 elk B tags in this region when elk numbers are this far over the objective range. Until the population gets close to objective numbers, MWF supports issuing LPT 005-00 tags for this hunting district.

**Modify LPT 502-20, create LPT 555-20:**

MWF supports these two changes due to the Robertson Draw fire's impact on this region. Formerly two separate HD's, the recent fire has exacerbated the difference between these two parts of the new HD. Going back to the old boundary lines and regulations for tags seems appropriate. This granular approach should ensure that objectives and quotas are representative of the region that elk actually exist in, rather than treating the district as if it has one distinct herd of elk. With no changes to the amount of tags available from the amount that was given to each unique district before their merger, we support providing the tools for regional biologists to manage these elk herds as unique to their respective regions, and we support this amendment.

**Increase LPT 700-20 and increase LPT 700-21:**

MWF does not support this increase in tag availability. As shown in the graph provided, bull-cow ratios have begun to come back into the objective range and they are now just slightly below the

stated objective number. This increase in tags is premature, according to the data provided. If this winter's flight data shows an increase similar to the previous two years, then MWF would support allocating these additional tags in the next round of season setting to help them remain within the objective range. We understand that the amount of permits available for various regions can have an impact on local economies, but that is the case across the state. We don't see this as a good justification for increasing permits when stated bull-cow ratios are just now getting to where goals state they should be. MWF would support an increase in permits allotted in the future if bull-cow ratios increase beyond the stated goal, but we do not support this increase in permits in this round of season setting.

#### **Pat Tabor's amendments:**

##### **Increase 700-20 permit from 200 to 250, increase 700-21 permits from 660 to 800:**

MWF does not support this increase in permits based on the justifications made in this amendment. Whether this region is designated as a trophy management area or not, does not address the fact that the original reduction in permits was due to "local preference", meaning that the public spoke loud enough to express how they would like to see this area managed and FWP biologists put in place permit numbers that reflected local preferences. Once again, local economies are affected by how many hunters come to their region, but this should not be a justification for an increase in permits that are contrary to local preferences on how to manage the local elk herd. 200 rifle permits and 660 archery permits are a part of the management program for this region because this area truly is one region where the opportunity for trophy bulls is higher than most of the state. Sacrificing a small increase in regional opportunity for the quality of animal pursued will result in fewer quality animals to pursue, making this region no different from the rest of the state. The end result could be that fewer hunters travel to this region to hunt because the trophy element is drastically reduced-which would negatively impact local economies, if that is as much of a justification as we are led to believe. MWF opposes this increase in permits.

##### **Re-establishing boundaries of HD 417 to old boundaries, pre 2021:**

MWF does not support changing the boundaries of HD 417 from where they currently stand. With deer numbers declining across major portions of the state, keeping HD 417 whole would allow the one portion of the hunting district that has not seen as drastic of a decline in deer numbers to be the source for deer repopulating the eastern portion that has seen a decline. There also does not seem to be a stop to the decline of deer populations in Montana, so one area that does not show a decline now could very well show a decline like the rest of the state has. This change could exasperate that decline. Furthermore, the stated justification for this change is that a few outfitters could see a loss in livelihood. Supporting commercial entities through changes to management of the Public Trust is a slippery slope that the public is typically extremely skeptical of. The public perception of changes with justifications like this can be very negative and can reduce the faith that the public has in how the Public Trust is managed for all. We urge the Commission to oppose this amendment.

**Make R7 antlerless mule deer harvest on private land only, including BMAs:**

MWF would like to see this proposal amended to exclude Block Management lands from this change. Cooperators are already empowered to make rules on their own land, so forcing them into this rule seems unreasonable. Some Cooperators sign up for Block Management to specifically reduce deer populations on their ranch, and this would limit their ability to do so, and could result in some Cooperators leaving Block Management altogether. MWF agrees with ending antlerless mule deer harvest on public lands in this region and we will fully support this amendment if it does not include Block Management. Mule deer are on the decline there, but we believe that Cooperators already have the ability to enforce this on their property if they choose to. Please amend this proposal to exclude BMAs from this regulation, and it will get our support for this needed change on actual public lands.

**Sheep points:**

We'd like to see sheep points treated like every other species are, but this amendment seems mired in multiple authorities and rules/laws that would need to be changed in the legislature. We would like to see some clean up and clarification of this proposal before consideration by the Commission.