

# #1

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, May 21, 2024 2:48:37 PM  
**Last Modified:** Tuesday, May 21, 2024 2:50:55 PM  
**Time Spent:** 00:02:17  
**IP Address:** 66.62.89.101

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## Q1

Contact information:

Name: **Jeff Darrah**  
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## Q2

Please comment on Big Game Policy Repeal

Regarding the proposed repeal of ARM 12.9.101 by FWP. When this repeal proposal first came out it wasn't clear to many of us why? The objectives in ARM 12.9.101 seemed to be the foundation of big game and other wildlife management in Montana. Later through digging deeper into this proposal we were told that many statutes outdated this arm. If this would have been explained upfront with examples of statutes that out date the ARM it would of eased tensions with many sportsmen who are apprehensive of such extensive changes.

I spoke with Chief Legal Council of FWP and it was explained to me very well and if we would have known this up front it would have negated much effort. I have reviewed statutes that are worded differently than the ARM and there have been obvious changes making the ARM antiquated.

The development of wildlife management plans in the future will rely on the statutes that have replaced the ARM. It should be FWP's practice to refer to these statutes by their MCA numbers in any draft sent out for comment.

These statutes should be easily retrieved by the general public in any plan development in the future. Just as the ARM listed the primary objectives there should be a list of statutes that are still the primary objectives in developing big game management plans and in this case the "law".

Jeff Darrah  
Executive Director  
MTSFW

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## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, May 22, 2024 9:11:46 AM  
**Last Modified:** Wednesday, May 22, 2024 9:13:23 AM  
**Time Spent:** 00:01:37  
**IP Address:** 69.51.103.82

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### Q1

Contact information:

Name: **Kell Christenson**  
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### Q2

Please comment on Big Game Policy Repeal

I move the Fish and Wildlife Commission to reject the proposed repeal of ARM 12.9.101, keeping the Big Game Management Policy. Environmentally, repealing big game management could threaten the balance of ecosystems, jeopardizing biodiversity and ecological resilience. In the mid-1900's wolves had been nearly eradicated from Montana due to overhunting and lack of management. The National Park Service recorded only 50 wolves in Yellowstone National Park and noticed detrimental impacts on the ecosystem. Socially, it undermines the well-being of communities reliant on wildlife for cultural and recreational purposes because of the potential loss of stable populations being over hunted because of the lack of species specific management. A study done by Jeremy Sage of University of Montana found that 1,450 identifiable entities for outfitting and serving 728,900 clients rely on the stability of our ecosystems and big game populations. Economically, it overlooks the long-term benefits of sustainable wildlife management, such as ecotourism revenue and job creation. According to the Montana Office of Tourism, 4.4% of our state income is from tourism and is worth more than \$7.5 billion. Upholding this rule is essential for ensuring a holistic approach to conservation and sustainable development. People who are for the repeal of 12.9.101 see it as obsolete because it has "achieved its purpose". The act has been around for a long time for a reason and will never become obsolete because of the importance of protecting big game and our ecosystems. As a big game hunter I do recognize the significance of 12.9.101 and the impacts of its continued use, but the continuation of the act is vital to protecting Montana's big game populations and ecosystems.

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# #3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, May 22, 2024 9:37:32 AM  
**Last Modified:** Monday, May 27, 2024 10:30:06 AM  
**Time Spent:** Over a day  
**IP Address:** 72.175.53.185

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## Q1

Contact information:

Name:	<b>Montana Wildlife Federation</b>
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## Q2

Please comment on Big Game Policy Repeal

MWF opposes the wholesale repeal of the big game management ARM rule without further review by stakeholders and a solid justification from FWP. Simply stating that this rule is outdated is not enough to take a bedrock ARM rule for all of big game management and repeal it. The public needs to see the exact justifications for why each of the individual pieces of this ARM rule is being repealed, and what the intended outcomes are. It's hard to imagine FWP expecting the public to pour through the associated laws and ARM rules to figure out whether this is needed or not. If the new process for statewide management plans for specific game species is the basis for this ARM repeal, we would like to point out that the public has been extremely frustrated with this new process. We have not found a single person or organization that felt the new process allowed as much input and interaction from the public as the old process did. People are downright frustrated with new management plan processes such as: Scoping meetings where the public can ask questions, but comments are not officially written down and submitted to the Agency, less interaction with Commissioners, and a process that makes it more difficult for the public to have their ideas heard and discussed publicly are just a few of the complaints we have consistently heard. Whether it was the Elk plan, Fish plan, or otherwise, folks had serious frustrations with the new process. This is not a process that FWP should be using to justify the wholesale repeal of the very ARM rule that guides big game management. When FWP considers this repeal, we suggest widely reaching out to the public and having stakeholder meetings to ask them if the new process for management plans is working for the public and whether they feel this ARM rule repeal is justified. MWF urges that the Commission tables this repeal and justifies to the public why each of the elements of this ARM are ALL outdated before moving forward with such an important repeal.

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