

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 8:26:15 AM
Last Modified: Wednesday, November 01, 2023 8:30:49 AM
Time Spent: 00:04:34
IP Address: 174.215.19.88

Page 1

Q1

Contact information

Name: Scott Richardson
City/Town: Florence
State: MT
Email Address: R6Livestock@gmail.com

Q2

Comments:

The upland bird season is way too long. The declining number of birds is due to over pressure not only from humans, but predators as well. The season needs to run from October to Thanksgiving and be done. Same as it was in the past. There is not the habit or the breeding population that can support a 3 month season. Shorten the season, there will be a more sustainable and higher population of birds in 5 years.

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 8:30:33 AM
Last Modified: Wednesday, November 01, 2023 8:32:55 AM
Time Spent: 00:02:22
IP Address: 98.97.10.138

Page 1

Q1

Contact information

Name: David Cochell
City/Town: Corvallis
State: MT
Email Address: tiptopconstruction1@yahoo.com

Q2

Comments:

The state of Montana needs to limit out of state bird hunting

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 8:31:21 AM
Last Modified: Wednesday, November 01, 2023 8:59:56 AM
Time Spent: 00:28:35
IP Address: 208.184.22.30

Page 1

Q1

Contact information

Name: Michael Faw
City/Town: Dillon
State: MT
Email Address: mikefaw@earthlink.net

Q2

Comments:

Great plan and I learned a lot by reading this. I hunt numerous UGBEP plots across the state each fall and use the booklet to locate these places and understand what work has been done. An awesome program.

I hunted an Open Fields project south of Big Sandy this fall. Great cover and many birds though several Block Mgmt lands I hunted in this region were over grazed by cows and held few if any birds. I also noted state trust lands held NO birds and were significantly grazed. I agree that working partnerships with other groups USFS/BLM and DNRC could dramatically improve habitat for upland birds and specifically sage grouse. Please proceed in this direction. I also believe more funds should work into pheasant habitat improvement and less on releases. Yes, I would support more funding for the UGBEP programs. I did not see any mention of the Upland hunting licenses and the annual sales and income for FWP. You can find many YouTube shows about nonresidents coming to eastern MT to hunt.

I will also mention many of the UGBEP need better signage. Some have been extremely difficult to discover.

Overall, i give this update and program and HUGE thumbs up. Mike Faw

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 8:59:48 AM
Last Modified: Wednesday, November 01, 2023 9:17:53 AM
Time Spent: 00:18:04
IP Address: 64.187.195.2

Page 1

Q1

Contact information

Name: Brett Shelagowski
City/Town: Lewistown
State: MT
Email Address: mi.brett.mt@gmail.com

Q2

Comments:

I'd like to know why, we as hunters can potentially shoot more sage grouse than we can turkeys? Why not have a kill tag for sage grouse or a lottery for a tag AND then allow us to shoot a sage grouse as late as the new year, so we can harvest a bird that is in full plumage instead of a bird that is young or not in full plumage. Most individuals shooting sage grouse would say they are not the best table-fare. Most are trying to shoot one to get mounted. I would love a response to why the season is kept to only the month of September and why an individual could potentially shoot 2 sage grouse a day for 30 days.

I am good with the rest of the upland game management in place.

I am an avid bird hunter and want the best for a sport I truly love!

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 9:15:29 AM
Last Modified: Wednesday, November 01, 2023 9:45:40 AM
Time Spent: 00:30:10
IP Address: 135.134.5.192

Page 1

Q1

Contact information

Name: TJ Smith
City/Town: Billings
State: MT
Email Address: louganmil@proton.me

Q2

Comments:

The following quote, from page two, clarifies the Program Goal. "While the plan describes real objectives and strategies for implementation of the UGBEP, it is not intended to serve as an upland game bird species/population management plan. The focus of the UGBEP is habitat and population enhancement." This clarification should be included within the section titled: Program Goal. Additionally, within this same section there should be a statement clarifying that populations of species may in fact decrease due to other causes, specifically predation by other species.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 9:29:24 AM
Last Modified: Wednesday, November 01, 2023 10:06:15 AM
Time Spent: 00:36:51
IP Address: 71.15.196.167

Page 1

Q1

Contact information

Name: Allan Gadoury
City/Town: Bozeman
State: MT
Email Address: al@6xoutfitters.com

Q2

Comments:

Sage grouse should be a trophy bird with no harvest until November to January 1 to allow for a decent mount. There should be no fall season for hen turkeys. A fall season for male turkey should have little impact on turkey populations. Science based studies show pen raised pheasants do not survive long. Money is better spent on habitat.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 10:50:31 AM
Last Modified: Wednesday, November 01, 2023 11:10:36 AM
Time Spent: 00:20:05
IP Address: 70.33.15.147

Page 1

Q1

Contact information

Name: Richard Schwalbe
City/Town: Big Sky
State: MT
Email Address: rjschwalbe@aol.com

Q2

Comments:

Very well thought out plan. Pen-raised Pheasant Releases has terrible public perception/optics. It looks like a tax payer paid program for wealthy landowners. Do pen raised fowl live through the winter? Are most of them prey to other wildlife?

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 11:57:13 AM
Last Modified: Wednesday, November 01, 2023 12:00:42 PM
Time Spent: 00:03:28
IP Address: 72.255.176.196

Page 1

Q1

Contact information

Name: peter rogers
City/Town: Moccasin
State: MT
Email Address: pete@pigeye.com

Q2

Comments:

As a upland bird outfitter (Pigeye Outfitters) here in Central MT I would suggest with the populations as they are, lowering the bag limit on Hungarian Partridge to 6 per day.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 1:24:46 PM
Last Modified: Wednesday, November 01, 2023 1:35:50 PM
Time Spent: 00:11:04
IP Address: 205.149.11.163

Page 1

Q1

Contact information

Name: Greg windtberg
City/Town: Belgrade
State: MT
Email Address: bergmt@aol.com

Q2

Comments:

It all looks good to me. But what I don't like is showing up to designated hunting fields and finding 2 to 5 guys out there target shooting with their AR 15s. Can't trust them not to shoot me or my dog. Would like to see the state restrict target shooting on certain properties

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 01, 2023 2:43:16 PM
Last Modified: Wednesday, November 01, 2023 3:06:07 PM
Time Spent: 00:22:50
IP Address: 98.97.35.235

Page 1

Q1

Contact information

Name: Nick Frank
City/Town: Helena
State: MT
Email Address: nickfrnk@gmail.com

Q2

Comments:

It's a shame that we don't limit the number of days out of state hunters can hunt per year per license ,along with having the earliest season opener dates in the area. This attracts hunters early in the season and some stay for months on ONE license fee. Dakota's allow 10 days.
This combination has lead to over crowding in popular hunting areas. Opener dates should align with neighboring states to spread out opener crowds.
Our public lands should also not be a dog trainers work place with 20+ dogs.
All of these points need to be addressed! Thank you Nick Frank

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 02, 2023 7:56:50 AM
Last Modified: Thursday, November 02, 2023 8:40:00 AM
Time Spent: 00:43:09
IP Address: 216.47.60.225

Page 1

Q1

Contact information

Name: Thomas Mccloskey
City/Town: Superior
State: MT
Email Address: thomasjmccloskey@outlook.com

Q2

Comments:

I am not in support of removing shelterbelt requirments which now exist. seems more habitat enhancement is needed . more open field projects could help with crp loss

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 02, 2023 9:01:04 AM
Last Modified: Thursday, November 02, 2023 9:04:44 AM
Time Spent: 00:03:40
IP Address: 70.33.9.75

Page 1

Q1

Contact information

Name: Mike Beyer
City/Town: Hinsdale
State: MT
Email Address: playto28@yahoo.com

Q2

Comments:

Reconsider any pheasant stocking using pen raised birds. Concentrate on habitat improvement and increasing hunter access to areas that get state funding/improvement.

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, November 04, 2023 8:34:41 PM
Last Modified: Saturday, November 04, 2023 9:05:05 PM
Time Spent: 00:30:24
IP Address: 67.143.192.92

Page 1

Q1

Contact information

Name: Ronald T Biglen
City/Town: Lewistown
State: MT
Email Address: rbiglen@q.com

Q2

Comments:

I am in favor of raising and releasing Pheasants in Montana.
Also in favor of releasing more Turkeys.
We are down in numbers of both in the Lewistown area where I live.
This past ten years or so our Big Game hunting went to crap for most of us we need more bird hunting opportunity's.

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, November 05, 2023 10:18:13 AM
Last Modified: Sunday, November 05, 2023 10:19:32 AM
Time Spent: 00:01:19
IP Address: 172.94.107.8

Page 1

Q1

Contact information

Name: Branden Long
City/Town: Missoula
State: MT
Email Address: branden.long@gmail.com

Q2

Comments:

It would be nice if you could legally shoot grouse with a rifle. Sniping them in the head saves most of the meat, which matters, when there ain't much meat on grouse to begin with.

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 02, 2023 2:30:47 PM
Last Modified: Tuesday, November 07, 2023 5:26:55 PM
Time Spent: Over a day
IP Address: 63.153.15.92

Page 1

Q1

Contact information

Name: Brewer Butler
City/Town: Livingston
State: MT
Email Address: BREWERBUTLER@GMAIL.COM

Q2

Comments:

Limit the amount of time non residents can spend in our state. The Dakotas allow 2 weeks of upland bird hunting per person. In the areas I hunt there are many people training dogs for the entire season from states as far away as South Carolina. They kill and educate a lot of birds that many others could enjoy. At least limit bird hunters to 2 weeks at a minimum.

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, November 10, 2023 9:24:16 PM
Last Modified: Friday, November 10, 2023 9:32:51 PM
Time Spent: 00:08:35
IP Address: 184.167.3.213

Page 1

Q1

Contact information

Name: Curtis Ferrin
City/Town: Billings
State: MT
Email Address: cferrin@bresnan.net

Q2

Comments:

Pen raised pheasant releases are a bad idea . The science bears this out and pheasants will have weakened genetics , eventually just like farmed Mallard Ducks have had on the wild duck populations . This program has no place in the UGEP . It should be eliminated before it has devastating consequences on the wild pheasant population .

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, November 13, 2023 6:55:17 PM
Last Modified: Monday, November 13, 2023 6:59:15 PM
Time Spent: 00:03:58
IP Address: 154.27.106.114

Page 1

Q1

Contact information

Name: Tana Kradolfer
City/Town: Belgrade
State: MT
Email Address: tanabanana.k@gmail.com

Q2

Comments:

To Whom It May Concern:

In the Strategic Plan Region 3 has never had a designated upland bird habitat biologist like most of the other regions or any habitat dollars spent in Region 3 other than at Canyon Ferry WMA many years ago. In the revised strategic plan on page 56 the paragraph on "Program Delivery" says it all. "Region 3 Biologists are consumed with competing priorities." And that means that it's all about elk, bison, wolves and grizzlies and not about birds. If you think FWP will spend a dime of habitat funds in Region 3 you are kidding yourself!

In addition the Strategic Plan makes it sound like Canyon Ferry WMA is the recipient of intentional and ongoing maintenance when in fact the long range plan for CFWMA has never been completed. Region 3 bird hunters pour significant license dollars into habitat enhancement every year and every dime of it is spent in Regions 4, 6 and 7. The Strategic Plan wholeheartedly accepts and encourages conservation partnerships in Region 3 as is stated on page 57 where it says it considers "collaboration with local PF chapters as instrumental partners" when in fact projects at Fairweather and Poindexter were turned down. At the UGBHEP council meeting in March of 2023 the council unanimously voted that FWP pursue a full time habitat biologist for region 3 but at the September 2023 council meeting FWP rejected that recommendation writing Region 3 off as hopelessly lost to development and leaving CFWMA out of any plan for habitat enhancement. At CFWMA on opening morning October 7, 2023 Canton lane had 33 vehicles parked at 9 a.m. not including 10 more vehicles in the lot behind the lumber mill. Riley Rd had 10 vehicles at 9:14 a.m. and Lower Ray had 20 vehicles at 9:20 a.m.. Canyon Ferry WMA has the ability to handle a lot of hunting pressure and is a true gem in Region 3 but how long can it stand up to these kinds of hunter numbers without some investment going back into it?

Finally, the entire Strategic Plan lacks accountability in terms of measurements of successes and failures. The citizen advisory aspect of the council seems to be the lone conduit for accountability which in my experience is largely ignored. If you follow the money it gets spent where the birds already live. The Strategic Plan revision is a flimsy revision at best and very little honest investment of time and energy was spent on it by FWP. And though they won't admit it, the upland game birds in Montana are and always will be a very low priority for FWP.

Tana Kradolfer
Belgrade

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, November 14, 2023 4:12:52 PM
Last Modified: Tuesday, November 14, 2023 4:38:53 PM
Time Spent: 00:26:00
IP Address: 161.7.39.7

Page 1

Q1

Contact information

Name: Ryan Foley
City/Town: Helena
State: MT
Email Address: ryan.mack.foley@gmail.com

Q2

Comments:

While I understand the popularity of pheasants and their respective hunting opportunities, I fail to see why FWP puts so many resources and money into managing and even releasing pen-raised pheasants. An increase in our native game bird populations (grouse) would be more beneficial to our local ecosystems and native populations. Any resources used to enhance pheasant habitat, or for the raising and release of pen-raised birds, should absolutely be funneled into creating better habitat for our native birds to enhance their populations and ensure they have higher quality habitat for future generations. Once again, I understand the popularity of pheasants due to their sportiness, but sub-species of grouse vary wildly in behavior and could easily replace the pheasant opportunities. I believe FWP has failed to popularize grouse enough compared to their non-native counterparts. I also fail to see why all grouse are fair game but only cock pheasants may be harvested. FWP has become too reliant on trendy birds instead of focusing on native birds that have always been here.

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, November 17, 2023 8:16:38 PM
Last Modified: Friday, November 17, 2023 8:22:56 PM
Time Spent: 00:06:17
IP Address: 75.143.201.163

Page 1

Q1

Contact information

Name: BRUCE GAARE
City/Town: Great Falls
State: MT
Email Address: bhgaare27@yahoo.com

Q2

Comments:

I would like to see FWP eliminate or minimize any program calling for the use of pen raised birds. The science clearly shows the survival rate is extremely low, at best, and a poor use of resources. Those funds would be better used for habitat projects. Thank you.

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 22, 2023 3:53:58 PM
Last Modified: Wednesday, November 22, 2023 4:01:31 PM
Time Spent: 00:07:33
IP Address: 184.166.236.214

Page 1

Q1

Contact information

Name: Alex Burks
City/Town: Billings
State: MT
Email Address: alexredlegs28@gmail.com

Q2

Comments:

I would like to see the state do habitat studies on Hungarian Partridge. Much of the state is too dry for reliable pheasant habitat and "Huns" seem to do better in our dryer areas. I think the limit on Huns and Chukar should be lowered to four birds daily. I am still seeing some Huns but the density seems to be very low compared to what it was when I moved to Montana in 1978.

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 8:30:18 AM
Last Modified: Wednesday, November 29, 2023 8:40:56 AM
Time Spent: 00:10:37
IP Address: 174.215.18.127

Page 1

Q1

Contact information

Name:	Tom Mutchlet
City/Town:	Joilet
State:	MT
Email Address:	falconmt@aol.com

Q2

Comments:

We must start the upland game bird season on September 15th, not September 1st. The baby birds are too young. Some can't fly more than fifty feet. It's not fair game.

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 9:22:44 AM
Last Modified: Wednesday, November 29, 2023 9:37:50 AM
Time Spent: 00:15:05
IP Address: 162.217.231.93

Page 1

Q1

Contact information

Name: Robert Seidel
City/Town: Eureka
State: MT
Email Address: bjseidel@interbel.net

Q2

Comments:

I agree with your habitat enhancement programs, but think pen raised pheasant releases are a waste of tax payers money.

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 10:13:16 AM
Last Modified: Wednesday, November 29, 2023 10:23:46 AM
Time Spent: 00:10:30
IP Address: 68.227.52.2

Page 1

Q1

Contact information

Name: **scott boettger**
City/Town: **Hailey**
State: **ID**
Email Address: **sboettger2020@gmail.com**

Q2

Comments:

Great plan, concentrate on habitat enhancement and not on stocking pen raised pheasants

#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 10:30:36 AM
Last Modified: Wednesday, November 29, 2023 10:44:37 AM
Time Spent: 00:14:00
IP Address: 174.231.95.83

Page 1

Q1

Contact information

Name: Max Bauer Jr
City/Town: Florence
State: MT
Email Address: bauertranch@gmail.com

Q2

Comments:

Great Plan

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 10:32:54 AM
Last Modified: Wednesday, November 29, 2023 10:46:36 AM
Time Spent: 00:13:42
IP Address: 47.37.11.176

Page 1

Q1

Contact information

Name: Brian Wheeler
City/Town: Dillon
State: MT
Email Address: bwheel00@gmail.com

Q2

Comments:

Please accept the following comments:

- 1) I am 100% against stocking pen-raised birds for public hunting on public lands. Like with trout, wild birds are prettier, heartier, tastier, a more wary (and therefore desirable) quarry, and there is no risk of hatchery-linked disease. I have no problem with hatchery birds released on exclusively private lands.
 - 2) I am absolutely in favor of compensating landowners for allowing the public to access their land through programs like Block Management, and don't necessarily mind grazing leases on public lands. However, nothing is more frustrating than to look at a BMA or piece of public land that is grazed down to nothing, providing no public or wildlife benefit whatsoever. If there is to be financial compensation for access (or the privileged use of public land for private grazing), then there should be an enforceable expectation that the land will be productive and not rendered a wasteland by cattle, devoid of good habitat.
-

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 10:47:25 AM
Last Modified: Wednesday, November 29, 2023 11:03:00 AM
Time Spent: 00:15:34
IP Address: 69.145.218.6

Page 1

Q1

Contact information

Name: Robin Hill
City/Town: Billings
State: MT
Email Address: montanaav8r@gmail.com

Q2

Comments:

In reading this plan I see that the data reflects only up to 2022. I have hunted region 6 for decades. In 2023, I saw noticeably more non-resident hunters (my estimate is an increase of 50%) in the area than I have seen in years past. I think that this kind of hunting pressure will be a detriment to the quality of hunting opportunities that this region has experienced in years past.

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 11:52:35 AM
Last Modified: Wednesday, November 29, 2023 12:11:54 PM
Time Spent: 00:19:18
IP Address: 35.150.115.6

Page 1

Q1

Contact information

Name: Randy Setter
City/Town: Anaconda
State: MT
Email Address: randysetter325@yahoo.com

Q2

Comments:

Stocking pen raised pheasants is a waste of money. Much rather see that money go towards habitat improvement and working with landowners.

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 12:57:28 PM
Last Modified: Wednesday, November 29, 2023 1:04:49 PM
Time Spent: 00:07:21
IP Address: 98.97.9.131

Page 1

Q1

Contact information

Name: Garth Flaming
City/Town: LAUREL
State: MT
Email Address: garthlisa@msn.com

Q2

Comments:

As a Montana resident, I see the need for the state to limit the amount of days that non resident hunter are allowed in the field. Other nearby state limit out of state hunters to 2 week periods. This would limit pressure on the resources. Second would be to not give a upland license to Big game hunters, and require that they purchase as an add on to their tag, thus increasing the revenue from the purchase. Habitat has diminished as the CRP program has scaled back. Additional CRP fields is a benefit to all game.

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 2:11:06 PM
Last Modified: Wednesday, November 29, 2023 2:26:23 PM
Time Spent: 00:15:16
IP Address: 216.166.169.10

Page 1

Q1

Contact information

Name: Richard Tramp
City/Town: Townsend
State: MT
Email Address: tramprichard@gmail.com

Q2

Comments:

I like what I have reviewed. Very interesting.
Thank You

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, November 29, 2023 3:09:46 PM
Last Modified: Wednesday, November 29, 2023 3:23:00 PM
Time Spent: 00:13:14
IP Address: 159.238.248.229

Page 1

Q1

Contact information

Name:	Stephen Siddons
City/Town:	Laramie
State:	WY
Email Address:	ssiddons22@gmail.com

Q2

Comments:

I really appreciate Montana's interest in providing high quality upland bird hunting, and specifically, the great access available to pursue this resource.

That said, I think any conservation funds that are spent to on UGBE should be used on properties that do or will allow public access. I understand the value of high quality habitat on private lands, but that already exists in abundance. I also think mountain grouse/ruffed grouse management is forgotten in the West. It would be great to see forestry activities emphasized as upland bird habitat work. Overall, the access is good, the landowners are great, and Montana is truly a special place.

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 30, 2023 7:11:45 AM
Last Modified: Thursday, November 30, 2023 7:16:49 AM
Time Spent: 00:05:04
IP Address: 104.224.62.132

Page 1

Q1

Contact information

Name: Vince Luparell
City/Town: Great Falls
State: MT
Email Address: vinceluparell@hotmail.com

Q2

Comments:

Please continue to improve Habitat and partnering with land owners for more public access. It would be nice if you could find a way to put more food plots in areas close to crp. Thanks for your continued efforts to improve our upland game bird population.

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 30, 2023 9:25:14 AM
Last Modified: Thursday, November 30, 2023 9:30:04 AM
Time Spent: 00:04:49
IP Address: 174.234.29.87

Page 1

Q1

Contact information

Name: Ryan
City/Town: Billings
State: MT
Email Address: ryan.stefek@gmail.com

Q2

Comments:

8 huns/day is too many!!

#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 01, 2023 9:49:05 AM
Last Modified: Friday, December 01, 2023 9:54:24 AM
Time Spent: 00:05:19
IP Address: 107.130.93.29

Page 1

Q1

Contact information

Name: Mark T. Savinski
City/Town: Sheridan
State: MT
Email Address: savinski54@outlook.com

Q2

Comments:

I strongly believe the Upland Game Bird Strategic Plan should contact the Assiniboin/Sioux Wildlife Officials in the Wolf Point area to get their input on Habitat Management for game birds. As an individual that has hunted on the Reservation in that area for many years, I have been thoroughly impressed by the Tribe's land management practices that have been vert conducive to game bird health and growth. They do a great job of managing the land up there and I strongly feel that Montana FWP and the Upland Game Management Committee could learn a lot from their land management practices. Sincerely, Mark T. Savinski.

#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 01, 2023 10:31:34 AM
Last Modified: Friday, December 01, 2023 10:47:10 AM
Time Spent: 00:15:36
IP Address: 216.47.60.225

Page 1

Q1

Contact information

Name: Thomas Mccloskey
City/Town: Superior
State: MT
Email Address: thomasjmccloskey@outlook.com

Q2

Comments:

very disappointed in region 2 and there plan which is basicly nonexisitent. fish creek state perk and wma have some good areas to improve habitat .they could follow some of Beckman wma habitat improvements.

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 01, 2023 11:21:23 AM
Last Modified: Friday, December 01, 2023 11:28:31 AM
Time Spent: 00:07:07
IP Address: 70.33.47.177

Page 1

Q1

Contact information

Name: Brady Burgess
City/Town: Glasgow
State: MT
Email Address: brady.burgess@hotmail.com

Q2

Comments:

MTFWP needs to adopt similar or identical upland and waterfowl hunting regulations to limit non-resident hunter days like that of North Dakota. Recent years have seen numerous conflicts with resident and non-resident hunters in eastern Montana under the current regulations and our surrounding states have all went to similar regulations pushing all of the non-residents here leading to over-harvest and over bag-limits

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, December 02, 2023 6:23:21 AM
Last Modified: Saturday, December 02, 2023 6:45:05 AM
Time Spent: 00:21:43
IP Address: 67.44.224.33

Page 1

Q1

Contact information

Name:	Stephen J Christian
City/Town:	Colstrip
State:	MT
Email Address:	mtduckhunter@gmail.com

Q2

Comments:

This revised plan is very comprehensive. One area that needs to be closely watched is the pen-raised pheasant (PRP) release program. Just what is the true cost of a pen-raised rooster? If 40% of PRP are roosters and 50% are harvested by hunters, does the cost/bird justify the program. Perhaps the \$\$\$ would be better spent on habitat improvements and hunter access.

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 07, 2023 8:43:00 AM
Last Modified: Thursday, December 07, 2023 9:01:25 AM
Time Spent: 00:18:24
IP Address: 76.75.29.73

Page 1

Q1

Contact information

Name: Ted Jay Stosich
City/Town: Lima
State: MT
Email Address: ted.stosich@gmail.com

Q2

Comments:

From reviewing your info on the sage-grouse in region 3, its clear that you agree there is a significant decline in the numbers. What I don't understand is why FWP continues to have a hunting season on the sage-grouse. In my opinion the hunting season should be shut down on these birds until the number come back to a sustainable healthy population. The sage-grouse are having such a hard time surviving but yet you see hunters out there with their bird dogs hunting them. The birds don't stand a chance with these highly skilled dogs flushing them out. Please close the Sage-Grouse hunting season in Southwest Montana. Thank You Ted Stosich

#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, December 10, 2023 11:34:44 AM
Last Modified: Sunday, December 10, 2023 11:36:45 AM
Time Spent: 00:02:00
IP Address: 65.131.204.22

Page 1

Q1

Contact information

Name: Neil Jacobson
City/Town: Lakeside
State: MT
Email Address: bpbows@bpbows.com

Q2

Comments:

Why would we spend money on a non native species. MFWP are such hypocrites.one non native species you want to eradicate but others you can make money off of your all in.

#41

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 15, 2023 4:47:48 AM
Last Modified: Friday, December 15, 2023 4:48:15 AM
Time Spent: 00:00:27
IP Address: 195.137.220.154

Page 1

Q1

Contact information

Name: e
City/Town: e
State: WY
Email Address: sample@email.tst

Q2

Comments:

e

#42

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, December 17, 2023 3:54:01 PM
Last Modified: Sunday, December 17, 2023 4:11:30 PM
Time Spent: 00:17:28
IP Address: 207.225.0.232

Page 1

Q1

Contact information

Name: Christopher M Hyle
City/Town: Butte
State: MT
Email Address: chrishyle55@gmail.com

Q2

Comments:

Grey (Hungarian) Partridge are perhaps Montana's most broadly distributed gallinaceous game bird, yet their management is best described as benign neglect. Region 2 and 3 could have robust populations of this species with relatively little management efforts (shelterbelts, food plots, "bug banks" and guzzlers) on the regional WMA's and with landowner approval on many block management areas. Huns in Regions 4-7 at least benefit from Sharptailed Grouse and Pheasant management efforts. I believe our Partridges are an over-utilized but under managed resource. Dusky Grouse should also be a management priority in Regions 1-3. Again, with a little human intervention in habitat manipulation, these birds would respond favorably rather than relying on Mother Nature alone. Finally look to you tuba and bird hunting in Montana to see the tremendous non-resident pressure our birds are receiving, particularly in the early days of open season. I expect this trend to only grow. A final note: There are still enormous blocks of agricultural land in production that contain not a square foot of bird habitat for miles. Might some UGEP funds be allocated to incentivize some of these farmers to leaves a little cover for our game birds?

#44

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, December 26, 2023 5:47:23 PM
Last Modified: Wednesday, December 27, 2023 5:20:18 AM
Time Spent: 11:32:54
IP Address: 67.44.224.9

Page 1

Q1

Contact information

Name:	Stephen J Christian
City/Town:	Colstrip
State:	MT
Email Address:	mtduckhunter@gmail.com

Q2

Comments:

The plan is very comprehensive. Thank you to the UGEBBC has and FWP have done a great job with this revision.

#45

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, December 27, 2023 12:14:16 PM
Last Modified: Thursday, December 28, 2023 6:13:15 PM
Time Spent: Over a day
IP Address: 67.221.196.208

Page 1

Q1

Contact information

Name:	Montana Wildlife Federation
City/Town:	Helena
State:	MT
Email Address:	garrett@mtwf.org

#46

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 29, 2023 9:11:35 PM
Last Modified: Friday, December 29, 2023 9:16:35 PM
Time Spent: 00:05:00
IP Address: 69.146.146.30

Page 1

Q1

Contact information

Name: Casey Hackathorn
City/Town: Missoula
State: MT
Email Address: caseyhackathorn@gmail.com

Q2

Comments:

On behalf of Hellgate Hunters and Anglers, we offer the following comments on the Draft Revised Upland Game Bird Enhancement Program Strategic Plan:

I submit the following comments on behalf of Hellgate Hunters & Anglers, a non-profit organization based in western Montana-based organization that represents hundreds of sportsmen and sportswomen across the state. We are grateful for the opportunity to comment on the Upland Game Bird Enhancement Program Strategic Plan.

We encourage the UGBEP and those that have the ability to enact positive change for Montana's upland game bird habitat to engage in the following:

- Emphasize the allocation of UGBEP financial resources to easements, leases, block management, and other forms of private lands that only provide HIGH-QUALITY upland game bird habitat or where there is a realistic opportunity to improve existing habitat.
- We highly support the elimination of the requirement to set aside a maximum of 15 percent of the annual revenue to fund bird planting activities.
- Decrease all possible expenditures associated with pen-raised pheasant releases and reallocate those financial resources to:
 - (1) invest in habitat priorities identified in the UGBEP Strategic Plan's regional strategies;
 - (2) funding biological staff to support the implementation of habitat-related projects and dedicated to UGBEP delivery; and,
 - (3) increase assistance to relevant parties engaged in increasing access to private lands for public hunting.
- Increase enrollment of new CRP projects through frequent communication of enrollment opportunities
- Maintain/improve existing CRP projects
- We support the Council's recommendation to research to quantify program components to justify use of funding and potentially justify additional funding in the future.
- We support the Council's recommendation for program staff to seek additional opportunities to conduct habitat enhancements on DNRC State Lands as supported by the DNRC/FWP MOU.

Thank you sincerely for your consideration of these comments,
Andrew Gorder, President Hellgate Hunters and Anglers

#47

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, December 30, 2023 5:11:04 AM
Last Modified: Saturday, December 30, 2023 5:12:15 AM
Time Spent: 00:01:10
IP Address: 216.228.40.162

Page 1

Q1

Contact information

Name:	Dale Tribby
City/Town:	Miles City
State:	MT
Email Address:	dtribby@midrivers.com

Q2

Comments:

Page 1 – Program Goal: Would like to see the word “wild” added prior to the word Upland.

Page 2 – 1st bullet: Suggest adding all upland game birds, as sharp-tailed and sage-grouse could be a focus in the future.

Page 3 – Council Meetings; I suggest this be modified to say “generally” meeting are held in the fall and spring. Not sure the two meetings a year should be a mandate.

Page 6 – Emergency Supplemental feeding; Recommend this be revised to state this program focus is Daniels, Sheridan and Roosevelt counties, but should conditions warrant, supplemental feeding could be authorized statewide.

Pages 6-7 –Grazing systems: Would encourage the department to get away from mandating rest-rotation and instead replace with a FWP approved grazing system. This would not preclude rest-rotation, but may allow for other grazing systems advantageous to upland game bird habitats.

Page 9 – Wild Turkey Transplants: As stated previously, please expand to allow for the trap and transfer of all upland game bird species. As stated, these projects need to be approved by the Commission and there would be adequate overview prior to any trap/transfer project being approved.

Page 12 – Upland Game Bird Hunters and Hunter Days: Stating that since 2012, 350,000 hunters have hunted upland game birds is misleading. Suggest focusing on the actual number of residents/non-residents per year and the number of hunter days per year.

Page 16 – Figure 7: Is the legend on the bottom of the graph supposed to read non-residents, as opposed to “number hunters”

Page 18 – 2nd paragraph: I applaud your comment that pheasant releases may assist to open private lands for hunting. Although, most believe the value of “stocking” pheasants is limited, the lands open to public hunting should be recognized.

Page 21 – 2nd paragraph: Recognizing the value of core areas is important, but as a reader one might come to the conclusion this is the only place where UGBEP dollars would be spent. Is this the case? I don't remember reading this in the plan. If this is not the case, some clarification may be warranted. In addition, in Figure 11, since you have referenced core areas in the paragraph above, it may be prudent to identify the core habitat areas.

Page 23 – Figure 12: Is there not a more updated map of occupied and potential habitat than one from 2001?

Page 30 – Habitat Project Maintenance: It seems to me there is a missing component here, that being compliance. Compliance with the terms of and UGBEP project may be as or more important than the maintenance of the project. Seems some discussion should be focused on compliance.

Page 26 – Last paragraph: Is the statement that the ARM was recently revised to provide equal footing between private and public lands accurate. Seems like this modification was made several years ago. Not sure how “recently” is defined. Suggest simply stating private and public lands receive equal consideration for the expenditure of UGBEP dollars.

Page 37-38 – Pen raised pheasant releases. Would it be prudent to include a section dealing with diseases, such as avian influenza and how FWP would respond to a disease outbreak?

Submitted Dec. 30, 2023

RE: Public comments on draft 10-year plan for Montana Fish, Wildlife and Park's Upland Game Bird Enhancement Program(UGBEP).

From: Big Sky Upland Bird Assoc. P.O. Box 9005, Missoula MT 59807-9005

Dear Debbie, Rick and FWP staff:

The Big Sky Upland Bird Association (BSUBA) has been organized for over 30 years as a non-profit organization in Montana dedicated to habitat conservation and hunting opportunities for all upland game bird species in the state. Over these decades we have engaged repeatedly in supporting the UGBEP's operations and projects to improve habitat quality on public and private lands, enhance wild populations of upland birds, and increase hunting access on private lands by the general public. We appreciate the extension of the public comment period on the draft 10-year plan to year-end.

Historically, the UGBEP has faced some criticism that after audits by the legislature were in-part found justified. As we understand it, both the creation of Citizen Advisory Council for upland birds (which two different BSUBA members have served on previously) and now this second 10-year draft plan are part of efforts to address these criticisms. While these actions do improve the transparency and strategies of the UGBEP, this plan still falls short of setting measurable objective goals for program delivery in each of FWP's regions, and remains financially obscure in terms of program income, expenditures, and budget trends.

We note that it may not be the explicit purpose of the UGBEP to diagnose causes or cures for resident upland hunter participation or harvest declines, because the purpose and focus of the strategic plan as stated in the draft is upland habitat and upland bird population enhancement. But it seems that it would also be within the remit of the program to track how the UGBEP contributes to overall upland hunter participation, hunt quality, upland bird productivity and harvest in Montana, or how it newly intends too under this revised 10-year strategy. Without measurable objectives for the future and no new initiatives proposed, for example, in partnerships with other agencies, NGOs or underperforming FWP regions, the program strategy seems mostly to be a plan for decade-long status quo.

Find below our specific comments on the draft plan, both positive and negative.

Pg. 2 - The draft plan states "The plan is intended to provide sufficient detail to guide and direct actions in a manner that is organized and understood by the different audiences interested in the program's success." We observe, however, that generally the draft plan lacks sufficient detail or organization to be understood by our organization, which nevertheless has a long history of promoting the program's success.

Pg. 3 - We agree that one of the roles of the Citizen Advisory Council is to monitor the finances of the program. However, we have heard from current Council members that the program's finances remain opaque. For example, funds for habitat improvement are committed to dozens of new and older contracts with landowners. However there is no detailed presentation of the contract's expiration dates, so no way to gauge looming contract renewal needs, acreage recruitment rates, or monies available or projected to maintain or grow habitat enhancement acreages. In five years the program could be

financially secure or depleted, but the public has no way of assessing that or recommending appropriate actions by the program.

p. 4 “Recognize each administrative region may not participate equally in the program.” Other than the collaborative position on wild turkey habitat enhancement in Region 2, is there ANY strategic outreach to Regions 1-3 to enhance habitats or upland hunter utilization of public lands or private timber land for forest grouse (Dusky and Ruffed) in particular? There is a tremendous public land resource in the form of USFS, BLM, and DNRC administered lands in these regions, plus private forestry land. Other states have a long track record of improving forest grouse habitat and hunting opportunity through promoting particular forestry practices and publicizing access routes to and through these habitats. For an excellent example, see Wisconsin’s County Forest Grouse Management Program (<https://wisconsincountyforests.com/recreation-opportunities/grouse-hunting/>).

Simply working with DNRC and federal land managers in western Montana to map closed roads in riparian or high park areas or identifying suitable vehicle parking opportunities near public ground, FWP could easily disperse “new” upland hunters to these largely unexploited areas to hunt forest grouse. You could also map 20-40 year old fire scars and clearcuts, which can support improved hunting for both Ruffed and Dusky grouse in brushy regrowth and young aspens. Much of this land is near major population centers like Kalispell, Missoula, Butte and Bozeman, so also potentially serves populations needed for the success of FWP’s “Three Rs” (Recruitment, Retention, and Reactivation) program. Such strategic outreach within FWP and to land management entities could result in accessible acres and habitat treatments comparable to UGBEP acres and BMAs contracted in Regions 4, 6 and 7.

Pg. 5 - Aspen regeneration is mentioned as one of the methods of enhancing Ruffed grouse habitat utilized by the program in the past. But what are the scope of current aspen treatment projects being contemplated, and how does the UGBEP contribute to them? Similarly, evergreen tree encroachment reduction on private ranchlands could increase the prospect of successful restoration of Sharp-tailed grouse in western Montana’s valleys. We don’t see that your plan considers evergreen tree encroachment reduction as a habitat enhancement tool for pheasant, gray partridge and sharptailed grouse in western Montana or elsewhere on public or private land.

Pgs. 12-17 - This section contains useful data of species harvest estimates by region, and resident vs. nonresident participation overall. Given recent elevated concerns about increased pressure on the resource and upland hunt quality, does FWP have data on where nonresident upland hunting is occurring or increasing? This data could guide where habitat or access opportunities need enhancement to better distribute hunting pressure in underutilized areas. No regions express that they desire more upland bird hunters, or plan to accomplish it in part with the assistance of UGBEP funds. A further discussion of this would help establish the context of FWP’s goals for this program.

Overall the strategy here contains an array of interesting and useful data on hunter participation and harvest trends. However the document largely lacks forward vision in how to strategically address the declines in, for example, wild pheasant harvest and resident participation in wild pheasant hunting. Your document doesn’t diagnosis the cause of these declines. But the range of causation could be gross habitat loss or degradation, a negative shift in landowner permissiveness, the change in the trespass law for bird hunting access, or loss of access on private lands due to exclusive leasing by outfitters or nonresident hunters. It seems that accurately diagnosing the cause(s) could assist your program in engaging more successfully in remedying the downward trend in pheasant harvest and resident

participation. We do not believe that releasing pen-raised pheasant onto some of our better public hunting lands for wild pheasants addresses this problem in a meaningful way.

Pg. 20 - Discussion of the attempt underway to restore Plains Sharp-tailed grouse to western Montana could use some correction and improvement. The reintroduction is now focused on only two areas (the upper Blackfoot near Helmsville and the Bitterroot near Florence). The results are positive, with sharptails documented breeding successfully in both areas since 2022- the first time in over two decades. Over 200 wild chicks hatched in 2023. And the map could be retitled and improved to represent occurrence of the species now on both sides of the Continental Divide.

In the same way that UGBEP funds are identified as committed to Greater Sage-grouse habitat enhancement, the same could be proposed for Plain Sharp-tailed grouse habitat enhancement since this plan identifies sharptails as “a highest priority species” in Montana. Other elements of FWP are already committing substantial resources to this effort, but the reintroduction is entirely lacking any habitat enhancement via any FWP program, including UGBEP. There are substantial public and private habitats in western Montana which sharptails are now documented to be using and transiting through which could be targeted for enhancement. These habitat enhancements would also likely enhance habitat for Gray partridge and Ruffed grouse, particularly if they employed controlled burns or selective logging to reduce evergreen tree encroachment, increase the extent of grassland, regenerate aspen stands, or enhance deciduous woody draws.

Pg. 28 - Along with Regions 1-3, Region 5 is conspicuously not targeted for enhanced program capacity. Why is this, particularly with the upland hunter population residing in the Billings area which could be served by increased upland habitat quality and access nearby? Simply getting R5 to meaningfully engage in UGBEP projects would be a major deliverable of the program.

Pgs. 33-34 - There is discussion here of “leveraging” projects with land management agencies like BLM and the USFS. Are there examples of this in Regions 1, 3, or 5 with UGBEP monies? We are aware and supportive of the National Wild Turkey Federation (NWTf) biologist supported in Region 2 at the USFS by this program and partnered with the Blackfoot Challenge and TNC.

We would support contract terms prohibiting the use of UGBEP acres for commercial dog training. Repeated disturbance of nesting and brood rearing wild upland birds by hunting dogs May-August clearly degrades habitat effectiveness for successful reproduction by upland birds.

Pgs. 36-37 - Regarding access to UGBEP projects BSUBA would like to see more emphasis given to those projects with the least burdensome access requirements. For years our members have attempted to access private lands where UGBEP habitat funds had been spent, but couldn't get permission from the landowner per their advanced reservation requirement. This occurs at properties, often distant from home, requiring a 1 week advance reservation to hunt. By the time you drive past the property and observe it may present good hunting conditions that season, it is impossible to stay in the area for an additional week to actually hunt the property. So properties that don't require a 7-day advance reservation (perhaps two or three days, or self-administered walk-in?) should be given preference for participation in the UGBEP.

Additionally, we agree that “An advantage of public lands is projects completed on public lands aren't generally subject to contract expiration, and therefore accessible public lands typically provide unlimited

public access during the agreement period and beyond.” This excellent point should not be underemphasized elsewhere in the document, or overall in the UGBEP program. Contracting enhancement projects with private timberlands may have similar access advantages.

Our Association continues to oppose any use of UGBEP funds for release of pen-raised pheasants. They generally have extremely low survival rates of short duration, exhibit poor instincts afield as a hunted quarry, pose disease risk to wild upland populations, and divert FWP staff resources to less enduring public or ecological benefit. In our opinion where releases of pen-raised pheasants happen they should occur within the private sector without subsidy from federal conservation funds or hunter license revenues. We would strongly oppose any consolidation of the Deer Lodge prison pheasant hatchery with the UGBEP. It would be useful to note that this opinion was also shared by the majority of the UGBEP Council.

Pg. 45 - We appreciate the outreach and marketing done by FWP via the UGBEP guide. We think this guide could be expanded through cost-efficient collaboration with USFS and BLM land managers in western Montana emphasizing high quality hunting opportunities for forest grouse.

Pgs. 49-50 - In terms of performance measures, there are no statements or estimates of existing or desired UGBEP project accomplishments for:

- annual hunter days on project acres;
- harvest or population trends of upland birds by species on project acres;
- hunter assessments of harvest opportunities on project acres.

In addition the *Performance Measures* section details how FWP will establish measurable work objectives and report program status and progress, and states that annual progress reporting is intended for the UGBEP Council, legislators, and interested organizations and citizens. **Please provide to us the program reports for years 2020-present via email at bddeeble@gmail.com and robertkjeffrey@msn.com.**

Lacking this data, we have a hard time assessing what the program is actually delivering to upland bird populations and upland hunters or the “burn-rate” of the program budget.

Pgs. 54-55 - The draft strategy reports that “Subdivision and residential development are prevalent, especially in the Missoula and Bitterroot valleys, which has contributed to the apparent extirpation of an isolated native population of sharp-tailed grouse.” However, the FWP Game Commission closed the hunting season for sharp-tailed grouse west of the Continental Divide in 1948 because of declines observed then. What evidence do you have that subdivision and residential development was extensive enough seventy-five years ago to have been a contributing factor to these historic sharptail declines? Around that same time Ravalli Co. had one of the highest estimated pheasant harvests in the state. Is it possible that a more significant factor was that landscape level habitat degradation was caused by fire suppression, and the ensuing evergreen tree encroachment in mountain passes isolated westside sharptail populations from larger population east of the Continental Divide, resulting in genetic inbreeding and fertility declines for sharptails? Lekking species are more subject to inbreeding. These two strongly sympatric species’ simultaneous but opposite population trends cannot be explained by general habitat conditions alone unless something like evergreen tree encroachment isolating smaller sharptail populations from their metapopulation was responsible. For these reasons we recommend the statement be deleted.

Regarding opportunities around NWTF staff embedded in the USFS, the draft states “...the major FWP inputs would be expertise and advisement in partnership with governmental agencies and non-profit organizations to influence landscapes broadly for multiple habitat benefits, of which upland birds would represent a resource of increased consideration at the planning table.” Other than the NWTF and sage grouse conservation efforts, what are the public land management plans or planning processes that FWP participates in for the enhancement of upland bird habitats or hunting opportunities? The draft plan identifies none.

Pg. 56 - What is the intent of this sentence in the draft UGBEP strategic plan? *“The combination of forested habitats with diverse elevational gradients, large areas of intact sagebrush/grassland communities, numerous planted agricultural valley bottoms and associated riparian and riverine systems.”* It should be rewritten or deleted.

Pg. 62 - These two sentences need to be joined with a comma *“Due to their adaptability to a variety of habitats and their high reproductive capacity. Gray partridge can sometimes survive where pheasant and sharp-tailed grouse cannot.”*

Pg. 68 - We are not sure what the intent is of the following sentence in the strategic plan: *“While a large portion of Region 4 is void of perennial vegetation because of high soil productivity, select areas nearer river corridors and mountains are have great potential fine scale habitat improvements and public access.”*

P. 73 - The reference to figure 8 in the context of the following sentence about chukars in Region 5 does not make sense: *“Our focus area is south of Bridger to the Wyoming border, bounded on the east by Highway 310 and on the west by Highway 72 (Figure 8).”* Figure 8 in this strategic plan carries this label: *“Montana resident and nonresident hunter-days and trends, 2004-2012, 2014 – 2022.”*

Pg. 83 - The eastern portion of Region 6 stands out as presenting a superior set of Objectives and Goals for the UGBEP. The goals are well-stated and explicitly quantitative via percentages.

Pg. 85 - Examples “Goals:

- a) Maintain 75% of food plots on land of existing BMA or UGBEP cooperators.
- b) Ensure 100% of food plots are within ¼ mile of winter cover suitable to harbor game birds in severe conditions. “

In our opinion, this objective-implementing structure of stated measurable goals is an approach which the rest of the regions would greatly benefit by adopting for the UGBEP. However, presently NONE of the other regions state measurable goals for their next decade of action.

Pg. 96 - We support the collection and dissemination of data useful to quantifying the impacts of the UGBEP. This draft strategy fails to reveal what the program generates in income, what the program annually spends, and what results from the expenditures in terms of increased hunting opportunities and quality, increased acres of enhanced habitat, increased upland bird populations, or increased bird harvest by upland hunters.

With the exception of the eastern portion of Region 6, the draft also doesn't offer any projections or goals for what the program will intend to accomplish over the next decade.

Conclusion

In conclusion, the final plan for the UGBEP would be improved by identifying a 10-year goal of the program in terms of acres by habitat enhancement type (hold total acres stable at current levels, increase acres, or gradually decrease acres or types?). It would also greatly benefit from recognizing the opportunities for upland bird hunting in the public forest and private timberland habitats of Regions 1, 2, 3, 4, and 5. The final could further describe why Regions 1, 3 and 5 are underperforming in the program, despite major demands for upland hunting opportunities near Kalispell, Missoula, Bozeman, Billings and surrounding communities, and describe strategies for increasing the activity of the program in these regions.

The final plan would also benefit from adopting measurable habitat and population objectives across all FWP regions in a consistent format. Where program participation is low or nonexistent, explain why and offer potential remedies to low program performance. Finally, presenting a more transparent financial picture of the program would help gauge the potential and limitations of program delivery.

Thank you for the opportunity to comment.

Sincerely,

Ben Deeble, president. Board of Director members: Robert Jeffrey, Tom Deveny, Jay Gore, Todd Cross, Stefen Harvey, Glenn Marangelo

ATTACHMENT 2: Dean Hardi Comments

Executive Summary Feedback:

These are the observations and feedback from two Montana hunters, who hunt most all upland species for an average of 30 hunting days/ hunter/year across Districts 1, 2, 4, 6, and 7.

1. UGBEP enhanced lands, (Open Fields, etc.) while representing a small fraction of the publicly accessible in Montana, have better consistency in quality of habitat and resulting bird populations than other types of public access land.
2. The program plan seems to focus on enlisting more lands via conservation leases, and private landowner enrollment into UGBEP programs. This is great, however there seems to be an untapped potential in extending current UGBEP practices onto existing State lands and coordinating with existing Block Management parcels that from appearances don't seem to be embracing UGBEP program elements.
3. The background study data provides a helpful year over year overview in trends of in-state and out-of-state hunter activity, by district, and by species. But a critical recent shift in out-of-state hunter activity lies beneath the data, and urgent action by FWP and State Legislators needs to address, or it will forever impact upland hunting in Montana.

Feedback: Additional Potential for Program Impact on Existing State and Block Management Land

Your study correctly states that there has been a marked reduction in quantity and quality habitat across the state. A huge amount of this is due to CRP program decline, and other changes in ag practices, as you note. We strongly agree with your programs goals to increase quality habitat by leasing more critical habitat, and enrolling more private land owners in beneficial programs.

One recommendation is to urgently increase coordination between the Upland Game Enhancement Program and other State managed land and programs.

Our observation this year has been that while there is marvelous habitat on actively managed Upland Game Enhancement project land, there are tens of thousands of acres of State land and private Block Management land that are not being managed well, being over-grazed and over planted. These are lands that FWP Should be able to influence the management practices of. Our phone calls to at least one Upland Bird Biologists in a district we hunt suggest there is limited to no cross agency interaction on managing fundamental items like ensuring harvesting on state leased land does not occur during nesting seasons, or retaining pockets of cover vs. fence to fence harvesting.

I would say that a majority of both State parcels and Block Management parcels this year that we scouted were devoid of any reasonable upland habitat, even though they might have been in a sweet spot of potential. These opportunities should be low-hanging fruit in creating / retaining essential habitat.

Feedback: Urgent issue on recent shifts in out-of-state hunting activities This issue may be out of the specific scope of the UGBEP but it is one that needs to be brought to FWP attention for urgent action.

I found the charts of year over year data of res/non-res hunters and hunter days, and harvested game by species and district very interesting. It has confirmed our on-the-ground observations that seemed to be missed in your analysis.

ATTACHMENT 2: Dean Hardi Comments

You stated that the overall number of hunters, both res and non-res, has been “relatively stable” since 2012. However that glosses over two trends:

- a) The 30% downtrend from 2015-2017
- b) The 25% uptrend in res and nearly 50% uptrend in non-res hunters from 2019 to 2022.

I can only guess that the 2015 – 17 downtrend was due to the disappearance of CPR habitat, and resulting loss of hunting opportunity, ... which your program is squarely trying to address.

The uptrend I would correlate with COVID induced, Social Media fueled outdoor trends happening across the US.

Furthermore, your harvesting charts show a concentration of activity on Pheasant and Sharptail, particularly in NE Montana. What is our observation of on-the-ground hunting in NE Montana?

Guess what... every out of state gun dog breeder and hunter has already figured out what your charts suggest, via social media You-Tubers, and they have all descended on District 6. This has enabled out of stater's to make money off of Montana resources at the expense of Montana residents, and hunters. And while some businesses have benefited from this, other Montana businesses are disadvantaged. (More on this below).

There has also been observed increase in illegal hunting practices. These dynamics have basically ruined pheasant hunting in District 6, and has spilled over and ruined sharptail hunting in that section of the state. If we don't take note, and take action, the same will happen across the state and with all species

Detailed Observations:

a. Our observations from hunting across the state (districts 1, 2, 4, 6, and 7) is there is an extreme increase in out of state hunters particularly in district 6. While your statistics show a 3-1 ratio of in-state vs out of state hunters across all districts, our observations show that ratio is REVERSED and MULTIPLIED in district 6. Out of state hunters outnumber resident hunters 10 or 20-1. In the last 5 years combined we have only observed a handful of out-of-county Montana plates in district 6 in extensive driving across all public hunting areas. Conversely we counted no fewer than 17 other states plates this year during the upland opening week alone...all the way from Maine, Pennsylvania, New York, and Florida, with states like Texas, Wisconsin, and Minnesota heavily represented. That is more states hunting Scoby MT on opening week than you would encounter in a drive through Yellowstone NP! Other districts we hunt have no where near that disproportionate out of state representation, with western districts only having a handful, mostly from Idaho or Washington.

b. If this uptick was purely organic growth in business from your normal recreational hunter, that wouldn't be alarming, but what is driving this uptick has not just been with the recreational hunters, with a couple of dogs. We have seen a marked increase in out of stater's making money off Montana resources, including out of state breeders training upwards of 16 dogs each, and You-Tube bloggers making money off of broadcasting their “Hot” hunting sites. We witnessed them first hand in our camp site at the Scobey fair grounds, which this year harbored 3 times as many hunters than in years past.

ATTACHMENT 2: Dean Hardi Comments

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d. These out of state abusers are not coming for just your 5-day average visit. They are hunting weeks, sometimes months on end. Recent regulation changes have enabled breeders to come in as early as August to start running their dogs, and they keep going well into October, November, or December.

e. The aggregate impact of the above is brewing local land owners' disdain for hunters, and in particular out-of-state hunters. One who I had conversations with this year is actively seeking to close a road that would land-lock state land they lease. It is also creating a split in the community between businesses who benefit from out of state hunting revenue, and land owners who are negatively impacted.

f. This uptick in out of state commercial use of Montana resources also puts a squeeze on Montana based outdoor businesses. Montana breeders, trainers, and guides, all voting tax payers, are being squeezed out of resources their businesses thrive on by these outside pressures. Montana governmental agencies work for the citizens of Montana, not for the citizens of other states! Our strong recommendation is to seek ways to restrict blatant misuse, and preserve our hunting heritage, while retaining or increasing state revenue streams. Examples could be:

a) Adopt out of state licensing like South Dakota, restricting hunting to two, non-consecutive one-week periods per season.

b) Increasing out of state license fees (if a doubling of the paltry \$110 out of state fee results in a 20% drop in numbers of out of state hunters, there would still be a 60% increase in revenue! Do the marketing analysis, and do the math!

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December 27, 2023

Dustin Temple
Director
Montana Department of Fish, Wildlife and Parks
1420 East 6th St.
Helena, MT 59601

Delivered via email and FWP portal

Director Temple,

Montana Wildlife Federation (MWF), Montana's oldest and largest hunter and angler-based conservation group, was founded in 1936 by conservationists, landowners, hunters and anglers. MWF is a 501(c) 3 nonprofit organization comprised of staff, more than 5000 members, and 14 affiliate clubs throughout the state who share a mission to protect and enhance Montana's public wildlife, lands, waters, and fair chase hunting and fishing heritage.

MWF expresses gratitude for the diligent efforts undertaken by Fish, Wildlife & Parks in formulating the Upland Game Bird Enhancement Program Strategic Plan. While we do have some constructive suggestions, we would also like to acknowledge the department's commitment alongside the Upland Game Bird Enhancement Program Advisory Council for their thoroughness in developing the plan. In this regard we offer the following recommendations for consideration, proposing amendments, or additions to specific sections.

Statewide:

- 1) **FWP data shows no significant increase in non-resident hunters** over the last several years, yet they spend much more proportionally than residents. Many states are trying to reduce non-resident participation, due to the perception of overcrowded hunting grounds. FWP and the Montana Wildlife Federation recognize the economic impact of non-residents. That said, the Montana Wildlife Federation has concerns about the **distribution** of upland hunters on the landscape, meaning there might be the same amount of non-resident hunters as there were 10 years ago but the number of hunters, both resident and non-resident, on publicly accessible ground has increased. FWP commented about this year's increase in harvest and pressure most recently on December 1st in a news release about the Havre game check station. "Upland bird numbers saw a substantial increase in harvest this year. For the eight weeks that the check station was open, the pheasant harvest of 725 birds was above last year (37%), and just below the long-term average. Sharp-tailed grouse (163 birds) harvest was just above last year's total, and 30% above the long-term average. Gray (Hungarian) partridge harvest (122) was well above both last year and the long-term average." We

propose Montana FWP consider changing the motivation of management of this resource. We propose shifting the gaze from an opportunistic style with long seasons and wide open doors to limiting opportunity and emphasizing experience within the hunt, especially to non-resident participants. The guiding principle would be “distribution of quality habitat has a significant influence on hunter distribution.” This proposal would be placed in the “Guiding Principles” on page 4. The objective is to achieve an abundance of habitat and a diverse bird population, aiming for an equitable distribution of hunting pressure. This approach is designed to enhance overall experiences for hunters while concurrently promoting increased bird populations.

- 2) **Gray Partridge.** MWF would like to see FWP study and focus on gray partridge (Hungarian partridge) populations. Upland hunters value Huns and want to see more of them. The population charts seem to be on a downward trend. We would like to see this trend reversed.
- 3) **Sage Grouse.** Currently FWP does not separate sage grouse population estimates by region. MWF proposes that FWP divide the state into zones or regions similar to Wyoming and establish population benchmarks for each zone. Currently, FWP estimates sage grouse populations primarily by counting leks statewide. This allows for one healthy region to mask problems elsewhere in the state. Our members have seen anecdotal evidence of a dramatic decrease in birds in Region 3 and would like to know the population status and trends for each region yearly before suggesting further management action. If the state is split into different zones/regions with benchmarks for regional populations we can support further action if necessary. We believe by taking this extra step we may be able to get a further understanding of habitat limiting factors. We would like to see a numerical goal of birds for every region that the state is broken out into, with the numbers of birds added into the plan once that data is compiled.
- 4) **Put and Take Pheasant Program.** On page 37 MWF infers that the “put and take” pheasant program is something that FWP is not intending to do. This would contradict the method for ensuring pheasants currently used at WMA’s around the state through HB 637. **We would like to see this practice abolished.** There is essentially zero carryover, so the amount of money being pumped into these pen-raised birds doesn't make sense. The money spent on this put and take program could be better spent in land acquisition, CRP enrollment, habitat improvement projects and gaining access to more acres of productive upland bird habitat in our state. Most importantly, there is no data showing that this program increases the number of upland hunters.
 - a) With this said, MWF does support FWP’s ability to do local stocking of populations, **if augmentation is deemed necessary for the survival of the area’s population.** We would much prefer wild birds be netted and translocated in these situations, as they are more likely to survive and breed.
 - b) We realize that HB 637 was passed in 2021, and the plan has not been updated since.
- 5) MWF would like to see the management of grazing contracts on BLM and state lands be addressed more in the plan. The plan mentions that increased grazing contract enforcement is needed for better habitat. Thousands of acres of public lands and publicly accessible lands could be improved for all wildlife if grazing contracts and BMAs had a

wildlife-friendly incentive tied to them. In the strategic plan, monitoring grazing leases is mentioned over 50 times, yet we still see issues year after year of leaving no cover for upland birds. We propose having minimum requirements for upland bird habitat management on publicly accessible land. This would include all state, BLM, BMA and Forest Service lands. Having a rating system to these leases in the fall would allow for more bird production and disperse hunting pressure.

- 6) **Mid-contract management practices.** A one-and-done approach doesn't work well with most upland bird management practices, as the ground must stay in early succession instead of growing stagnant. CRP plantings lose a significant amount of their wildlife value if they are not periodically rejuvenated by mowing, discing, burning, herbicide application or other techniques. We urge FWP to engage in the development of the next Farm Bill to require such management practices in future CRP contracts.

- 7) **CRP.** FWP acknowledges the significant impact of the loss of Conservation Reserve Program (CRP) ground on bird populations within the state. The positive influence of CRP on upland bird populations and, consequently, hunting opportunities is well-established. To further enhance the program's effectiveness, we propose FWP hires an upland bird specialist in each region. Additionally, another staff member would focus on the enrollment and re-enrollment of lands in the CRP program, particularly targeting regions 3, 4, 5, 6, and 7. Recognizing the broad consensus among wildlife professionals, conservationists, and hunting NGOs regarding the substantial benefits of CRP to wildlife, it is suggested that FWP collaboratively works with federal and non-governmental partners. The objective is to strengthen efforts for increasing CRP enrollment and reenrollment, with a particular emphasis on addressing the pressing needs of regions 3, 4, 5, 6, and 7. To assist with CRP enrollment, MWF would like to see FWP work with the current administration and legislature in the development of an upland game bird stamp, similar to the duck stamp that is currently utilized for wetland habitat work.

- 8) **Wild Turkeys.** MWF would like FWP to designate the goals of turkey management on a regional basis. We would like to see this section added on page 18 under Statewide Priorities, or page 22 under Merriam's Turkey.
 - a) For example, publicly accessible turkeys are primarily found in the eastern half of the state, which will lead to crowding issues in a few short years from now, as non-resident license sales are climbing at an unprecedented rate in recent years. We would like a public comment period to see what residents value regionally when it comes to turkeys. MWF sees that the management of turkey in region 1, with increased property damage reports due to turkeys, can and should be different from the management of turkey in region 7 where most of the publicly accessible birds exist. We urge FWP to change its opportunity based approach to a focus on the hunting experience itself and social tolerance especially in regions 5 and 7.
 - i) A solution could be staggered hunting seasons for non-residents, or only allowing non-residents the opportunity to buy one turkey tag (not being able to buy regional turkey licenses for all regions). We could look at welcoming non-resident pressure by giving them the option to buy a regional tag in regions where turkey populations are in need of more management (such as region 1) due to reaching their social tolerance

level in the communities. We believe that selling non-resident licenses is important and FWP should continue to do so, but directing this pressure to areas in higher need of management would help preserve the experience of public land hunting and help manage problematic populations.

Region 1:

- MWF would like to see an upland bird biologist specifically for this region. There are many projects that this person could begin to use some UGBEP funds for mountain grouse habitat work and identifying properties or landowners receptive to this work.

Region 2:

- MWF supports the region 2 plan. We would like to see more about the goals of future turkey management in this region. MWF realizes that winter is hard on the wild turkeys, and this region is known for property damage and not much public access to manage the species. We would like to see habitat work to alleviate some property damage for landowners and access to manage these problematic turkey populations.
- We would like to see a regional biologist specifically for upland birds, even though the region is challenging for most upland birds aside from mountain grouse.
- On page 55, MWF would like to see a statement on region 2 sharptail grouse reintroduction and the goal for this program with habitat work, and population goals outlined. MWF would like FWP to include CRP enrollment goals and open fields work as sharptail grouse are reintroduced. MWF would like to see more native bird relocation projects with UGBEP funds.

Region 3:

- MWF supports region 3's strategic plan.
- MWF suggests FWP hire a specific upland bird biologist/specialist for this region.

Region 4:

- MWF suggests a plan to increase CRP enrollment. We suggest FWP have staff dedicated to CRP enrollment and re-enrollments. MWF would like to see a minimum acreage goal in the strategic plan for new and re-enrollment of CRP.
- We appreciate the upland bird staff currently on board. We urge additional staff tasked with CRP enrollment, re-enrollment and sage brush leasing.
- We do appreciate how FWP has laid the groundwork for five different ecosystems within this region.

Region 5:

- With turkey populations declining in the Big and Little Snowies and along the Musselshell River, while simultaneously increasing landowner transplant requests, we propose FWP identify the best and most needed areas to begin translocation projects to help these areas.
- MWF requests an acreage goal for 30 year sagebrush habitat leasing due to the declining sage grouse numbers. MWF proposes dedicated staff to work solely on CRP enrollment and re-enrollment.

Region 6:

- MWF proposes adding dedicated staff to work on CRP enrollment and re-enrollment in addition to the existing upland bird specialist in Plentywood. Region 6 has lost over 1 million acres of CRP since 2008. MWF urges a minimum acreage goal for CRP enrollment and re-enrollment. MWF appreciates Region 6's approach to sage grouse.
- We salute FWP's work with Block Management in this region. It has opened up many acres for hunting opportunities that we would not have without the program.
- We appreciate the upland bird staff currently on board. We urge additional staff tasked with CRP enrollment, re-enrollment and sage brush leasing.

Region 7:

- MWF members have seen a large increase in non-resident spring turkey hunting in region 7 over the past few years. We suggest FWP limit non-residents to a single tag. We would like this monitored to preserve the public hunting opportunities in this portion of the state. Crowding is not necessarily an issue today, but as non-resident turkey licenses continue to rise alongside turkey populations falling in most other areas of our country, we forecast this particular region becoming the new destination for turkey hunters.
- We appreciate the upland bird staff currently on board. We urge additional staff tasked with CRP enrollment, re-enrollment and sage brush leasing.

Acknowledging the habitat enhancement focus strategic planning of this comment period, we wish to express our appreciation for the opportunity to provide feedback. In addition to addressing the strategic aspects, we would like to take this opportunity to comment on specific management practices. Our intention is to highlight areas where adjustments could enhance alignment with the suggestions previously presented and our interpretation of the plan.

- 1) **Prairie Upland Bird Season Start Dates.** MWF would like to see season start dates changed for prairie upland bird season. Below we have provided a few suggestions due to the increase in pressure on early season prairie birds.
 - a) MWF suggests a bifurcated season date **or** starting our season alongside our neighboring states. MWF suggests starting Montana's season simultaneously with our neighbors to reduce both pressure on young of the year broods, as well as hunter crowding. FWP could go to a bifurcated season between residents/non-residents at the start of upland bird season (September 1) for prairie birds. Currently, Montana's upland bird season opens before any other state. We have a documented problem of having non-resident commercial dog trainers arrive in August, train their dogs on our publicly accessible land then stay for the first few weeks of the season. Being the first state to open, losing millions of acres of CRP resulting in falling bird populations, technology advancements and having liberal bag limits has attracted many non-residents and concentrated pressure.
 - i) Analyzing the 2023 season dates of neighboring states reveals notable variations. In Idaho, the season commences on September 15, with a distinction between residents and non-residents during the pheasant opener. Wyoming's upland season contrasts with Idaho's, featuring a two-week window for sage grouse in September, while mountain grouse

and sharp-tailed grouse open on September 1. Additionally, Wyoming's gray partridge season opens on September 15.

North Dakota's upland season, initiating on September 9, focuses on gray partridge and sharp-tailed grouse. The pheasant opener in North Dakota restricts non-residents' access to publicly available areas during the first week. South Dakota's sharp-tailed grouse season starts on September 16.

Upon examining our neighbors' seasons, it becomes evident that they commence later and extend further than our current season. For instance, Idaho's season remains open until January 31, Wyoming's season for Hungarian partridge extends until February 28, North Dakota's season concludes on January 7, and South Dakota's season persists until January 31.

- ii) MWF is trying to reduce impacts on young broods and disperse non-resident, public-land hunters by setting back the opening date. Note: Having seasons open longer should require a public comment period.
- iii) Taking the above into account, the MWF suggests that mountain grouse season shall remain unchanged, prairie birds (sage grouse, sharp-tailed grouse and gray partridge) do not start until seasons in neighboring states start. This timing of the season start date would help spread out the onslaught of hunting pressure at the beginning of our season.
- iv) MWF supports ending Montana's prairie upland bird season so that the season length remains the same number of days as it is now. This is something that we would like more public comment on. It was brought up last year but not in relation to a later season starting date.

- 2) **Commercial dog training on public land.** MWF proposes that commercial dog training on public land be outlawed. MWF believes that once the hunting season opens, dog owners may train their bird dogs on wild birds, not before. This would be applicable to publicly accessible lands, including BMAs, upland game bird enhancement projects, state land, BLM land, and national forests, but excluding private lands that aren't enrolled in any program.

The Upland Game Bird Enhancement Program's Strategic Plan developed by FWP demonstrates a comprehensive approach that MWF finds commendable for its detailed focus on supporting avian populations. Although we are concerned about the spatial distribution of hunters, declining bird numbers and habitat loss, there is a lot that we do support. This plan is a great step forward - thank you and your colleagues at FWP. We look forward to further collaboration with the department toward helping populations, improving habitat, and managing upland game birds for the future.



Frank Szollosi
Executive Director
Montana Wildlife Federation

ATTACHMENT 2: Dean Hardi Comments

Executive Summary Feedback:

These are the observations and feedback from two Montana hunters, who hunt most all upland species for an average of 30 hunting days/ hunter/year across Districts 1, 2, 4, 6, and 7.

1. UGBEP enhanced lands, (Open Fields, etc.) while representing a small fraction of the publicly accessible in Montana, have better consistency in quality of habitat and resulting bird populations than other types of public access land.
2. The program plan seems to focus on enlisting more lands via conservation leases, and private landowner enrollment into UGBEP programs. This is great, however there seems to be an untapped potential in extending current UGBEP practices onto existing State lands and coordinating with existing Block Management parcels that from appearances don't seem to be embracing UGBEP program elements.
3. The background study data provides a helpful year over year overview in trends of in-state and out-of-state hunter activity, by district, and by species. But a critical recent shift in out-of-state hunter activity lies beneath the data, and urgent action by FWP and State Legislators needs to address, or it will forever impact upland hunting in Montana.

Feedback: Additional Potential for Program Impact on Existing State and Block Management Land

Your study correctly states that there has been a marked reduction in quantity and quality habitat across the state. A huge amount of this is due to CRP program decline, and other changes in ag practices, as you note. We strongly agree with your programs goals to increase quality habitat by leasing more critical habitat, and enrolling more private land owners in beneficial programs.

One recommendation is to urgently increase coordination between the Upland Game Enhancement Program and other State managed land and programs.

Our observation this year has been that while there is marvelous habitat on actively managed Upland Game Enhancement project land, there are tens of thousands of acres of State land and private Block Management land that are not being managed well, being over-grazed and over planted. These are lands that FWP Should be able to influence the management practices of. Our phone calls to at least one Upland Bird Biologists in a district we hunt suggest there is limited to no cross agency interaction on managing fundamental items like ensuring harvesting on state leased land does not occur during nesting seasons, or retaining pockets of cover vs. fence to fence harvesting.

I would say that a majority of both State parcels and Block Management parcels this year that we scouted were devoid of any reasonable upland habitat, even though they might have been in a sweet spot of potential. These opportunities should be low-hanging fruit in creating / retaining essential habitat.

Feedback: Urgent issue on recent shifts in out-of-state hunting activities This issue may be out of the specific scope of the UGBEP but it is one that needs to be brought to FWP attention for urgent action.

I found the charts of year over year data of res/non-res hunters and hunter days, and harvested game by species and district very interesting. It has confirmed our on-the-ground observations that seemed to be missed in your analysis.

ATTACHMENT 2: Dean Hardi Comments

You stated that the overall number of hunters, both res and non-res, has been “relatively stable” since 2012. However that glosses over two trends:

- a) The 30% downtrend from 2015-2017
- b) The 25% uptrend in res and nearly 50% uptrend in non-res hunters from 2019 to 2022.

I can only guess that the 2015 – 17 downtrend was due to the disappearance of CPR habitat, and resulting loss of hunting opportunity, ... which your program is squarely trying to address.

The uptrend I would correlate with COVID induced, Social Media fueled outdoor trends happening across the US.

Furthermore, your harvesting charts show a concentration of activity on Pheasant and Sharptail, particularly in NE Montana. What is our observation of on-the-ground hunting in NE Montana?

Guess what... every out of state gun dog breeder and hunter has already figured out what your charts suggest, via social media You-Tubers, and they have all descended on District 6. This has enabled out of stater's to make money off of Montana resources at the expense of Montana residents, and hunters. And while some businesses have benefited from this, other Montana businesses are disadvantaged. (More on this below).

There has also been observed increase in illegal hunting practices. These dynamics have basically ruined pheasant hunting in District 6, and has spilled over and ruined sharptail hunting in that section of the state. If we don't take note, and take action, the same will happen across the state and with all species

Detailed Observations:

a. Our observations from hunting across the state (districts 1, 2, 4, 6, and 7) is there is an extreme increase in out of state hunters particularly in district 6. While your statistics show a 3-1 ratio of in-state vs out of state hunters across all districts, our observations show that ratio is REVERSED and MULTIPLIED in district 6. Out of state hunters outnumber resident hunters 10 or 20-1. In the last 5 years combined we have only observed a handful of out-of-county Montana plates in district 6 in extensive driving across all public hunting areas. Conversely we counted no fewer than 17 other states plates this year during the upland opening week alone...all the way from Maine, Pennsylvania, New York, and Florida, with states like Texas, Wisconsin, and Minnesota heavily represented. That is more states hunting Scoby MT on opening week than you would encounter in a drive through Yellowstone NP! Other districts we hunt have no where near that disproportionate out of state representation, with western districts only having a handful, mostly from Idaho or Washington.

b. If this uptick was purely organic growth in business from your normal recreational hunter, that wouldn't be alarming, but what is driving this uptick has not just been with the recreational hunters, with a couple of dogs. We have seen a marked increase in out of stater's making money off Montana resources, including out of state breeders training upwards of 16 dogs each, and You-Tube bloggers making money off of broadcasting their “Hot” hunting sites. We witnessed them first hand in our camp site at the Scobey fair grounds, which this year harbored 3 times as many hunters than in years past.

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