



Mr. Ken McDonald, Administrator
Wildlife Division
Montana Fish, Wildlife and Parks
1420 E. 6th Avenue
Helena, MT 59620

April 5, 2018

SUBJECT: Big Game Hunting and Harvest Census Process

Dear Mr. McDonald:

I am writing to you on behalf of the Helena Hunters and Anglers Association to convey our thoughts regarding the Montana big game hunting and harvest data gathering and reporting processes currently used by Montana Fish, Wildlife and Parks.

Helena Hunters and Anglers Association is a 501(c)(3) non-profit organization dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor hunting and fishing opportunity for all citizens to share equally. Our board of directors and membership consist of individuals with career natural resource backgrounds, including biologists, hydrologists, archeologists, recreation specialists, planners, and land managers. We promote using the best available science when making natural resource management decisions, and validating those decisions with active monitoring and feedback.

Montana is in the midst of major changes on a variety of scales. The maintenance and management of our state's world-renowned wildlife populations is becoming increasingly complex due to a variety of biological, social, and political factors. We are experiencing a different climate, and seeing changes in demographics, land ownership, lands uses, and recreation. Frequency and intensity of wild fires has increased and, when coupled with other factors such as the pine bark beetle epidemic, plant communities are changing and big game security cover has declined. At the same time, new wildlife diseases have appeared on the landscape and concerns about wildlife and livestock interactions have never been greater. These problems have contributed to a variety of management responses, including elk shoulder seasons, large scale vegetation management projects aimed at reducing forest fuels, and proposals to weaken or eliminate big game security standards since existing standards seem unattainable.

Our membership is growing increasingly concerned about Montana's ability to maintain hunter opportunity in the face of these changes. We define "hunter opportunity" as: 1) ability to maintain a 5-week general rifle season, 2) the reasonable potential to encounter a mature buck or bull - if that is one's goal, 3) a well-distributed harvest of male animals over the 5-week season, 4) ability to retain public wildlife on public lands that are available to the average Montanan, and 5) most importantly –

maintenance of public ownership of our great public lands legacy. We have concluded that better data on hunter participation and harvest can help us protect and maintain hunter opportunity in this changing setting.

We suggest that now is the time to increase Montana hunter and harvest data gathering so that we can be in a better position to analyze cause-and-effect relationships and to identify emerging trends before it is too late to correct problems. We have been concerned for some time that MFWP has reduced the scope of the telephone hunter surveys and has done away with details such as dates of harvest, antler points (rough surrogate for age), and other information. Discontinuing the antler points question took away the ability to assess criterion number 2 of our "hunter opportunity" definition above. Discontinuing dates of harvest reduced the ability to assess criterion number 3 from the definition. It is our understanding that the department is considering reinstating some of these details in the future. While we would support those changes, we encourage you to consider other options.

Many western states require mandatory reporting for anyone who purchases a hunting license. Some example states include Alaska, California, Idaho, New Mexico, North Dakota, Oregon, Utah, and Washington. In the case of the majority of these states, mandatory reporting includes both hunting and harvesting. Additional states such as Texas have a voluntary reporting option. There certainly are advantages and disadvantages associated with mandatory reporting programs. For example, there will be front end investment costs to implement a system. But once an automated system is in place, and automated data reduction and reporting mechanisms are created, costs will drop measurably. Costs can be offset by discontinuing the contracted telephone surveys. The new MyFWP website already includes provisions for mandatory reporting for some species and this system could be expanded to accommodate other types of reporting. Based on other states' experiences, incentives may be needed to encourage participation in mandatory reporting. Oregon levies a \$25 penalty to non-reporting hunters when they purchase their next license. New Mexico charges an \$8 fee for non-reporting and blocks non-compliant hunters from entering drawings the next year. With those measures in place, both states saw participation increase from 28 - 41% to around 80%. Oregon's reporting system eliminated an expense of \$300,000/year for telephone surveys and now generates about \$200,000/year from the \$25 fee assessed to non-reporting hunters. Oregon also concludes that, "We now have the best harvest survey data the state has ever had." (Suzanne Downing, *Killer Stats*, Bugle Magazine, Mar-Apr 2018).

We feel strongly that data from mandatory reporting can enhance our ability to manage Montana's wildlife populations in a changing environment and time. More comprehensive hunter and harvest data will help us to better understand hunter numbers, harvest rates and timing, means of hunting, and game population age structures and sex ratios. Better data can also help us to depoliticize discussions between MFWP, hunters, landowners, land managers, outfitters, and other special interest groups. As one example, mandatory reporting data could provide an improved basis for communication between federal land managers and MFWP wildlife managers regarding effectiveness of travel management plans, maintenance of security cover, wildlife response to various management projects, and hunter use patterns on our public lands. Helena Hunters and Anglers is convinced that now is the time for Montana to join the growing number of states that have adopted programs of mandatory hunter and harvest reporting.

Thank you for considering our views.

Sincerely,



Gary Ingman, Vice-President
Helena Hunters and Anglers Association