



BACKCOUNTRY
HUNTERS & ANGLERS
NEW ENGLAND

November 13, 2024

Becky Orff
Inland Fisheries and Wildlife
353 Water Street 41 SHS
Augusta, ME 04333

Re: PROPOSED RULE NUMBER: 2024-P289- Hunting (Upland Game Seasons)

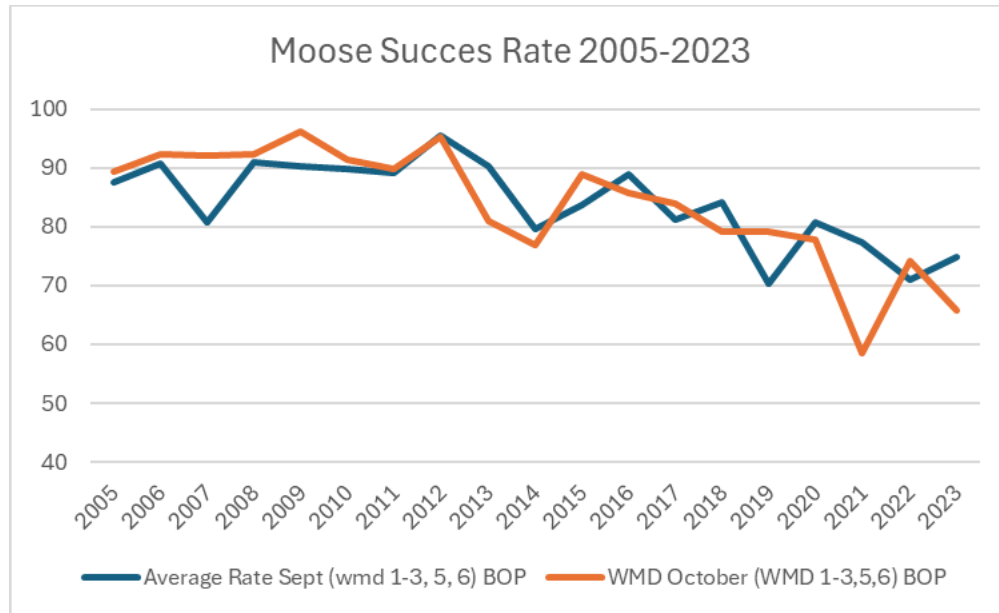
Backcountry Hunters and Anglers (BHA), seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting by supporting land conservation, public access to hunting and fishing areas, fair chase, and the sound management of fish and wildlife and their habitats.

On behalf of the New England Chapter of Backcountry Hunters and Anglers we are commenting in opposition to the change of the Upland Game Season Dates. This rule-making proposal is in response to LD 831 An Act Regarding Low Success Rate for Moose Hunting, which became a resolve directing the department to examine issues related to moose hunting seasons. A stakeholder group was convened and one of the four recommendations from the stakeholder group and department was to modify the September upland hunting season.

Consistent with our support for the North American Model of Wildlife Conservation, Backcountry Hunters & Anglers believes fish and wild resources belong to the public and supports science-based fish and wildlife management. We have studied the published success rates for bull only moose permits for zones 1-3, 5 & 6 for the September and October hunts to determine if the expanded opportunity for Upland Hunting created with the "Cast & Blast" weekend resulted in a material shift in moose hunt success rates. We purposely excluded zones 4 & 4A to exclude any data shifts related to the Winter Tick Study. This analysis shows that the decline in success rates began before the 2019 legislation that moved the opening of Upland Season to create a "cast & blast" opportunity. We do not see a significant shift in success rate following 2019, but recognize there are only a few data points. We do note that the 2nd week bull only week, which has always coincided with upland hunting, does not have a significantly different success rate from week 1. This leads us to the conclusion that overlapping moose and upland season for a few days is not a driver for declines in moose hunt success. We also note that the proposed change to season date for upland would include the entire state, yet only the most northern zones are open for moose during that time period.



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As an organization that values access and opportunity for sportsman we appreciate the added opportunity for 0-5 upland days that overlap with more open water fishing opportunities. To pair a wild brook trout or landlocked salmon with a ruffed grouse harvest is a unique wild food opportunity that our membership appreciates. We feel strongly that upland, moose and bear hunters should be able to share the 3.5 million acres of the North Maine Woods without conflict. As an upland hunter I have not experienced significant conflict during moose weeks, while hunting away from roads with vehicle access. The other Chapter Board Member from Maine reports that he has not had conflict during three recent moose hunts where he has been hunter or assisted friends.

We look forward to reviewing the data from the recent Moose Management Survey completed by the department. We believe this survey work should could help guide changes to moose management. We also recognize the value of access to the large tracts of commercial forest and support efforts to reduce conflicts landowners, but we do not think the few days of Cast & Blast create significant conflict. We would support more messaging from the Department to educate users about behaviors that impact landowners and that create conflict with other recreational users.

We appreciate the opportunity to comment on this proposed rule. As an organization we are very willing to participate in further conversations with the Department and other Stakeholders about how we can improve the experience for all hunters and anglers in Maine.

Sincerely,

John Simoneau,
New England Chapter Secretary
Maine State Team Chair
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