

October 24, 2023

Idaho Department of Fish and Game Headquarters Office 600 S. Walnut Street Boise, ID 83712

Re: Proposed Rulemaking Changes

To Whom It May Concern:

The Idaho Wildlife Federation (IWF) thanks the Idaho Department of Fish and Game (IDFG) for the opportunity to comment on the proposed rulemaking changes for chapters 6,8, 11, 12, and 15.

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

We applaud the IDFG for taking the time to go through a ZBR rewrite to simplify and clarify existing rules, as well as looking at potential rule changes due to sportsman feedback. We offer our brief comments and suggestions below.

## Chapter 8: Rules Governing Taking of Big Game Animals – Section 406 Special Weapons Seasons – Muzzleloader

The proposed changes to Section 406 include the allowance for a metal or metal alloy projectile with the exception of allowance of accuracy tips and pressure bases. IWF has heard from many sportsmen and women on each side of this potential rule change for years. IWF remains neutral on the current proposed changes, however we do have concerns about the direction this potential rule change could take us if we continue down the path of liberalizing muzzleloader regulations. Our current muzzleloader regulations allow for hunters to have additional opportunities by choosing to use a more primitive weapon. This makes for a more challenging hunt, primarily

due to severe range restrictions when compared to modern centerfire rifles, but also to the difficulty of keeping your weapon operating during challenging weather conditions. These difficulties make for lower harvest success, which in turn allow for more tags to be issued for a hunt outside of the general centerfire seasons. We would encourage IDFG and the IDFG Commission to keep this in mind when looking at any potential rule changes in the future.

## **Chapter 11: Rules Governing Fish**

**Section 404.01.b-** While we have no issue with the restriction against processing jack salmon while in the field and in transit, we do not see this stated in the Idaho Fishing 2022-2024 Seasons and Rules 2nd edition 2023. This has been stated in past supplemental Spring and Fall Salmon regulation booklets. While not a comment on this rulemaking, we would encourage the Department to add "Jack salmon may not be processed while in the field or in transit." to the Idaho Fishing 2022-2024 Seasons and Rules booklet.

**Section 601.03.f-** IWF supports the inclusion of language that gives the Department, when issuing fishing contest permits, discretion to require mandatory kill of fish species deemed incompatible with water body management objectives. In the future, we urge IDFG and the IDFG Commission to consider expanding this discretion to fishing outside of fishing contests where incompatible fish species may be present and impacting anadromous fish species, such as walleye on the Snake River.

IWF would like to thank you for the opportunity to comment on proposed rulemaking changes.

Thank you,

Kyle Maki

North Idaho Field Representative

Idaho Wildlife Federation

Kyli Muhi

kmaki@idahwildlife.org