

**From:** [Richard Furst](#)  
**To:** [DLNR.FW.Outreach](#)  
**Cc:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Comments regarding proposed Adaptive Management Rules for Maui GMUs  
**Date:** Thursday, October 3, 2024 12:14:47 PM

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Aloha,

My name is Richard Furst, and I am a Hawaii resident and avid hunter. I live on Oahu, but regularly hunt on Maui, Molokai, and Lanai. I'm writing today to provide public comment on the proposed rulemaking by Adaptive Management Authority (AMA) for Unit C and E Kula Forest Reserve and Unit D Makawao Forest Reserve.

First off, mahalo for making proposed changes to expand game mammal hunting opportunities for the island of Maui. This is badly needed, and I am sure that all public land hunters will appreciate the expanded bag limits, hunting periods, and hunting days provided in the proposed changes. Kudos to DLNR for making efforts to provide expedited improvements via the AMA process, rather than having to wait for legislative changes to HAR 13-123.

I'd like to make the following suggestions to the proposed AMA rulemaking to help improve the clarity and consistency in the rules, as well as to avoid any confusion among hunters attempting to comply with the regulations:

- Unless there are specific reasons why muzzleloaders are not considered appropriate means of take for pigs and goats, I recommend adding muzzleloaders as a listed means of take for hunting goats and pigs in Units C and D. Without this change, it could be difficult for hunters to understand and comply, and for DOCARE officers to enforce, these regulations without unnecessary confusion. Furthermore, if increasing control of ungulate populations in these areas is a primary goal of the Department, it would seem reasonable to allow any viable means of take for goats and pigs. Lastly, it just makes for a more enjoyable hunting experience if hunters can pursue any legal animal that opportunity presents while afield, thus improving their overall experience.

- In lieu of the above (or perhaps preferably), DLNR should consider clarifying that a more primitive / less effective weapon can be used as valid means of take in any unit where rifle hunting is allowed during a valid hunting period on open hunting days. For example, if rifle hunting is listed as allowable means of take, you could also use muzzleloader, archery tackle, etc.; if muzzleloader is listed as allowable means of take, you could use archery tackle, but not rifle; if archery is listed as allowable means of take, you could only use archery. This would help to alleviate current confusion / unclarity about valid means of take on Oahu, Molokai, and Maui, where muzzleloader is not listed as a valid means of take at all in any of the pertinent Exhibits to HAR 13-123.

Thank you for the opportunity to provide public input on this matter, and I hope you will consider making further changes to the proposed AMA rulemaking to address this issue. And mahalo nui again for taking action to improve public hunting opportunities for the people of Hawaii!

Aloha e,

Richard Furst

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