

Aug. 6, 2019

Shane Colton, Chair
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59624

RE: Elk management

Dear Chairman Colton and commissioners,

Our organizations represent thousands of hunters around Montana. We care deeply about our public wildlife resources, our habitat and our fair-chase hunting traditions. For years our groups have been engaged in policies and projects to enhance habitat, solve problems with private landowners and to maintain our sporting heritage. We are the grassroots hunters who get things done and we take pride in working with our friends in the agricultural community to solve these difficult issues.

During the 2019 Legislative Session management of our elk herds was a hotly debated issue with bills and a resolution introduced to legislatively manage our elk harvest rather than by the professional biologists at Montana Fish, Wildlife and Parks. With that in mind, our groups have serious concerns with the direction of elk management in the state and particularly performance-based “shoulder seasons.”

Four years ago when the Montana Wildlife Federation and other hunting groups agreed to the trial implementation of shoulder seasons we did so on the premise they would be a temporary action to reduce elk numbers to current population objectives and to improve distribution of elk on the landscape. Our understanding was that shoulder seasons were not meant to replace general season harvest. That’s clearly stated in the performance criteria. Past experience has shown that late season hunts were not in and of themselves effective at controlling elk numbers. Elk management must consider their distribution on the landscape, as well as their total numbers. In the past we found that herds were being run from one ranch to another, and from public to private lands, as they sought refuges from hunting pressure.

Successful elk management requires broad harvest spread across the landscape when the most hunters are in the field, and that is during the general rifle season. That’s when the strong majority of Montana hunters plan trips, spend extensive time afield and look to fill their freezer. That’s why a robust general season harvest is so essential to effectively manage elk. We know that we can’t manage a district’s worth of elk on one ranch, and we can’t manage a season’s worth of elk in one week. The five-week general rifle season is our best tool to kill elk, break up large herds, push elk to public lands and distribute them more evenly across the broad landscape.

It's also the ethical time of year to hunt elk, before deep snows when pregnant cows are working hard to survive.

Now that we have completed the trial period for shoulder seasons and are entering the season setting process for the next biennium, the agreed upon review of shoulder seasons based on the harvest performance criteria is critical. We expect that those criteria will be used in deciding where shoulder seasons should continue and where they should end. The hunters of Montana agreed to the shoulder seasons on a three-year, trial basis to see if they would help FWP achieve its management goals. They also included the performance criteria that emphasized the need for a strong general season harvest, and stressed that shoulder seasons are not meant to replace general season harvest.

In those units where harvest during the general season is not meeting established criteria we request that shoulder seasons end. There is no scientific or ethical reason to continue to allow shoulder seasons in units where large herds of elk are harbored on private lands during the general season and then pushed off of those lands during the late shoulder season. Simply put, we cannot allow elk sanctuaries during the general season and expect to have effective elk management by pushing harvest to the shoulder seasons.

While our comments are focused on the use of shoulder seasons in the upcoming season setting process we believe that the Commission and the Department need to take immediate steps in regards to the upcoming 2019-20 season. In those hunting units where we have reached the population objective for elk, shoulder seasons should be eliminated immediately. While we realize that there may be administrative/enforcement reasons for their continuance, there is no scientific or ethical reason to be hunting elk herds that are at population objective six months of the year.

The larger question in front of us is where do we go from here? We continue to hear that landowners are having unacceptable levels of game damage and that disease transmission from elk to cattle is a concern. At the same time, we're hearing from hunters who have concerns about reduced numbers of elk on public lands, an increasing amount of private land unavailable for elk hunting and unacceptable demographics in some of our elk herds. The challenge in addressing these concerns while maintaining ethical, fair chase hunting and getting the desired total harvest speaks to the need to update the statewide elk management plan, including the objective numbers. MWF encourages the Commission and the Department to engage stakeholders and proceed with a collaborative decision making process that focuses on clearly defining current elk management goals and objectives and to develop alternative actions not limited to harvest strategies to meet those goals and objectives. The main goals of the elk plan should include:

1. Minimize game damage on private lands.
2. Encourage elk presence on public lands.
3. Restore historical elk migration patterns.
4. Maximize number of hunters participating in elk hunting.
5. Minimize potential for disease transmission between elk and livestock.
6. Maintain quality elk habitat on public and private lands

Thank you for the opportunity to comment on this important issue for all Montanans. We appreciate the hard work that FWP staff does every day to ensure we maintain abundant wildlife and the best hunting opportunities in the West. We hope we can continue our strong collaborative partnership and address the very real challenges around elk management in our state.

Sincerely,

Montana Wildlife Federation

Hellgate Hunters and Anglers

Flathead Wildlife, Inc.

Laurel Rod and Gun Club

Traditional Bowhunters of Montana

Bearpaw Bowmen

Public Land/Water Access Association

Montana Bowhunter's Association

Bridger Bowmen

Ravalli County Fish and Wildlife Association

Anaconda Sportsmen's Club

Western Bear Foundation

Great Falls Archery Club

Laurel Rifle Club

Helena Hunters and Anglers

Russell Country Sportsmen

Cc: Martha Williams