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January 18, 2019

Montana Fish, Wildlife and Parks
Attn: Wildlife Division
PO Box 200701
Helena, Montana 59620-0701
Re: Proposed 2019-2020 Elk Shoulder Seasons

Helena Hunters and Anglers Association (HHAA) is committed to promoting the highest standards of sportsmanship as hunters and anglers; and to strengthen private landowner—sportsman relations. HHAA is writing to offer comments about the proposed 2019-20 elk shoulder seasons (ESS). Overall, we are concerned that ESS have led us down this path of *killing elk* instead of *hunting elk*. We feel it is time to reverse this trend.

HHAA offers *conditional support* for another ESS in 2019. We encourage the FWP Commission to:

- (1) implement a moratorium on all ESS post the 2019 season until FWP:
 - (a) performs a comprehensive analysis of the effectiveness of ESS, and
 - (b) prepares a revision of the 2004 elk management plan
- (2) shorten the 2019 season to September 1 - December 31.

With regard to # 1a. we are concerned that FWP will perform what is expedient in evaluating the performance of ESS by merely considering “number of elk harvested” and whether the ESS were effective in achieving management objectives. We feel the review must also consider the impacts of ESS on the *measures of the hunt* such as hunter experience, public perception, elk distribution on public land, public access to elk, landowner relations, and *fair chase* hunting.

With regard to # 1b. we see before us an outdated elk management plan which is the crux of the management/social/ethical problems we are now experiencing. Much has changed over the 15 years since the plan was last revised, and just like FWP must update its organizational *Vision & Guide* from time to time, so must it also follow suit with regard to its obligations to the people and their relations with elk.

With regard to # 2. we are concerned that the proposed season dates will negatively impact the welfare of elk and the image of hunting. HHAA recommends that the 2019 ESS start no sooner than September

1st to give calves extra time to wean. Inflicting deaths on nursing calves is cruel and reflects poorly on hunters. Moreover, we recommend that the season end December 31st to avoid hunting elk in winter conditions when stress levels are high. *Fair chase* is critical to the acceptance of hunting by the general public, and we feel ESS are problematic from the standpoint of both animal welfare and hunting ethics.

We trust in the ability of the FWP Commission to make the right decision. Thank you for your consideration of our comments.

Sincerely,

Stan Frasier, President

Thomas Baumeister, Director