



Montana Fish, Wildlife & Parks  
1420 E. Sixth Avenue  
Helena, MT 59620

December 4, 2019

**Subject: Comments on 2020 Elk Shoulder Seasons and Third Elk License Proposals**

I am submitting the following comments for consideration by the MT FWP Commission at the December 5 meeting.

My name is Gary Ingman. I live in Helena and am vice-president of Helena Hunters and Anglers Association. I am a third generation Montanan and a life long hunter. Elk hunting is my passion and I have spent decades of volunteer time working to protect and improve wildlife habitat and big game security on public lands.

Our group has previously commented on shoulder seasons. We have encouraged a performance based approach to managing elk populations in over objective districts, and have asked for development of specific evaluation criteria and ongoing monitoring. By any measure, shoulder seasons are not working. It is time to end this experiment and consider other management options in districts that remain above elk population objectives.

Continuing with more of the same is not biologically sound, plays into the hands of commercial interests, and is ethically wrong. We need a new approach.

Shoulder seasons should be terminated in all districts that have returned to stated population goals. In districts that remain over objective but where landowner participation is limited, we should enact antlerless-only elk hunting district-wide during the five-week rifle season until populations fall in line.

In districts where monitoring shows willing and widespread landowner participation, and demonstrates clear effectiveness of shoulder season hunts in reversing antlerless elk population trends, shoulder seasons could be continued on a limited basis. The hunts should not continue past January 1 for biological and ethical reasons. Ongoing effectiveness monitoring should dictate the extent of these hunts and they should be terminated as soon as population goals are attained.

We are also opposed to the third elk license proposal as a management tool because it can limit public participation on the subject private lands. We also oppose any extension of late and early season hunts to public lands. We also encourage MFWP to prioritize and expedite updating and revision of the statewide elk management plan in order to look at this issue from the broadest perspective possible.

Lastly, we endorse the comments submitted to the Commission by the Montana Sportsmen's Alliance, with the above caveats.

Thanks for the Commission's consideration of my comments.

Sincerely,

Gary Ingman