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August 10, 2015

Montana Fish, Wildlife and Parks
P.O. Box 200701
1420 E. Sixth Avenue
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SUBJECT: Proposed Elk Season Guidelines: Shoulder Seasons

Montana Department of Fish, Wildlife and Parks,

The Helena Hunters and Anglers Association does not support the proposal for Elk Shoulder Seasons. We offer the following comment

Proposed listed Fundamental Objectives are incomplete and do not reflect objectives of the Elk Plan. For example, under the following headings:

Elk Considerations:

- Above all other considerations, take whatever actions necessary that favor retaining public ownership and access to Montana's wildlife while preventing its privatization and commercialization. This should be the most fundamental, and stated "Objective" of any and every wildlife management program in Montana.
- Manage elk populations to objective whether up or down, as rapidly as possible.
- Increase or decrease harvest of elk, where appropriate.

Logistical Considerations:

- The definition of a shoulder season specifically states "any firearm season *printed in the hunting regulations* that occurs outside the 5-week general firearm season... and may include antlered and antlerless elk."
 - Publishing shoulder seasons within the regulations would tend to permanently institutionalize this type of game damage remedy as a hunting season. We fear this type of season would expand for lesser reasons in the future, particularly where the criteria for their use and removal are not clear.

- Extended seasons permanently enshrined in the regulations would make it very easy for commercial hunting ventures to set up shop, and for political entities to whittle away at the department's resolve to uphold its Public Trust responsibility to the public's fish and wildlife.
- The proposal makes it **optional** to remove shoulder seasons once objectives have been met. In so doing, incentives for both the agency and landowner to work on alternative means of meeting elk plan objectives are removed. The proposal has numerous caveats to retain shoulder seasons even if the populations have been reduced, including "...support from landowners." If any form of shoulder seasons are implemented at all, they should be used on a temporary and very limited basis.
- The purpose of any special season is to reduce elk populations. Male elk should not be targeted when the objective is to reduce elk populations. Offering male elk for harvest when the issue is game damage only leads to commercial enticements inviting, or at least accommodating, privatization of a public resource.

HHAA recommends that the various and extensive game damage provisions that currently exist be appropriately applied in lieu of establishment of elk shoulder seasons. The shoulder season proposal would only confound the issue of game damage when the state has required, through Legislative Audit, the department return to application of game damage provisions as originally outlined. Those provisions clearly indicate that assistance be provided to those landowners who allow public hunting access during the established archery or rifle seasons (September through November). Public hunting dollars are not to be used on properties that are not open to the general public - as they inappropriately have been in the recent past. Our solution is to let the existing game damage provisions work as intended.

It is curious to note that simultaneously while we debate Elk Shoulder Seasons, the Game Damage regulations have been tentatively approved by the Fish and Wildlife Commission to allow landowners to use their own selected hunters to participate in game damage hunts. This move reinforces our concerns about incremental exclusion of the general hunting public to the publicly-owned wildlife that is under the stewardship of the Department of Fish, Wildlife and Parks.

Helena Hunters and Anglers Association respectfully requests that the legally required information identifying where commercial hunting ventures are occurring on private lands across the state of Montana, is provided annually. Only the old 2012 mapped information is currently available to the public. We wish to see mapped, outfitter-leased or owner-outfitted private land information on an annual basis, published on MFWP's website. Such information is fundamental to understanding harboring situations and the possible underlying motivation to more easily commercialize the public's wildlife.

The current 2004 Elk Plan states that 6.1 million acres of private land were commercially outfitted in 2003. The most recent 2012 Montana Board of Outfitters information states that 6.79 million acres were being commercially outfitted – an increase of nearly 700,000 acres over 9 years (map attached). HHAA would like to see a trend analysis of private lands in Montana that have been leased by outfitters over the past 20 years, and any potential correlation to wildlife populations that now exceed Elk Plan standards. In particular, where lands closed to public hunting harbor wildlife, those herds should be designated cow elk hunting only, and those harbored herds should no longer be included in the Elk Plan population data for each hunting district – to avoid over harvesting publicly accessible elk herds.

We strongly recommend that every effort be made to maintain or improve public land elk habitat in order to retain elk on public lands during the hunting season. Poor big game security on public lands results in displacement of big game from accessible public lands to inaccessible private lands, and exacerbates elk management, private land crop depredations, and engenders harboring by private entities. FWP is not fully engaging in National Forest policy changes that will seriously reduce big game security standards on public lands. Such Forest Plan Standard changes will have acute consequences to the future of public land hunting in Montana and will substantially contribute to the harboring issue.

It is the opinion of Helena Hunters and Anglers Association that Elk Shoulder Season are not only NOT the answer to private game damage complaints, but in fact such a proposal for new season structure is clearly counter to the mission of this agency which is legally bound to uphold its public trust stewardship responsibility to keep public wildlife public, and to avoid any incremental movement toward privatization and commercialization of the public's cherished wildlife resources.

We all know enough about the great North American Model of wildlife management to know that the wildlife resource in Montana is the result of generations of Montana citizens investing in and working on their restoration. To now threaten our public resource by creating circumstances that would accommodate their defacto privatization and make them vulnerable to commercialization is totally inappropriate. HHAA believes that Elk Shoulder Seasons are just such a step in the wrong direction. We believe the MDFWP should abandon this proposal. Our solution is to let the existing game damage provisions work as intended.

Thank you for this opportunity to comment.

Gayle Joslin
On behalf of Helena Hunters & Anglers Association