



Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

Jan. 17, 2018

Dan Vermillion, Chairman
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59624

RE: Elk Shoulder Seasons

Dear Chairman Vermillion and fellow commissioners,

The Montana Wildlife Federation (MWF) is our state's oldest and largest wildlife conservation organization. We have an 83 year record of working with landowners to resolve the many difficult issues of managing our public trust wildlife resources, including the issue of elk management. In fact, MWF was formed when landowners joined hunters to restore depleted wildlife, including elk. They remain one of our most valued wildlife species, not just for hunters, but also for wildlife watchers and landowners.

CONCERN: When MWF supported the establishment of elk shoulder seasons we did so based on the premise they would be a temporary action to reduce elk numbers to proposed objectives and to improve distribution of elk on the landscape. We also agreed that we would evaluate the season's effectiveness at the end of three years based on specific performance based criteria. Montana Fish, Wildlife and Parks (FWP) has proposed a new harvest strategy on five hunting districts that have clearly not met the harvest objectives. While we support this new harvest strategy as a potential means of meeting harvest criteria we believe we have a commitment to the sportsmen and landowners to evaluate success or failure of the shoulder seasons against the established performance criteria.

RECOMMENDATION: MWF strongly recommends that all the elk shoulder seasons from this year's hunting regulations be removed and an addendum process be used to make necessary changes to regulations once the review is completed. That will allow FWP to gather the harvest data from the 2018-2019 hunting season and assess whether districts are meeting the criteria laid out in the original shoulder season proposal. Those criteria are essential to creating a well distributed harvest across the landscape that meets our established harvest unit objectives. There is no reason to believe that shoulder seasons that failed to meet the criteria after three seasons will achieve different results in a fourth season. Nor should we continue shoulder seasons where distribution and population objectives have been achieved.

RATIONALE: We are concerned that moving forward with another hunting season will further expectations that shoulder seasons are the norm for some hunting districts rather than a temporary harvest strategy. We already see this with additional shoulder seasons being discussed, public land being suggested for inclusion and cow elk hunts being marketed during existing shoulder seasons.

We know from past experience with numerous late seasons there are three significant principles of elk management: 1) We can't kill a season's worth of elk in one week. 2) We can't kill a hunting district's worth of elk on one ranch. 3) Elk beget elk, meaning once they find a refuge or place with very limited hunting pressure, other elk show up. Put another way, if we start to tailor seasons around properties that are only killing bulls during the general season, with no or very limited cow elk harvest, we will never reach the population and distribution objectives. Crafting such seasons would represent a significant change in elk management in Montana.

In the mid 2000's, FWP developed Administrative Rules giving ample tools to the agency to address landowner concerns. They ensured we would have adequate management and game damage hunts to address landowner issues, while ensuring that we have adequate public access during the general and archery seasons to properly manage both elk population numbers and their distribution.

While some have stated that FWP is trying to force public hunting access onto private lands, MWF sees it another way; FWP and the sportsmen of Montana are trying to implement effective management of our public elk and that requires a partnership with landowners. We believe that landowners can benefit from both an outfitting operation as well as allowing public hunting of cow elk to improve distribution needs. It happens on many ranches throughout Montana and we need such partnerships to continue. We could run shoulder seasons for years and never reach the harvest needed if we push elk from places where there is adequate hunting pressure to properly manage the herds, to places where there isn't. However, we must always be vigilant that elk are a public and not a private resource and must be managed accordingly. Montana is at a crossroads in the management of our public trust wildlife.

We also need to consider how these shoulder seasons are portrayed to members of the non-hunting public. The late shoulder seasons requires hunters to hunt elk in the heart of winter, when they're stressed, dealing with cold temperatures and deep snows. Late season hunting can also create negative situations where elk and hunters are concentrated, often leading to lapses in ethical behavior that are quickly circulated on social media and news outlets. Fair chase is paramount in regards to continued public support for hunting.

Some individuals are proposing that late shoulder seasons be expanded to include public lands. Montana's hunters will not accept large scale hunting on public land at that time of year. There is not an overabundance of elk on public land in most places during the general season. Applying more hunting pressure to the elk on our public land (which are often at higher elevations and have deeper snows) does not address the larger issue of unacceptable elk distribution on the overall landscape during the general season.

PROPOSED FUTURE DIRECTION: MWF understands that crafting an addendum to the hunting regulations that reinstates a shoulder season in August demands a lot of work from FWP staff. However, with an issue this important, it is in the best interest of our elk herds, hunters, wildlife enthusiasts and landowners to do so.

The larger question is what to do next as elk populations continue to grow and distribution is unacceptable to both landowners and sportsman. To date our focus has been on sportsmen harvest strategies which have delivered mixed results. MWF believes it is time for the agency and stakeholders to proceed with a collaborative decision making process that focuses on clearly defining current elk management issues and developing additional sportsmen/landowner actions to deal with those issues. Those actions should not be limited to harvest strategies alone. For example, should we consider modifying the population objectives that were established 15 years ago when elk distribution was much different than today? Besides hunting, what other ways of affecting distribution of elk on the landscape are available? Such questions could be addressed if the state's elk management plan was revised, an action MWF would support.

Thank you for the opportunity to comment on this important issue for Montanans. MWF appreciates 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 partnership and address the very real challenges around elk management in our state.

Sincerely,

A handwritten signature in black ink, appearing to read "William Geer". The signature is fluid and cursive, with a prominent loop at the end.

Bill Geer
President