

Environmental Quality Council
Hearing on Wildlife Conflict Management – Game Damage Issues
September 10, 2015

My name is Gayle Joslin. I appreciate the opportunity to speak with you today about Montana Fish, Wildlife and Park's Game Damage Program and what I believe is the need to take a much broader look at the causes of some game damage issues resulting in landowner-intolerance to big game animals and in some cases their inclination to take advantage of the public's wildlife resource. I believe the scope of the game damage evaluation has been too narrow.

First of all I'd like to explain why I feel that a very important component leading to game damage has been entirely overlooked by FWP, and therefore the Legislative Audit of the Game Damage Program and the August 19 EQC Program Evaluation of Wildlife Conflict Management by DFWP Wildlife Division.

I am an avid hunter and a native of Helena. I was one of the founding members of the Helena Hunters and Anglers Association, which is an affiliate of the Montana Wildlife Federation. I have been retired for 8 years and now volunteer most of my spare time to Helena Hunters and Anglers, on behalf of wildlife habitat issues.

HHAA has submitted two sets of comments on the Game Damage program and one on the Shoulder Seasons as per FWP request for public comment.

I was employed by Montana Fish, Wildlife & Parks for 30 years as a wildlife biologist, the last 20 of that for the Helena Area. I dealt with numerous game damage complaints and implemented several game damage hunts, provided stack yards, kill permits, and aversive conditioning devices. I kept excellent records that came in very handy in courtroom proceedings. All of the landowners that received assistance through me provided public hunting opportunities. There were several other folks that requested assistance but did not meet the criteria, and so did not receive materials or hunts, but we would discuss ways to deal with their circumstances.

I am concerned about the way in which FWP has approached recommended changes as per Legislative Audit direction. In particular, FWP initially made no provision to limit the number of hunters coming from **landowner-generated lists**.

Montana's wildlife is stewarded as a Public Trust on behalf of the state's citizens by FWP. Exclusive use of landowner-generated hunter lists would be a breach of that responsibility. We now understand that the proposal has been modified to allow a limited percentage (HHAA requested 20% or less) of hunters on a game damage or management season hunt be recommended by the landowner. But use of exclusive landowner lists comes perilously close to privatization of wildlife, or at least the sanctioning of exclusive private hunting.

Proposed **Management Hunts** have legitimacy in identifying a large portion of a hunting district or districts that experience game damage issues. However, there should be more oversight to evaluate the circumstances prior to establishing a hunt. Critical oversight is essential to evaluate and document all the reasons leading up to a game damage hunt.

While most Montana landowners appreciate wildlife and may be looking for democratic methods to alleviate depredation they may be experiencing, others less than altruistic. A combination of existing allowances in the game damage process are quite troubling when one considers that landowner-selected hunters will be able to exclusively pursue *bull elk*, on private lands during these hunts. This looks like the perfect storm for enticing further privatization and perhaps commercialization of wildlife. To control populations, harvesting antlerless elk should be the exclusive and legally accepted approach.

In publicly hunted herds, bull elk constitute only 10-20% of the population, and if they are available to hunt during game damage hunts, the entire system can easily become corrupted particularly when private bull elk hunts are sold for thousands of dollars. Enticements to rig the game damage system would be moot for landowner-selected hunters who otherwise would be privy to exclusive information about where the bull elk may be (perhaps for a price – of course never acknowledged).

These are all issues that become apparent on the surface. But there are other, more long-lasting issues that have to do with where big game is able to meet their yearlong life-cycle needs. What is happening to wildlife habitat on our PUBLIC LANDS is affecting private landowners and having onerous consequences to the future of public hunting.

I firmly believe that FWP must pay more attention to PUBLIC LAND habitat condition and Wildlife Standards imposed by Montana's long-standing National Forest Plans. These public land conditions and forest plan wildlife security

standards across much of the state dictate whether private landowners experience wildlife depredation.

When road densities displace wildlife from public land, when public land vegetation removal projects of all kinds remove wildlife security and thus displace wildlife; when the National Forests remove their Forest Plan Standards for Wildlife Security and FWP goes along with it, then FWP is complicit in the problems that ensue on private lands.

As all of this occurs, FWP bemoans the decline in hunters, but fails to assess their own role in the falling-domino decline of big game habitat on public lands that leads to displacement of game to private lands, that leads to game damage, that leads to commercialization of wildlife, that leads to less access to public wildlife, that leads to declining public participation in the tradition of hunting in Montana.

The National Forests complain that they cannot meet their wildlife standards for big game security during hunting seasons because there are too many roads and too little cover, so they have developed, with the support of FWP a new security standard amendment that no longer requires ANY vegetative cover for elk, mule deer or any other big game on public lands during the hunting season. This new approach is verging on implementation this year.

We at HHAA firmly believe that hunted wildlife will NOT stay on public lands that have no realistic requirement for vegetative cover. Rather, they will move to un hunted private lands where game damage complaints will become even more prevalent, and thus economic incentives will engender privatization and commercialize of the PUBLIC's wildlife.

There is still an opportunity for FWP to make a correction with respect to wildlife security on public lands to help alleviate game damage on private lands. This can occur through pending Forest Plan revisions.

Fish, Wildlife and Parks needs to self-examine their role in game damage, the commercialization that often ensues, and the ultimate decline of public hunting opportunities.

With respect to alteration of the Administrative Rules for implementation of the Game Damage Program, we would be satisfied if the following were clearly stated in the Administrative Rules:

- FWP will work with appropriate state and federal land managers to assure that wildlife habitat on public land is managed to retain wildlife on those public lands during the hunting season;
- Antlerless hunting only during game damage hunts, management hunts, or other hunting opportunities designed to address game damage;
- Twenty percent or less of hunters from landowner-compiled hunter lists be allowed to participate in any hunt or season designed to address game damage;
- That all Regions of FWP will submit an annual report of game damage assistance.

In addition, 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 in a timely fashion. We wish to see mapped, outfitter-leased and owner-outfitted private land information on an annual basis, published on FWP's website. Such information is fundamental to understand and alleviate harboring situations and the underlying incentives that are incidentally created to more easily commercialize the public's wildlife.

We feel it is essential that the Administrative Rules clearly reflect these items.

Gayle Joslin
2763 Grizzly Gulch
Helena, MT 59601