



May 3, 2021

Montana Fish and Wildlife Commission  
 Wildlife Division  
 Box 200701  
 Helena, MT 59620-0701

**Re: Montana Elk Management Plan Guiding Principles**

Montana Fish & Wildlife Commission:

On behalf of the Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC), and the Montana Association of State Grazing Districts (MASGD), we appreciate this opportunity to provide comments regarding the proposed Elk Management Guiding Principles. Our organizations represent producers who manage livestock on private, state, and federal lands in Montana and have a significant and long-standing interest in elk management, due to their substantial impacts on ranching families. The increasing elk populations have had a great impact to producers, and it is encouraging to see your agency identifying guiding principles to address this issue.

Our organization was able to sit through portions of the citizen advisory working group meetings and would like to commend the group for the work that was done and the ability to come to a consensus. We appreciate the diverse nature of the group and the perspectives that were shared. We feel that the robust discussion allowed for viewpoints to come together on private land issues that may not have been considered in the past.

In the review of the guiding principles, we feel the principles accurately identify the high-level issues ranchers and private property owners face when trying to manage their ranching operations while dealing with the impacts of large elk populations. Priority areas for our organizations within the guiding principles include:

- Minimize transmission of brucellosis to livestock
- Minimizing impacts on agricultural production, private rangeland, and infrastructure
- Recognizing landowners for providing elk habitat
- Maximizing partnerships between private landowners, agencies, and FWP
- Maintaining hunting as a primary tool for elk populations
- Ensure regular reviews and update of management and population objectives
- Maximize coordination between predator and elk management plans

Minimizing transmission of brucellosis to livestock is a priority for our organization. The prevalence of brucellosis infected elk continues to significantly increase. Elk migrate to livestock feeding, calving and grazing areas for a variety of reasons, therefore increasing the risk of brucellosis from bison and elk to cattle. Bovine brucellosis has significant animal health, public health, and international trade consequences. Currently, there are 107,000 cattle in the Designated Surveillance Area (DSA) and roughly 88,000 brucellosis tests were conducted on cattle during FY19. The financial burden on livestock producers as well as the state’s DSA budget is significant. Our organizations support all efforts to eliminate the threat of brucellosis transmission to cattle. It is imperative Montana keeps its brucellosis-free certification.

We appreciate the acknowledgement of landowners’ contribution to providing habitat. Two-thirds of our state is private property and as a result provides a significant amount of elk habitat. Current areas where population are over objective result in habitat damage and economic hardship for landowners in the livestock industry. Efforts to control populations and meet objectives are critically important.

We firmly believe maintaining hunting as a primary tool for elk populations is important. Elk numbers are substantially increasing and in certain districts are over objective. The development and implementation of hunting seasons and harvest strategies including but not limited to extended shoulder seasons, liberalized cow tags, disbursement hunts and party hunting will result in targeted levels of elk harvest being achieved in each district. We do not support a blanket increase in objective levels.

MSGA, MPLC, and MASGD would like to thank the Fish and Wildlife Commission for your consideration of our comments. As next steps within the process move forward our organization and our members are ready to engage, serve, advise, and participate where opportunities are available. Since 1884, we have been dedicated to finding proactive solutions for Montana ranching communities and Montana's diverse wildlife and will continue to work to do so.

Sincerely,

A handwritten signature in black ink, reading "Raylee A. Honeycutt". The signature is written in a cursive, flowing style.

Raylee A. Honeycutt  
Director of Natural Resources | Montana Stockgrowers Association  
Executive Staff | Montana Public Lands Council  
Executive Staff | Montana Association of State Grazing Districts