

Name:	City:	State: Please comment on the 2014 Work Plan for Elk Management Guidelines in Areas with Brucellosis as proposed:
Glenn Monahan	Bozeman	<p>Please accept my comments on the elk brucellosis plan. I am a 38 year resident of Montana, and a long-time hunter. I am opposed to FWP being involved in any actions that haze, kill, or relocate elk for the benefit of private interests, in particular the livestock industry. I believe that it is the responsibility of the livestock industry to take whatever necessary actions, within the limits of the law, to protect their privately owned livestock. This includes hiring hazers, building fences, moving cattle, using vaccines, and allowing access to hunters. Regarding the current plan, there is a glaring lack of opportunities for public input. Instead FWP is proposing a carte-blanche approach that includes wording that provides for "undetermined" numbers of elk to be hazed, killed, and harassed. Especially troubling is the proposed dates of such actions, which will impact cow elk in the third trimester of pregnancy – this is entirely unacceptable. I believe that these proposals were not intended as outcomes by the Elk Brucellosis Working Group, and that FWP is misinterpreting the recommendations of that group, and far overstepping its boundaries. Scientificqally, the studies done by Neal Anderson – FWP - demonstrate that brucellosis in elk is not significant, both in terms of seroprevalence and infection rates. In summary, it is the responsibility of the livestock industry to protect its privately owned cattle, and is NOT the responsibility of FWP, which is funded with sportsmen dollars. Private livestock interests ahold be expected to pay for hazing, fencing, and any/all measures to separate their cattle from wildlife – if so desired. Also the livestock industry should be actively promoting and funding research for vaccines for cattle. FWP MUST abandon any and all efforts to eradicate brucellosis in wildlife, which leading scientists have consistently stated is IMPOSSIBLE. Thank you, Glenn Monahan 420 North 10th Ave Bozeman, MT</p>
Tom	Boulder	<p>I like the plan as it was introduced, but I would also recommend that should private land owners accept public tax dollars for fencing or other materials; then they must also allow the said public to access their land for hunting and hiking purposes. This is only practical in that they have accepted materials purchased by the public to protect "private" property. They forget it was their ancestors that brought the problems we now face with wildlife diseases with them when they moved into Montana. In this the cattle and cattle rancher have portrayed themselves as the victims, and Montana as well as many western states have perpetuated this disgraceful situation. Is it not enough that we give away our public forests to these people every summer at the cost of feed for wildlife and our tax dollars supporting these welfare ranchers? If you can't protect or provide the resources for your ranch, i.e.: your fences, your cattle, your feed for such; then why are we the tax payers supposed to support you? If you want our protection you must unconditionally allow our (public) access.</p>

Nancy Schultz	Bozeman	<p>Comments on Elk Brucellosis Work Plan I support sustainable management of fish and wildlife populations. Sustainable means to supply with the necessities; to provide for. As I read the details of the Elk Brucellosis Work Plan that is in the final approval stage, I do not see how the needs of our treasured elk herds are being met. I will explain the problems I see with the plan. There will be an unknown number of hazing events that will occur from 1/15-6/15. These hazing asks have no public oversight. When I look at the actions that took place in the Paradise Valley in 2013, HD 313, I question the impact on elk. This HD is 74% below peak population and the hunt is limited, an yet hazing and kill permits were authorized for this district. This does not appear to be science based wildlife management. We suggest the FWP Commission instruct FWP to work proactively to better inform the public about this issue. FWP came out with an information page on 9/10/13, the day after comments were originally due and then extended until 9/13/13. This is not timely. If there is a problem occurring on any given landscape, the FWP should publicly announce the need to establish a local working group to bring all interested parties to the table to address the issue. A facilitated educational component is a key first step. Alternatives to lethal take must be vetted publicly. This "default" plan circumvents the need to establish diverse local working groups before actions are taken. One of the educational items is an accurate assessment of the risk of brucellosis transmission to livestock. For example, since 2011 there have been over 40,000 tests given to measure brucellosis exposure, and they have been all negative. In Park, Madison and Gallatin Counties alone there have been a total of 5 positives exposures, and over 15,000 negatives test results reported by APHIS of the affected and adjoining herds. These numbers do not show a high level of risk to support the proposed actions. Minimizing Transmission from elk to livestock needs to focus on habitat, increasing vegetation on WMA's and public lands to attract and retain elk (elk security to restore public herd), look at reducing grazing on FWP WMA's to provide more forage for wildlife, as well as evaluate later release dates to not interfere with elk calving. Dispersal Hunts: the word "hunt" should not be used. This is not a fair chase hunt situation, it is not ethical hunting, it is a removal. No dispersal removal activity should occur after Feb. 15th, the time period established for ethical hunting considering the gestation period of the cows. Also, no removals should occur in areas that are in decline/under objective. Removals should not be a first choice, but rather a last resort, if that. We do not believe the second objective of the Elk Brucellosis Working Group recommendations, which is to maximize acceptability of elk management tools and populations in the Designated Surveillance Area for sportspersons, wildlife enthusiasts, landowners and livestock owners, is being met. This default plan will allow significant lethal elk management actions to proceed again in 2014 without local working group input and oversight. Please vote no on this tentative proposal and instruct FWP to publicly advertise and convene local working groups if any areas of concern exist. If there isn't enough interest to convene a local working group is there really a problem? GWA members stand ready to participate, but we need to be aware of what if any local working groups exist or will be formed. Will elk management actions be taken to protect cattle or hay/pasture? Is fencing and herding always considered first before lethal elk dispersal hunts or kill permits are authorized? Have any landowner/manager elk kill permits been issued; if so, how many and to whom? Were any of the lethal elk management actions in 2013 (dispersal harvests/landowner kill permits) authorized in areas that are at or below objective, for example Hunting Districts 313 and 317? If below objective should we be harvesting more female elk? I urge the Fish, Wildlife and Parks Commission to not approve the Elk Brucellosis Work Plan. Nancy Schultz 420 N. 10th Ave Bozeman, MT 59715</p>
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Montana Wildlife Federation	Helena	MT	<p>Sept. 10, 2013 Mr. Jeff Hagener, Director Montana Department of Fish, Wildlife and Parks 1420 6th Avenue Helena, MT 59601 Dear Director Hagener: The Montana Wildlife Federation (MWF) appreciates the opportunity to comment on your "ELK MANAGEMENT IN AREAS WITH BRUCELLOSIS 2014 PROPOSED WORK PLAN". We believe that you and the Elk Brucellosis Working Group are making significant progress on addressing this issue. However, we also believe that this is a very complex issue and deserves the establishment of more site-specific solutions tailored to local "on the ground" situations. MWF is the oldest and largest hunter and angler based conservation group in Montana and was founded in 1936 by Montana conservationists, landowners, hunters and anglers. MWF is a 501(C) 3 non-profit organization comprised of a Helena-based staff and over 5,000 members and 24 affiliate clubs throughout the State. We share a mission to protect and enhance Montana's public wildlife, lands, waters and fair chase hunting and fishing heritage. Since practically all of our members are elk hunters and since the area where elk that test seropositive for brucellosis has the potential of expanding, implementation of this work plan has significant implications that extend well beyond the current Designated Surveillance Area (DSA) and is of greatest concern for our members across the state. As MWF has stated many times, "When dealing with wildlife/domestic livestock disease transmission issues, we believe that wildlife should be "kept wild" and that disease management solutions should focus on domestic livestock that can be more practically managed under more controlled conditions." We hope that you and the Working Group will keep this principle in mind as you finalize and implement this work plan. Before we make specific comments regarding the work plan, MWF would like to commend FWP for being the first agency to acknowledge that the objective for dealing with this problem is to "minimize risk" of brucellosis transmission from wildlife (elk in this case) to domestic livestock. Until now, the objective has been to "eradicate" brucellosis. Eradication may be a reasonable objective for domestic animals, but not for free ranging wildlife. In wild populations, "eradication" is an impossible task and the use of the term only serves to create "false expectations" among interest groups. Acknowledgement of this fact is a major step forward and can only lead to more practical, workable and realistic solutions. Thank you for taking the lead on this. MWF offers the following comments and suggestions regarding your proposed work plan: 1. Creation of Local Working Groups – As expressed in meetings with your staff, FWP prefers that local working groups that are expected to deal with the elk/brucellosis transmission issue be created from existing local working groups that volunteer to take on this responsibility. MWF believes that FWP should take a leadership role in convening and managing these groups. We agree that, in some cases, FWP can authorize existing local groups that have been established for other purposes to successfully take on this responsibility. However, MWF has serious concerns that some existing groups may lack interest, knowledge and expertise to effectively carry out its responsibilities. MWF also has concerns that fair representation of all interests may not exist on currently established groups. We recommend that, should you sanction an existing group, you ensure that there is fair representation of all interested parties and that the work group has the capability of fully addressing the problems at hand. When there may be questions regarding expertise, impartiality and fairness, FWP should give strong consideration to creating "new" working groups from scratch. 2. Responsibilities of Local Working Groups – MWF believes that the expectations and responsibilities of local working groups be precisely defined. Research and experience from similar processes around the West and nationwide clearly demonstrates that collaborative working groups succeed when they have a clear charter and well-defined responsibilities. Local working group responsibilities should include items that stem from the approved work plan and include such things as recommending refinement of policy and proposing strategies and actions that are appropriate for use in resolving local issues and problems. Local working groups should have procedures in place that insure that other interested citizens who have pertinent knowledge have ample opportunity to provide input. Tactical site-specific decisions that are needed to implement the strategies should not be the responsibility of local work groups and should be determined by FWP and the particular landowner(s). 3. Dispersal Hunts – MWF strongly recommends that the term "dispersal hunt" be changed to something that does not imply that this is a normal "recreational hunting" situation. Management actions that entail killing and removing wildlife under what may appear to be overly controlled conditions and during the later stages of pregnancy do not replicate the more traditional wildland hunting situations that exist during the regular elk hunting</p>
Brian McCarty	Harrison	MT	<p>I am writing in opposition to any hazing or dispersal hunts within areas with Brucellosis. I would be in favor of fencing projects as long as land owners allow some hunting on their land. While I am on the rancher's side on most issues (predator control, bison and grazing issues), I can not agree with putting more stress on an already rapidly declining population of elk. Not only do the added kill numbers hurt the herd, so will the stress to pregnant cows. At an 11 calves per 100 cow ratio the herd can't afford anymore mid winter stress in my opinion. Thanks for the opportunity to comment, Brian McCarty</p>

Gayle Joslin	Helena	MT	<p>September 9, 2013 □□□□□□□□ Montana Fish, Wildlife & Parks Wildlife Division 1420 6th Avenue Helena, MT 59601 Attn: Public Comment - Elk Management in Areas with Brucellosis – 2014 Work Plan Dear Wildlife Division, Thank you for this opportunity to comment on the “Elk Management in Areas with Brucellosis - 2014 Work Plan.” The following is my perspective, but what I also believe represents the viewpoint of thousands of people who cherish wildlife, and have a particular reverence for elk. Montana’s elk populations are legendary. Through the ages, countless stories revolve around chance encounters, or stealthy pursuit of wapiti. Whether we are Montanans or visitors, few things stick in one’s memory more permanently than a brush with a cow, a calf, or even a shredded-velvet spike bull elk. When people brought diseased domestic animals onto the magnificent Montana landscape, it was a devastating moment in history for wildlife. As cattle released the Brucella abortus pathogen into the environment, it not only infected other ungulates, it melted into temporary obscurity within foxes, coyotes, ground squirrels, badgers – as well as other unsuspecting species that had lived under the Big Sky for thousands of years. As with most afflictions, nature has a way of coping, and so physiological survival strategies evolved to endure this exotic adversity. Integrity demands fairness for native creatures of Montana. Since time has removed full opportunity to rectify damages to wildlife, Montanans and others who have kindred relationships with wildlife and the country they require, request fair and honest resolution of the brucellosis issue. Such treatment demands respect for wildlife and therefore respectful policy – policy that drives methods to resolve disease conditions that have been imposed upon wildlife through domestic livestock. The 2000 Interagency Bison Management Plan, with its numerous amendments, (signed by Montana Fish, Wildlife & Parks, Montana Department of Livestock, Animal Plant Inspection Service, National Park Service, and USDA Forest Service) calls for eradication of the Brucella virus in wildlife. The following specific request is being made: amend that language to realistically accept that Brucella cannot be eradicated now that it has been introduced into the environment. Removal of wildlife, lethal or otherwise, that carries the now feral bacteria, for the purpose of Brucella eradication, is unrealistic. Any provision that may provide for removal of wildlife from the wild is unacceptable to the populace that highly values Montana wildlife, and should be deleted from these and other policy directives. If this language is not removed, there will be no public trust in the working group process, and FWP actions will always be suspect. It has been shown that Brucella abortus can be effectively managed in domestic livestock with proper vaccination, as a number of other diseases have been. Therefore, Brucella abortus should be removed from the list of biosecurity pathogens. At the same time, vaccinating wildlife against Brucella is virtually impossible and is not in the best interest of wildlife or the sporting public that would be pressed to foot such a bill without possibility of eradicating the pathogen. The report, “A STATUS REVIEW OF ADAPTIVE MANAGEMENT ELEMENTS, 2000 to 2005” (http://ibmp.info/Library/7%20-%20IBMP%20Status%20Review_Sept2005.pdf) states, “A protocol for evaluating the safety and efficacy of a wildlife vaccine against brucellosis in the GYA was adopted by the Greater Yellowstone Interagency Brucellosis Committee (GYIBC) in 1998. The purpose of the protocol was to establish guidelines for the development and evaluation of new brucellosis vaccines to be used in free-ranging elk (Cervus elaphus) and bison (Bison bison).” Regardless of measures that might be taken to overcome set backs to wildlife vaccination, including the discovery that, “Shedding of vaccine strain Brucella is possible when pregnant bison are vaccinated and abort their pregnancy” --vaccination experimentation should not be conducted on Montana wildlife without full disclosure to and discourse with the public. The above measures can and should be expeditiously accomplished through the combined efforts of the agencies previously listed. Such actions would set the stage for good-faith efforts on the part of working groups that must be convened to further the efficient and effective implementation of provisions to maintain spatial and temporal distance when and where necessary to minimize contact between wildlife and livestock. Such alterations in the IBMP documents would also allow pursuit of management options that heretofore have not been seriously considered, but which would help to alleviate grid-lock by design. If language alteration is resisted by the other agencies, MFWP should remove their endorsement from the IBMP documents. The genesis of Working Groups came about as a result of democratic processes for the public’s inclusion. Often such working groups have been requested by government to help garner broad-based consideration of issues that such agencies must consider as they develop management policy. In the case of Brucellosis Working Groups, MFWP appears I agree that Public Access MUST have strong consideration in implementing any assistance to landowners. If a rancher has not made any concessions to reasonable hunting access, I don’t believe that FWP and The Public, at large, owe them any protection. I agree with the notion of management hunts (landowners should be given a tag) but kill permits solely for landowners is something I disagree with. Thank you.</p>
Duane Ziegler	Belgrade	MT	<p>I agree that Public Access MUST have strong consideration in implementing any assistance to landowners. If a rancher has not made any concessions to reasonable hunting access, I don’t believe that FWP and The Public, at large, owe them any protection. I agree with the notion of management hunts (landowners should be given a tag) but kill permits solely for landowners is something I disagree with. Thank you.</p>
Fred Shewman	Cascade	MT	<p>Please make sure the final plan contains public land management options acceptable to sportsmen and wildlife groups and is not lopsided in favor of private livestock interests. A possible elk friendly example might be to limit livestock grazing on public lands to times when elk are not using those lands for winter range.</p>

Richard Tyll	Absarokee	MT	I am NO scientist but, I would suggest research in a delivery system through genetically modified crops containing doxycycline and rifampin which could be a long-term remedy toward inoculating, leading to prevention of these animals acquiring brucellosis. Another method which could be researched is using a delivery system such as combining the new NANOTECHNOLOGICAL DRUG DELIVERY SYSTEMS working on the molecular level with what are refereed to as Quantum dots or "Buckyballs" combined with the Strain 19 vaccine , sprayed on food sources which these free-ranging animals consume. In this way, the herds would be inoculated over a season of grazing. While both of these methods of treatment may sound like science fiction or have the difficulty of being a long-range goal. I believe they are worthy and merit consideration for a long term solution. Here are a few web links for further consideration. http://www.articlesbase.com/science-articles/quantom-dots-and-bucky-ballsnovel-nanotechnological-drug-delivery-systems-for-the-future-5390096.html http://www.aphis.usda.gov/animal_health/animal_diseases/downloads/elkisland_ra.pdf http://www.aphis.usda.gov/animal_health/animal_diseases/brucellosis/_Introduction_by_either_means_of_doxycycline_rifampin_or_the_Strain_19_vaccine.pdf
Yogesh Simpson	Bozeman	MT	The public wildlife should be managed in the interests of the public, not ranchers. Hazing elk, harassing elk with captures and testing and late season hunts while cows are pregnant are options that should not be on the table. Simple steps can be taken to all but eliminate the risk of transmission from elk to cattle. It is the responsibility of the stockgrowers of this state to manage their cattle. For example, when the risk of transmission is greatest in the spring while elk are calving, maybe don't graze your cattle in those areas. Common sense should prevail here.
Arthur Burns	Livingston	MT	I attended the Upper Yellowstone Watershed Basin meeting on 9/4 in Emigrant, where both the Elk Management Guidelines and Gardiner Basin Bison issues were discussed. First, I generally approve of the elk management tool FWP has developed to allow producers in Paradise Valley to more actively manage elk-cattle co-mingling. We actually used a similar set of tools on our place on Elbow Creek last year, with some benefit. UYWB has established a working group to facilitate a more wide spread utilization of these tools. Good. Second, there is no way Bison should be allowed to freely roam the Gardiner basin, especially when YNP continues to mismanage the bison population levels in the Park. There is very little to keep roaming bison from entering Paradise Valley, further putting livestock producers and the public at risk for disease transmission and property damage. FWP should advocate adherence to the guidelines of the established IBMP. Thanks for the opportunity to express my views. Art Burns
Tim Owsley	Great Falls	MT	I don't believe any of the management practices listed should be allowed on private property unless the property owner allows some type of public access to hunt. Either as part of the block management program or allowing a limited number of people that ask each season to hunt. That doesn't mean that the only ones that get permission are family.
David Nolt	Butte	MT	Respected members of the Montana Fish & Game Commission- In regard to the management of Montana's wild elk populations, I am opposed to any management plan that puts the prerogatives and interests of the stockgrowers above the interests of managing wildlife for its inherent value and for the good of the public. I am opposed to any plans to haze, capture, test or relocate elk in the interests of cattle production. I am opposed to any hunting of elk past February 15. I am opposed to any plan that ignores habitat improvement and increased public hunting access in favor of expensive and unnecessary actions meant only to protect the interests of stockgrowers. If the goal is to prevent the transmission of brucellosis from elk to cattle, the onus is on stockgrowers to protect their cattle. Stockgrowers cannot insist on grazing their cattle in areas where elk are calving and simultaneously ask the FWP, sportsmen and taxpayers to protect their interests, especially when what they are proposing is to the detriment of a public resource. Likewise, grazing allotments on public land in these areas and during elk calving should not be given to encourage this practice. It is the mission of the FWP to manage Montana's treasured wildlife for the inherent value of wildlife and as a public resource in perpetuity. Montana's wildlife is the pride of the world, and our diligence in upholding the North American Wildlife Conservation Model is a beacon while so many other states move towards the privatization and over-exploitation of wildlife. No one owns Montana's elk populations, and insofar as the FWP acquiesces to manage Montana's elk populations based on business and politics rather than science, they are failing the public and our wildlife in this mission. Thank you for this opportunity to comment. -David Nolt 1211 West Gold Street Butte, MT 59701

Marty Zaluski	Helena	MT	Dear FWP Commission: I offer the following comments on the 2014 Work Plan for Elk Management Guidelines in Areas with Brucellosis. I'd like to thank the FWP Commission and the Elk Working Group for their diligent efforts. On the ground activities including dispersal hunts, hazing, and limited kill permits allow the use of socially acceptable elk management practices to address the risk of brucellosis transmission to livestock. In addition to these efforts being recognized by Montanans as targeted and effective, they also demonstrate our commitment to brucellosis risk mitigation to other states. Maintaining the confidence in Montana's cattle is a critical component to the continued interstate marketability of Montana's livestock. Respectfully, Marty Zaluski, DVM State Veterinarian Montana Department of Livestock
Michael Miller	Toano	VA	Protect the elk, not the livestock industry! Do not haze, capture or test wild and free roaming elk, remove the cattle from public lands during periods of increased risk. State of Montana vs. Rathbone: "One who acquires property in state does so with notice of the presence of wild game and presumably is cognizant of its natural habits, and hence a property owner must recognize that there may be injury to property or inconvenience from wild game for which there is no recourse."
Bruce Nelson	Dillon	MT	What do you suppose the reaction around the country would be if there was general knowledge of what's being "run up the pole" that passes for elk(wildlife ?) management.? Are the European imports, in Montana, and across the region, currently free of all pathogens ? Growers manage for the presences of those viruses and infections; the same should be required of brucellosis.
charles murtagh	bozeman	MT	I do not want my licence dollars used for test and slaughter or contraception on elk. Landowners should allow the public to hunt if they want help dispersing the elk. Incidentally, did anyone consider this issue when every grazing allotment was renewed on our WMA 's ? It does not appear so.
Clay Miller	Missoula	MT	Why would sportsmen and tax payer \$ be spent to protect a private industry. I am tired of the private interests (the livestock industry here) getting a free pass on whatever they want done on public lands. Our public wildlife (a treasured resource) should be managed in the interests of the public, not ranchers. Hazing elk, harassing elk with captures and testing (and potentially slaughter if they test positive for brucellosis?) and late season hunts while cows are pregnant are options that should not be on the table. Simple steps can be taken to all but eliminate the risk of transmission from elk to cattle. It is the responsibility of the stockgrowers of this state to manage their cattle. For example, when the risk of transmission is greatest in the spring while elk are calving, maybe don't graze your cattle in those areas. Common sense should prevail here.
Aaron Shewman	Anchorage	AK	I recommend you work to minimize the contact between livestock and elk at a time when brucellosis transmission could occur. One way would be to ensure livestock grazing lease agreements have "grazing dates" in the them that minimize the presence of elk during the allowed grazing timeframe. Also, ensure the leased dates are enforced. Thank you
Sabina Strauss	Gardiner	MT	Dear FWP, thank you for making an effort to consider elk in the effort to manage brucellosis and not just the bison.
Randall Knowles	Great Falls	MT	Are the concerned land owners providing access? Are the private land owners leasing public land? Elk that need to be removed should be removed by hunters and not helicopters. Perhaps FWP needs to help the cattle industry with Brucellosis education. It is my understanding that Mule Deer also carry Brucellosis. BUT, none of it matters without access. FWP needs to lead the charge for Public Access to Public Lands. We need to get tough and let private land owners know we are serious about accessing public lands. No more pussy footing around and singing KumBaya around the campfire. Nothing happens without access AND a poor job is done with partial access.

Geary, Laura

From: Furthmyre, Coleen on behalf of FWP Commission
Sent: Wednesday, August 07, 2013 8:41 AM
To: Geary, Laura
Subject: FW: Elk Management In Areas With Brucellosis 2014 Proposed Work Plan
Attachments: elk work plan 2014.pdf

Please put with the public comments. I also sent this to Quentin. Thanks, Coleen

From: katqanna@gmail.com [mailto:katqanna@gmail.com]
Sent: Tuesday, August 06, 2013 6:06 PM
To: FWP Commission
Subject: Elk Management In Areas With Brucellosis 2014 Proposed Work Plan

To the FWP Commissioners, Thank you for allowing me to participate in this public process. As I mentioned when I came to your July Commission meeting, there are serious issues with the management of the Elk Management in Areas of Brucellosis that desperately need your attention. The 2014 Proposed Work Plan is basically a repeat of the open ended document that was submitted to y'all in spring, with some "Covering my ass" measures thrown in and an attempt to explain why a local working group plan is not being submitted to you as directed by the commission on Jan. 10, 2013 (per MTFWP Commission minutes). The following are a number of points, just following the Work Plan layout, that I hope y'all look into. There are more concerns that are not even in this document. Please do not approve this current 2014 Proposed Work Plan.

- "To date, local working groups (which are supposed to have representation by Sportspeople, Wildlife enthusiasts, Landowners that do not raise livestock and Livestock Producers) have not been identified in all areas." As I supplied the commissioners with documentation, the first local working group meeting ended up being a number of ranchers in Park County, meeting in one of their kitchens and possibly Hayes Goosey of the Park County Rod and Gun Club (PCRGC) in Livingston. Gallatin Wildlife Association (GWA conservation hunters) had notified Quentin Kujala on Jan 12th, that we would like to participate in a local working group. Two members, one of which was Glenn Hockett (president), were on their way to the meeting when they received a call from Karen Loveless, the wildlife biologist involved, per instructions by Quentin Kujala, to inform the GWA members that they could not attend the meeting. Having received an invitation from Lou Goosey (PCRGC) to attend an FWP elk brucellosis mtg being hosted at their club, several GWA members accepted the invitation, only to be told once again, that we could not attend. Hayes Goosey stated it was a private mtg. When Glenn Hockett pressed Quentin Kujala about the open meeting aspect of the FWP presentation, contrary to Montana Annotated Code 2-3-101 - 107. , Kujala stated, "Glen—My understanding is this is Livingston Rod and Gun Club meeting. That definition is theirs to make. Quentin".

When I wrote a complaint letter to Dan Vermillion, Ken McDonald, including Quentin Kujala and Pat Flowers in the communication, complaining about what Glenn and I had to go through that day to try and get into this meeting (I attended with a copy of the Code, even though I had no confirmation I would be allowed in at that point) Quentin Kujala replied to Ken McDonald, "To be frank again, my first inclination (probably not the best?) is to make no response. " Which is what occurred - no response was made to a complaint about open meeting

obstruction. After waiting two weeks for some response and receiving none, I filled a FOIA with Dir. Jeff Hagener on May 3rd, to receive information on this elk management process. Hagener approved my FOIA, sending it to McDonald telling him to comply. McDonald sent it to Kujala and it has been obstructed as well, with only a partial fulfillment. I have sent a follow up on June 14th, with no reply whatsoever.

Also of note, in this "local working group" process, Hayes Goosey, in an email to Glenn Hockett on April 22nd, the day of the meeting at the Park County Rod and Gun Club, stated, "The Park Co. Rod and Gun Club is part of the Brucellosis working group and this is a presentation with the intent of communicating with our board of directors and membership." Another point, the Madison Elk Working Group was an already established group to deal with elk. I was there the day that Kujala made a brucellosis presentation. No educational presentation was done, just an explanation of the original Working Group and a copy of the voted on Proposed Recommendations. There were 5 of us that were sportsmen, all the rest were ranchers, no other stakeholders represented per the Proposed Recommendations – if this is to be counted as one of the "local working groups". I sat across the room from ranchers that openly stated they wanted all the elk killed, that they were eating all "our grass". This statement was repeated a number of times during the meeting.

It was not until I began speaking up about the FWP obstruction of the public meeting and varied stakeholder process that certain members of FWP began saying that there were no local working groups. I have documentation to show that there has clearly been an obstruction of the FWP Commission approved process and this should be accountability and transparency in this process. Please address this situation. I would be glad to provide you with any and all documentation you require to research this matter.

- Again, the "Unknown number of..." aspects to this plan is not really a plan, but an opened ended recipe for continuing the practices that have been occurring with little accountability or transparency.
- Why has FWP used sportspersons dollars to supply stackyard fencing, hazing, kill permits, etc. to ranchers that do not allow public access hunting during the established hunting season as the Game Damage Program requires (Landowners may be eligible for game damage assistance **if they allow public hunting during established hunting seasons**. Assistance may include hazing, repellants, temporary or permanent stackyard fencing, damage hunts, kill permits, or supplemental game damage licenses.)? When this question was brought up by one of the Elk Brucellosis Working Group members at the July 11th meeting in Bozeman, Quentin Kujala quickly replied to them that they, the Working Group, did not include it in their Proposed Recommendations that the FWP Commissioners approved. I have a number of questions with this. 1. Why did not Quentin Kujala, FWP's representative and manager of this program point this out to a "civilian" working group when they were compiling their proposed recommendations? 2. Why did no other FWP representative reviewing this document before presentation point this out? And if they did, why was it not presented to the Working Group? 3. Why did the FWP Commissioners not add this as an amendment to the Proposed Recommendations to protect Montana Sportsmen, their access and their dollars coming into FWP? 4. Why is this still not required in this work plan?
- "Hunters will be selected using mechanisms "comparable" (this kind of ambiguity is what has been causing concerns.) to those used for game damage hunts." This should read, "Hunters will be selected from the Hunt Roster ("There is only one Hunt Roster and hunters from this

roster may be identified for 3 types of hunts: Game Damage, Management Season, and Dispersal." - FWP website)."

- "Dispersal hunts will be accomplished as early as possible in the risk season..." This whole section should lead with a statement that IF there is a concentration of elk in a commingling situation, then..., not the open ended objective of accomplishing dispersal hunts as early as possible. In effect, what this sounds like is a Montana elk hunt season from Sept. 7th through May 15th. also, Julie Cunningham, FWP's Region 3 wildlife biologist warned in an email, "Furthermore, I think of the Madison-Gallatin herd as an example here. Elk move out of the Gallatin into the Madison during winter. The more we hunt during winter, the more we are reducing a herd which spends summer on public lands and is publicly accessible through early hunting season, AND which is BELOW objective. We could be really hurting our Gallatin herd by allowing post-February hunting. I do have radio-collar data showing mid-winter migrations out of the Gallatin to back this up."
- Gut pile management is crucial, IF this whole process is really about minimizing the risk of brucellosis transmission with cattle and other elk. This seasons gut piles were not managed. Why did Quentin Kujala and other FWP personnel familiar with the biology of brucellosis not insist on gut pile management? The only way a bull can transmit brucellosis to cattle is if he is infected (not just seropositive, showing antibodies to exposure), you kill him and then expose his lymph nodes and sexual organs to cattle or other elk. Likewise, with cow elk, with the addition of the birthing materials. There was one pregnant cow that was killed in this years "dispersal" hunts. This would have been a sure fire way, if she was infected/infectious to expose cattle and other elk to brucellosis.
- Why is there nothing in this document about kill permits and dispersal hunts in areas under objective? The Northern Elk herd has been in an average decline of 6-8 % each year for the last decade. Kill permits were issued in HD 313, which is 25% below objective, with yearling bull counts of .56% (less than 1 percent). The dispersal hunt occurred in HD 317 which is 16% below objective, with yearling bull counts of .9% (less than 1 percent). There were no cow/calf counts in HD's 314, 315, 317, and 393. There should be some restrictions against kill permits and dispersal hunts in areas with such a decline, focusing on other means to achieve the dispersal.
- Kill permit requirements should follow those of the fencing mentioned above - required public hunting during established hunting seasons and consideration of population numbers.
- Local Working Groups - should be established based on the multi stakeholder representation. I called all the conservation and wildlife advocate groups from Gardiner over to Bozeman and not one even knew about this group and had not been asked to participate. GWA had asked repeatedly to participate and was denied. I am still wanting to participate in the Park County local Working group and still have not heard anything.
- The educational presentation needs some serious work to not look like and be presented as a livestock advocacy presentation, instead of a FWP wildlife presentation. Why is Quentin Kujala stating the inflammatory transmission risk time, from an abortion or birthing materials of brucellosis is 81 days? This is based on a worst case scenario test conducted by Keith Aune, Tom Roffe and others, which restricted any predation, sunlight and temps from normally affecting the bacteria. This has never been replicated in a natural brucellosis scenario. In fact at the Elk Working Group meeting on July 11th, Neil Anderson stated it was a race against the birds to get to an abortion event (notified by a VIT) and generally he lost. This inflammatory 81 day statement is not being qualified and is being used by ranchers as a war cry to eliminate elk and brucellosis from wildlife, even being incorporated on film, which is being passed around to the livestock community. Dr. Marty Zaluski, in public meetings such as the IBMP, has stated 21 days for the transmission period from an abortion. If birthing materials later in the season, the transmission period is even shorter due to temperature and sunlight.

- "Explore potential habitat management adjustments on WMA's and other lands and hunting season recommendations designed to foster adjusted elk distribution." This section sounds like it is more concerned with elk population numbers, wanting to apply increased elk tag numbers, which has no bearing on brucellosis transmission risks from commingling, especially in areas, such as Park County, that are in a decline. As far as the hunting to affect elk distribution, a recent paper, Effects of Hunter Access and Habitat Security on Elk Habitat Selection in Landscapes With a Public and Private Land Matrix, published 2013, written by FWP's Kelly Proffitt, et al should be considered. They found that elk cow security was affected by threats such as public land hunting and motorized vehicles, causing them to congregate on private lands, which is reducing the public land herds available to the public hunters. "Focusing harvest pressure on private lands currently restricting hunter access while limiting harvests on public lands may be an effective strategy for redistributing elk onto public lands in areas where elk distribution is focused on private lands with limited public hunting access." (pg. 10) This goes back to my earlier point of hunter resources being used for private ranchers that do not allow this public hunter access - its a lose/lose for he Montana sportsmen. Increasing nearby hunting on WMA's will only increase the elk population densities on the very ranches that they are wanting less elk populations on, to reduce the possible spread of brucellosis, which is not a threat during the regular hunting season anyway. So why is this really here, unless the objective is population control or to really drive the elk to the private lands during hunting season?
- As to "effective communication, education and outreach" with this Commission, the general public and landowners. I feel the Montana sportspersons should be included in this. I wholeheartedly agree. Y'all should be given the numerous documents from FWP wildlife biologists that you have been excluded from. Educating yourselves on these issues is necessary to your making wise wildlife management policy.

With that I will conclude my comments, again asking you to please not pass this 2014 Work Plan, please do an audit of what has been taking place and please manage our elk as wildlife, for the benefit of Montana, her public and her hunting community, not certain private ranches and the livestock industry special interests. The reduction of brucellosis transmission can be attained without throwing our elk, the public process and accountability/transparency under the bus. Thank you for all your hard work.

Thank you, Kathryn QannaYahu

Geary, Laura

From: Furthmyre, Coleen on behalf of FWP Commission
Sent: Wednesday, August 07, 2013 10:32 AM
To: Daniel Vermillion - FWP (dan@sweetwatertravel.com); Gary J Wolfe; Larry Wetsit; Matthew Tourtlotte (mtourtlotte@gmail.com); Richard Stuker
Cc: Dockter, Rebecca; Kujala, Quentin; FWP Wildlife
Subject: FW: Elk decline in areas of elk brucellosis management

From: katqanna@gmail.com [<mailto:katqanna@gmail.com>]
Sent: Wednesday, August 07, 2013 9:30 AM
To: FWP Commission
Subject: Elk decline in areas of elk brucellosis management

I read something interesting in the Bison EA, pg. 49, I thought I would share, since this pertains to elk and the northern elk herd, specifically elk HD 313, an area that is of concern involving the elk brucellosis management. Take a look at information provided by FWP wildlife biologists. This is an area that kill permits were issued to ranchers this spring, as part of the elk brucellosis management. HD 317, just north of 313 is where the dispersal hunts occurred. Please do not approve the Elk Management in Area With Brucellosis 2014 Proposed Work Plan.

Northern Boundary (HD313):

Hunting District 313 encompasses winter range for the Northern Yellowstone elk herd, a migratory herd that summers primarily within Yellowstone National Park and the Absaroka-Beartooth Wilderness. This population peaked during the 1980's and 1990's with a 10-year average of 15,304 during 1986-1995 and **has been in decline since the late 1990's**. The highest number of elk observed during aerial surveys was 19,054 elk in 1994. The winter 2013 count resulted in 3,915 observed elk, **a decline of 74%** from the population average at its peak. The herd is counted cooperatively by Montana and Yellowstone National Park, and the portion of the herd that winters in Montana is managed with an objective of 4,000 elk. The 2013 count resulted in 3,000 elk wintering in Montana. The highest count of elk wintering in Montana was 8,626 in 1996 with a 10-year average of 5,444 during 1989-1998. Within HD 313 from 2004-2012, there has been an average of 1,344 elk hunters and 7,302 elk hunter days annually. **The average number of elk harvested declined from 1,590 (average 2000-2006) to 259 (average 2007-2012). Hunting season structure is restrictive with antlerless harvest limited to 30 brow-tined bull/antlerless youth-only permits and unlimited permits for brow-tined bulls."**

Thank you,
Kathryn QannaYahu

Geary, Laura

From: Furthmyre, Coleen on behalf of FWP Commission
Sent: Tuesday, August 27, 2013 9:01 AM
To: FWP Wildlife
Subject: FW: 2014 FWP Elk Work Plan in Areas with Brucellosis
Attachments: 2104 Elk Work Plan.pdf

From: Glenn Hockett [<mailto:glhockett@bresnan.net>]
Sent: Wednesday, August 21, 2013 4:21 PM
To: FWP Commission; Hagener, Jeff
Cc: GWA Board; McDonald, Ken; Kujala, Quentin; Flowers, Pat; Nick Gevock; Skip Kowalski; Greg Munther; Jim Posewitz
Subject: 2014 FWP Elk Work Plan in Areas with Brucellosis

Dear FWP Commission and Director:

We are very concerned about the tentative 2014 FWP Elk Work Plan in Areas with Brucellosis, attached. This plan outlines FWP's intentions to proceed with an "unknown" number of elk hazing operations, elk fencing projects, private landowner elk kill permits and/or elk dispersal hunts, which could occur after Feb. 15th and as late as May 15th. Bull elk may be killed, but the target animals are cow elk that are likely in their last trimester of pregnancy. This "default" plan circumvents the FWP from publicizing, organizing and facilitating diverse local public working groups as recommended by the appointed Elk Brucellosis Working Group. Formation of open and diverse local working groups would at least provide some level of much needed public scrutiny, input and feedback. We also see education and communication as very important aspects of local working group formation and function.

A number of Gallatin Wildlife Association members testified to the FWP Commission on Thursday Aug. 8, 2013 expressing some of our concerns about this tentative proposal. I also sent a letter on GWA letterhead to the FWP Commission that day, which addressed many of our concerns in more detail. At the FWP Commission meeting (via video from Bozeman) I also suggested an amendment to the 2014 tentative proposal. The request/suggestion was to preclude any lethal take of elk after Feb. 15th in 2014 without the review and consensus of a local working group. The FWP Commission dismissed this request and approved the tentative proposal as written by FWP. GWA believe these types of last trimester (Feb. 15 – May 15) "dispersal hunts", kill permits and/or hazing operations for disease control go beyond the scope of the FWP's 2004 Elk Management Plan and may have significant consequences to elk and other resources, including but not limited to actually increasing the risk for disease transmission. Thus, I suggest an EA should be required of FWP before the FWP Commission approves such an approach. Without proper environmental review, please drop this tentative proposal and instruct the FWP to publicize, organize and facilitate the formation and function of open public local working groups if any areas are identified where elk and brucellosis are a significant concern to local livestock owners.

Thank you for your consideration of our concerns.

Sincerely,

Glenn Hockett

Volunteer President, Gallatin Wildlife Association
P.O. Box 5317
Bozeman, MT 59717
(406) 586-1729
www.gallatinwildlifeassociation.org

Working to Protect Habitat and Conserve Fish & Wildlife

ELK MANAGEMENT IN AREAS WITH BRUCELLOSIS

2014 PROPOSED WORK PLAN

August 8 Introduction to Fish and Wildlife (FW) Commission

Public Review and Comment to Precede any Final Adoption on October 10, 2013

This is a proposed 2014 annual work plan that has been generally assembled by FWP with input from the Elk Management Guidelines in Areas with Brucellosis Working Group. To date, local working groups have not been identified in all areas. Given ongoing efforts to identify local working groups that may develop and submit area specific work plans for public review and FW Commission adoption, this work plan is proposed as a “default” work plan for implementation in 2014 by FWP until/unless other specific work plans replace it. Actions may be applied in any sequence and/or in combination. Although some actions (dispersal hunts, fencing, hazing, etc.) are available for implementation if adopted as Final in October 2013, other potential management actions would require additional Commission process prior to implementation (biennial season setting, lease approval, etc.).

Potential management actions identified here may be implemented no later than December 31, 2014. Other management actions that may be identified prior to December 31, 2014 but not enumerated here may require additional Commission process. The next annual summary of management efforts and results and any 2015 work plan(s) adoption are tentatively scheduled for Commission review in August 2014. Any additional replacement work plans from local working groups may be proposed for public review and Commission adoption at the time they are assembled.

2014 WORK PLAN MANAGEMENT ACTIONS AVAILABLE FOR APPLICATION WITHIN THE DESIGNATED SURVEILLANCE AREA

Unknown number of local elk hazing efforts during risk period (January 15 - June 15) throughout the Designated Surveillance Area (DSA). Enhance description of potential and actual commingling before and after hazing to improve annual assessment of effectiveness.

Unknown number of small scale fencing efforts (stackyards, feed lines) throughout the DSA. These efforts shall mimic the existing game damage process whereby FWP is responsible for materials and the landowner is responsible for installation and routine maintenance. Public access circumstances (see last bullet below) may influence consideration of temporary vs. permanent fencing materials. Enhance description of potential and actual commingling before and after fencing to improve annual assessment of effectiveness.

Unknown number of small scale dispersal hunts throughout the DSA during the risk period. Each dispersal hunt may not harvest more than 10 elk and would be individually described (dates, area, number of hunters, etc.) by FWP regional staff working directly with the landowner(s) involved. Dispersal hunts will be used to adjust elk distribution and not for population control. Hunters will be selected using mechanisms comparable to those used for game damage hunts. Multiple hunts (each up to 10 harvested elk) could be applied in the same area/same time but each would require specific approval. Antlered and/or antlerless elk may be made available for take depending upon circumstances that include herd composition, population status and risk to other elk and cattle from reproductive tissues in gut piles. Dispersal hunts will be accomplished as early as possible in the risk season and no dispersal hunts will be initiated after May 1 and all dispersal hunts will conclude not later than May 15. Both the FWP Regional Supervisor and local area FWP Commissioner may modify and both must approve dispersal hunt proposals, including the sex/age of animals harvested for the purpose of dispersal. Hunt area identification will be based on commingling risk of re-distributed elk on other properties. Gut piles will be managed to minimize the potential for disease transmission to cattle and elk. Enhance description of potential and actual commingling before and after dispersal hunts to improve annual assessment of effectiveness.

Unknown number of kill permits during the risk period in circumstances that do not lend themselves to dispersal hunts. Kill permit descriptions and authorization will mimic dispersal hunts with no lethal removal after May 15. Enhance description of potential and actual commingling before and after kill permits to improve annual assessment of effectiveness.

FWP staff will continue efforts to coordinate with local working groups to assemble more area specific comprehensive annual or multi-year work plans. This will include an initial presentation by FWP to ensure common understanding of the recommendations and brucellosis transmission dynamics. Options for assembling working groups include existing working groups, conservation or watershed groups and facilitators. Given issue complexity, divergent perspectives, time and interest required, and apparent tolerance (by some) for agency implementation in 2013, it is still unclear in some areas what working group(s) will assume this task despite FWP efforts in 2013 to communicate with local working groups. That said, it is clear some advocates and the statewide working group look for the working group component to be enhanced in 2014.

Explore potential habitat management adjustments on WMAs and other lands and hunting season recommendations designed to foster adjusted elk distribution. A working group setting would be fitting for both topics but that does not preclude recommendations that may be proposed independent of a working group. The biennial season setting process for the 2014 – 2105 hunting seasons begins in December 2013.

Work with Montana Department of Livestock and USDA APHIS to assess and coordinate the need, opportunity and capacity for continued targeted elk surveillance captures beyond 2015.

Continue to explore and implement effective communication, education and outreach with the FW Commission, general public and landowners. While FWP will continue to coordinate local working groups open to all interested parties, those efforts should not be confused with necessary conversations between landowners and FWP about the literal implementation details of approved management actions that include hazing, fencing, and dispersal hunts. These smaller and very site specific conversations are essential to identify logistics that may include fence material definitions and open/closed areas for a dispersal hunt on a specific ranch.

Continue to evaluate public hunting access in the implementation of management efforts. Recognize that restricted or no access may contribute to elk distributions and concentrations that potentially enhance the risk of transmission. In these circumstances any comprehensive management response to reduce commingling and transmission risk includes efforts to increase public hunting access. This scenario may be best addressed with local working groups. Where access has been limited or restricted in the past, assistance from FWP may be based upon the confirmation of landowner tolerance or interest for access in the future. This recognizes that there may be specific circumstances where hunting access is logistically impractical for reasons that might include proximity to home sites, no elk present during the hunting season, small acreage, etc.

Geary, Laura

From: Kujala, Quentin
Sent: Thursday, September 05, 2013 4:25 PM
To: Geary, Laura
Subject: FW: 2014 Brucellosis Work Plan
Attachments: Bruc. W.P. 2014.doc

Brucellosis comments for Oct Commission meeting.

Q

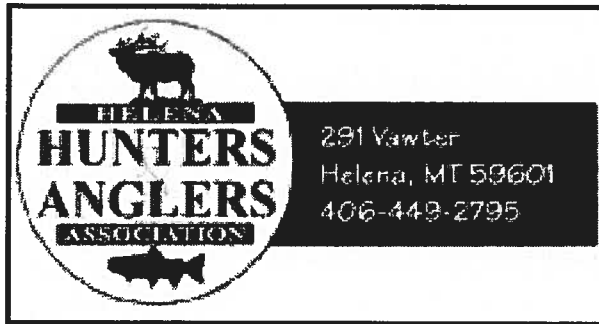
From: Jim Posewitz [<mailto:jim.posewitz@bresnan.net>]
Sent: Thursday, September 05, 2013 11:25 AM
To: Kujala, Quentin; 'Gary Wolfe'; Hagener, Jeff
Cc: 'Stan Frasier'; 'Skip Kowalski'; 'Nick Gevock'; joznpoz@bresnan.net; 'Bill Orsello'; 'Gary Ingman'; 'Charles McCarthy'; Platt, Stephen; 'Steve McEvoy'; 'Bud Gale'; 'Glenn Hockett'; 'Kathryn QannaYahu'
Subject: 2014 Brucellosis Work Plan

Dear MT Department of Fish, Wildlife and Parks.

Attached please find a copy of comments on the 2014 Brucellosis Work Plan prepared by the Helena Hunters and Anglers Association (HHAA). Your attention to our concerns will be greatly appreciated.

Sincerely,

Jim Posewitz, Secretary HHAA



September 5, 2013

Jeff Hagener, Director
Montana Department of Fish, Wildlife and Parks
1420 6th Avenue
Helena, MT 59601

Dear Director Hagener,

On September 3, 2013 the Helena Hunters and Anglers Association (HHAA) meeting featured a discussion relative to elk management and brucellosis. The program included Quentin Kujala of the Montana Department of Fish, Wildlife and Parks (MFWP) and two members of the Gallatin Wildlife Association, Kathryn QannaYahu and Glenn Hockett. Fish and Wildlife Commissioner Gary Wolfe attended and we thank him for his interest and effort.

Following the presentations the HHAA board met to discuss a response to the proposed "Elk Management in Areas with Brucellosis - 2014 Work Plan" (Work Plan) that was introduced to the Fish and Wildlife Commission (FWC) on August 8, 2013 with a public comment period scheduled to end on September 9, 2013.

The HHAA initiates our commentary with the following quotations from two Supreme Court decisions relevant to this issue. The first is taken from an 1896 U. S. Supreme Court ruling in *Geer vs. Connecticut*; and the second from a 1940 Montana Supreme Court decision in *State of Montana vs. Rathbone*. The HHAA believes these decisions have a bearing on the role Montana hunters and anglers urge the FWC to assume as the brucellosis issue is addressed.

Geer vs. Connecticut

"the development of free institutions has led to the recognition of the fact that the power or control lodged in the State, resulting from the common ownership (of wildlife), is to be exercised, ... as a trust for the benefit of all people, and not as a prerogative for the advantage of the government, as distinct from the people, or for the benefit of private individuals as distinguished from the public.

State of Montana vs. Rathbone

“One who acquires property in state does so with notice of the presence of wild game and presumably is cognizant of its natural habits, and hence a property owner must recognize that there may be injury to property or inconvenience from wild game for which there is no recourse.”

In regard to the specific issues the Work Plan addresses the HHAA offers the following comments and suggestions:

- 1) **Public Inclusion:** Every effort should be made to include balanced representation on any and all Working Groups assembled; and that meetings that include MFWP participation be open to full public notice and participation.
- 2) **Habitat:** All land management tools available to improve public land habitat (forage and security) must be part of the effort to achieve the necessary seasonal separation of elk and livestock in sensitive areas. These may need to include reduced grazing on state WMAs and adjustments to travel management plans.
- 3) **Public Lands Grazing Permits:** It only seems logical that discussion of alternatives for reducing livestock/wildlife interactions in the affected target areas would include an evaluation of public lands grazing practices and season of use. The 2014 Work Plan should include an assessment of risks associated with early season livestock grazing on public lands and consider alternatives for reducing these threats. These findings should be communicated to the state and federal land management agencies.
- 4) **Dispersal:** HHAA asks that the word “hunt” not be used in this activity since components of ethical hunting are not a part of this activity. HHAA asks that no dispersal activity occur later than February 15th of any year; and that no dispersal activity occur in management areas that are below the elk population quotas articulated in the current Elk Plan. In addition, the agendas of Working Groups need to also address means of keeping livestock away from wildlife since livestock are easier to control.
- 5) **Contraceptives:** HHAA recommends that no contraceptive testing or use on wildlife be allowed.
- 6) **Costs:** All costs of designing and implementing plans to manage diseases that are a threat to domestic livestock production should be shared by that interest group.
- 7) **Hunter Access:** Currently this program is not requiring ranchers to allow public hunter access during the general season in order to receive any assistance such as Game Damage hunts require subsequent to MCA 87-1-225. There is not difference in purpose between “damage hunts” and “dispersal hunts.” As mentioned in #4 above, we need to find a new terminology other than ‘hunts’ to describe these activities.
- 8) **Past Agreements:** Any and all past agreements signed by representatives of the MFWP relative to this subject need to be reviewed. The purpose of the review would be to amend agreements to preclude unrealistic expectations such as eradication of a disease and/or the “test and slaughter” option applied being to any Montana wildlife.
- 9) **MFWP Role:** HHAA recommends that the MFWP become more of a wildlife advocate rather than a livestock disease management facilitator in this process. It is further suggested that the MFWP increase its educational effort relative to the importance of preserving the truly wild nature of the public resources of the Greater

Yellowstone area and the wildlife being restored to their full potential on the landscapes in question.

In conclusion, the HHAA thanks the MDFP and MFWC for the opportunity to comment and looks forward to having serious consideration given to our commentary.

Sincerely,

A handwritten signature in black ink that reads "Stan Frasier". The signature is written in a cursive style with a long, sweeping tail on the letter "e".

Stan Frasier, President
Helena Hunters & Anglers Association
219 Vawter Street
Helena, MT 59601

CC Quentin Kujula
Gary Wolfe

Geary, Laura

From: Furthmyre, Coleen on behalf of FWP Commission
Sent: Thursday, September 05, 2013 8:32 AM
To: FWP Wildlife
Subject: FW: Elk Management & Brucellosis Risk Plan

-----Original Message-----

From: Superior Archery [<mailto:sarchery@bresnan.net>]
Sent: Wednesday, September 04, 2013 9:57 PM
To: FWP Commission
Subject: Elk Management & Brucellosis Risk Plan

Brucellosis was transmitted to our ungulate herds at a time when accepted practices were being used. Accepted practices means the majority of us agreed on what was taking place. Therefore we all bear the consequences. Today we have a consequence we need to deal with as a cohesive group, not as sportsmen or ranchers, or etc. Any solution is going to require funding. The funding should come from a collective source, ie. from all of us...perhaps something like a ten cent tax on gas. Once the funding source is secured then we can work on other details of the plan.

T.J. Smith
Billings, Montana 59101
Ph:(406)245-0087

From: katqanna@gmail.com
Sent: Saturday, September 07, 2013 1:46 PM
To: FWP Wildlife
Subject: 2014 Work Plan for Elk Management Guidelines in Areas with Brucellosis

Below are my comments for the 2014 Work Plan for Elk Management Guidelines in Areas with Brucellosis

1. **Local Working Groups:** It is crucial that there be implementation of the Elk Management Guidelines In Areas With Brucellosis Working Group Proposed Final Recommendations: Fundamental Objective # 2 - local working groups (collaboration of diverse representation - Sportspersons, Wildlife Enthusiasts, Landowners, Livestock Producers and other resource or land management agencies). "All would be open meetings." Montana Annotated Code 2-3-101-107
2. **Fundamental Objective # 3: Maximize Cost Effectiveness:** These so called Dispersal "Hunts", hazing and rancher stackyard fencing efforts all utilize Game Damage forms and models, yet do not have the requirements of the Game Damage program Montana Annotated Code 87-1-225: "Regulation of wild animals, damaging property ---public hunting requirements. Landowner is **only eligible** for game damage if...allows public hunting during established hunting seasons..." This is not cost effective for sportsmen if they are not receiving public hunting access in exchange for these services. Please make public hunter access a mandatory for requirement for FWP action on private land.
3. **Fundamental Objective #1: Minimize Transmission from elk to livestock -** needs to focus on Habitat, increasing vegetation on WMA's and public lands to attract and retain elk (elk security to restore public herd), look at reducing grazing on FWP WMA's to provide more forage for wildlife, as well as evaluate later release dates to not interfere with elk calving.
4. **Dispersal Hunts:** the word "hunt" should not be used. This is not a fair chase hunt situation, it is not ethical hunting, it is a removal. No dispersal removal activity should occur after Feb. 15th, the time period established for ethical hunting considering the gestation period of the cows. Also, no removals should occur in areas that are in decline/under objective. Removals should not be a first choice, but rather a last resort, if that.
5. **Brucellosis:** While capture, test and slaughter was added to the draft Proposed Recommendations in 2012, by the FWP editor, it was objected to by the original Working Group and removed for the Final Recommendations. This needs to be adamantly maintained, in light of the ranching community calling for capture test and slaughter, as well as legislative efforts to make it law. Dispersal "hunts" should not mimic this policy under another name. Gut piles from removals should be managed so that if an elk was infected, any possible brucella in birthing materials, lymph nodes and sexual organs does not present a mode of transmission to cattle or other elk, which would be counter productive to this program (gut piles were not managed in 2013!). In addition, FWP is signed on to

the IBMP 9 objectives, point 4 being "Commit to the eventual elimination of brucellosis in bison and other wildlife." The only other wildlife in Montana that carry *Brucella abortus* are our elk. FWP (elk brucellosis working groups) needs to remove themselves from this objective. In addition, USDA and its subsidiaries such as APHIS, as well as the MTDOL are promoting and pushing the immunocontraceptive sterilization of our wildlife. This elk brucellosis management plan needs to adamantly and publicly reject any efforts by the ag/livestock interests in promoting immunocontraceptives or vaccines as a means of minimizing transmission of brucellosis to livestock. "Humans have rarely (if ever) eliminated a disease from a wildlife population without eliminating the wildlife population of concern."

6. Managing for Wildlife: A number of FWP wildlife biologist and peer agency papers and comments concerning the elk brucellosis management plan stated repeatedly that FWP should not be managing elk like livestock, but as wildlife.
7. Education: There needs to be a concerted effort to produce wildlife management supported educational materials for the public (not tweaking the DoL's presentation), not this worst case scenario study quote of 81 days (last time I heard the presentation to the FWP Commissioners it was up to 100 days, which has never been duplicated in natural conditions) that brucella remains on the landscape. Even the MtDoL states 21-26 days. 81 or more days is inflammatory and counter productive to the goal of maximizing acceptability of the disease in wildlife and the elk populations. Also, much of the current presentation is advocating the business of the livestock industry and their interests. FWP is in the business of managing Fish, Wildlife and Parks, not livestock.

Please do not approve the current Draft 2014 Work Plan, but require this document to uphold and reflect the commission approved Proposed Final Recommendations.

Thank you, Kathryn QannaYahu

September 9, 2013

To Whom It May Concern,

The following comments pertain to the 2014 Proposed Work Plan for Elk Management in Areas With Brucellosis. Overall the Plan uses the tools recommended by the Elk Working Group, and adopted by the Fish and Wildlife Commission. The tools represent a significant effort from FWP to address the changes in elk distribution and to prevent comingling of elk-diseased or not-with livestock.

However, there are areas of concern. The second and third bullets talk about hazing and dispersal hunts. It is important to have these tools available starting right after the normal hunting season ends and before the start of the brucellosis risk period-January 15. The time described may be when elk start to access the lower elevations and for some areas try to create resident populations. These groups of elk may be small in number, but they become attractants for other elk as we near the identified January 15 to June 15 risk period. For livestock producers, elk are a disease threat at all times, not just for the identified risk period.

Another concern deals with hazing. As different hazing areas in Paradise Valley are identified, there will be a need for another hazer. It would be good to have the new hazer be trained by the present hazer. Hazing anywhere in the DSA requires someone very competent and dependable. They can be hard to find.

With the ability to use different hunts and kill permits to disperse elk and prevent comingling, timing will be a factor. The time involved between identifying the project and actual on the ground action needs to be as responsive as possible. Many times opportunities are lost due to the inability to get the ok to proceed.

For Paradise Valley it will be critical to identify which areas need more permits to actually allow for hunters to be successful during the regular seasons. Also, altering the areas-for example 314-to accommodate more permits may be helpful. It is frustrating for livestock producers that have elk not to be able to get hunters in because there are not enough permits. We realize this is a discussion for the future, but it does pertain to this issue.

The eighth bullet mentions public education. A possibility would be sending out brucellosis fact sheets in FWP correspondence with hunters.

There are changes on the landscape this year which may alter the way the migratory elk access Paradise Valley. The Emigrant Fire burned habitat and natural barriers that may cause/allow for elk to show up earlier than normal. Other geography in the DSA may be experiencing change. It remains imperative to be flexible and quick in response to the needs presented.

Thank you.

Druska and Richard Kinkie

MONTANA WILDLIFE FEDERATION

www.montanawildlife.org



*Protecting
Montana's wildlife,
land, waters,
hunting and fishing
heritage since 1936*

Sept. 10, 2013

Mr. Jeff Hagener, Director
Montana Department of Fish, Wildlife and Parks
1420 6th Avenue
Helena, MT 59601

Dear Director Hagener:

The Montana Wildlife Federation (MWF) appreciates the opportunity to comment on your "ELK MANAGEMENT IN AREAS WITH BRUCellosIS 2014 PROPOSED WORK PLAN". We believe that you and the Elk Brucellosis Working Group are making significant progress on addressing this issue. However, we also believe that this is a very complex issue and deserves the establishment of more site-specific solutions tailored to local "on the ground" situations.

MWF is the oldest and largest hunter and angler based conservation group in Montana and was founded in 1936 by Montana conservationists, landowners, hunters and anglers. MWF is a 501(C) 3 non-profit organization comprised of a Helena-based staff and over 5,000 members and 24 affiliate clubs throughout the State. We share a mission to protect and enhance Montana's public wildlife, lands, waters and fair chase hunting and fishing heritage.

Since practically all of our members are elk hunters and since the area where elk that test seropositive for brucellosis has the potential of expanding, implementation of this work plan has significant implications that extend well beyond the current Designated Surveillance Area (DSA) and is of greatest concern for our members across the state. As MWF has stated many times, **"When dealing with wildlife/domestic livestock disease transmission issues, we believe that wildlife should be "kept wild" and that disease management solutions should focus on domestic livestock that can be more practically managed under more controlled conditions."** We hope that you and the Working Group will keep this principle in mind as you finalize and implement this work plan.

Before we make specific comments regarding the work plan, **MWF would like to commend FWP for being the first agency to acknowledge that the objective for dealing with this problem is to "minimize risk" of brucellosis transmission from wildlife (elk in this case) to domestic livestock.** Until now, the objective has been to "eradicate" brucellosis. Eradication may be a reasonable objective for domestic animals, but not for free ranging wildlife. In wild populations, "eradication" is an impossible task and the use of the term only serves to create "false expectations" among interest groups. Acknowledgement of this fact is a major step forward and can only lead to more practical, workable and realistic solutions. Thank you for taking the lead on this.

MWF offers the following comments and suggestions regarding your proposed work plan:

1. **Creation of Local Working Groups** – As expressed in meetings with your staff, FWP prefers that local working groups that are expected to deal with the elk/brucellosis transmission issue be created from existing

local working groups that volunteer to take on this responsibility. **MWF believes that FWP should take a leadership role in convening and managing these groups.** We agree that, in some cases, FWP can authorize existing local groups that have been established for other purposes to successfully take on this responsibility. However, MWF has serious concerns that some existing groups may lack interest, knowledge and expertise to effectively carry out its responsibilities. MWF also has concerns that fair representation of all interests may not exist on currently established groups. We recommend that, should you sanction an existing group, you ensure that there is fair representation of all interested parties and that the work group has the capability of fully addressing the problems at hand. When there may be questions regarding expertise, impartiality and fairness, FWP should give strong consideration to creating “new” working groups from scratch.

2. **Responsibilities of Local Working Groups – MWF believes that the expectations and responsibilities of local working groups be precisely defined.** Research and experience from similar processes around the West and nationwide clearly demonstrates that collaborative working groups succeed when they have a clear charter and well-defined responsibilities. Local working group responsibilities should include items that stem from the approved work plan and include such things as recommending refinement of policy and proposing strategies and actions that are appropriate for use in resolving local issues and problems. Local working groups should have procedures in place that insure that other interested citizens who have pertinent knowledge have ample opportunity to provide input. Tactical site-specific decisions that are needed to implement the strategies should not be the responsibility of local work groups and should be determined by FWP and the particular landowner(s).
3. **Dispersal Hunts – MWF strongly recommends that the term “dispersal hunt” be changed to something that does not imply that this is a normal “recreational hunting” situation.** Management actions that entail killing and removing wildlife under what may appear to be overly controlled conditions and during the later stages of pregnancy do not replicate the more traditional wildland hunting situations that exist during the regular elk hunting seasons. In situations where animals are harvested in close proximity to development and at times that are normally considered inappropriate for the harvest of females, there is a great opportunity for misunderstanding. Questions can arise regarding “fair chase” and can potentially create unnecessary conflict and animosity with non-hunting advocates. Let’s call these actions something that more closely describes what they are actually intended to be - “emergency conflict resolution actions”. A term similar to the one described would more precisely explain the purpose for the action - an animal dispersal measure and not necessarily a recreational hunting activity. Although we understand that in some cases it may be necessary, **MWF is also concerned about routinely using lethal removal of cow elk in order to separate elk from livestock after Feb. 15 and especially where elk herds are below population objective.** This is an action that we would normally support only as a last resort and it provides yet another opportunity to further divide sportsmen from those that otherwise accept hunting as a legitimate activity.
4. **Habitat – Habitat modification should be used in preference to lethal techniques in order to reduce the opportunity for commingling of elk and domestic livestock during high risk periods for disease transmission.** All land management tools available to improve habitat (forage and security) conditions on public lands must be part of the effort to achieve the necessary seasonal separation of elk and livestock in sensitive areas. These may include adjustments to grazing on state Wildlife Management Areas (WMAs) and other public grazing lands, direct habitat improvement (for example, vegetation treatments) on public lands and reducing disturbance from motorized and non-motorized activities that can significantly displace elk from public to private ranch lands.
5. **Equity – The cost burden of implementing this plan should not be borne solely by sportsmen.** This is a problem where both sportsmen and livestock producers have a stake and both groups should share responsibility. In addition to sharing a portion of costs with sportsmen, livestock operators should also consider modifying management of their livestock to reduce risk. Running steers in areas of high risk of disease transmission is one example.
6. **Hunter Access - Currently this program does not require ranchers to allow public hunter access during the general season in order to receive assistance. Sportsmen should be given some opportunity for hunting access on these private lands in order to help ensure that disproportionate numbers of elk do not congregate on disease susceptible ranches because of a lack of hunting pressure.** Similarly sportsmen,

including landowners, should be given equal opportunity to legally take elk outside of the general hunting season when lethal removal of elk is determined to be necessary.

- 7. Animal Husbandry Practices - MWF is opposed to using intensive animal husbandry practices on wild elk.** We are very concerned about the use of any means that would potentially reduce the wild character of Montana's elk populations. Except for legitimate research and FWP management purposes, this would include actions such as the use of corralling, quarantines, contraceptives and vaccination.

In summary, MWF appreciates the opportunity to comment on your proposed work plan for managing elk in areas where seroprevalence of brucellosis exists. We support the establishment and use of local working groups to deal with localized issues where brucellosis transmission is possible. We prefer habitat modification and making changes in management over the killing of elk long after the regular hunting season has ended to resolve the problem. We are emphatic in that we want to keep wildlife "wild" and want to give sportsmen an opportunity to harvest animals whenever possible. We also expect that the private landowner will make reasonable management concessions and contribute equitably to the costs associated with implementing this 2014 work plan. Thank you for the opportunity to comment.

Sincerely,

Gerald "Skip" Kowalski, Board President
Montana Wildlife Federation

Gayle Joslin
2763 Grizzly Gulch
Helena, MT 59601
September 9, 2013

Montana Fish, Wildlife & Parks
Wildlife Division
1420 6th Avenue
Helena, MT 59601

Attn: Public Comment - Elk Management in Areas with Brucellosis – 2014 Work Plan

Dear Wildlife Division,

Thank you for this opportunity to comment on the “Elk Management in Areas with Brucellosis - 2014 Work Plan.”

The following is my perspective, but what I also believe represents the viewpoint of thousands of people who cherish wildlife, and have a particular reverence for elk.

Montana’s elk populations are legendary. Through the ages, countless stories revolve around chance encounters, or stealthy pursuit of wapiti. Whether we are Montanans or visitors, few things stick in one’s memory more permanently than a brush with a cow, a calf, or even a shredded-velvet spike bull elk.

When people brought diseased domestic animals onto the magnificent Montana landscape, it was a devastating moment in history for wildlife. As cattle released the *Brucella abortus* pathogen into the environment, it not only infected other ungulates, it melted into temporary obscurity within foxes, coyotes, ground squirrels, badgers – as well as other unsuspecting species that had lived under the Big Sky for thousands of years. As with most inflictions, nature has a way of coping, and so physiological survival strategies evolved to endure this exotic adversity.

Integrity demands fairness for native creatures of Montana. Since time has removed full opportunity to rectify damages to wildlife, Montanans and others who have kindred relationships with wildlife and the country they require, request fair and honest resolution of the brucellosis issue. Such treatment demands respect for wildlife and therefore respectful policy – policy that drives methods to resolve disease conditions that have been imposed upon wildlife through domestic livestock.

The 2000 Interagency Bison Management Plan, with its numerous amendments, (signed by Montana Fish, Wildlife & Parks, Montana Department of Livestock, Animal Plant Inspection Service, National Park Service, and USDA Forest Service) calls for eradication of the *Brucella* virus in wildlife. The following specific request is being made: amend that language to realistically accept that *Brucella* cannot be eradicated now that it has been introduced into the environment. Removal of wildlife, lethal or otherwise, that carries the now feral bacteria, for the purpose of *Brucella* eradication, is unrealistic. Any provision that may provide for removal of

wildlife from the wild is unacceptable to the populace that highly values Montana wildlife, and should be deleted from these and other policy directives. If this language is not removed, there will be no public trust in the working group process, and FWP actions will always be suspect.

It has been shown that *Brucella abortus* can be effectively managed in domestic livestock with proper vaccination, as a number of other diseases have been. Therefore, *Brucella abortus* should be removed from the list of biosecurity pathogens.

At the same time, vaccinating wildlife against *Brucella* is virtually impossible and is not in the best interest of wildlife or the sporting public that would be pressed to foot such a bill without possibility of eradicating the pathogen.

The report, "A STATUS REVIEW OF ADAPTIVE MANAGEMENT ELEMENTS, 2000 to 2005" (http://ibmp.info/Library/7%20-%20IBMP%20Status%20Review_Sept2005.pdf) states, "A protocol for evaluating the safety and efficacy of a wildlife vaccine against brucellosis in the GYA was adopted by the Greater Yellowstone Interagency Brucellosis Committee (GYIBC) in 1998. The purpose of the protocol was to establish guidelines for the development and evaluation of new brucellosis vaccines to be used in free-ranging elk (*Cervus elaphus*) and bison (*Bison bison*)." Regardless of measures that might be taken to overcome set backs to wildlife vaccination, including the discovery that, "Shedding of vaccine strain *Brucella* is possible when pregnant bison are vaccinated and abort their pregnancy" -- vaccination experimentation should not be conducted on Montana wildlife without full disclosure to and discourse with the public.

The above measures can and should be expeditiously accomplished through the combined efforts of the agencies previously listed. Such actions would set the stage for good-faith efforts on the part of working groups that must be convened to further the efficient and effective implementation of provisions to maintain spatial and temporal distance when and where necessary to minimize contact between wildlife and livestock. Such alterations in the IBMP documents would also allow pursuit of management options that heretofore have not been seriously considered, but which would help to alleviate grid-lock by design. If language alteration is resisted by the other agencies, MFWP should remove their endorsement from the IBMP documents.

The genesis of Working Groups came about as a result of democratic processes for the public's inclusion. Often such working groups have been requested by government to help garner broad-based consideration of issues that such agencies must consider as they develop management policy. In the case of Brucellosis Working Groups, MFWP appears to be waiting for the spontaneous genesis of such groups, in order to utilize such group's existing structure – as was explained at a recent meeting by the Wildlife Management Section Chief. However, existing groups did not form for this purpose and are not equitably balanced or informed to address the specific issue of an escaped pathogen. Government entities have regularly worked with the public to establish balanced and knowledgeable working groups. In the case of wildlife and cattle and brucellosis, it is unreasonable for the State of Montana to expect such working groups to spontaneously come together. Further it is disingenuous for the State of Montana to generate its own Work Plan then call for that Work Plan to be the default action if such working groups do not materialize. Therefore, another important item that should be addressed in order to kick-start the elk-livestock-brucellosis work plan and implementation effort, is for Montana

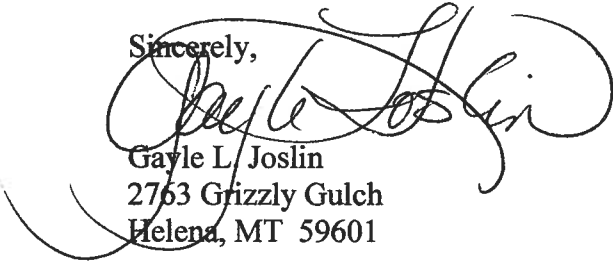
Department of Livestock and Montana Fish, Wildlife & Parks to call for applications of knowledgeable individuals to serve on such a Working Group. The State of Montana, including both MDOL and MFWP should provide travel support for such efforts that are designed to benefit livestock and impact elk.

Hunting for elk beyond the established 5 week season for the purpose of reducing elk numbers (or any other big game animal) in Management Units that are at or below at population objective, should not be an option. Within fair chase hunting doctrine, there is no purpose in such actions.

We the people who hunt and appreciate wildlife, look to MFWP and the Fish and Wildlife Commission as the State's wildlife stewards, to advocate on behalf of wildlife and their habitats. As your constituents, we appreciate your clear actions and unfailing dedication to wildlife across Big Sky country.

Thank you for accepting and earnestly considering my perspectives and suggestions.

Sincerely,



Gayle L. Joslin
2763 Grizzly Gulch
Helena, MT 59601

cc: Jeff Hagener, Director
MFWP Fish and Wildlife Commission

Geary, Laura

From: Kujala, Quentin
Sent: Monday, September 16, 2013 8:31 AM
To: Geary, Laura
Subject: FW: Park Co. Rod and Gun Club Elk MGMT and Brucellosis Work Plan Public Comment
Attachments: PCRGC Brucellosis public comment.pdf

Another brucellosis comment for the October Commission meeting.

Thanks and sorry,
Q

From: Hayes Goosey [<mailto:hgoosey@wispwest.net>]
Sent: Friday, September 13, 2013 10:27 AM
To: Hagener, Jeff
Cc: Vermillion, Dan; Kujala, Quentin; Loveless, Karen
Subject: Park Co. Rod and Gun Club Elk MGMT and Brucellosis Work Plan Public Comment

Dear Director Hagener,

Please find attached a public comment from the Park Co. Rod and Gun Club, a local grass roots sporting organization based out of Livingston. We appreciate the opportunity to comment on this sensitive issue and are available for additionally comment or clarification should they be needed.

Best regards,

Hayes Goosey, President
Park Co. Rod and Gun Club

CC Dan Vermillion
Quentin Kujala
Karen Loveless

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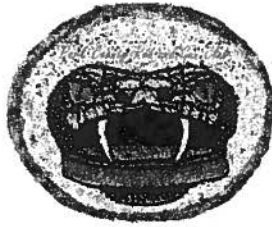
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Hayes Goosey, President
Park Co. Rod and Gun Club

CC Dan Vermillion
Quentin Kujala
Karen Loveless



Park County Rod & Gun Club
P. O. Box 315, Livingston, Montana 59047

11 September 2013

Mr. Jeff Hagener, Director
Montana Department of Fish, Wildlife and Parks
1420 6th Avenue
Helena, MT 59601

Dear Director Hagener:

I am writing to you today as President of the Park Co. Rod and Gun Club (PCRGC), a local grass roots sportsmen's organization located in Livingston. Our membership consisted annually of around 650 family memberships allowing us to honorably represent over 1,000 individuals from Park, Gallatin, Sweet Grass, and Meagher counties. The PCRGC appreciates the opportunity to comment in support of the proposed 2014 Elk Management work plan as it is written and displayed on the Montana Department of Fish, Wildlife, and Parks (FWP) web page.

Initially, the PCRGC would like to commend FWP for acknowledging the objective of minimizing the risk of brucellosis transmission between elk and domestic livestock. As the current working plan is modified and implemented, it is crucial for the success of this effort that there is an understanding that transmission can occur not only from wildlife to livestock, but also from livestock to wildlife. Therefore, a work plan which gives FWP the necessary tools to minimize livestock/wildlife interactions during high risk transmission periods is paramount. The PCRGC supports the proposed 2014 work plan as it is written and we offer the following suggestions for your consideration:

1. Terminology: It is becoming apparent that the term 'dispersal hunt' is receiving much debate on the grounds that the lethal actions used to disperse elk are somehow not implemented in a fair chase fashion. The PCRGC has seen no evidence which would support that these hunts are in fact unethical or that elk are intentionally baited into a 'kill zone' or that they are contained within any fencing or structure which would restrict or eliminate their ability to flee from the hunter. Furthermore, we are unclear why harvesting a cow elk in any given pasture or hay field during the general 5-week season constitutes fair chase yet harvesting the same elk in the same field using the same techniques but in February is considered a gross violation of fair chase hunting. Regardless of this, the PCRGC does agree that it would be in the best interest of the 2014

work plan to re-name these hunts to something else so that individuals and groups can start to focus on the real issue. That being brucellosis risk management. Quite often academic debates over terminology inadvertently become sticking points which, ultimately, slow down and/or destroy these types of on-the-ground efforts. On a final note, the PCRGC is concerned that excessively late hunts could be viewed as unethical by the anti- and even non-hunting communities. In light of this, we are, however, supportive and do agree that the use of dispersal hunts is a step forward and more ethical practice than simply issuing kill permits.

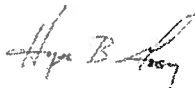
2. Local Working Groups: The PCRGC is always supportive of solutions being crafted with the input from local individuals and groups and if a brucellosis working group is to be appointed, we recommend that it be established from scratch rather than appointing any existing group to the lead. However, the PCRGC questions the importance and need of establishing local working groups. The best way to minimize the risk of transmission is for FWP to have the tools necessary to accomplish the task at hand. One tool which is crucial for success is giving FWP the 'flexibility' to adapt to situations on the ground as they occur. Establishing working groups will simply weight down implementation of the work plan with unnecessary debate from opposing interests which will, in the end, have the reverse effect and maximize the potential of brucellosis transmission by tying the hands of FWP. The PCRGC believes that public comment periods, like this one, alongside developing working relationships with FWP managers, biologists, and commissioners provides sufficient opportunity for input by members of the public.
3. Hunter Access: The PCRGC is a staunch supporter of public access for hunting purposes to both public and private lands. Several landowners in the Mill and Elbow creek areas of the designated surveillance area (DSA) do in fact allow and have historically allowed hunting on their properties. On the other hand and in this same area there is substantial acreage which is either closed outright to hunting or is outfitted for big game. In light of this we do realize that the current brucellosis management effort does not require landowners to allow public hunting access during the general season; however we are still supportive of the proposed 2014 work plan because it does recognize the need to evaluate public access in the area over the long term. We see efforts like these, through FWP, as opportunities to improve relations between landowners and sportsmen which will ultimately improve the future of public access in the DSA.
4. Habitat: Improvement of habitat is always a positive action in terms of wildlife management. However the PCRGC is hesitant to recognize this action alone as any form of silver bullet which will ultimately eliminate commingling between elk and cattle during high-risk transmission periods. Improving elk calving habitat is one thing getting them to use it is another. Elk seek out calving grounds in close proximity to livestock calving grounds for many reasons. One of the most obvious reasons though is the indirect protection elk receive from predators through the mere presence of ranchers in these calving areas. This indirectly provides very excellent elk calving 'habitat'. Consequently, lethal dispersal tactics substantially reduce the attractiveness of livestock calving grounds to elk.

5. Harboring Public Wildlife: One of the most serious concerns of the PCRGC is actions which harbor the public's wildlife. There are several properties in the Mill and Elbow creek areas of the DSA which do not allow hunting or are outfitted. It is primarily these areas which harbor elk during the general 5-week season. Once the season is complete, the elk migrate to lower lying properties, some of which allow general season public hunting, to the protective calving grounds. We encourage FWP to work toward minimizing wildlife harboring on private lands during the general 5-week season.

6. Livestock Production Practices: The PCRGC encourages FWP to work with livestock operations toward a mutual goal of appropriate livestock management. It is much easier and more cost effective for domesticated livestock to be herded than any attempts to manipulate the natural behavioral patterns of wild elk. In fact we are in opposition to any non-research related corralling, quarantines, contraceptives or vaccinations of our wild elk populations. As the people are supportive of the efforts of the 2014 work plan, we would appreciate the agricultural community responding in-kind by implementing livestock management techniques, should they exist, which minimize the commingling of wild elk and cattle.

In closing, the PCRGC is supportive of the current 2014 Elk Management and Brucellosis Risk work plan. We appreciate the efforts of FWP and are supportive because it allows FWP to adapt quickly to local needs. One opinion, which resonates in some communities, is that government cannot respond quickly and we view the 2014 work plan as an adaptive and appropriate set of guidelines which will give FWP the necessary flexibility to respond, in a timely fashion, to local needs. Again, thank you for the opportunity to comment on this issue from a local perspective. We look forward to the coming year.

Best regards,



Hayes Goosey, President
Park Co. Rod and Gun Club

CC Dan Vermillion
 Quentin Kujala
 Karen Loveless