

## Hearing on Game Damage Issues

August 11, 2015

My name is Gayle Joslin. Although I am submitting comment on behalf of Helena Hunters and Anglers Association, I also take this opportunity to speak for myself.

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

I point this out because during all the game damage hunts, I never had trouble recruiting hunters, through the process that we had in place at the time.

I am quite concerned with the notion that landowners would be allowed to develop their own exclusive list of hunters, and thus the real possibility that the general public may be excluded from game damage hunts or management seasons. As the proposed regulations are now phrased, this is a real possibility. Montana's wildlife is stewarded as a Public Trust on behalf of the state's citizens by FWP. Exclusive use of landowner-generated hunter lists would be a breach of that responsibility. Perhaps 20% of the allowed hunters on a game damage or management season hunt could be recommended by the landowner. But exclusive landowner lists, comes perilously close to privatization of wildlife, or at least the sanctioning private hunting.

Development of the proposed Game Damage Hunt roster is unclear. No longer would the roster be open for a specified period but rather "dates specified by the department annually". Would these dates be consistent? Would the sporting public be adequately advised of the roster openings?

Management Seasons seem to have some legitimacy in identifying a large portion of a hunting district or districts that experience game damage issues, rather than changing them to Management Hunts, which would limit the oversight necessary to establish a hunt and would compromise the authority of the FW Commission. I understand that it would be easier for the Department to administer a "hunt" rather than a management season, but oversight is important.

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

I firmly believe that FWP must pay more attention to PUBLIC land habitat condition and wildlife standards imposed by Montana's long-standing National Forest Plans. These public land conditions and forest plan wildlife security standards across much of the state dictate whether private landowners experience wildlife depredation. When road densities displace wildlife from public land, when public land vegetation removal projects of all kinds remove wildlife security and thus displace wildlife; when the National Forests remove their Forest Plan Standards for Wildlife Security and the Department goes along with it, then FWP is complicit in the problems that ensue on private lands.

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

Fish, Wildlife and Parks needs to self-examine their role in this decline of public participation.

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