



Montana Fish & Game Commission  
PO Box 200701  
Helena, MT 59620

November 10, 2021

To the Commission:

As you are aware, according to Montana law, “the commission shall determine the appropriate elk, deer, and antelope numbers that can be viably sustained...(and) the department shall implement, through existing wildlife management programs, necessary actions with the objective that the population of elk, deer, and antelope remains at or below the sustainable population” Mont. Code Ann. § 87-1-323(1). Prior hunting regulations have failed to achieve this goal for elk populations, especially for limited-entry permit districts. Of the ten districts that are the most over objective, all have limited permits.

Thus, we request the Commission to consider two proposals for consideration as part of the biennial season setting for elk management:

1. Eliminate limited-entry archery permits in all districts that are over objective.
2. Adopt a formula for setting the number of rifle permits for limited entry districts. The number of rifle permits allocated should be a function of the Department’s preferred 30:100 bull-to-cow ratio, historic harvest success data, and the objective level for the district.

These proposals are intended to address two problems: persistently over-objective elk populations, and the disparate treatment of landowners in districts with a limited-entry permit.

The trend of elk populations exceeding objectives is well documented. Reducing hunting opportunity through limited-entry permits has been the primary driver of this problem. The number permits should be based on reaching the biologically healthy bull to cow ratio based on the objective limits—not based on niceties like creating trophy opportunity.

These proposals may not fully bring the Department into compliance with this law, but they would achieve a big step in the right direction.

Sincerely,

CHARLES DENOWH  
Executive Director