

# #1

**COMPLETE**

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## Q1

Contact information

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**Q2**

Please comment on Elk Hunting Access Agreements

## Elk Hunting Access Agreements

Chair Robinson, Commissioners -

On behalf of the Montana Wildlife Federation (MWF), Montana's oldest and largest hunter and angler-based conservation group, please accept these comments regarding the 2026 Elk Hunting Access Agreements.

While our feelings on the EHAs are mixed, we certainly appreciate the habitat, wildlife tolerance, and public access and hunting opportunities provided by private landowners.

Rather than reacting to the individual 2026 applications, which we were told won't be published for public review before the online comment deadline anyways, we'd like to step back and address the 2025 Program Evaluation Report and ongoing programmatic concerns.

The feedback from both landowners and hunters underscores the need to continue to improve the program's communication and oversight. That said, this has already become a heavy lift for the Department, with decreasing interest from landowners and very little harvests to show for it.

The 2025 report suggests that only 32 elk were taken - including landowner and public hunter harvests. Of those, at least 25 were bulls, meaning as few as 7 cow elk were harvested from these EHA agreements. It's hard to think this had any measurable wildlife management benefit, which, importantly, is the stated goal of the program.

Perhaps unsurprisingly, landowners and the hunters they selected had significantly higher harvest rates - 52% and 66%, respectively - compared to just 16.5% success rates for public hunters, and that's just counting the publicly assigned hunters who actually hunted. Many (27%) selected hunters didn't even hunt these properties, citing, among other reasons, that they "heard/were told there were no elk on the ranch: or "couldn't get in contact with the ranch."

These numbers alongside the dropping EHA landowner participation, plus the program feedback all seem to validate some of the early and ongoing apprehension to the program. We remain unconvinced that the return on investment is worth it.

Note: more than a third of these EHAs are on lands also enrolled in Block Management, which is great from an access standpoint, but really defeats the perks of the program in terms of a quality experience being offered to hunters. This also highlights the unbalanced incentives offered for public access where landowners who allow just two or three hunters are getting these free permits whereas Block Management cooperators aren't, necessarily. We commend FWP for recognizing this glaring inconsistency with access programs, and working to at least make it clearer to hunters ahead of time if an EHA is on a ranch enrolled in Block Management or not. As noted in FWP's report, this dynamic also creates challenges in terms of program reporting since more than a third of these agreements are enrolled in Block Management - meaning those participants are not even surveyed or part of the results. In our opinion, a comprehensive look at landowner incentives for both residents and nonresidents is needed.

Finally, the fluctuating/drop in program interest welcomes a compelling argument to move these EHA applications and agreements up so they can be folded into the general deer and elk permit draws. This would 1) prevent FWP from distributing more than the biologist-recommend and Commission-approved permits (it could be part of the permit quota rather than in addition to it), and 2) further incentivize the program as landowners would then have to decide at the time of the permit application window if they want to allow limited public access for a guaranteed permit, or if they want to roll the dice on getting a no-strings-attached permit. Aligning the EHA applications with the general draw would increase landowner participation in this program, without question.

Thank you for the opportunity to comment.

Kevin Farron, Conservation Director, Montana Wildlife Federation

**Q3**

**Respondent skipped this question**

Optional: Upload your comments

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#2

**COMPLETE**

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**Q1**

Contact information

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**Q2**

Please comment on Elk Hunting Access Agreements

Licensed hunters should be allowed to step from one public access to another public area at any corner.

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**Q3**

Respondent skipped this question

Optional: Upload your comments

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