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April 28, 2010

Director Maurier  
PO Box 200701  
Helena, MT 59620

RE: Emergency Closure for Elk and Deer hunting district 250

Dear Director Maurier,

My name is Scott Boulanger and I am an Outfitter from Darby that operates my Outfitting business in hunting district 250. The West Fork of the Bitterroot.

After reviewing the 2009/2010 post season flight surveys, and the wolf population reports, and the lion harvest results, and the 2009 Darby check station reports I am requesting you to issue an EMERGENCY CLOSURE for the 2010 Elk and Deer hunting season. (Copies of reports attached)

I am requesting the EMERGENCY CLOSURE for the following reasons.....

- 1) The elk population objective for unit 250 adopted by the Bitterroot Elk working group was approved at 2000 head. For the last 2 years we have been hovering around 764. That means we are 62% UNDER the objective! The TOTAL elk population for the entire Bitterroot Valley continues to decline and is down 21% in the past 4 years.
- 2) The adopted statewide elk management plan calls for a minimum of 10 bulls per hundred cows. Our 2010 flight surveys show that there are only 4 bulls per hundred cows. In fact in the entire hunting district there were only 6 adult bulls observed and 20 yearling bulls observed. That means we are going to have most of our cows being bred by immature bulls if they get bred at all.
- 3) The current data supplied by FWP wolf specialist Liz Bradley indicates that there are at least 52 wolves per thousand elk in unit 250. It is one of the highest wolf densities in the State. With that amount of wolves there are simply not enough elk and deer left for sport hunting.
- 4) The 2009 Mule deer survey indicate that there are only 3 bucks per hundred does in hunting district 250. FWP recognizes this fact by instituting a limited permit system but then turned around and issued 125 permits! Even more confusing to me is that in unit 270 across the river we have observed 34 bucks per hundred does yet we only issue 45 permits in that unit?

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- 5) After reviewing the 2009 harvest results of the special limited Mountain Lion permits it reveals that the FWP only reached 40% of the desired harvest of Lions AGAIN. In fact the year before in 2008 there was only 1 lion harvested in the entire unit 250. Also in the previous 9 years the FWP protected ALL female Lions from being harvested. From 1999 through 2008 there was not one single female lion harvested. Again I feel like the abundance of predators has eliminated our prey base of mule deer and elk.
- 6) Also revealed in the flight surveys is the fact that we are having a serious problem with our elk calf recruitment. The 2010 surveys show that we have a ratio of 11 calves per hundred cows. The experts tell us it used to take 23-25 calves per hundred cows to MAINTAIN herd populations. That was BEFORE the introduction of the Gray Wolf. Modern Biologist tells us it now takes a minimum of 30 calves per hundred cows to maintain the herd populations.
- 7) Bears. Mike Thompson FWP Biologist told the Outfitters at the USFS meeting that the season structure we have had for bears over the last 20 years was designed to GROW the Bear population. Well, I believe that the plan worked and that the Bears did increase in population and they are also having a negative effect on the ungulate populations. FWP recognizes this to be true and this year implemented a season that lasts 2 weeks longer than in the past. It is my hope that we will harvest more bears this year as it is proven in multiple western states studies that Bears prey hard on elk calves during the first 2 weeks of an elk calves life.
- 8) Darby Check Station Results. In the 2009 the whitetail deer and mule deer harvest are down by nearly half. Hunters' numbers have declined 17% with hunters not seeing the game they used to see with many negative comments about the wolves and more lion sightings while deer hunting.

I am troubled and saddened to have to make such a drastic request but I truly feel that this is in the best interest of the wildlife. I believe it is the charge of the FWP to be responsive and responsible public resource managers and this un-precedented action is required at this point in time. We simply cannot continue to keep things on the status quo and expect anything to change. It's like doing the same thing over and over and expecting different results. I am on record with the elk working group all the way back in 2005 when we enjoyed a record population of elk, warning of what was coming if we did not do anything to control our predators and limit cow harvest. Almost every Bitterroot hunting district is under management objective and the same is true with the Bull to cow ratios. I understand that a 3 year study was approved but I also understand we are about \$180,000 short of funding in the first year alone. We don't need a study, we need predator control. I feel like it's about time we put our personal and political agendas aside and start looking out for the wildlife!

Feel free to contact me anytime if you have any questions or would like to discuss this matter in detail.

Respectfully submitted.

Scott D. Boulanger  
Owner

Enclosures

CC: Commissioners, Director, CAC Region 2, Elk working group, USFS, MOGA, RMEF, SFW,