

Draft document on Elk Archery Regs for 2022

I'll break my comments down into five hopefully succinct sections.

1. Public Process
2. Our statutory and Policy Direction
3. What are the problems we are trying to address?
4. Overarching goals for elk management
5. Possible ideas for Commission/Department and public consideration

Public Process

I'd like to start off by saying thanks to the overwhelming amount of public and stakeholder input the Department and the Commission has received since last year when it was decided to postpone the archery elk discussion for one more year to gather more public input. Since then, there have been numerous meetings of the Department's Big Game Review Team, 13 virtual public meetings held around the state to gather more detailed information from user groups and the public. I attended three virtual meetings with stakeholders and others over the last year where a number of options were proposed, discussed and revised based on input from those stakeholders. The last Zoom meeting I attended hosted by Back County Hunters and Anglers had 111 folks in attendance. The Commission has also been provided copies of the two Responsive Management's statistically valid public opinion surveys/forums that were held in 2019 and 2020. Data from these statistically valid public opinion surveys was considered with the other forms of public input in the development of the staff proposals before us today. In addition, we have also received hundreds of letters and emails up to this meeting providing us valuable input to consider. Thank You. I assure you, I have heard and read the passion behind the input we have received.

Our Policy Direction

Our Commission's Wildlife Policy and Elk Management Plan are the overarching guiding documents we use as we review, comment and establish our hunting regulations and in this case the archery elk regulations for the 2022 season. The Elk Management Plan sets objectives for population levels and bull to cow ratios. The Plan translates into the number of elk in each management unit and the proposed number of bulls that escape hunting seasons or what is referred to as Management Objectives (MO's). The Commission set MOs in 1981 for elk, revised them with our 1992 elk plan, and revised them again in 1994.

We talked about this subject last year and there was general agreement to move archery deer to controlled hunts in 2021 but we held off on archery elk for a year to give archery elk hunters and the public some more time to meet with the Department and develop some options for Commission review and eventual approval. We are getting to that point with this informational briefing

today and will finalize the 2022 archery elk regulations at our August Commission meeting. The Commission has agreed to move up the final decision of the archery elk regulations to August at the request of archers as they are usually in the field during September are not able to comment when we normally set the fall seasons for the next year.

First established in 1979, archers have had the opportunity to draw a 30-day over-the-counter general elk tag every year in Oregon except for a few controlled hunt units. Rifle hunters have for the most part been the ones who have taken any reduction in the number of elk tags issued where we are below MOs in specific wildlife management units. Based on the input we have received; I believe that many archers are in some agreement that some form of revision to the archery regulations are in order to share the pain with rifle hunters in order to protect and enhance our elk resource for the long term.

I fully understand that when you have an open archery season for most of a month and over the counter elk archery tags for many years, any change is hard to accept. We had an archery review committee in 2003. Many of the concerns raised in 2003 appear to be the same that we are experiencing today. In 2014, an Archery Review Public Advisory Committee was formed to again assist the agency in addressing archery related regulations. Some of those same issues are again with us today. It's time to we address these management challenges with this Commission.

What are the social issues, management challenges we are trying to address?

- *The Department is proposing a change in the Status Quo for archery elk hunters that has been place since 1979. Archery hunters have been able to draw a 30 day over the counter archery tag statewide and now there is a proposed change in this status quo. Change is hard to buy into unless there are good reasons for a modification to the Status Quo. The Department is proposing an archery elk season in select eastern Oregon WMU's to provide elk tag allocations and harvest management that is equitable for all hunters in addressing biological MOs.*

Reasons to modify the Status Quo

- *Management objectives are set for wintering elk populations. **We are significantly below bull MOs in seven eastside management units** (Desolation, Starkey, Snake River, Minam, Imnaha, Pine Creek and the Keating. Five of those seven units have below MO every year for the last five years of tracking data, with the other two successfully meeting MO in only a single year. In some of those same units we are approaching 50% of the bulls taken are in the general archery season.*

The Department has proposed a reduced harvest in some areas to get back to MOs over a 3–5-year period. Some units like Starkey may actually take longer than 3-5 years to get us back to Mo's.

- *In 2020, **archery branched bull harvest** exceeded rifle branched bull harvest in the Heppner, Ukiah, Starkey, Pine Creek and Keating units.*
- ***Hunter crowding** in some units is an increasing concern for some archers who say they want a "quality" hunt where they are not seeing a lot of other archers in the field.*
- *In some areas of Eastern Oregon, these elevated archery hunter densities are pushing **elk from public lands onto private land** causing significant economic issues for those private landowners.*
- **Equity**
 - *There has been a nearly 60% decline in total rifle tags offered in the past 25 years to try and address MOs in some management units. During this same time period there has been a 60% increase in over-the-counter archery tag hunting participation, which has also remained a 30-day general season in nearly all of the state.*
 - *Concern has been raised by some to the question "how do we allocate hunting opportunity fairly in units where archery tags are unlimited and rifle tags are controlled."*
 - *Concern has been raised as to why Oregon allows unlimited non-resident archery tags when other states limit the number of out-of-state tags they issue for archery.*

Overarching goals

1. I believe our primary goal should be to protect and enhance the resource by giving direction to begin the process to achieve MOs in those units where we are facing declining elk numbers and not currently meeting MOs.
2. I believe we need to as much as possible maintain the "archery backcountry experience" for archers seeking a level of seclusion desired by many.
3. I believe we need to continue to support our youth archery hunts as these are the hunters of the future.
4. I believe we need to strive to reduce overcrowding in some of the units where it has become an issue for some hunters.
5. I believe we need to strive to keep elk populations on public lands for those herds that have historically resided there.
6. I believe we need to keep our regulations as simple as possible but also realize that all wildlife management including elk management is complex.

I want to give a shout out to the department's (Jeremy in particular) efforts including the District Biologist meetings with staff to present the problems, discuss options and most importantly to listen to the public as well as they have. There has in my opinion

been movement from the Department in what they had originally proposed to the options in front of us today based upon these important conversations.

Considerations

1. In order to reduce the number of archery hunters in those units where we need to reduce the harvest, I would propose we evaluate three options:
 - a. East/West concept. Archery hunters would choose to hunt either the eastside or the westside. Based on the public opinion survey we may see an increase in hunter density in eastern Oregon with an east west concept though. If implemented, we could monitor this for a couple of years and see if it has an impact on hunter density on the eastside. I personally like leaving the east/west line on the top of the Cascades after listening to public input and talking to a few folks. The line for Rocky Mountain elk (eastside) and Roosevelt elk (westside) is pretty clear now with the break on the Cascade Summit.
 - b. Choose your weapon concept. Hunters would choose to hunt elk with a rifle or bow. If you apply for a rifle tag and you don't get drawn, you can't then go get an over-the-counter archery tag. A lot of folks commented on this concept and this option may help eliminate archery overcrowding.
 - c. Limiting out-of-state archery tags. Right now, as I understand it, anyone from another state can get an over-the-counter archery tag in Oregon if they did not draw a tag in their state and still want to archery hunt. There fallback is if I don't draw in my particular state, I can always go to Oregon as they have unlimited out-of-state tags for archery general season tags. In 2020 for example, there were 31,940 general season archery tags issued. There were 2,295 out-of-state archery tags issues or about 7% of the total archery tags issued. Total of non-resident tags issued in the units proposed by staff to go to controlled is 1,282. If there was agreement to accept those units going from general to controlled, the number of out-of-state tags would be cut in half from 1,282 to 626 using our 5% out-of-state cap statute. If we wish to reduce tag numbers to get us back to MOs, this option may need to be further discussed. It should be noted that non-resident tags would not be impacted in those units staying general.
2. Based upon what I read and heard there seemed to be some degree of support for the zone concept of controlled tags valid in NE Eastern Oregon consisting of two or more Wildlife Management Units (WMU's). As we have heard, this zone concept allows biologists to regulate tag allocations and harvest, but also allows an archer the flexibility to move between units in the zone in the event of an area fire or other closure, reduced elk numbers in a particular unit or crowding issues in a particular unit. The negative to this Zone concept proposal is that it likely would result in a greater reduction in archery tags when compared to individual WMU controlled hunts if any unit within the zone

requires a harvest reduction to achieve bull ratio MO. Since most hunters, according to the survey results, pretty much stay within a particular unit anyway, it would be better for them to choose to hunt in a specific WMU because they would likely have better odds of drawing an archery tag. That would mean the following specific wildlife management units would go to controlled hunt as proposed by staff: DESOLATION, SNAKE RIVER, STARKEY, HEPPNER, MURDERERS CR, NORTHSIDE, SILVIES, UKIAH, N MALHEUR, N. SUMPTER, W. BEULAH. I fully realize that going to the WMU controlled concept combines some units not below MO. The rationale for this concept is to try and not encourage hunters to bleed over into an adjacent uncontrolled unit particularly in NE Oregon where the numbers are close to but maybe not below MO. Example is Murderers Cr.

3. Eagle Cap Back Country Zone concept including Catherine Creek, Minam, Imnaha, Pine Creek, and Keating units is a proposal that may deserve some attention. There seemed to be some support for testing an Eagle Cap Wilderness Zone concept as it would be fairly simple and straightforward with the least amount of complexity built in. Yes, it likely will mean reduced tag numbers because of those WMU's in that zone where we are below MO. Hunters would have to know they might not now get drawn as often and this would put them on par with rifle hunters who have to wait in some cases more than one year to draw a tag.
4. There appears to be some level of support for a statewide general season Youth Archery Hunt in units that are proposed to stay in the general season category. Archery hunt time period could be a factor though. I have heard concerns about hunting cows during the period when the calves have not yet been weaned. In order to ensure a humane period of time when calves are weaned and on their own, I'd propose we discuss with staff a possible time period from Sept. 15th to Dec. 31st and hear from the Department on this option as we get closer to the August final decision.
5. I'd like us to consider keeping western Oregon as it is with general season hunts as they are currently meeting management objectives. In addition, those units not identified as controlled units in Eastern Oregon would stay general season as they are now for over-the-counter tags.
6. Keep the Fire Policy but add some internal flexibility to ensure that you can address needs as they arise.
7. We should consider a three-to-five-year implementation period for this process to make sure we get those units below MO back to consistently meeting MO.
8. I'm hoping these concepts will have a net 0 impact on the budget but we will see how it teases out.
9. Finally, we need to continue and, in some cases, expand our relationships with the landowner community be it private, state or federal to improve elk and deer habitat for the long run.

One very big negative of all this is that it may affect folks who have accumulated significant Preference Points. You may not be able to save them if you want to hunt a particular controlled archery unit now.

I don't see us adding in additional hunting days for archers as a result of this new direction.

If a unit moves to archery controlled, LOP tags will have to choose archery or rifle.

And finally, we all need to realize that there will be some level of harvest reduction in some units to get us back to MO during this 3-to-5-year period. We need to make sure we set up a evaluation period to track if the eventual changes are in fact doing what we hoped they would do and if yes great but if they are not revisit them and make the necessary adjustments.

One area where I don't see it being addressed is regarding expanding the window of disturbance allowed in critical winter ranges. For example, should there be a season for shed hunting especially in winter ranges? Should we work with our partners more to implement more road closures in critical winter ranges during the period deer and elk are using these areas to reduce disturbance and strive to keep deer and elk from moving onto private lands?

I fully realize we are not addressing predator and habitat issues with these comments today

We have with COVID found new ways to engage hunters and the public through Zoom. The BHA Zoom meeting in late May had 111 people on the call. I'd like to see this process of public participation continue as one of our methods along with face-to-face public meetings around the state, letters and surveys as tools to engage and hear from the public. They have proven to be very successful in getting more voices to the table.

And last but not least I fully understand that we also need to pay attention to other sources of reduced numbers of both deer and elk including predators, poaching, the role of nutrition and most importantly habitat quality and quantity. That is a discussion for another time as it continues to be a very controversial and difficult discussion.