

Briefs for Hunting Districts that are Over Objective and Have Limited Either-Sex Permits

In response to questions regarding the use of limited either-sex (ES) permits for elk in hunting districts (HDs) that are above population objective, the Department assembled a brief for each HD where these circumstances apply. In the past, the Department attempted to be responsive to matching limited permit numbers with levels of existing opportunities, which resulted in either-sex permit quota increases when possible. In 2021, there were 30 HDs that met the above circumstances. As part of the 2021 biennial season setting process, the Department is proposing to remove limited ES elk permits in six of the 30 HDs where these circumstances exist and is also proposing to increase ES permit quota (from 300-400) for three of the current HDs in question.

The Department has limited ES permits for multiple different reasons, which vary across HDs and through time. Some of the current reasons why limited ES permits are used in Montana include: to protect bull elk in areas with low security or in those areas where bull elk are highly accessible and vulnerable to harvest; to provide equitable allocation of the elk resource by designating opportunities via random draw lottery; to limit hunter crowding; to meet the demand for older age class bulls; to address landowner tolerance of hunter density; and to maintain agreements made with existing local working groups. If limited ES elk permits were removed, the primary expected population response would be a significant decrease in the bull segment of the population, with this being more pronounced on public lands.

Lastly, the Department is attempting to decrease populations that are over population objective. All HDs that currently have limited ES permits and are over population objective have liberal antlerless harvest opportunities. Harvesting antlerless elk has the largest effect on population growth, and the Department will continue to manage antlerless opportunities liberally to decrease elk populations in these areas.

See below for summary information on the use of limited ES elk permits in individual HDs that are over population objective.

HD 380:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?

Yes, the 2005 Elk Management Plan calls for maintaining the average age of bulls harvested on either-sex permits between 5.5 and 6.5 years of age (age range viewed as a minimum). The 2005 Elk Plan also calls for maintaining a bulls:100 cows ratio observed during post-season aerial surveys of at least 15 bulls:100 cows OR, if bulls:100 cows ratios are not obtained, maintaining a minimum of 10% of the population comprised of antlered bulls.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Since the late 1980s, HD 380 has been managed by a season structure that calls for a limited number of either-sex permits that are targeted for older age class bull harvest while allowing spike harvest on a general license. The season was put in place for biological reasons, because prior to going to that season type bulls in the Elkhorns EMU were so heavily harvested (great access, most elk in the district are available for hunter harvest) that winter bulls:100 cows were in the very low single digits with almost all the surviving bulls being yearling bulls. The current either-sex permit/spike harvest allowed on a general license season structure has extremely strong public support.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

HD 380 is one of, if not the most heavily hunted elk district in the state of Montana. In recent years the number of elk hunters hunting in HD 380 annually has been in excess of 3,200+ hunters a year. Given the great hunting access (lots of public land and accessible private land), availability of elk to the public in the HD, and HD 380's reputation for producing older age class bulls, if HD 380 were to go to a general license, older age class bulls would be expected to be eliminated from the population within a couple years.

HD 410:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the bull:cow ratio (from 2020 elk survey) was 50:100.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 410 is characterized by relatively open country – scattered timbered breaks interspersed by large expanses of sagebrush prairie. The Missouri Breaks Elk Management Unit (EMU), particularly HD 410, is known for its high numbers of bulls and “large, trophy bull elk” by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands.

Overall, the hunting opportunities in HD 410 are very good, considering the relatively high amounts of legally accessible public lands and Block Management Areas (BMAs). However, despite this, some private lands in HD 410 are trending towards leasing/outfitting or severely limiting hunting opportunity for elk, and elk will congregate on these properties during the hunting season. The current LE permit system maintains the equitable allocation of this resource, by designating hunting opportunity for bulls in this HD via random draw. At current LE permit levels, most hunters already complain that HD 410 is too crowded during the archery season, and/or there are too many ES rifle permits offered. Drawing statistics for landowner preference average 53% and 74% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the “House Bill 454” program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year, regardless of permit quota.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest (especially on public lands) because given habitat conditions they are more visible and easier to find. The current ES rifle permit quota represents 50% of the estimated 6-point bulls that exist in the HD, which are what most hunters wish to pursue. Archery harvest alone has averaged 107 6-point bulls/year for the last decade. Approximately 65% of the HD's observed 6-point bulls were harvested in 2020. Given the amount of lands open to elk hunting and lack of security cover, increasing the number of permits further, or turning either archery and/or rifle season into general ES will likely eliminate or greatly reduce the number of bulls, particularly 6-point bulls, on huntable public lands and BMAs. Proponents of increasing the number of ES permits claim doing so will help reduce elk numbers of objective, however harvesting cow elk, not bull elk, is the only effective way to manage elk populations.

Much public input has been gathered over the years concerning archery and rifle hunting in this HD; a sweeping change to season-structure or increased permits beyond what are already available will likely elicit extensive public pushback.

HD 411:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The 2005 Elk Management Plan speaks to providing hunter opportunity for harvesting older bulls as a management goal.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited-entry (LE) permits are required to prevent overharvest of bull elk because they lack large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. Where elk reside in the Snowies during hunting season are typically foothill-type habitats with smaller patches of timber, or open prairie/agricultural lands. Social support exists for providing hunter opportunity to harvest older bulls, and LE permits prevent the overharvest of such, especially on huntable areas (legally accessible public lands containing elk). The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 70% and 76% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member, or full-time employee in a district a free, ES elk permit each year. A general license opportunity for either-sex (ES) elk has existed in the Snowies via a spike-only bull regulation (in addition to antlerless elk) since 2014. Average annual spike bull harvest has increased 4-fold since. The 411-20 ES elk permit is proposed to increase from 300 to 400 for the 2022 season. Finally, a hunter can legally harvest 3 elk in the HD with proper licenses.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest (especially on public lands) because given habitat conditions they are more visible and easier to find. Harvest data indicates that increasing permits without any significant increase in public hunting access stagnates hunter success; relatively few additional bull elk are harvested compared to numbers of permits available or hunters on the ground.

Specific to the Snowy Mountains, HDs 411 and 535 contain a total of 2,524,342 acres. Of that acreage, 457,513 acres are considered elk fall/winter range (18%). However, those acreages overlapped by legally accessible public lands or Block Management Areas (BMAs) amount to just 64,229 acres or 2.5% of the HDs, and over half of that primarily represents archery/early season hunting. Thus, only 2.5% of the entire Snowy Mountain HDs provide guaranteed public elk hunting opportunity, and not usually during the rifle/shoulder seasons when elk hunting for "management" occurs. Further liberalizing/generalizing the ES seasons for elk in this area will substantially increase crowding issues on public lands/BMAs that are already maxed out in regard to hunting pressure. Despite an already very liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are well over-objective due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. With an increase in archery permits valid in the Snowies via 900-20, more lands were leased/outfitted, and this trend would continue with extensive liberalization of rifle permits. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

HD 412:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The 2005 Elk Management Plan speaks to providing hunter opportunity for harvesting older bulls as a management goal.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited-entry (LE) permits are required to prevent overharvest of bull elk because they lack large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. Where elk reside in the Judiths and Moccasins during hunting season are typically foothill-type habitats with smaller patches of timber, or open prairie/agricultural lands. Social support exists for providing hunter opportunity to harvest older bulls, and LE permits prevent the overharvest of such, especially on huntable areas (legally accessible public lands containing elk). The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 64% and 80% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member, or full-time employee in a district a free, ES elk permit each year. A general license opportunity for either-sex (ES) elk already exists via a spike-only bull regulation (in addition to antlerless elk).

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest on public lands because given habitat conditions they are more visible and easier to find. Harvest data indicates that increasing permits without any significant increase in public hunting access stagnates hunter success; relatively few additional bull elk are harvested compared to numbers of permits available. After the permit increase in 2020 from 85 to 120 permits, success rates for bull elk were at an all-time low after 20 years. Forty-nine bulls were harvested on the ES permit in 2019 (with a quota of 85) compared to just 54 in 2020 (with a quota of 120). The current quota represents 34% of the available bulls in the district and over 50% of the 6-point bulls, which the majority of people who put in for this LE, ES permit wish to hunt. Hunting district 412 contains a total of 420,807 acres. Of that acreage, 153,862 acres are considered elk range (including summer ranges not occupied by elk during the hunting season; 37%). However, those acreages overlapped by legally accessible public lands or Block Management Areas (BMAs) amount to just 28,123 acres. Thus, only 6.6% of the entire HD 412 provides guaranteed public elk hunting opportunity, and not usually during the rifle/shoulder seasons when elk hunting for "management" occurs.

Further liberalizing/generalizing the ES seasons for elk in this area will substantially increase crowding issues on public lands/BMAs that are already maxed out in regard to hunting pressure. Despite an already very liberal license structure for antlerless elk, harvest is insufficient to meet management objectives. This is not a season-type or quota issue; it is an access issue. With an increase in archery permits valid in HD 412 via 900-20, more lands were leased/outfitted (not likely to be reversed), and this trend would continue with extensive liberalization of rifle permits. At current permit levels, local FWP staff are inundated with calls from hunters having difficulties gaining access on private lands and unable to find elk on legally accessible public lands.

HD 417:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the current bull:cow ratio in HD 417 (from the March 2021 elk survey) is 34:100, right at objective.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 417 is characterized by relatively open country – scattered timbered breaks interspersed by sagebrush prairie and farmground. The Missouri Breaks Elk Management Unit (EMU) as a whole is known for its high numbers of bulls and "large, trophy bull elk" by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands, which has already been shown cannot be done with an additional permit quota increase (or by extension, general season) here.

A few large ranches in HD 417 lease/outfit or severely limit hunting opportunity for all elk. Implementing the shoulder season in 2020 possibly decreased the number of antlerless elk harvested during the general season. The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 70% and 44% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Due to high bull numbers in HD 417, the Fish & Wildlife Commission increased the 417-20 ES permit quota from 100 to 225 for the 2020 and 2021 hunting seasons. Prior to this increase, in 2019, harvest success was 62% and the majority of harvest (64%) occurred on private lands that allowed limited public elk hunting. These private lands were already "at capacity," and with no further increase in private land access, the 125 additional hunters in 2020 and 2021 were limited to legally accessible public lands and the three BMAs in HD 417 containing elk. Since the permit increase, fewer bull elk have been harvested on private lands, and significantly more hunter pressure is occurring on already-limited public lands. All permit holders from 2020 and 2021 were surveyed and most (77% and 87%) have stated they could only get access on public lands (which were overcrowded), they were not in favor of the increase, they did not have a pleasurable experience, they feel like they wasted years' worth of bonus points, and would not be applying to hunt HD 417 again.

Despite an already very liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are well over-objective due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. A hunter can legally harvest 3 elk in the HD with proper licenses. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

HD 426:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the bull:cow ratio (from 2020 elk survey) is 125:100, however we observed only 157 total bulls.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 426 is characterized by relatively open country – scattered timbered breaks interspersed by large expanses of sagebrush prairie and farmground. The Missouri Breaks Elk Management Unit (EMU) as a whole is known for its high numbers of bulls and “large, trophy bull elk” by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands.

Several landowners in HD 426 lease/outfit or severely limit hunting opportunity for all elk; landowners that allow for hunting access have stated being “at capacity” for public hunting access. Landowners, some of whom allow bull hunting opportunity, have expressed that the current number of LE permits, 60, is already too high given the limited public opportunities to harvest elk in this district and have spoken against an additional increase. The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Most pressure for increasing the number of permits in this HD originates from landowners who would like to be able to hunt their own property. Drawing statistics for landowner preference already average 41% and 38% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the “House Bill 454” program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year, regardless of permit quota.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Despite an already liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are over an already relatively-low objective (75 total elk) due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. The current permit quota already represents 38% of the total bulls available to harvest and 73% of the 6-point bulls that members of the public and landowners alike hope to harvest with this permit.

At current permit levels, local FWP staff are inundated with calls from hunters having difficulties gaining access on private lands and unable to find elk on legally accessible public lands. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

HD 445:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? Yes. The 2005 Elk Management Plan calls for:

- Maintaining total elk numbers within habitat capabilities and at a level acceptable to landowners and sportsmen.
- Producing older age class bulls, while maintaining a diverse age structure. In HD 445, provide a bull harvest comprised of at least 75% BTB, while maintaining a diverse age structure. In HD 455 (Beartooth Wildlife Management Area), provide a bull harvest comprised of at least 60% BTBs, while maintaining a diverse age structure.
- Maintaining the number of elk observed during post-season aerial surveys in the EMU within 20% of 2,200 elk (1,760-2,640). Wintering population objectives by area are: 1,500 elk on the Beartooth WMA (HD 455) and 700 elk in HD 445.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

The Devil's Kitchen EMU consists of two adjoining Hunting Districts, HD 445 and HD 455. HD 455 is entirely public land mostly the Beartooth Wildlife Management Area and portion of the Gates of the Mountains Wilderness. HD 445 contains nearly 90% private lands with some interspersed BLM, DNRC, and FWP (Whitetail Prairie portion of Beartooth WMA) lands. In the 1980's and early 1990's the elk population in the EMU was managed with either sex general license and antlerless permits. In 1990, the Devil's Kitchen Working Group was created to assess elk management/issues in the area. The group established five goals: 1) Increase harvest to manage the elk numbers 2) Secure public access to hunt elk, including bulls. 3) Reduce the burden on landowners for managing hunters 4) Improve age diversity among bull elk. 5) Maintain existing outfitting operations on private land. A large emphasis has been to redistribute elk onto the Beartooth WMA during winter and improve overall harvest opportunity. In 1995, the Devil's Kitchen group endorsed the bull elk hunting season structure which remains in place (6-week general archery, 2 weeks general rifle followed by 3 weeks permit-only rifle). In 1994 limited entry permits were implemented in the Beartooth WMA (HD 455) as well. In all but four years since 2008, archery hunting has been on limited permit in HD 455. Both bull harvest objectives are annually met or exceeded.

Over the last 20 years, the elk population in the Devil's Kitchen EMU has grown to a record high of 4,363 elk observed in 2016. Presently, numbers remain above objective but lower than recorded highs. Winter 2020/21 surveys revealed 3,460 elk (467 BTB, 295 Spikes). Liberal antlerless seasons were implemented over the last 20 years to increase harvest to include general elk license, B licenses and shoulder seasons (since 2015). An elk hunter with proper licenses can harvest up to 3 elk in the EMU.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

The Devil's Kitchen Working Group and area sportspeople continue to support the elk hunting regulations in the EMU, including the liberal shoulder seasons. Check station hunter comments indicate satisfaction with existing elk hunting opportunities on the Beartooth WMA. Removing permits or liberalizing bull harvest opportunities may shift winter elk distribution and affect relationships amongst the DK working group, landowners, sportspeople and outfitters. Consistent public and landowner comments are to maintain limited entry rifle and archery permits in HD 455 and to maintain current season structure in HD 445.

HD 447:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? Yes. The 2005 Elk Management Plan calls for:

- Maintaining total elk numbers within habitat capabilities and at a level acceptable to landowners and hunters.
- Producing older age class bulls while maintaining a diverse age structure. The population objective was to provide a bull harvest comprised of at least 75% brow-tined bulls (BTBs).
- Maintaining the number of elk observed during post-season aerial surveys in the EMU within 20% of 550 elk (440 – 660). A revision to the EMU plan was made in 2007. The change increased the objective to within 20% of 700 total elk (560 – 840).

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Bull elk hunting with a rifle has been limited entry since the 1980's. Archery hunting bull elk has been limited permit since 2008. Bull harvest objectives were implemented in the 1992 elk plan to manage for older age class bulls. The objective was to maintain annual bull harvest comprised of 60% BTBs, of which 20% should be 6-point or better. In the 2005 elk plan, this language changed, "to produce older age class bulls while maintaining a diverse age structure, and a harvest of at least 75% BTBs". Approximately 79% of the elk habitat is under private ownership; the remaining habitat is on public land, primarily the centrally located USFS (21%).

Winter 2020/21 surveys revealed 1,563 elk (310 BTB, 122 Spikes). Over the last 20 years, the elk population in the Highwoods has grown and expanded range to a high of 1,828 in 2016. Presently, numbers remain above objective but stabilized and declined from highs due to liberalized antlerless seasons and increased either sex permits. Either sex rifle permits have remained very stable over the last 20 years, increasing to current allocation of 100 permits in 2017, following increasing bull numbers. On average, 85 bulls are harvested annually from both the archery and rifle seasons. Since 2004, the average 6-pt-or-better bull harvested has been 74.8%, very close to harvest objectives for the EMU.

Antlerless opportunities in HD 447 have been liberalized over the years to increase harvest. Year 2006 was the first-year antlerless harvest was allowed during the rifle season on a general license (without a permit), restricted to youth hunters only. These opportunities expanded to B licenses, general elk license antlerless and shoulder seasons off USFS lands (implemented in 2018). An elk hunter with proper licenses can harvest up to 3 elk in the EMU.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Bull elk in this EMU are highly susceptible to overharvest if weather conditions prevail. Most elk leave USFS lands to lower elevation privately owned foothills where security is very low. At present times, hunter overcrowding on the USFS, particularly during the archery season, remains a concern. Public access to private land for permit holders remains difficult. Given that the USFS is centrally located amongst most of the elk habitat, removal of either the archery or rifle permits would likely further increase hunting pressure on the National Forest and push elk out onto private lands. Consistent comment indicates permit-only opportunities in the Highwoods has largely been the preference of both landowners and the general public.

HD 411 and proposed HD 535 (currently HDs 511 & 530):

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? Yes, the 2005 Elk Management Plan, on page 350, states as a Management Goal to “provide hunter opportunity for harvesting older bulls.”

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Limited entry permits are a proven tool to manage for older age class bulls which is the management goal from the 2005 Elk Management Plan. To increase bull harvest but maintain older age class bulls the General Elk License regulation changed in 2014 to include Spike Bull and Antlerless Elk. Average spike bull harvest from 2014-2020 was 32 spikes compared to the average of 8 spikes harvested 1999-2013. In 2020 fifty-three spike bulls were harvested. Elk hunting on publicly accessible public and private lands is extremely limited in these districts. The limited free public opportunities are overcrowded for the archery and rifle seasons. The overcrowded public opportunities usually keep the elk on inaccessible private land for most of the season. The either-sex permits allow for some equitable distribution of elk hunting opportunity across the landscape so that wealth isn't the only factor determining access to elk hunting in these districts.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

The 411-20 Either-sex elk permit is proposed to increase from 300 to 400 permits. The last increase from 200 to 300 Either-sex permits was in 2018. Several hunters and landowners made complaints about the increase in permit numbers causing increased hunting pressure on public hunting opportunities and the increase in hunters requesting access. Some landowners have voiced support for keeping the either-sex permits to maintain the quality of bulls in these districts. Hunting district 580 is a common example used by landowners and sportsmen to describe a hunting district with either-sex general elk license regulation with a lot of bulls but not that many really big bulls. Amenity landowners are already purchasing property in these hunting districts for the elk hunting opportunity which has contributed to the increased land prices. If these hunting districts are no longer managed with an either-sex permit more amenity landowners will purchase land in these districts because of the high bull quality that would be available for a few years. What little free public hunting opportunities exist will further decrease to only those opportunities on publicly accessible public land. These public lands will be so overcrowded very few elk will be present during hunting seasons. The equitable allocation of elk hunting will be lost to the general public. Only those hunters who can afford to pay thousands of dollars for the opportunity to harvest a bull elk will have access to this public resource in these districts.

HD 555 (formerly 510 and eastern portion of 520) & 502:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?

The elk management plan specifically endorses maintaining limited either sex permits. Prior to the implementation of the ES permits excessive harvest of bulls resulted in bull:cow ratios of less than 5:100. There was some evidence that the low bull:cow ratio negatively impacted calf production. Sportsmen demanded a more conservative season designed to increase bull survival and manage for a diversity of age structure. The public has consistently voiced support for this season type.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Biological: Elk in this area, especially bull elk, routinely move between HD 555 and HD 502. Such movement makes it necessary to manage bulls with one license type. The Robertson Draw fire in 2021 burned 30,000 acres much of which was elk security habitat. That loss of habitat makes elk, especially bulls, much more vulnerable to harvest under normal fall weather conditions. While the HD 502 portion of the elk herd is above objective, the HD 555 portion is below objective.

Social: The public continues to demand conservative bull management to avoid repeating the over harvest of bulls that occurred in past years.

Equitable allocation: The current season type results in similar numbers of archers and rifle hunters having access to bulls.

Access: Access to BLM and Forest Service land is very good. The largest landowner in Carbon County with large parcels in both HD 502 and 555. The same landowner provides free public access for both elk and deer hunters. Access in the Roberts/Joliet area of HD 502 is more limited but available. Access west of Bridger in HD 502 is non-existent.

Crowding: Currently there is consistent pressure on elk accessed from public access sites such as Robertson Draw, Line Ck. And Grove Ck. Areas. Crowding is becoming an issue at times during the season. With the recent changes to habitat after the Robertson Draw fire, the Line Ck. and Robertson Draw areas are seeing more crowding as elk are not as available in the Grove Ck. area this year.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Biological: The loss of bull security due to wildfire would result in increased harvest of bulls. That harvest could well result in the much lower bull/cow ratios that were seen in previous years.

Social: There would be a significant loss of public support if the ES permit were eliminated.

Equitable allocation: There would no longer be a balance in opportunity for archers and rifle hunters.

Access: The largest landowner in Carbon County currently provides the majority of the private land access. Liberalized seasons could overwhelm their ability to provide access to the same level they are currently providing.

Crowding: A general ES season would result in crowding on Forest Service access points in Line Creek, Robertson Draw and Grove Creek areas.

HD 590:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? Yes, the 2005 Elk Management Plan does state as a management goal to “provide opportunity for hunters to harvest older bulls”.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

Biological: In other districts with high numbers of older class bulls, elimination of either-sex permits resulted in an overall decline in opportunity for harvest of older bulls.

Social and Equitable allocation: There is little access in this hunting district for the general public. Elimination of either-sex permits would result in increased access to older class bulls to those able to afford outfitting services and less opportunity to harvest older class bulls for most of the public.

Access and Crowding: Access to elk on public land is very limited in hunting district 590. Crowding is currently an issue for elk permit holders on accessible public land and would likely increase with an either-sex general elk license valid for the archery only and general seasons.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Biological: Over time the number of older age class bulls would decrease. The bull to cow ratio would decrease.

Social: Some public land hunters will oppose removal of permits due to overcrowding on public lands during both archery and general season.

Equitable allocation: There is little access in this hunting district for the general public. Elimination of either-sex permits would result in increased access to older class bulls to those able to afford outfitting services and less opportunity to harvest older class bulls to the majority of the public.

Access and crowding: There is very little accessible public land in HD 590. Crowding is currently an issue for elk permit holders on accessible public land in HD 590 and would likely increase with an either-sex general elk license valid for the archery only and general seasons. Many hunters would be frustrated by the lack of opportunity to find elk on public land in HD 590.

HDs 620, 621, 622:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The objective is at least 30 bulls: 100 cows, which is for all HDs in the Missouri River Breaks EMU.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

The 2005 Elk Plan prescribes limited either-sex (ES) permits. The standard regulation is prescribed when bull ratios are at least 30 bulls:100 cows. The restrictive regulation is prescribed when bull ratios are under 30 bulls:100 cows for two consecutive years. The elk plan details these antlered regulations:

General season regulations:

- Standard regulation- 50 or more either-sex permits (*160 were issued in 2021*)
- Restrictive regulation- less than 50 either-sex permits

Archery season regulations:

- Standard regulation- Limited either-sex archery only permits, 1st choice only (*1,400 were issued in 2021*)

Bull ratios during the most recent elk survey (2020) in these HDs was 31 bulls:100 cows and averages 44 bulls:100 cows over the past 10-years. The elk population is currently 20% above objective in these HDs.

We adjust general season ES permits accordingly to observed bull ratios from post-season surveys, to maintain at least 30 bulls:100 cows. Over the past ten years, we have had between 125 and 170 ES permits for the general season. Archery permits have maintained at 1,400 for the past 10 years.

We also work with the Breaks Elk Working Group, wherein the group serves as a citizen advisory group to FWP and provides a venue to discuss elk management. This group has desired an equitable harvest of antlered elk between archery and rifle (general season) harvest and annually reviews harvest and quota recommendations. In 2020, 62% of the 233 bulls harvested was by archers. The ten-year average is 53% of the bull harvest by archers.

The relative acceptance by landowners and land management agencies of the current level of limited bull harvest has resulted in ample public access on public lands and on private lands enrolled in FWP's hunting access programs. In Phillips Co., there are 37 BMAs with 325,081 acres.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Removal or liberalizing ES permits would likely result in a decrease in bull:cow ratios to levels below 30 bulls:100 cows. This is based on the most current status of 31 bulls:100 cows, combined with the high level of interest in rifle bull hunting as evidenced by a 5% drawing odd for ES elk permits (3,178 applicants for 160 permits), and relatively good access to bull elk on publicly accessible lands.

We annually hear public comment about crowding on publicly accessible lands in this area and removal or liberalizing ES permits would likely result in further crowding. We also have a long history of collaboration with stakeholders in the area which is formalized by a subset of those represented on the Breaks Elk Working Group <https://fwp.mt.gov/aboutfwp/breaks-elk-working-group> . A large deviation from the current ES permit level would fray our relationship and trust with this group and other stakeholders. This could result in loss of public access through our Block Management Program, lessening our ability to manage elk and other game species.

HDs: 630, 631, 632

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The objective is at least 30 bulls: 100 cows, which is for all HDs in the Missouri River Breaks EMU.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

The 2005 Elk Plan prescribes limited either-sex (ES) permits. The standard regulation is prescribed when bull ratios are at least 30 bulls:100 cows. The restrictive regulation is prescribed when bull ratios are under 30 bulls:100 cows for two consecutive years. The elk plan details the following antlered regulations in HDs 630, 631, 632:

General season regulations:

- Standard regulation- 20 or more either-sex permits. (40 were issued in 2021)
- Restrictive regulation- less than 20 either-sex permits

Archery season regulations:

- Standard regulation- Limited either-sex archery only permits (300 were issued in 2021)

Bull ratios during the most recent elk survey (2020) in these HDs was 92 bulls:100 cows and averages 82 bulls:100 cows over the past ten years. The high bull ratio is a function of a relatively small number of cows in the population (166). The elk population is currently 16% above objective in these HDs. Either-sex permits have been maintained at 40 permits for general season and 300 for archery season for the past 10-years. The relatively small elk population, tendency of the elk to seek refuge in neighboring HD 622 with increasing hunter pressure, and public desire for a higher elk population in these districts has driven the stable permit levels. We also work with the Breaks Elk Working Group, wherein the group serves as a citizen advisory group to FWP and provides a venue to discuss elk management. This group has desired an equitable harvest of antlered elk between archery and rifle (general season) harvest and annually reviews harvest and quota recommendations. In 2020, 58% of the 52 bulls harvested was by archers. The ten-year average is 59% of the bull harvest by archers. The relative acceptance by landowners and land management agencies of the current level of limited bull harvest has resulted in very good public access on public lands and on private lands enrolled in FWP's hunting access programs. In Valley Co., there are 52 BMAs with 238,652 acres of private land.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Liberalizing ES permits could result in a decrease in bull:cow ratios to levels closer to 30 bulls:100 cows. The relatively small population size would not leave room for too much additional harvest. Removal of ES permits would likely reduce bull ratios below 30 bulls: 100 cows. This is based on the combined high level of interest in rifle bull hunting as evidenced by a 5% drawing odd for ES elk permits (786 applicants for 40 permits), and very good access to bull elk on publicly accessible lands.

We annually hear public comment about crowding on publicly accessible lands in this area and removal or liberalizing ES permits would likely result in further crowding. We also have a long history of collaboration with stakeholders in the area which is formalized by a subset of those represented on the Breaks Elk Working Group <https://fwp.mt.gov/aboutfwp/breaks-elk-working-group> . A large deviation from the current ES permit level would fray our relationship and trust with this group and other stakeholders. This could result in loss of public access through our Block Management Program, lessening our ability to manage elk and other game species.

HD 690:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The objective is at least 10 bulls: 100 cows during post-season aerial trend surveys.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

The 2005 Elk Plan prescribes limited either-sex (ES) permits. The standard regulation is prescribed when bull ratios are at least 10 bulls:100 cows and a restrictive regulation when bull ratios are under 10 bulls:100 cows for two consecutive years. The elk plan details antlered elk regulations for HD 690:

General season regulations:

- Standard regulation- at least 10 either-sex permits (*35 were issued in 2021*)
- Restrictive regulation- less than 10 either-sex permits

Archery season regulations:

- Standard regulation- at least 15 either-sex archery only permits (*50 were issued in 2021*)
- Restrictive regulation- less than 15 either-sex archery only permits

Bull ratios during the most recent elk survey (2021) were 46 bulls:100 cows and average 43 bulls:100 cows over the past 10-years. Elk population surveys (and ratios) have been highly variable, ranging from 10-year low of 190 and a high of 1026 during the 2021 survey. The elk population objective is 250 elk.

The current level of limited ES permits is largely a result of matching ES opportunity with the limited public access opportunities in the district, primarily on the BLM lands (20% of the HD) and several large Block Management ranches totaling 70,000 acres.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Removal or liberalizing ES permits could decrease bull:cow ratios to levels closer to 10 bulls:100 cows. There is a high level of interest in both archery and rifle bull hunting as evidenced by a 3% drawing odd for ES rifle elk permits (1,242 applicants for 35 permits) and a 7% drawing odd for ES archery elk permits (690 for 50 permits). If either-sex hunting opportunity is given to a large portion of applicants, there would be an increase in bull harvest and lead to limited bull elk presence on publicly accessible lands.

A substantial increase in ES permits would crowd the limited public access opportunities. The Block Management Areas (BMAs) are Type II (requiring permission from the landowner) and currently the requests for permission to hunt far exceed the amount of access provided. Increases in either-sex elk hunter days on BMAs would require a reduction in antlerless elk or other hunting opportunities. Most of the increased hunting pressure would be shifted to public lands. The result on public lands and BMAs would likely be a redistribution of elk to inaccessible lands.

This district currently allows antlerless elk harvest on a general license. Further reductions in public access could reduce antlerless elk rifle harvest; which is the primary tool for elk population management, and further limit the ability to meet population objectives.

HD 700:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The overall population objective for HD700 in the 2005 elk plan is 200-300 elk. This objective was set when the population was very new and repeatable, good survey data was lacking. This population objective does not well represent the carrying capacity of the habitat and landowner tolerance of elk in the district. According to the 2005 Elk management plan FWP is to manage for a minimum of 30 bulls: 100 cows. During the last elk survey conducted (2020) FWP observed 15 bulls: 100 cows, and the two surveys previous to that (2018 and 2016) FWP observed 32 bulls: 100 cows. Both, archery and general season permits are needed to maintain this objective, increased bull harvest would decrease our bull to cow ratio below this objective.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

We are limiting bull harvest because of the bull numbers we are counting during our biennial full coverage surveys. An increase in bull harvest would reduce the bull numbers below the objective, but also could easily eliminate the bulls in this population. In 2021 we awarded 955 permits, with 3,757 hunters applying for these permits. Interest in hunting this district drastically exceeds supply, as the number of resident first choice applicants is over 32 times the number of estimated bulls in this population. Our bull population cannot support the number of hunters who desire to hunt bulls in this hunting district. The draw odds for landowner preference are 100%, with fewer landowners applying than number of permits allotted. In 2021, 176 archery bull permits were available to landowners and only 2 applied, while 63 rifle bull permits were available to landowners and only 37 applied.

Bull harvest success is significant, with the 2020 rifle bull harvest success being 72% and archery bull harvest being 16%. In 2020 294 bulls were harvested, with 179 bulls being harvested with the rifle permit and 115 being harvested with archery permits. Over time archery hunters have become more successful and are harvesting numbers similar to rifle hunters, which will likely continue to increase as technologies improve.

These permits have successfully minimized elk depredation, with only 3 complaints in this HD since 2018. Private landowners and hunters are at their maximum tolerance for hunter densities in the HD. I regularly get calls, am stopped at the gas station, and talk with landowners while doing block management contracts and other field work, complaining of too many hunters and a desire to have fewer. I regularly hear from hunters through phone calls and while working check stations that they like hunting HD700 because it isn't overcrowded for the most part but in some areas can be when the bulls are bunching up. Hunters and Landowners have expressed concern for an increase in bull permits because more access would be lost more elk would be protected on inaccessible private lands, to later cause damage issues on publicly accessible private lands.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Removing ES permits in HD 700 would completely wipe out the bull population and would not contribute to overall population management. It would cause severe overcrowding on publicly accessible land. It would cause landowners to reduce access, either to protect elk, reduce hunter crowding on their property, or encourage charging a fee for access. The reduction in access would reduce access to cow elk, encouraging large population growth, and would result in more game damage issues. Reduction in access causes heartburn with neighboring landowners who allow access to mitigate damage issues but drastically limits the effect of those efforts. Landowners and hunters would not tolerate increased hunters in the district. The CMR Refuge has its own management goals and has the authority to limit hunting access on the refuge lands. Likely, the CMR would put a limit or a moratorium on elk harvest on CMR lands, which would drastically reduce the publicly accessible land and encourage population growth.

HDs 702, 704 & 705:

Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD? The current Elk Management Plan lists an objective for the Custer Elk Management Unit (EMU) of 500 elk with a sex ratio of 30-40 bulls:100 cows.

We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?

The most recent survey observed a minimum count of 2,019 elk with a bull:cow ratio of 39 bulls:100 cows. Limited permits are needed to maintain this objective. Bull harvest interest exceeds supply, as the number of 1st choice applicants for the either-sex permits is over 7 times the number of estimated bulls in this population. Access to private land is a primary limiting factor to managing the elk population, and the current hunting structure allows for hunters to hold two easily obtained licenses that are valid on 100% of private land in the EMU.

While the respective drawing odds are different, the current system of limited permits promotes an equitable harvest of bull elk between archery and rifle hunters. In general, hunters and landowners support limited entry permits for the archery and general season for the EMU.

Antlerless elk harvest is the main driver of the elk population trend in the Custer Forest EMU. The general elk license is valid for antlerless elk and spike bulls across 92% of the region (not valid on the Custer National Forest). The 007-00 B-license, which has 100% draw odds for 1st choice residents, is valid across 92% of the region as well. The 799-00 B-license (63% of 1st choice resident drawing success) is valid for antlerless elk across the entire EMU and is used to obtain a managed level of harvest on the Custer National Forest. Hunting access is the limiting factor for managing the population and distribution of hunters across the EMU (only 24% of the EMU is public land). The current managed level of opportunity/harvest helps ensure that elk are distributed across public and private land.

Harvest from archery (15% harvest success) and rifle (58% harvest success) permit holders has remained comparable in the EMU.

- 21 bull elk were harvested with rifle in 2000 and 159 were harvested in 2020.
- 19 bull elk were harvested with archery in 2000 and 132 were harvested in 2020.

Because of difference in success rates, more archery permits are allocated than rifle permits.

What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?

Eliminating the limited archery permit would favor archery hunters over rifle hunters in terms of amount of opportunity and harvest. For the upcoming biennial season-setting process, FWP has recommended to eliminate the 900-20 archery-only permit and to create a new archery-only, either-sex permit that is valid in HDs 702, 704 and 705. This recommendation would allow FWP to better assess archery effort and harvest in this area.

As part of the 2016-17 biennial season setting process, FWP staff held a public meeting in Colstrip. During that meeting staff presented the concept of increasing the either-sex elk permit (“rifle permit”) from 175 to 225. There were no positive comments for the proposal, and the root of the aversion to the proposed increase was ‘we don’t have a place to hunt so why give out more tags.’ Additionally, conversations with members of the Montana Bowhunters Association indicate that the group would strongly oppose eliminating the limited entry system used in the EMU.