

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Antlerless Elk Permit Removal HD 130**

**Hunting Districts:** 130

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal would remove the antlerless elk permit 130-00 in Hunting District 130.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The purpose of this proposal is to simplify the regulations by removing any permit hunt with a quota less than 25. We currently issue 5 permits for antlerless elk in this district. There is no biological justification for removing or maintaining this hunting opportunity.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

N/A

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

We do not specifically survey elk in HD 130, due to the forested nature of the Swan Valley; however, incidental observations of elk during deer recruitment surveys indicate an increase in elk numbers in the district in recent years.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

While there is no biological justification for maintaining or removing 130-00, hunters have appreciated this limited opportunity to harvest antlerless elk in HD 120. Due to the small herd size, increasing the number of permits issued to 25 is not possible.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available online for public comment during the 2021 scoping period from Sept 21 - Oct 20. In addition, we held a public virtual open house discussing all regional proposals. We received very few comments regarding this proposal, and most were in favor of removing this opportunity.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 102 and 103**

**Hunting Districts:** 102,103

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal would combine HDs 102 and 103, and adjust the northern boundaries of both HDs, creating a new HD 103. The adjusted boundary is created by using well-known landmarks. To our knowledge, there has never been a history of these 2 HDs being combined, and the regulations across both HDs are relatively quite similar.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Regulations Simplification.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success could be measured by a reduction in the number of complaints received regarding the difficulty of FWP's regulations.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The population status of deer should not decline as a result of combining these 2 HDs.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Because the regulations and habitat conditions are similar across both of these HDs, we do not anticipate much difference in hunting pressure if the HDs are combined. This proposal should only change how the deer and elk regulations appear by reducing the total number of HDs in Region 1.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Region 1 received a number of comments during the 2021 scoping period ending on 20 October. Few comments were received regarding this proposal, however the majority were in favor of combining HDs 102 and 103. Relevant to this proposal, most respondents either supported or were neutral regarding combining the districts as long as it didn't affect the special mule deer management area in HD 103.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Antlerless Elk Permit Removal HD 120**

**Hunting Districts:** 120

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal would remove the antlerless elk permit 120-00 in Hunting District 120.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The purpose of this proposal is to simplify the regulations. We currently issue 5 permits for antlerless elk in this district. Follow guidance to remove any permit hunt with a quota of less than 25. There is no biological justification for removing or maintaining this hunting opportunity.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

N/A

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

We do not specifically survey elk in HD 120, due to the forested nature of the habitat in HD 120. There is a small elk herd in the district, although the actual size of the population fluctuates and is unknown.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

While there is no biological justification for maintaining or removing 120-00, hunters have appreciated this limited opportunity to harvest antlerless elk in HD 120. Due to the small herd size, increasing the number of permits issued to 25 is not possible.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available online for public comment during the 2021 scoping period from September 21 through October 20th. In addition, we held a public virtual open house discussing all regional proposals. We received no comments regarding this proposal although there were a few general comments both for and against removing antlerless elk opportunity.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove antlerless elk permits for PTHFV holders**

**Hunting Districts:** 100, 103, 104, 120, 121, 122

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently, several districts within Region 1 offer limited numbers of permits (less than 10) that are only available for people who possess a Permit to Hunt From a Vehicle (PTHFV). These permits are available on a limited draw bases. Over the last two years nearly 60% of the applicants did not possess a PTHFV due to confusion over the application process. In addition, the statewide effort to simplify the regulations included removal of small numbers of permits as the large volume of License and Permit Types (LPT) was also viewed as being confusing and overcomplicating the regulations. As a result, we are proposing to remove all limited draw antlerless elk permits for people who possess a PTHFV. As a replacement and to maintain opportunity for disabled hunters, we are proposing to offer PTHFV holders to harvest an antlerless elk during the general hunting season with a General Elk License, allowing the harvest of a brow-tined bull or antlerless elk. This regulation is similar to what other regions have offered PTHFV holders.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify the regulations and reduce confusion over the application process, yet allow antlerless elk opportunity for disabled hunters holding a PTHFV.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by overall satisfaction with opportunity to hunt elk in Region 1 by holders of a PTHFV and general acceptance of the regulation by the public and other sportsmen and sportswomen.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations are at levels below historic highs but are relatively stable. Districts with available aerial survey information indicate populations at the lower end of the objective range or slightly below objective in terms of brow-tined bull harvest. Even though elk numbers are below historic highs, we can offer some limited antlerless opportunity without impacting populations. This opportunity is typically through the use of limited draw permits or licenses. A summary of historic survey and harvest data is attached.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Habitat changes resulting from succession related to timber harvest and fire disturbance has resulted in large-scale shifts in elk use and distributions. Additionally, Region 1 hosts high levels of native carnivores which may also be impacting elk survival and recruitment. Although populations are not at historic highs, elk numbers are sufficient to offer limited harvest opportunity. Overall interest in applying for an antlerless elk permit for PTHFV holders has been limited as has been harvest. The table below indicates the number of applicants for these permits in 2021 as well as the harvest from 2016 and 2020.

HD	No Permit Issueds	2020 PTHFV Applicants	2018 Harvest	2019 Harvest
100	5	16	0	0
101	5	11	2	1
102	5	9	0	0
103	5	31	3	4
104	5	14	5	0
120	5	5	0	0
121	10	21	4	3
122	5	15	5	0
123	5	9	0	0
124	5	1	2	0

**Figure 1:** R1 antlerless elk PTHFV permit statistics.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was part of the 2021 regulation simplification scoping process. The public was able to comment on the proposal. Comments received were split with about one-half supporting removing the antlerless permits for PTHFV holders and about one half either against removing the permit or in favor of removing the permit if the opportunity was provided on a General License. Many of those opposed cited concern over antlerless elk harvest in general or providing special opportunity to any individuals. Those in favor of the permit or offering the opportunity on a General License sited limited ability and likelihood to harvest a brow-tined bull during the general season when disabled.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Region 1 antlerless elk permit conversion to B Licenses**

**Hunting Districts:** 100, 103, 104, 122

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Antlerless elk harvest in Region 1 is currently administered through the use of antlerless elk permits. Members of the public have expressed confusion over the use of permits for antlerless elk vs the use of B Licenses. As part of a statewide regulations simplification and standardization process, all antlerless elk permits are to be converted to B Licenses. The primary concern we have heard from R1 hunters is the potential to harvest more than one elk in the region. Hunters generally do not support an individual harvesting more than one elk in the region. Harvesting both a bull and a cow in the region doesn't happen often and is not a biological issue, yet most hunters commented against having that opportunity in R1.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Convert antlerless elk permits to B Licenses and reduce hunter confusion regarding the hunting regulations and permit/license application process.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Less confusion regarding the use of permits vs B Licenses during the application process. A simplification and standardization of language within the regulations regarding permits and B Licenses.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations are at levels below historic highs but are relatively stable. Districts with available aerial survey information indicate populations at the lower end of the objective range or slightly below objective in terms of brow-tined bull harvest. Even though elk numbers are below historic highs, we can offer some limited antlerless opportunity without impacting populations. This opportunity is typically through the use of limited draw permits or licenses. A summary of historic survey and harvest data is attached.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Habitat changes resulting from succession related to timber harvest and fire disturbance has resulted in large-scale shifts in elk use and distributions. Additionally, Region 1 hosts high levels of native carnivores which may also be impacting elk survival and recruitment. As a result, antlerless elk harvest opportunity is limited and only available through special drawings.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

As part of the state-wide regulations simplification process, the proposal to change antlerless elk permits to B Licenses was vetted by the public and opportunity to comment was provided on the FWP website and by submitting written comment. Based on comments received, hunters are split relatively evenly on this topic with about 1/2 in favor and 1/2 opposed to move to B Licenses. Most of the concern for those opposed to moving

away from permits was related to the ability to harvest two elk in Region 1 if we move to an antlerless B License. Some of those supporting moving to a B License also expressed concern over the ability to harvest 2 elk in Region 1. This sentiment has been consistent from the hunting public in Region 1.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Add antlerless elk opportunity for PTHFV to general season**

**Hunting Districts:** 100, 101, 103, 104, 120, 121, 122, 130

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently, several districts within Region 1 offer limited numbers of permits (less than 10) that are only available for people who possess a Permit to Hunt From a Vehicle (PTHFV). These permits are available on a limited draw bases. Over the last two years nearly 60% of the applicants did not possess a PTHFV due to confusion over the application process. In addition, the statewide effort to simplify the regulations included removal of small numbers of permits as the large volume of License and Permit Types (LPTs) was also viewed as being confusing and overcomplicating the regulations. As a result, we are proposing to remove all limited draw antlerless elk permits for people who possess a PTHFV. As a replacement and to maintain opportunity for disabled hunters, we are proposing to offer PTHFV holders to harvest an antlerless elk during the general hunting season with a General Elk License, allowing the harvest of a brow-tined bull or antlerless elk. This regulation is similar to what other regions have offered PTHFV holders.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify the regulations and reduce confusion over the application process, yet allow antlerless elk opportunity for disabled hunters holding a PTHFV.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by overall satisfaction with opportunity to hunt elk in Region 1 by holders of a PTHFV and general acceptance of the regulation by the public and other sportsmen and sportswomen.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations are at levels below historic highs but are relatively stable. Districts with available aerial survey information indicate populations at the lower end of the objective range or slightly below objective in terms of brow-tined bull harvest. Even though elk numbers are below historic highs, we can offer some limited antlerless opportunity without impacting populations. This opportunity is typically through the use of limited draw permits or licenses. A summary of historic survey and harvest data is attached.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Habitat changes resulting from succession related to timber harvest and fire disturbance has resulted in large-scale shifts in elk use and distributions. Additionally, Region 1 hosts high levels of native carnivores which may also be impacting elk survival and recruitment. Although populations are not at historic highs, elk numbers are sufficient to offer limited harvest opportunity. Overall interest in applying for an antlerless elk permit for PTHFV holders has been limited as has been harvest. The table below indicates the number of applicants for these permits in 2021 as well as the harvest from 2016 and 2020.



HD	No Permit Issueds	2020 PTHFV Applicants	2018 Harvest	2019 Harvest
100	5	16	0	0
101	5	11	2	1
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103	5	31	3	4
104	5	14	5	0
120	5	5	0	0
121	10	21	4	3
122	5	15	5	0
123	5	9	0	0
124	5	1	2	0

**Figure 1: PTHFV statistics.**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was part of the 2021 regulation simplification scoping process. The public was able to comment on the proposal. Comments received were split with about one-half supporting removing the antlerless permits for PTHFV holders and about one half either against removing the permit or in favor of removing the permit if the opportunity was provided on a General License. Many of those opposed cited concern over antlerless elk harvest in general or providing special opportunity to any individuals. Those in favor of the permit or offering the opportunity on a General License sited limited ability and likelihood to harvest a brow-tined bull during the general season when disabled.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Justification for Eliminating HD 110 Antlerless Elk Permits**

Hunting Districts: 110

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

In 2020, 5 antlerless elk permits were issued in HD 110 which requires the permit to be used in combination with a General Elk License. Additionally, permit holders may not hunt antlered elk within HD 110. Antlerless elk permits in HD 110 were first offered during the 2006 season (n=5) in response to landowner complaints in the southern portion of the HD. The number of permits was briefly increased (2007-2009) due to a perceived increase in elk numbers but was reduced back to 5 prior to the 2010 hunting season. Since 2006, average harvest success on the permit has been 22%.

Lic Year	Elk Harvest			Antlerless Permit 110-00			
	Total Harvest	Antlered	Antlerless	Permit Issued	Permit Harvest	% Permit Success	% Total Female Harvest
1986	84	17	67	na	na	na	na
1987	62	16	46	na	na	na	na
1988	92	34	58	na	na	na	na
1989	76	10	66	na	na	na	na
1990	74	25	49	na	na	na	na
1991	85	27	58	na	na	na	na
1992	55	19	36	na	na	na	na
1993	58	27	31	na	na	na	na
1994	61	51	10	na	na	na	na
1995	49	38	11	na	na	na	na
1996	42	40	2	na	na	na	na
1997	No survey	No survey	No survey	No survey	No survey	No survey	No survey
1998	No survey	No survey	No survey	No survey	No survey	No survey	No survey
1999	18	18	0	na	na	na	na
2000	22	22	0	na	na	na	na
2001	23	20	3	na	na	na	na
2002	32	29	3	na	na	na	na
2003	42	37	5	na	na	na	na
2004	85	71	14	0	na	na	na
2005	81	59	22	na	na	na	na
2006	74	52	22	5	0	0	0
2007	80	80	0	25	0	0	na
2008	55	51	5	25	2	8	44
2009	64	45	19	25	5	20	27
2010	84	64	20	5	3	60	15
2011	32	22	10	5	2	40	20
2012	28	22	6	5	0	0	na
2013	35	34	2	5	2	40	100
2014	25	25	0	5	0	0	na
2015	29	26	3	5	3	60	100
2016	23	19	4	5	1	20	23
2017	29	26	3	5	0	0	na
2018	25	16	9	5	3	60	34
2019	12	6	6	5	0	0	0
2020	31	25	6	5	3	60	50
LTA	51	33	18	NA	2	22	36
10-year average	32	26	6	NA	1	28	42

Figure 1: HD 110 elk harvest and permit success derived from hunter survey data 1986-2020.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

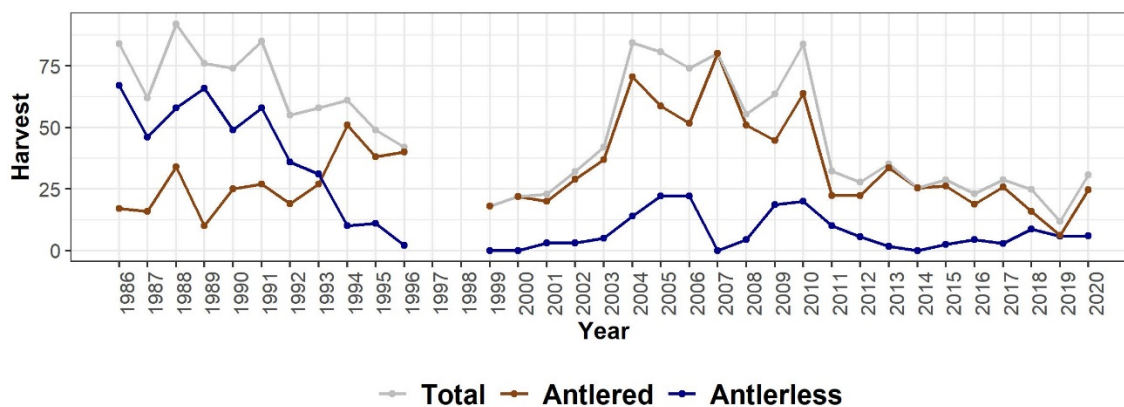
Regulations simplification. The objectives of this proposal are to reduce the number of LPTs offering fewer than 25 licenses/permits and eliminate antlerless permits in favor of B Licenses. Additionally, this proposal will minimize antlerless elk harvest in a HD where populations have declined within the last decade.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by a reduction of complaints to FWP staff regarding confusion over hunting regulations and opportunities in HD 110, reduced game violations specific to the proposed change, and general hunter and private landowner satisfaction.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

As per the 2005 Montana Elk Management Plan, HD 110 falls within the Whitefish EMU. Dense forest and mountainous conditions preclude effective aerial surveys and are not formally conducted within the EMU. As such, there is no set population objective. Population trend is monitored annually through harvest survey estimates and, along with sportsmen and landowner input, indicates that the populations have declined since 2010 (Figure 2). While harvest estimates obtained since 1986 have rarely exceeded 100 animals, recent declines are most likely the cumulative result of habitat changes brought on by forest succession, major forest fires in 2001 and 2003, urban development of winter range in the southern portion of the HD, and a complete predator community. To facilitate population growth in the HD, antlerless harvest is currently limited to the 6-week archery season and the 5 antlerless permits. Due to the limited number of permits and harvest success, eliminating this opportunity will likely not result in a positive change in elk population trend. However, since 2010, permit harvest has accounted for approximately 42% of the total antlerless harvest within the HD.



**Figure 1:** HD 110 elk harvest trends estimated from hunter survey 1986-2020.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Game damage complaints involving elk historically occurred in the southern portion of this HD (Whitefish area) and were the original justification for establishing the permit. However, urban expansion and large-scale development of agricultural land in this region have reduced available wintering range for elk and make practical and safe hunting difficult. Few game damage complaints have been received from this area in recent years.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Comments were collected online, as part of the 2021 Regulations Simplification Season Setting Package, September 21 through October 20. Seven comments were received, with five in support and two opposing. Both supporting and opposing comments cited limited availability of elk within the HD, though opponents did not

support removing the antlerless opportunity. During a virtual open house held 10/14/21, a clarification question was asked about the proposal but did not indicate support or opposition. Public comments related to replacing antlerless permits with B Licenses are relevant to this proposal, with opinions evenly split between supporters in favor of additional opportunity, and opponents against providing opportunity to harvest multiple elk within Region 1.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Justification for Combining HD 101 and 109**

**Hunting Districts:** 101,109

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal would combine HDs 101 and 109 for elk, mule deer, and white-tailed deer. Proposal is being considered for regulations simplification.

Mule deer season structure is not consistent between HDs 101 and 109. Opportunity using a General License in HD 101 is limited to antlered buck during the six-week archery season and five-week general season. Opportunity using a General License in HD 109 is limited to antlered buck during the six-week archery season and the first three weeks of the general season. Limited draw permits (n = 10) are issued for antlered buck during the last two weeks of the season in HD 109. The 109-mule deer season structure was adopted by the commission prior to the 2012 hunting season, and was put in place due to hunter interest in maintaining a mature age-class of antlered mule deer by restricting harvest during the last two weeks when deer are more vulnerable to harvest due to migratory and breeding behavior. If this proposal is adopted, the reformed HD 101 would adopt the HD 109 season structure where opportunity using a General License would be limited to the six-week archery season and the first three weeks of the general season, with the last two weeks of the season restricted to limited draw permit holders. The number of permits issued will need to be adjusted pending commission decision.

Elk season structure is consistent between HDs. Opportunity using a General License is limited to either a brow-tined bull or antlerless elk during the six-week archery season, and brow-tined bull only during the five-week general hunting season. An additional 50 private-land only antlerless elk permits are issued to address game damage issues during an established shoulder season, Aug 15 – Feb 15. Permits are already valid in both HDs. HD 109 was created prior to the 2002 hunting season, primarily as means of effectively addressing elk game damage in the North Tobacco Valley. The establishment of the shoulder season permits has largely resolved the game damage issues that prompted HD 109 establishment. However, adopting this proposal would split HD 101 between two elk management units (EMUs) identified in the 2005 elk management plan.

White-tailed deer season structure is consistent between HDs. Opportunity using a General License is limited to either-sex during the six-week archery season, the first week of the general season and the last week of the general season on private land. Exceptions include youth hunters (ages 10-15), and those with a permit to hunt from a vehicle (PTHFV), who can harvest either-sex white-tailed deer on a General License throughout the general season. Each HD offers limited-draw antlerless licenses, valid on private land, to help address concentrations of deer on private agricultural ground. If the proposal is adopted, the number of 101-00 antlerless licenses issued would increase to 200 and the maximum quota range would be set at 800 to reflect the combined districts.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Regulations simplification. The objective of this proposal is to simplify the hunting regulations by reducing the number of HDs. There is no biological justification for this proposal.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Mule Deer

Dense timber precludes effective aerial surveys for mule deer in HDs 101 and 109. Limited ground surveys are conducted during spring green-up in HD 109, and buck harvest derived from hunter phone survey data is used to estimate population trends. Across Region 1, mule deer populations have declined since the early 1990s. Prior to 1996, Region 1's mule deer general season structure consisted of two weeks either-sex, followed by three weeks antlered only harvest. In 1997, an antlered buck only regulation was adopted for the general five-week season, though antlerless opportunity was allowed during the six-week archery season. Between 1997 and 2012 limited antlerless harvest opportunities were available within the region, and all antlerless mule deer harvest opportunity was discontinued prior to the 2012 season. Based on harvest survey data, mule deer populations in HD 101 and 109 appear to have been relatively stable for the past ten years, albeit at much lower densities than those observed prior to 1996. This proposal will not affect overall population trend.

#### Elk

Dense timber precludes effective aerial surveys for elk in HDs 101 and 109. Generally, elk populations occur at low densities throughout Salish and Whitefish Mountain Ranges in small (<50) localized groups. The Tobacco Valley, which occupies the northern portion of HD 101 and the western portion of HD 109 comprises the largest low-elevation winter range for some resident elk populations as well as migratory populations from British Columbia. The size of the migratory population varies according to winter severity and can result in numerous game damage issues within the predominately privately owned valley. Existing elk season structure is consistent between HD 101 and 109 and this proposal is not expected to have a biological impact on elk populations.

#### White-tailed Deer

Dense timber precludes effective aerial surveys for white-tailed deer in HDs 101 and 109. Ground based recruitment surveys are conducted annually during spring green-up, and buck harvest estimated from hunter phone survey data is used to track changes in population trend. In HD 101 and 109, recruitment has been steadily increasing since 2016 and has been estimated above 40 fawns per 100 adults for the past two years in HD 101, and this past year (2020) in HD 109. Antlered harvest has remained relatively stable during the last three years. The white-tailed deer population is stable to increasing within both HDs. Existing deer season structure is consistent between HD 101 and 109, and this proposal is not expected to have a biological impact on white-tailed deer populations, though may result in a limited compensatory increase in antlered buck harvest if a limited mule-deer season structure is adopted as proposed.

### **5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Mule deer populations in HD 101 and 109 are behaviorally distinct, though there is likely some interchange of individuals between populations. Mule deer in HD 109 are predominantly migratory, moving east into the remote and mountainous conditions of the Whitefish Range and British Columbia during the summer and transitioning to the lower elevation foothills of the Whitefish Range (east HD 109) during the late fall. Mule deer within HD 109 are most vulnerable to harvest while on breeding/winter range where hunter access is improved, and habitat offers improved visibility. No movement studies have been conducted on mule deer within HD 101, though observation and movement data from adjacent HDs suggests that both resident and migratory populations occur. Most resident populations occur within the Tobacco Valley and along Koochanusa Reservoir (east HD 101). Unlike HD 109, there is extensive road access throughout HD 101, though densely timbered conditions still provide some measure of security throughout the hunting season.

### **6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Public comment was collected online September 21 – October 20, 2021. A virtual open-house public meeting occurred October 14. A total of 19 comments were received specific to the proposed changes, with 9 generally supportive of the proposal and 8 opposed. While in person discussions and public forums were limited by COVID-19 restrictions, discussions with local hunters suggests that division over this proposal is evenly split due to strong contention over what mule deer season structure will be applied to the much larger and combined HD 101. Overall, there is support or neutrality towards the district combination, as it relates to elk and white-tailed deer season structures.

Supporters of the proposal are generally in favor of restricting mule-deer buck harvest within the combined HD during the last two weeks of the season when bucks are perceived to be more vulnerable to harvest due to breeding behavior or late-season spatial distribution. The season structure in HD 109 is popular with hunters, who perceive an increase in older age-class deer within the HD, and value the season structure as a compromise between a limited permit season structure, and an open opportunity season structure (6 week archery, 5 week general).

Opponents of the proposal are not in favor of restricting opportunity for mule deer bucks during the last two weeks of the season and cite differences in geographic characteristics, road densities, and mule deer distributions as justification to maintain an open opportunity season structure within 101. Some indicated general support for the HD 109 season structure within its current boundary but were not supportive of extending the season structure to a combined HD 101.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Upper Clark Fork replace permits with B Licenses**

**Hunting Districts:** 210,211,212,213,215,216

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Replace antlerless permits with B Licenses.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to make consistent use of the Elk B License statewide and eliminate use of the permit for antlerless elk.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Easier and more consistent regulations for hunters to understand and apply in the field.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

These HDs are a mix of at or above objective. This information was not a driver for making this recommendation. It is a socially based recommendation.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

N/A

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Public comment supports keeping the antlerless permit, partly because they don't think it's a fair allocation of opportunity for people to kill two elk, and partly because they expect B Licenses to allow greater bull harvest and lower bull survival in areas of Region 2 where bull survival is perceived to be low. Some public comment supports switching to B Licenses, particularly where there are the highest concentrations of elk.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Elk 213-215 add late season**

**Hunting Districts:** 213,215

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Extend the season end date for LPTs 213-01 and 215-02 to Feb. 15; i.e., a late shoulder season. In 2020 and 2021, these Elk B Licenses were valid from October 23-Nov 28 for antlerless elk on essentially private lands (outside the National Forest boundary), with 350 issued in 213 and 400 in 215. From 2017 to 2020, late shoulder seasons were in place in these hunting districts.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the change is to temper the growth of elk numbers above elk objectives in both HDs by focusing harvest pressure on the private properties where damage occurs.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by an initial leveling of elk population trend and potentially a declining trend toward objective within a 5-year period.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

HDs 213 and 215 are more than 25% above the objective midpoint.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This harvest would complement harvest offered via other LPTs that are valid on public land in each district. This harvest on private land ensures that sufficient numbers of hunters will seek and secure access on private land in addition to the bulk of hunters who would choose public land without this focused LPT. Also noteworthy is that an extended season is required to achieve the hundreds of harvested elk needed to turn the population trend. In this environment, it takes more days in a season for the harvest to accumulate as needed.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

We received little comment from the public on a proposed late shoulder season in these districts. We know that there has been demonstrated opposition to late shoulder seasons in this area, registered as recently as early 2020. We have received landowner input in support of using the shoulder season tool again at this time.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 202 B License**

**Hunting Districts:** 202 (Trout-Quartz Creek portion)

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Retain the Trout Creek-Quartz Creek portion and add 50 limited draw B Licenses for antlerless elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Focus elk harvest on an area around and including a ranch in HD 202 that experiences game damage and increase opportunity for elk harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

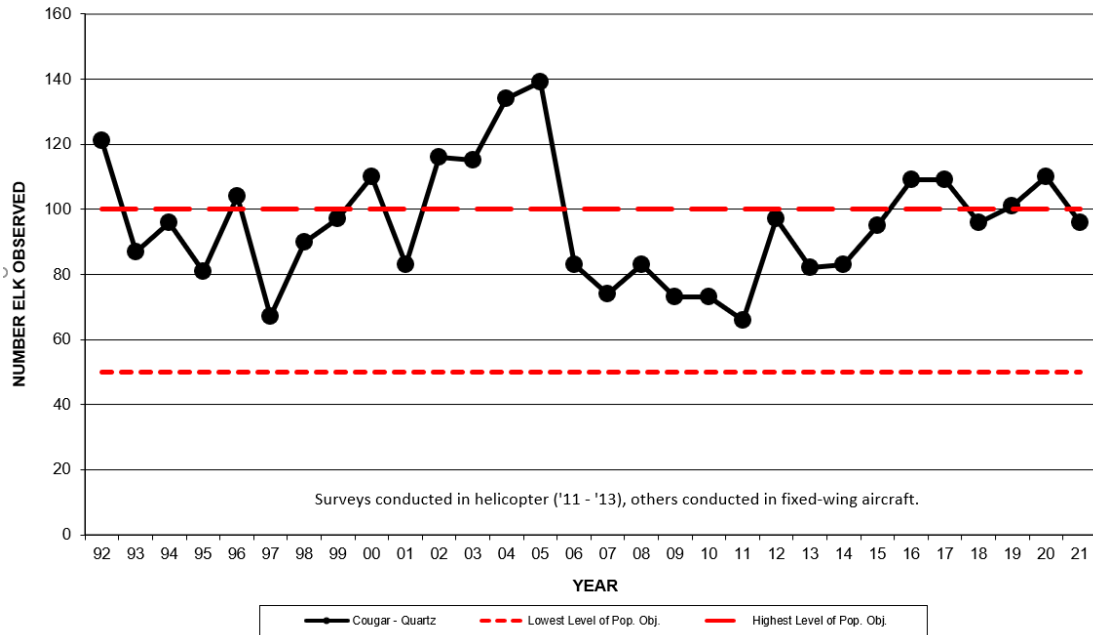
Success will be measured if the elk population declines and stays below population objective. The area is flown and counted annually in the spring.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

HD 202 has a population objective of 350 with subobjectives for each of 3 portions of the district which are flown and counted annually each spring. The Cougar-Quartz portion has an objective of between 50-100 elk and this is where the Trout Creek-Quartz Creek hunting portion is located. Elk numbers have been above or at the upper end of the population objective for the last ~7 years (see Figure 1).

The other 2 portions, the Cold-Thompson Creek and North Fork Fish Creek portions, are at and below objectives respectively. But the overall district population is currently within objective range.

**Elk Trend Data and Population Objective for the Cougar - Quartz Survey Unit in HD 202 (1992 - 2021)**



**Figure 1.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

A large fire burned between Trout and Quartz Creek in 2017 and has improved the habitat for both elk and mule deer. The landowner reported less game damage the year following the fire but it has picked up again since then. Some private parcels have recently sold have been closed to hunting so access issues are starting to become a challenge but none of these parcels are big enough to harbor all the elk. However, it makes it more difficult for hunters to access the area immediately behind the primary ranch in HD 202. Still, this ranch felt that increasing the cow licenses from 30 to 50 would be manageable.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

There were numerous comments against removing the Trout-Quartz Creek hunting portion and making a district wide B License. There was concern for harvesting elk where herds are struggling (like Fish Creek) as well as comments voicing concern over the need to focus harvest in and around the primary ranch in this HD, including comments from that ranch. The primary ranch is enrolled in Block Management and allows a lot of access during the hunting season. After a considerate conversation over surrounding access issues and hunting pressure, they wanted to see the B Licenses increased to 50 in order to get more harvest. This proposal reflects the public as well as the primary ranch's comments to retain the portion and increase B Licenses to 50.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 201 B Licenses**

**Hunting Districts: 201**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to remove all previous antlerless licenses and to offer 2 types of B Licenses district wide in the new HD 201: 1) OTC B License valid on private land only, 2) limited draw B License valid district wide. Add youth/PTHFV opportunity to harvest antlerless elk on private land district wide on General License. HD 201 had an OTC private lands B License in 2018-19 and we saw higher harvest in those years than others with a limited draw license. Youth/PTHFV is currently being offered on private land in HD 201 but is not valid west of Deep Creek in Mineral County. In HD 203, youth/PTHFV is currently being offered district wide but only in the portion east of Petty Creek-Grave Creek Road. Both of these portions are being removed or changed with HD boundary changes to reflect statewide guidance to remove portions.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

To follow guidelines to simplify regulations by reducing number of hunting districts, # of licenses, and portions of district. To increase opportunity on private land with the goal of bringing the elk population down to objective and redistributing elk off private and onto public lands.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by whether the elk population in old HD 201 is brought down to within population objective and elk are redistributed onto public land with harvest opportunity increasing on public land. In annexed portions of HDs 240, 203, and 283 the objective is likewise to redistribute elk from private onto public land. The survey unit will be flown annually in the spring with a fixed wing.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population is over objective in HD 201 (see Figure 1).

The portion of HDs 203 that is being added to HD 201 does not have its own population objective, however most of the elk in current HD 203 are heavily skewed to the east side of the district, being included with HD 201 (see Figure 2).

The portion of HD 240 being added to HD 201 does not have its own population objective. There are ~230-280 elk in this portion of the district.

The west side of HD 283 has 2 subobjectives for the North Hills/Evaro herd and the Mt Jumbo herd. The Mt Jumbo herd is within objective and the North Hills herd is below objective with ~200 elk counted in 2021 (objective = 300) (see Figure 3). However this herd is still the largest herd wintering in the Missoula Valley and past experience has shown this herd can grow very quickly. When the herd was 300+ there were numerous management problems including game damage and concern with habituation. Therefore we believe this population objective should be revisited with the development of the new Elk Management Plan. Most harvest on the North Hills/Evaro herd has historically occurred in a late season game damage hunt as the North Hills herd (larger of the 2 herds) are usually not down on the winter range during the general season and access is controlled by private landowners. Therefore an OTC B License during the general season could be helpful to

allow for some cow harvest, keep the population from starting on an upward trajectory again, and would likely target the non-migratory Evaro herd, which are more problematic.

In spring 2021 there were 2,163 elk counted in new HD 201.

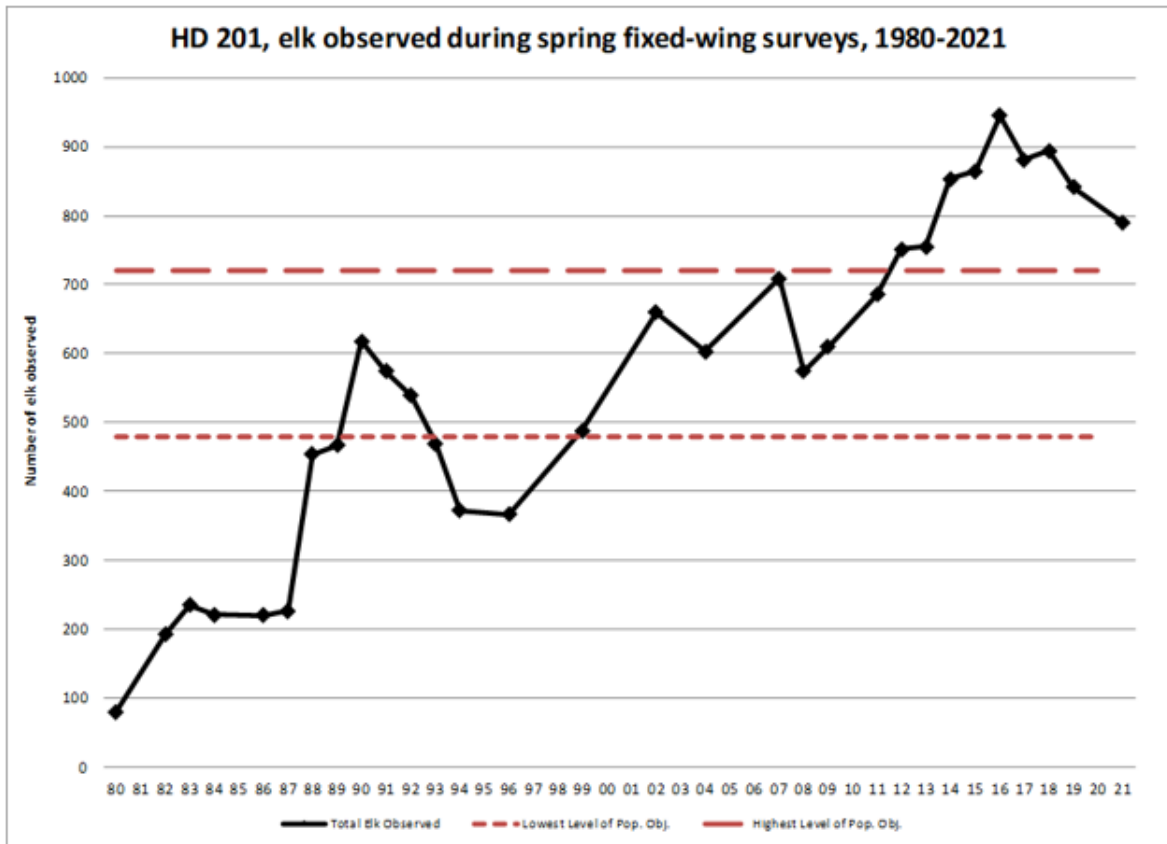
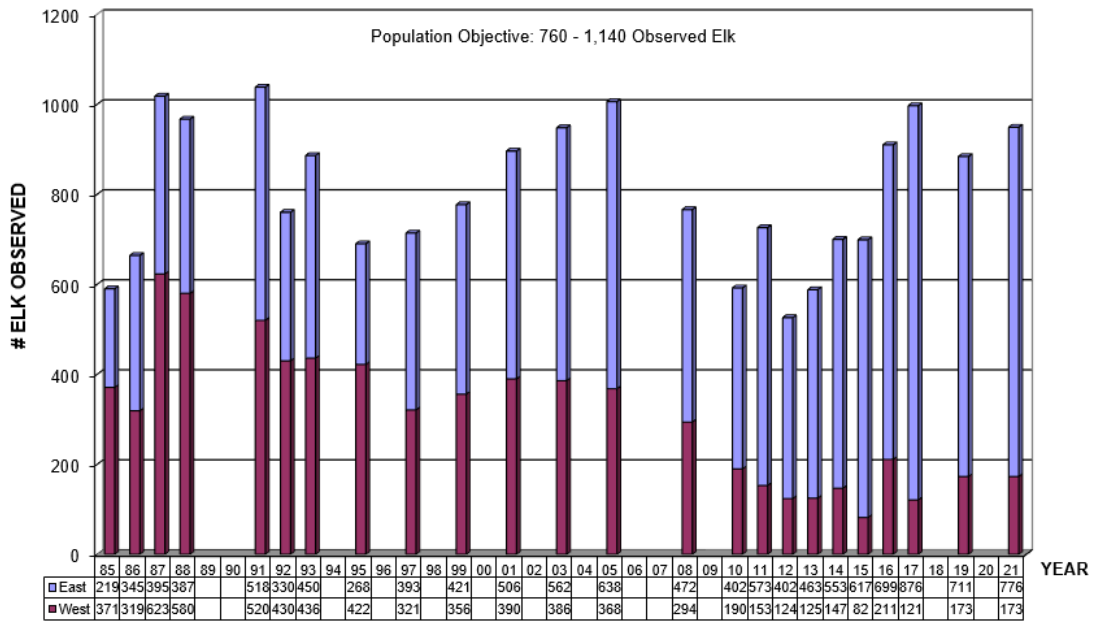


Figure 1.

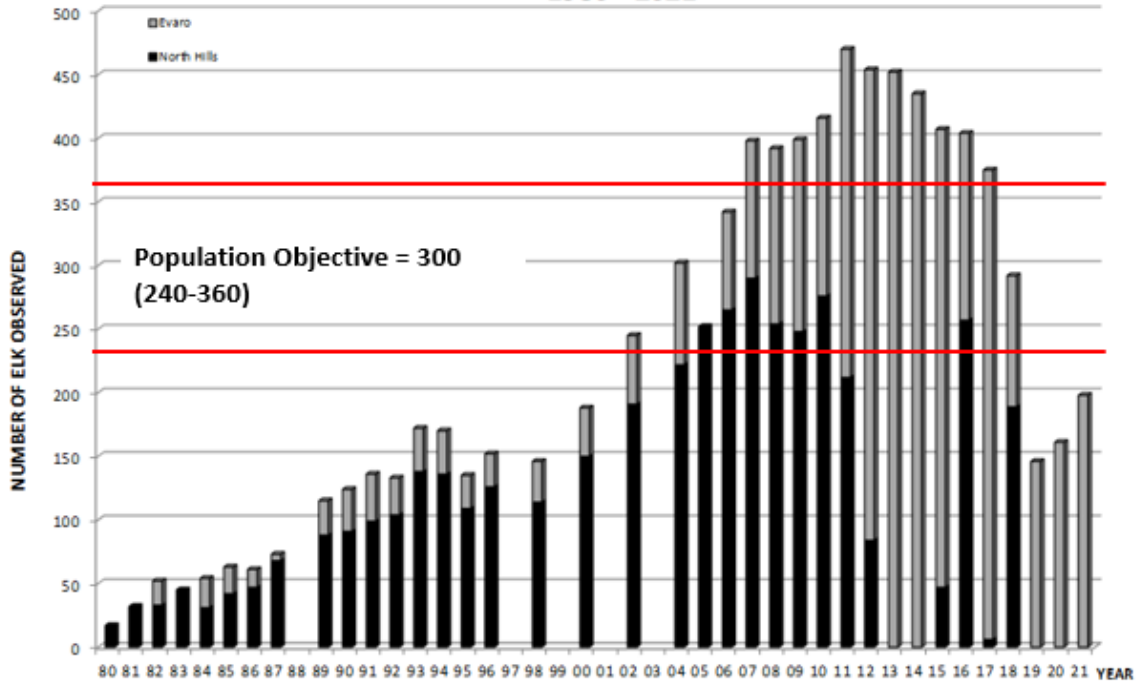
**Elk Trend Surveys, HD 203, 1985 - 2021\***  
**E. of Petty Creek (Formerly 203-80) & W. of Petty Creek (Formerly 203-81)**



\* Incomplete data sets resulting from partial surveys were not included ('89, '90, '96, '98, '00, '02, '04, '06, '07 & '09); Portion of survey conducted in helicopter ('95, '05, '11, '12, '13).

**Figure 2.**

**Combined Data: HD 283 (West) - North Hills and Evaro Elk Trend Counts**  
**1980 - 2021**



**Figure 3.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Recruitment in the North Hills/Evaro herd has been low (below 20 calves:100 cows) since 2018 (see Figure 1) and could be due to predation, as the last several winters have been mild. Similar trends are being seen on the east half of HD 283.

Recruitment in other parts of this new HD (201, 203, and 240) have been stable (generally in the mid 20s).

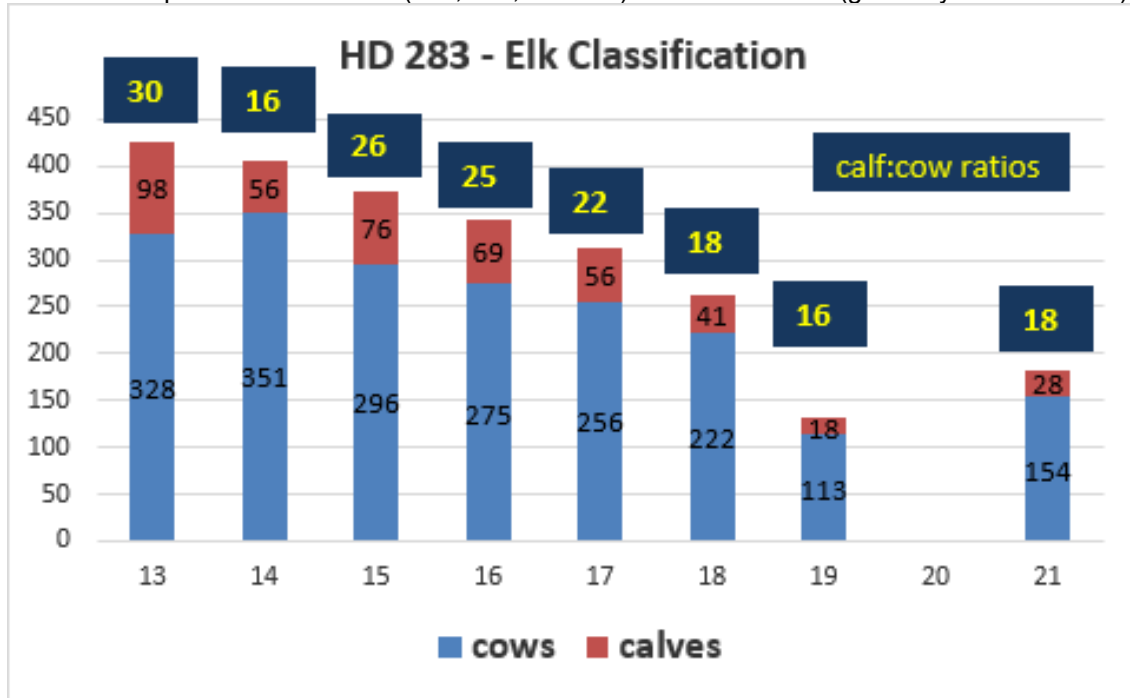


Figure 1.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Public comment has generally been favorable for this change, although some hunters feel like the OTC private lands B License is favoring landowners. Still, there are many landowners who allow some access. The biggest problematic concentration of elk has been on the northeast corner of current HD 203. The elk (~200) cross the Clark Fork River and cause game damage on a ranch in HD 260. This ranch is enrolled in Block Management but HD 260 has weapons restrictions due to safety. An OTC B License would allow more shotgun/muzzleloader hunters to hunt this HD. Right now, with limited draw B Licenses they aren't seeing enough hunters that have licenses. Some landowners in HD 201 have game damage but do not qualify for landowner preference and have not been able to draw B Licenses. When there was an OTC private land B License in HD 201 in 2018-19 these ranches allowed more public access, as did others. In general, landowners favor the OTC B License and there's precedent to believe there will be more public hunting opportunity on private land with this license.

A ranch west of Lolo, which has property on both sides of Highway 12, would be consolidated into one HD with the proposed boundary change. Typically this ranch has not allowed hunting but is under new management and now allows some PTHFV hunters (wounded warriors). Keeping an antlerless PTHFV opportunity would continue to allow this opportunity without requiring a second license.

There were numerous public comments to keep youth opportunities where we could so we are proposing an antlerless opportunity for youth on private land throughout the new district.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 260 elk**

**Hunting Districts:** 260

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove Bitterroot/Missoula portions of HD 260.

Remove the 262-01 B License, formerly valid in only the Bitterroot portion of HD 260.

Add the 201-01 B License, over-the-counter, to entire HD 260, valid for special weapons only early and general/late (retaining archery season).

For many years HD 260 has had various regulations in the Missoula and Bitterroot portions of the HD, which have been confusing to everyone (hunters and biologists). This was due in part to trying to deal with game damage issues as well as bowhunters who are very resistant to any addition of guns into HD 260.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify regulations and allow some gun opportunity (special weapons) in HD 260.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Reduced confusion from hunters, monitoring elk populations in the river bottom during aerial surveys, and monitoring elk harvest via the annual phone survey.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The Bitterroot portion of HD 260 has a population objective of 50 elk, which has been exceeded since that objective was developed in 2016. Many elk (about 150-200) are year-round residents of HD 260, while some (about 150) use the HD seasonally. Elk harvest has been restrictive for many years to archery only, while special weapons opportunities have been added periodically with varying success.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 260 has historically been an archery only area. Hunters cite both safety concerns over long-range weapons close to homes and people, and the area's historical cultural importance as a bowhunting-only area.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Initially, we proposed to combine the Bitterroot portion of HD 260 with HD 262 and add rifle elk opportunity. This proposal was open for public comment in September/October 2021. We received numerous concerns from hunters about the addition of rifles into what is currently the Bitterroot portion of HD 260, primarily due to safety concerns.

This proposal--to remove the Bitterroot portion and allow the over-the-counter 201-01 license valid for special weapons--is intended as a compromise between the issues of game damage, confusing regulations, and safety issues and has not been reviewed by the public. We expect many bowhunters to oppose it, especially in the Bitterroot.





**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
HD 201 Boundary Change**

**Hunting Districts:** 201, 203, 240, 283

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Expand the existing boundary for HD 201 to include the west half of HD 283, the east half of HD 203, and the northern portion of HD 240. Removed HD 203 and HD 283 and associated portions.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify regulations by consolidating and reducing number of hunting districts, and removing portions of districts.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by whether we can keep consistent regulations across this enlarged hunting district, or if we learn that the scale is too big and we need to manage this area in smaller HDs. Success will also be measured by feedback from hunters that the boundary is easier to understand or not.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Public comment was generally favorable to expand this district although there was some concern that we wouldn't be able to manage at a smaller scale and respond to changing conditions as needed. One landowner on the west end of HD 201 did not like the west end of 201 being included in the same district that would have more liberal regulations for elk harvest, as there are fewer elk on the west end.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 200 Boundary Change**

**Hunting Districts:** HDs 200, 123, 124

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Enlarge HD 200 to include all of HDs 123 and 124. Previously, HDs 200, 123, and 124 were managed individually. Responsibility for surveys, management, and enforcement will stay with the respective regions and the area bios will work together on season setting. Remove Mullan Gulch portion of HD 200. Mullan Gulch was built to focus deer and elk harvest around a single ranch, due to game damage. The new HD 200 boundary follows existing outside boundaries for these 3 districts.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify regulations by consolidating and reducing number of hunting districts and removing portions of districts.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured in old HD 200 by level of elk/deer game damage and if the elk population stays within objective.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The main landowner in HD 200 has elk regularly on his property. He has experienced game damage for years and is enrolled in Block Management. The Mullan Gulch portion was formed to focus elk harvest in and around his property. He did not comment formally but we discussed the proposal and he was in favor of it.

FWP received formal public comment on this proposal in Sept/Oct 2021. Comments were mostly related to the change of managing Elk B Licenses across one larger district. This proposal represents a potential reduction in antlerless elk opportunity in old HDs 123 & 124, because permit levels were cumulatively higher when these HDs were managed individually. Therefore some hunters commented negatively that they were losing opportunity on the R1 side. On the R2 side, this proposal represents a potential increase in opportunity and there was more positive comment regarding this change.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 285 and 283 East combine**

**Hunting Districts:** HD 285, 283 East

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

We propose to combine hunting districts 285 and 283 east half to create a new HD 285. Elk regulations will remain either-sex during archery season and brow-tined bull during the general season, with a youth opportunity and permission to hunt from a vehicle opportunity. One antlerless elk opportunity will exist on a B License valid on private land only during the archery season and general rifle season with a quota of 30. Mule deer will remain antlered buck and white-tailed deer will remain either-sex during the archery season. White-tailed buck and mule deer buck only opportunity on the General Deer License for the general rifle season with the exception of mule deer season closing after the first 3-weeks. Antlerless white-tailed deer opportunity will remain on a B License with a quota of 125.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to combine hunting districts with similar regulations, populations in relation to objectives, and landcover/ownership into a larger hunting district for the purpose of simplifying hunting regulations in Region 2. Regulations will effectively remain unchanged with the exception of a reducing the mule deer buck season from five weeks during the general season to the first 3 weeks.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by harvest at or below the current harvest levels for elk and mule deer and at current levels for white-tailed deer. Game damage complaints for elk will be fewer than previous seasons before the creation of the new HD 285.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent elk surveys for districts included in this proposal were as followed and include the 5-year long-term average (LTA) and (objectives in parentheses): HD 283 East=233 (300) LTA = 245, HD 285/282=584 (1000) LTA = 718. A population objective for HD 285 will be a combination of objectives for the districts included, new objective 1,300 (range 1,040 to 1,560).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Elk habitat in the new HD 285 is predominantly public and private, but publicly accessible forested land with high quality white-tailed deer habitat and more marginal to average elk and mule deer habitat. Habitat security is generally good with seasonal closures on forest roads, while still allowing quality access for hunters. Winter severity is high in the district with annual snowfall totals averaging over 100 inches and sub-zero temperatures a normal occurrence. These severe winter conditions limit elk herd production with average calf:100cow ratios in the upper teens and low 20s.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was part of the regulations simplification process that was subject to a long public comment period. I have fielded multiple calls, emails, and reviewed numerous public comments. In addition, R2 hosted two public meetings with the R2 CAC. Comment has been both supportive and opposing. Generally, the public was not supportive of the first iteration of this proposal and preferred smaller expansion of hunting districts so biologists could maintain control local issues and have a better understanding of where harvest was occurring in relation to expanded opportunity. This proposal represents consideration of public concern and should do well to meet the objective of simplifying regulations and allowing appropriate opportunity without compromising deer and elk populations.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 291 Boundary Change**

**Hunting Districts:** HD 291, 298, 293 south portion

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

We propose to combine hunting district 291 with HD 298 and the portion of 293 south to create a new district 291. Elk hunting regulations have been liberal within 291 and 298 over the past 5 to 10 years due populations at almost double the management objective. Proposed elk regulations for this new district will remain the same as current regulations for HD 291. Brow-tined bull or antlerless elk will remain for the archery season, and BTB only during the general rifle season, with the exception of BTB or antlerless elk for youth and PTHFV hunters. The current elk permit will be removed and the existing antlerless Elk B License will remain with the same quota range that currently exists. The antlerless Elk B License will be valid during the early, general, and a late shoulder season on private lands only.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to combine hunting districts with similar regulations, populations in relation to objectives, and landcover/ownership into a larger hunting district for the purpose of simplifying hunting regulations in Region 2. Regulations will effectively remain unchanged with the exception of eliminating the antlerless elk permit and antlerless mule deer license.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by harvest at or below the current harvest levels for elk and mule deer and at current levels for white-tailed deer. Game damage complaints for elk should remain unchanged.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent elk surveys for districts included in this proposal were as followed and include the 5-year long-term average (LTA) and (objectives in parentheses): HD 291=734 (600) LTA = 937, HD 298=902 (600) LTA = 887. A population objective for HD 291 will be a combination of objectives for the districts included, new objective 1,200 (range 960 to 1440).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Elk habitat in the new HD 291 is predominantly private range land and some higher elevation forested public land. The district has high quality mule deer habitat and isolated pockets of high-quality white-tailed deer habitat. Habitat security is generally good with seasonal closures on public roads and mixed access to the private land. Winter severity is generally mixed along the northern portion of the district and lessens along the southern portion where south facing slopes reduce snowpack.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was part of the regulations simplification process that was subject to a long public comment period. I have fielded multiple calls, emails, and reviewed numerous public comments. In addition, R2 hosted two public meetings with the R2 CAC. Comment has been both supportive and opposing. Generally, the public was not supportive of the first iteration of this proposal and preferred smaller expansion of hunting districts so biologists could maintain control local issues and have a better understanding of where harvest was occurring in relation to expanded opportunity. This proposal represents consideration of public concern and should do well to meet the objective of simplifying regulations and allowing appropriate opportunity without compromising deer and elk populations.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 200 B License**

**Hunting Districts: 200**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is adding a single district wide B License for new HD 200, which encompasses old HDs 200, 123, and 124. Historically, and most recently, these HDs have been managed individually for antlerless elk harvest using permits. In HD 200, from 2009-2021, only 5-15 antlerless permits were issued annually for the Mullan Gulch portion of the district, due to low recruitment and concerns for a declining population. Prior to 2009, 100-275 antlerless permits were issued in HD 200 annually. In HD 123 in 2021, 50 antlerless permits were issued and 5 permits for PTHFV. In HD 124 in 2021, 25 antlerless permits were issued and 5 permits for PTHFV.

Conversion from 3 districts to 1 district creates uncertainty about spatial distribution of access due to the loss of spatial allocation of cow harvest opportunities. Access to HD 123 is primarily through Prospect Creek and Cherry Creek (Thompson Falls) while access to 124 is primarily through the town of Plains. Summing of the current allocation of cow harvest opportunities for HDs 123, 124, and 200 without spatial control could result in undesirable harvest levels in any one of these districts. Therefore, we are starting conservatively with a harvest quota of 50, with liberal quota ranges for future adjustment based on harvest statistics and trends.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

To simplify regulations by removing antlerless permits and replacing with district wide B Licenses. The objective is for elk harvest to be distributed across the new HD proportionally and align with distribution/numbers of elk so that more elk are harvested where elk numbers and opportunity are higher (in old HD 123) and fewer elk harvested where populations are lower (in old HDs 124 and 200), so that populations are within objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Feedback from hunters that regulations are easier to understand. Aerial surveys will be conducted annually to document population trend and recruitment.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in old HD 200 are currently within, but at the lower level, of the population objective (300) (See Figure 1). Recruitment has typically been low in this HD in recent years.

Elk recruitment in HD 123 has typically been low in recent years (see Figure 2). HD 124 is currently not surveyed for elk.



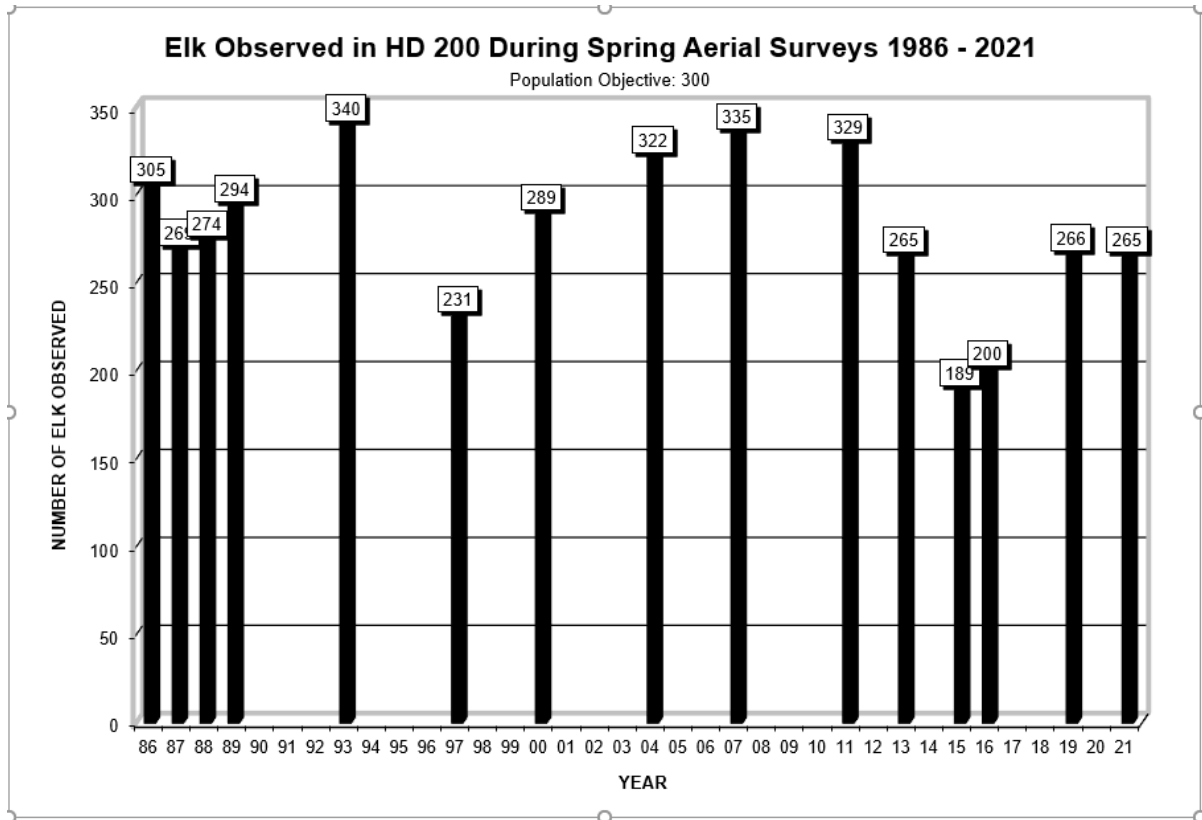


Figure 1.

Table 3. Elk Recruitment for Clark Mountain HD 123, 2012-2021.

<i>Hunt District</i>	<i>Survey Year</i>	<i>Calves per 100 cows</i>
123	2011-2012	18.84
123	2012-2013	-
123	2013-2014	-
123	2014-2015	21.94
123	2015-2016	23.48
123	2016-2017	6.15
123	2017-2018	-
123	2018-2019	12.10
123	2019-2020	-
123	2020-2021	19.40

**Figure 2.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 200 is habitat limited with a population objective of only 300 elk. Old HD 200 has had very little fire and habitat management until just recently. The USFS has several commercial and thinning projects ongoing as well as prescribed fire on Boyd Mountain, which is some of the best elk winter range in this district. All this could improve productivity. Travel management is a challenge in HD 200 on FS lands with illegal OHV use. Predator numbers are high in HDs 200, 123 & 124 and likely contribute to lower recruitment.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

FWP received formal public comment on this proposal in Sept/Oct 2021. This proposal represents a potential reduction in antlerless elk opportunity in old HDs 123 & 124, because permit levels were cumulatively higher when these HDs were managed individually. Therefore some hunters commented negatively that they were losing opportunity on the R1 side. On the R2 side, this proposal represents a potential increase in opportunity and there was more positive comment regarding this change. Dave Jensen is the main landowner in HD 200 with elk regularly on his property. He has experienced game damage for years and is enrolled in Block Management. The Mullan Gulch portion (which is also being proposed for removal) was formed to focus elk harvest in and around his property. He did not comment formally but we discussed the proposal and he was in favor of it.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**New HD 281**

**Hunting Districts:** Combine HD 281, 284, and 293

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

We propose to combine current hunting district 281 with 284 and 293. The new district 281 will absorb the remaining portion of 293 and create an archery-only weapons restriction area using the existing boundary of HD 284. Elk regulations for the new 281 will remain the same as current elk regulations for HD 281 with the exception of eliminating the antlerless elk permit. Therefore, either-sex elk opportunity will exist during the archery season, be limited to brow-tined bull during the general rifle season with and either-sex opportunity for youth and PTHFV.

The unlimited mule deer buck permit will be eliminated and replaced with a General Deer License opportunity for the first 3 weeks of the general rifle hunting season. White-tailed deer opportunity will be either-sex during archery season, a General Deer License buck opportunity during the general season, with limited antlerless B Licenses.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to combine districts with similar regulations, populations relative to objective, and landcover/ownership patterns. Harvest should remain very similar to current harvest levels.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by maintaining a similar level of harvest and aerial survey results for elk that are within the range of population objective. Game damage is not a major consideration for this district.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent elk surveys for districts included in this proposal were as followed and include the 5-year long-term average (LTA) and (objectives in parentheses): HD 281=608 (600) LTA = 716, HD 293=619 (750) LTA = 450. Antlerless harvest have mirrored recent reductions in the number of permits or licenses available in these districts. Bull harvest has declined in HD 281=55 (LTA= 86), HD 284=8 (LTA=20), and held steady in HD 293=98 (LTA=103).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This district is predominantly summer range with limited, but marginal pockets of winter range for deer and elk. During most years, winter conditions are harsh to severe with an average annual snowfall near 100 inches and cold, often times sub-zero temperatures. Spring and summer vegetation quality can be very good, with a delayed spring green up because of relatively high elevations.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was part of the regulations simplification process that was subject to a long public comment period. I have fielded multiple calls, emails, and reviewed numerous public comments. In addition, R2 hosted two public

meetings with the R2 CAC. Comment has been both supportive and opposing. Generally, the public was not supportive of the first iteration of this proposal and preferred smaller expansion of hunting districts so biologists could maintain control of local issues and have a better understanding of where harvest was occurring in relation to expanded opportunity. This proposal represents consideration of public concern, specifically, safety concerns about the removal of the archery-only HD 284. We addressed this important issue by converting HD 284 into an archery-only weapons restriction area that functions almost identically to its previous designation as a hunting district. We feel this change should do well to meet the objective of simplifying regulations and allowing appropriate opportunity without compromising deer and elk populations.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R2 antlerless permits**

**Hunting Districts:** 204,240,291,200,201,203,202,214

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove all antlerless permits from Region 2 hunting districts.

Many HDs had antlerless permits as a way to allow antlerless harvest on the General Elk License and subsequent forfeiture of bull elk opportunity. This was instituted as a way to focus harvest on antlerless elk while reducing some pressure on bulls, and, in some cases, disallowing harvest of 2 elk where populations were not above objective.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is regulation simplification according to Director's Office goals.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured via reduced hunter confusion/phone calls to biologists and/or Licensing.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A. This proposal is not related to any population objectives or statuses.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This is a statewide regulations change.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was open for public comment during September/October 2021. Some comments opposed all changes focused on regulations simplification. There were also numerous comments that did not support removing antlerless permits and replacing with B Licenses because it allows hunters to kill 2 elk.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 214 opportunity removal**

**Hunting Districts: 214**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

We propose to remove the 214-00 permit for antlerless elk.  
In 2020 and 2021, the antlerless permits were reduced to one.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposed change is to increase elk in HD 214 and remove the unnecessary antlerless harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by decreased regulations complexity and an increase in elk numbers counted in winter-spring trend flights.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk counts in annual surveys are low, below objective, and slowly increasing.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This winter range is harsh and will not support a substantial surplus of elk. Weather conditions along with predation are likely factors suppressing population growth.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The public has expressed support for managing the elk population in HD 214 conservatively while maintaining the opportunity to hunt bulls on the General License.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 270 Elk--expand 262-01 opportunity**

**Hunting Districts: 270**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Expand the 262-01 license to be valid in entirety of HD 270, not just the "north of Rye Creek" portion, and lower the 270-02 quota because of the addition of the 262-01 license.

The 262-01 license has been valid north of Rye Creek since 2018. (For 2018-2019 seasons, it was a regionwide license called 002-00, but with same functionality in 270 as 262-01 license.) This restriction was put in place due to a popular Block Management Area in the south portion of 270, which attracts a lot of hunters and has experienced "shoot-outs" in the past. In 2020, this BMA instituted changes to its access requirements which places limits on the number of hunters who can enter the BMA per day. (Formerly, hunters could park anywhere in the vicinity and enter the BMA; in 2020, hunters may not park along public roadways and enter, but must park only in designated parking areas.) These changes should allow the use of the OTC 262-01 license without the danger of a flood of hunters entering the BMA when elk are present. However, a reduction in the 270-02 license quota (valid in the south portion) is warranted out of an abundance of caution, until we are able to evaluate the impact of the 262-01 license in this area.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposed change is primarily to simplify hunting regulations by removing a portion restriction of a B License. The 262-01 is valid in multiple HDs across the Bitterroot, and the inability to use it in the south portion of HD 270 has caused confusion in the past. A secondary objective of this proposal is to allow an increase in antlerless elk harvest in the French Basin area, where elk spend much of their time on private lands (some publicly accessible, some inaccessible), without the danger of shoot-outs.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be measured by decreased complaints/questions from hunters, and increased antlerless harvest on the 262-01 B License in HD 270. Game damage complaints may also be somewhat mitigated by allowing this license on private lands in this portion. We will be closely monitoring the harvest in the French Basin area, primarily through the Darby Check Station, as well as annual hunter harvest surveys.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population in HD 270 is within its population objective of 3,800 (+/- 20%). The most recent aerial survey, conducted in spring 2021, yielded 4,052 elk. The elk have been within objective since 2005. There are two other B Licenses valid in HD 270, which are not restricted to private land, as is the 262-01 license. Fill rates on these two B Licenses average 20% (270-01 license) and 34% (270-02 license) for the last 3 years. On the 262-01 and 002-00 licenses, which have been valid for the last 3 years in the North Rye portion, an average of 40 elk were harvested. This license has been a valuable tool for many ranches in the area to harvest antlerless elk, including through the use of public hunters (primarily disabled and youth hunters). Collectively, the B License harvest and General License antlerless opportunity for archery, youth, and disabled hunters, has resulted in an average antlerless harvest of 216 elk in HD 270 for the past 3 years. This is far lower than the number of elk that may be harvested annually to maintain the population at the objective of 3,800. The stagnation

of the population is likely due to habitat limitations and resulting low calf: cow ratios (averaging 23 calves:100 cows for the past 3 years).

We expect that expanding the 262-01 license into the south portion will result in a sustainable increase in elk harvest on private land, both BMAs and private lands that restrict access. Increasing antlerless harvest should result in increased calf: cow ratios, increased overwinter survival of adults and calves, and, indirectly, increased bull: cow ratios through improved annual recruitment of bull calves.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 270 is a unique place in that the elk population in the southern portion is partially migratory, with a large influx of elk from the Big Hole into the French Basin area, typically during the general rifle season (but weather-dependent).

The area is extremely popular with hunters, owing to the excellent public access and the large elk population. Hunter pressure is high during rifle season, despite antlerless hunting being restricted to B License only, and brow-tined bull hunting restricted by an unlimited, 1st-choice only bull permit. Many elk ultimately take refuge on private lands in French Basin, some with extremely limited hunting opportunity/public access, while others do allow some hunters, or are enrolled in the Block Management Program. Landowners in the area are often frustrated by the heavy hunter pressure, and a history of poor hunter behavior offers little incentive to allow access. Thus, allowing the OTC 262-01 license may allow these ranches to be selective in the hunters they allow, increasing harvest on private lands which may indirectly benefit public hunters by periodically pushing elk back into accessible areas.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal received 0 public comments during the Sept/Oct 2021 scoping period. It is supported by the local game warden, now that access on the Lazy J Cross BMA is better regulated.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**261 Elk B License**

**Hunting Districts:** 261

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Add a limited B License, valid in all of HD 261 (public and private land), with a quota of 50.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to allow some public land antlerless elk harvest and maintain the elk population within objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured via annual spring elk surveys as well as harvest data.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population in HD 261 is currently within objective range, but barely. The elk population here has exceeded its population objective of 700 since 2014, finally falling within objective after the 2021 spring count (837 elk). Bull:cow and calf:cow ratios has been stable.

Antlerless harvest in HD 261 has been gradually increasing over the last 10 years, however the 2020 harvest dropped to half that of 2019 with only 29 antlerless elk harvested. Harvest data suggests this may have been due to confusion over the renaming of the 002 regionwide B License to 262-01, which was still valid in HD 261 but may have confused hunters. HD 261 also had an antlerless elk permit with a poor fill rate (sometimes as low as 0, according to harvest data). The generally stable population and harvest trends in HD 261, with its gradual decrease toward population objective, warrants maintenance of current harvest regulations but with variable B License quotas. This can be achieved by replacing the limited antlerless permit, proposed to be removed via statewide regulations mandate, with a limited B License and a quota of 50.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 261 is a mix of private and public land. Game damage issues are not as common here as in surrounding HDs, but do occur sporadically. HD 261 is a common destination for local residents and nonresident hunters, especially hunters who did not procure the bull permit for neighboring HD 270.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The removal of antlerless permits was proposed in September/October 2021, but this proposal--replacing the permit with a B License--was not included in that scoping package. We do not expect this proposal to produce much public comment.

## HD 240 boundary change

### Hunting Districts: 240

#### **1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Adjust the north 240/south 201 boundary so that Lolo Creek drainage is completely inside HD 201. For many years, the boundary between HDs 240, 203, and 202 has been Highway 12, which generally follows Lolo Creek west to the Idaho border. Not only do animals regularly cross this boundary, but hunting regulations have been difficult to rectify between HD 240—which contains a lot of private land further south, with numerous game damage problems—and the Lower Clark Fork districts. Previously, HD 240 Elk B Licenses and General License private land opportunities have been restricted to areas south of Lolo Creek to avoid targeting elk in the largely public land Lolo drainage. This proposal eliminates the need for this portion, and standardizes hunting regulations on either side of Highway 12 to more appropriately manage wildlife in that drainage.

#### **2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposed change is a simplification to hunting regulations and a better ability to manage big game (primarily elk) separately, in both the Lolo drainage and surrounding HDs. The actual boundary becomes more difficult to describe, but the removal of a within-HD portion (north HD 240) simplifies regulations.

#### **3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be measured through ongoing monitoring of big game populations (aerial elk counts and roadside white-tailed deer surveys).

#### **4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The population of elk in HD 240 is within the current objective of 1,000 elk. However, surveys are often complicated by the frequent movement of elk across Highway 12 during the survey period. For the last 5 years, the Lolo drainage has been flown simultaneously by both the Bitterroot and Lower Clark Fork biologists (in separate planes) to avoid double-counting or missing elk that may have moved. However, once the elk are found, where do they belong? Which HD's objective should they be applied toward? Moving the HD 240 boundary south and out of the Lolo drainage will allow the Lower Clark Fork biologist to set a more appropriate objective for HD 201 (formed out of previously HDs 202 and 203 and fully encompassing the Lolo drainage) and be better able to monitor that elk population. It will also allow the Bitterroot biologist to better manage the rest of the HD 240 elk, without having to exclude the Lolo drainage, which, owing to its largely public land ownership, requires more careful harvest management.

#### **5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The Lolo drainage typically experiences harsher winters and later green-up than the rest of HD 240, and is comprised of a greater proportion of public land.

#### **6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was open for public comment in September/October 2021. Only one comment was received in opposition, on the basis of Highway 12 being an easy-to-understand boundary.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 204 elk changes**

**Hunting Districts:** 204

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal has two parts, aimed at increasing antlerless elk harvest:

1. Allow the currently valid 262-01 over-the-counter Elk B License to be valid in a short, late season, from the end of general rifle to January 1.

2. Allow General License antlerless opportunity during rifle season.

The management of HD 204 has changed greatly in recent years, partly due to population concerns and partly due to statewide concerns over shoulder seasons. For the 2020-2021 seasons, antlerless harvest has been achieved through the 262-01 license valid during an early shoulder season plus general archery and rifle, in addition to antlerless permits valid district-wide. We have also achieved additional antlerless harvest through game damage hunts on lands in the northern portion of HD 204. In the previous biennium (2018-2019), the over-the-counter 002-00 license (262-01's predecessor) was valid for both an early and late (February 15) shoulder season.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposed change is increased antlerless elk harvest, fewer game damage complaints, and a population closer to its objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured via annual elk population surveys, game damage complaints, and harvest data. MPG Ranch also provides annual summaries of elk population, herd locations, and harvest.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The population objective for elk in HD 204 is 600. The most recent count, from aerial surveys, was 855. This population has exceeded its objective since 2014. Calf:cow and bull:cow ratios have met and often exceeded objectives.

Most of the antlerless harvest in this HD comes from private land on the 262-01 license and game damage licenses, with some youth/PTHFV harvest (mostly on private land as well). Overall, antlerless harvest has not been sufficient to arrest population growth, averaging 56 antlerless elk (range 36-73) per year for the last 11 years. Harvest on the antlerless permit is particularly low, averaging only 11 elk out of 150 permits for the last 3 years.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Public land access is difficult in HD 204, more so in recent years due to changes in adjacent land ownership/access and a change in the Bitterroot National Forest's travel management plan. Much of the

antlerless harvest in this HD has come from private lands, though not enough to arrest population growth. Based on this information as well as abysmal harvest on public lands B Licenses/antlerless permits, we feel that opening General License antlerless opportunity here will not proportionally impact public vs. private land elk, but rather increase antlerless harvest on private lands.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was open for comment during September/October 2021. There were several comments in opposition focusing on the potential impact to public land vs. private land elk. Several area landowners commented in support of this proposal.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 393 Elk AMENDED changes**

**Hunting Districts:** 393

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This is an amended proposal. When direction was received to combine HDs, biologists considered combining HD 312, 393, and 390. However, it would prove harmful to deer management strategies, as well as our own resolution in interpreting harvest data relative to our counts for elk management. It also received strong opposition from the public. Nonetheless, we recognized that HD 312, 393, and 390 have some related elk herds and related elk management needs. Therefore, we looked for ways to unify and standardize regulations for simplicity.

This proposal would allow the OTC, unlimited (1 per hunter) Elk B License 397-00 (already available in HD 311, 309, and 312) to also be available in HD 393 and 390. This B License would have common dates and rules in all 5 districts, and would replace the 389-00 Elk B License which was in 393 and 390. This will serve to reduce the numbers of LPTs for regulation simplification. Additionally, common dates for shoulder seasons in HDs 312, 390, and 393 will provide for regulation simplification.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to follow regulation simplification guidance to reduce the number of LPTs and to standardize hunting starting and ending dates.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied. One objective is to reduce LPTs and this reduces LPTs. Another objective is to standardize start and end dates. This proposal does that as well.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The Bridger elk management unit has several sub-herds. One herd moves between the Horseshoe Hills in HD 312 and crosses Sixteenmile Creek into HD 390. HD 312 also has 2 smaller local elk herds which do not move out of district. HD 393 has northern and central herds which move between 390 and to a lesser extent 315, and a southern elk herd which resides mostly in HD 393.

Biologists monitor these different elk herds through different survey and inventory effort, and also use hunter harvest data by district to understand where hunters are meeting with success relative to the elk populations present.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was sent out through email to interested party list serve by individual biologists. It was also on the MFWP website and Region 3 discussed it at our 10/13/21 public meeting. Several public comments were

opposed to joining the three elk districts, and several more public comments were unhappy with the resulting changes that would have happened for deer management if we were to have made these changes.

MFWP staff took into account the public concerns and modified the original proposal to this one. Elk management will still be standardized to meet regulations simplification guidance, and this proposal allows that to happen without combining the districts or influencing deer management.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine portion of 293 with HD 343 D/E**

**Hunting Districts:** portion 293, 343

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

**Proposed Changes:**

Combine a portion of HD 293 with HD 343 to create a new district boundary.

The following are additional, related changes that are recommended in separate proposals:

- Retain HD 343 season structure and all HD 343 License and Permit Types (LPTs) except:
  - create an antlerless mule deer opportunity valid across both HDs 339 and 343, only valid east of the Continental Divide (CD);
  - make the antlerless white-tailed deer opportunity offered on the General Deer License during rifle season only valid east of the CD;
  - make the Region 3 antlerless white-tailed deer license only valid east of the CD; and
  - convert the 396-00 brow-tined bull/antlerless elk permit (also valid for spike/antlerless in HD 339) to an antlerless elk license valid in both HDs 343 and 339 with a quota of 300 (range 200-600); limit holders of LPT to harvest of only one elk within area where LPT is valid.

**Prior History:**

Recent general season structure for antlerless opportunity varied across all three hunting districts and included: antlerless elk licenses, antlerless elk licenses valid only on private land, antlerless elk permits, antlerless elk permits only valid in a portion of a district, split seasons (some portion of the season allowed antlerless elk harvest with a valid General License), and a full 5-week antlerless opportunity with a General Elk License.

- In HD 293, 25 to 250 antlerless licenses or permits were issued from 2004 through the 2021 season and were valid across the district in some years and valid in only a portion of the district in other years. A Region 2 002-00 unlimited antlerless elk license was valid on private land in 2018 district wide in HD 293 and valid on private land only in the southern portion of the district in 2019. For the 2020 and 2021 seasons, a district specific antlerless elk license was valid on private land only in the southern portion of the district.
- In HD 339, 300 to 500 antlerless licenses or permits were issued annually from 1993-2011 and 2014-2017, except for the 2009 season, when 799 permits were issued. In 2010 and 2011, a split season was implemented in which an antlerless elk could also be harvested on the General License for the last two weeks of the rifle season. In 2012 and 2013, the antlerless opportunity was offered on the General License for the full 5-week rifle season.
- In HD 343, 300 to 450 licenses were issued from 1993 through the 2017 season, except for the 2009 season, when 600 permits were issued. As for HD 339 above, in 2010 and 2011, a split season was implemented.
- In 2015, Regions 2 and 3 discussed introducing an antlerless elk permit that would've been valid across the EMU in HDs 293, 339, and 343, but it was not moved forward to the FWC.
- Beginning with the 2018 season, an antlerless permit (396-00) was introduced and was valid across both HDs 339 and 343. The quota was 600 from 2018 through 2021. In 2020, the permit was changed to include a bull opportunity: brow-tined bull in HD 343 and spike in HD 339.
- For the 2021 season, in HD 293 25 antlerless permits valid across the district were offered and 150 antlerless elk licenses valid in the southern portion of the district and only valid on private land were also offered.



For the Granite Butte EMU, we are proposing that 300 antlerless licenses valid across HDs 339 and new 343 be offered for the initial season in 2022. However, this number should not be considered static, because 2022 winter surveys, 2021 hunter harvest surveys, and public input will be considered. Quotas are prescribed annually prior to license/permit drawings.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The primary objectives of this change are to manage elk at the population level, which is a better fit given a proportion of the population is migratory and move between districts in the EMU (Elk Management Unit), and to provide hunters the opportunity to pursue antlerless elk where they are distributed during fall hunting seasons.

Radio-collar data from the late 1980s - early 1990s\* documented that some elk herds are migratory, predominantly wintering east of the continental divide and spending spring/late spring, summer, and most of the fall hunting seasons west of the continental divide. The continental divide is one of the boundaries between these hunting districts, and snow/winter weather drives when migratory elk return to the east side. Annual trend surveys are conducted in winter and likely do not reflect where the elk are available during the fall hunting seasons, especially in those years with more open winters, or late onset of winter, after hunting seasons. Please see #4 below for a thorough discussion.

\*Note: these data were collected for a mining study, not specifically for this application. However, we thought there were enough locations of collared individuals throughout all seasons to inform general movements/use areas during fall and winter seasons.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This proposal will be considered successful if the number of elk observed across the Granite Butte EMU during winter surveys remains within the population objective for the EMU. It will be acceptable, and still considered successful, if the number of elk observed during winter surveys in any of these hunting districts is sometimes above or below the district-level population objective, so long as the EMU population objective is sustained.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population in the Granite Butte EMU has been stable for decades . However, the distribution of the population varies across individual districts, between both years and seasons. From 2005 - 2015, HD 339 was within and above the district-level objective, and it was above objective for the past five years. From 2005 - present, HD 343 was below, above, and within the district-level objective. Comparatively, both districts combined were within or just above objective for the same time period; this captures differences in distribution from year to year. The boundary between these two districts is a road that elk freely and frequently cross. From 2005 - present, HD 293 was below and within district-level objective and is currently within objective. Again, when the three districts are considered together, at the population level, the EMU has been stable for decades and remains within the population objective established in the 2005 Elk Plan.

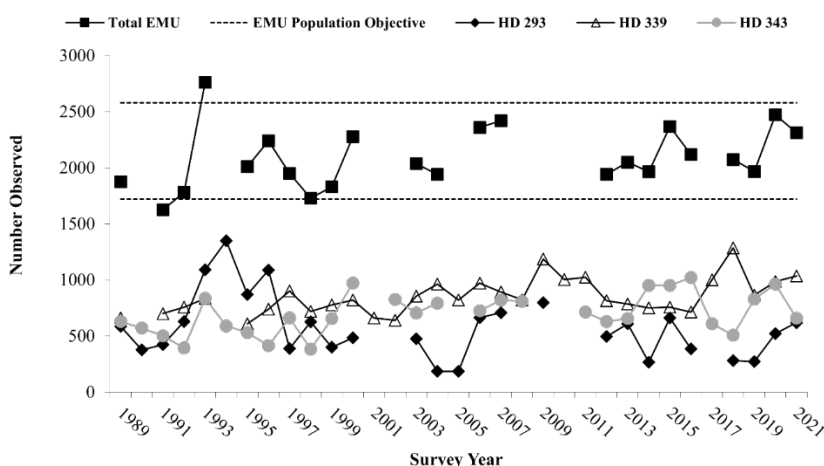
In response to increasing numbers of elk observed in any one of these three districts, liberal seasons and/or increases in antlerless elk licenses and/or permits were instituted. In 2008 and 2009, HD 293 was open for antlerless harvest with a General License for one week in the middle of the rifle season. In 2009, the number of antlerless permits issued was increased substantially in HDs 339 and 343. In 2010 and 2011, HDs 339 and 343 were open for antlerless harvest with a General License for the last two weeks of the rifle season. In 2012 and 2013, HD 339 was open for antlerless harvest for the entire five-week rifle season. Hunting pressure has varied from district to district due in large part to these liberal season types. We think that elk responded to changes in hunting pressure by redistributing to other parts of the EMU with less pressure (any of the three districts depending on the year) and to some areas with little or no pressure (e.g., HD 293 since the 2010 season). This isn't to say that we haven't had some success at increasing antlerless elk harvest in districts where we thought it was warranted; some structures were better than others, but snowfall drives harvest success.

Considering the EMU as a whole indicates that additional harvest is not necessarily warranted given differences between elk distribution in the fall and winter and given that the EMU-level population objective is being met. As stated above, one objective of this proposal is to discuss and to manage elk at a more appropriate scale, and in this case we think that is at the EMU/population level.

We do not anticipate negative impacts to the elk in that portion of HD 293 proposed to be incorporated into HD 343, given the amount of functional elk security in that area. Additionally, harvest data do not suggest that overharvest would occur with an antlerless permit or license in place. In HDs 339 and 343, management success with an antlerless license or permit over the past decade ranged from <10% to 25%, and the higher success rate was associated with snowfall during the 2010 and 2011 hunting seasons. With the 396-00 antlerless elk permit (valid in both HDs 339 and 343), it was about 15% from 2018-2020. If approximately 10-20% management success remains similar for an antlerless license that would be valid across HDs 339 and the newly defined 343, issuing 300 licenses would result in approximately 30-60 antlerless elk harvested with this LPT out of about 2000 observed elk (observed range: 1940-2471, 2000-2021). In years when snow coincides with the fall seasons, harvest would be expected to be greater.

Comment on the 2018 proposal, which introduced the antlerless permit valid across HDs 339 and 343, included concerns that hunters would swamp one of the two hunting districts. The harvest survey data do not suggest that is the case.\* While the 396-00 antlerless elk permit has only been in place since 2018, antlerless elk harvest was split between the two districts relatively evenly, with harvest slightly higher in HD 339 in 2018 and 2019 and higher in HD 343 in 2020.

\*Similarly, in HDs 318 and 335 where the 394-00 antlerless elk permit was valid from 2016-2021 seasons, harvest survey data indicated a relatively uniform distribution of antlerless elk harvest with this LPT between the two districts.



**Figure 1:** Plot of the total number of elk observed during winter surveys and the EMU population objective (2150 + or - 20%) for Granite Butte EMU hunting districts 293, 339, and 343, Powell and Lewis and Clark Counties, Montana, 1989-2021.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The most effective big game security areas in this EMU are located primarily west of the continental divide, and the bulk of the winter range is located east of the divide. This makes management at the district scale problematic: due to the migratory nature of some of the elk in the EMU, some of the elk observed east of the divide in the winter are west of the divide during fall hunting seasons; and when surveys are conducted in the winter, the migratory elk that spend the bulk of the year west of the divide are not there to be counted. As stated earlier, distribution varies across districts, both seasonally and annually. The counts east and west of the divide

are best considered as a whole to avoid the perception that elk are skyrocketing on the east side while plummeting on the west. Radio-collar data documented how antlerless elk utilized this landscape and support management at this larger scale.

We chased our tails when attempting to manage at the hunting district level, in pursuit of district-level objectives, and it was not effective at reducing elk within a given district. Elk likely just moved to an area with less pressure. However, it did at times result in disgruntled hunters and landowners. For over a decade east of the divide, increasing antlerless permits/licenses and implementing a split or full antlerless season on the General License put more pressure on the nonmigratory portion of the population and increased hunter crowding, which was not popular with hunters or landowners. Additionally, this increase in hunting pressure may have resulted in delaying and/or reducing the number of elk that migrate east to winter range.

Public hunting access is very good across this landscape (HDs 339 and the newly described HD 343) with both public land and a great deal of private land enrolled in the block management program. Migration in the fall to early winter, and harvest success, is largely driven by snowfall and winter weather conditions. There is some concern about the number of elk wintering east of the divide and impacts to winter range.

A separate but related proposal to convert antlerless permits to licenses for HDs 339 and 343 includes limiting holders of this LPT to harvest of only one elk within the area where the LPT is valid, and this may reduce some of the bull harvest in these districts. This restriction would apply during archery and rifle seasons. A restriction could be added to restrict holders to antlerless harvest only (holders would not be able to harvest an antlered elk where the LPT is valid). This restriction is not preferred, and if implemented it may draw in more hunters, if local hunters are hesitant to forfeit an opportunity for a bull in their backyard if they successfully draw the antlerless license. Additionally, it would allow a hunter to harvest two antlerless elk in the district, although one would have to be harvested during the archery-only season with a General Elk License. This is not preferable to the public or necessary to achieve management objectives at this time.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Management of elk at the population level for the Granite Butte EMU has been years in the making between the regions, and it has been discussed as a next, and preferred, step with both landowners, hunters, and FWP staff. When HDs 339 and 343 were combined for an antlerless elk opportunity beginning with the 2018 season, there were some landowners and hunters that supported the proposal and some that opposed it, but the proposal moved forward. There wasn't a great deal of written comment (Sept-Oct comment period) on this recent proposal, but the response was mixed as well: there was some support and some opposition to incorporating a portion of HD 293 within HD 343 and/or allowing additional antlerless elk harvest in HD 293. More recent comment included concerns about negative impacts to the elk in that portion of HD 293. We do not anticipate that will be the case (see prior discussion). Comment on the 2018 proposal, which introduced the antlerless permit valid across HDs 339 and 343, included concerns that hunters would all swamp one of the two hunting districts. The harvest survey data do not suggest that is the case (see prior discussion).

Due to the short timeline, and later receipt of comments emailed to the agency at large, only those comments submitted through the online survey portal, and inclusive of Helena area HDs (deer/elk HDs 318, 335, 339, 343, and 388 [also pronghorn]) were enumerated below. Additionally, comments that were not specific to a proposed change may not be captured in the list below, but they were considered when making adjustments to initial recommendations for the Helena area. All comments submitted during the Sept/Oct comment period are to be considered along with comments that will be submitted during the traditional comment period in December and January.

**Sept/Oct public comment included:**

**General**

6 Opposed to any combining [2 may be opposed to ANY changes, unclear from comment], and/or reducing opportunities for any of the Region 3 HDs as proposed in Sept.

3 Opposed to process: take input from hunters and landowners before proposals are put together, not after; pause and engage public first; use traditional process for changes.

1 Opposed to loss of data collected at and loss of management at existing HD scales.

1 Opposed to boundaries based on private property.

**New Boundary**

1 Overall support for inclusion of a portion of HD 293 in HD 343.

3 Oppose inclusion of a portion of HD 293 in HD 343; oppose cross-regional HDs.

3 opposed to use of FS boundary as HD boundary; continental divide is an easy boundary to locate and follow. (Note: A portion of HD 293 has already followed the FS boundary, and enforcement reviewed and assisted with new boundary description.)

**293/339/343 Elk**

2 Oppose converting from antlerless elk permit to license in HD 343 or in HDs 293, 339 and 343.

1 Support to make antlerless elk licenses valid in both HDs 339 and 343.

1 More antlerless elk opportunity could be provided in HD 293: only allow license holders to harvest antlerless elk in HDs 293, 339, and 343.

3 Opposed to antlerless elk licenses valid in both HDs 339 and 343 or valid both east and west of the continental divide (HDs 339/343 and HD 293). (Note: The existing antlerless elk permit is valid across both HDs.)

**293/339/343 MD**

2 Support making antlerless mule deer licenses valid in both HDs 339 and 343.

2 Opposed to any mule deer licenses in HD 339 or HDs 339 and 343. (Note: 25 are now offered in each).

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
380 Amended**

**Hunting Districts:** 380

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to eliminate the legally defined north and south portions and their associated Elk B Licenses. The number of 380-00 B Licenses is proposed to be increased to 250 from the current 150. The General License antlerless elk hunting opportunity is being proposed to be expanded to the full five weeks of the rifle season and will be valid everywhere except on national forest lands. In addition, in a corresponding proposal, the southeast portion of the current HD 380 (area between the Missouri River and U.S. Hwy 287) is being proposed to be added to the current HD 390. Elk that likely originated out of either the Horseshoe Hills or the Sixteen Mile Creek area have become established in this area since the 2005 Elk Management Plan was written. Management wise this elk herd fits better under the Bridger EMU (HDs 312, 390, 393, 451) than it does under the Elkhorns EMU (HD 380).

**HD 380**

**Current (2021 - dates)**

**General Elk License.**

- Sep 04 – Oct 17 - Spike Bull or Antlerless Elk. Archery Only Season
- Oct 23 – Nov 28 – Spike Bull or Antlerless Elk. Only youth ages 12-15 and hunters with a PTHFV.  
- Spike Bull Elk.
- Oct 23 – Nov 14 – Spike bull or Antlerless Elk. Only valid off National Forest land in the defined South and North Portions of the HD (see HD legal descriptions). Not valid the rest of the HD.

**Elk Permit. Drawing only. Apply by March 15.**

**380-20: 135 permits.**

- Sep 4 – Oct 17 – Either-sex Elk. Archery Only Season.
- Oct 23 – Nov 28 – Either-sex Elk.

**Elk B License. Drawing only. Apply by June 1**

**380-00: 150 B Licenses.**

- Sep 4 – Oct 17 – Antlerless Elk. Archery Only Season.
- Oct 23 – Nov 28 – Antlerless Elk.

**380-01: 350 B Licenses. Only valid in south portion of HD.**

- Sep 4 – Oct 17 – Antlerless Elk. Archery Only Season.
- Oct 23 – Nov 28 – Antlerless Elk.

**380-02: 250 B Licenses. Only valid north portion of HD.**

- Sep 4 – Oct 17 – Antlerless Elk. Archery Only Season.
- Oct 23 – Nov 28 – Antlerless Elk.

**Proposed (2022 – dates)**

**General Elk License.**

- Sep 03 – Oct 16 - Spike Bull or Antlerless Elk. Archery Only Season
- Oct 22 – Nov 27 – Spike Bull Elk.  
- Antlerless Elk. Valid entire HD only for youth ages 12-15 and hunters with PTHFV.
- Oct 22– Nov 27 – Antlerless Elk. Only valid off National Forest lands.

**Elk Permit. Drawing only. Apply by March 15.**

**380-20: 135 permits.**

- Sep 3 – Oct 16 – Either-sex Elk. Archery Only Season.
- Oct 22 – Nov 27 – Either-sex Elk.

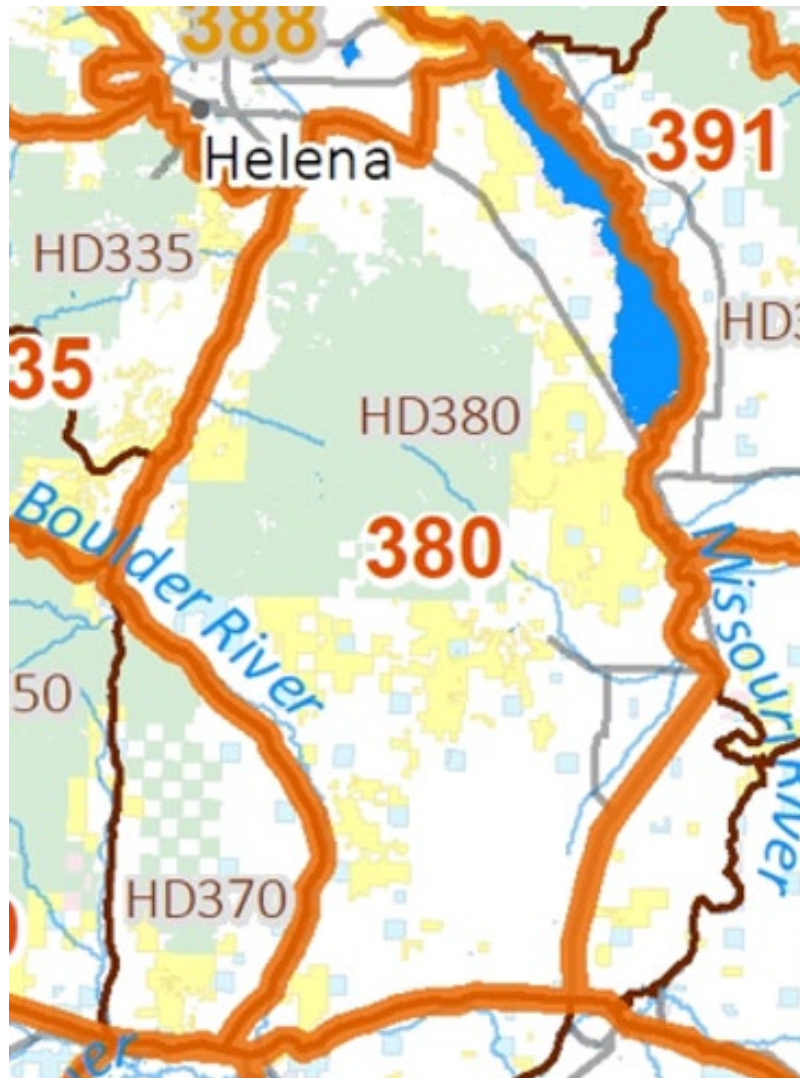
**Elk B License. Drawing only. Apply by June 1**

**380-00: 250 B Licenses.**

- Sep 3 – Oct 16 – Antlerless Elk. Archery Only Season.
- Oct 22 – Nov 27 – Antlerless Elk.

New HD 380 legal description:

Those portions of Jefferson, Broadwater, and Lewis and Clark Counties lying within the following-described boundary: Beginning at Boulder, then southerly along Route 69 to Interstate 90, then easterly along said route to its junction with U.S. Hwy 287, then northeasterly along U.S. Hwy 287 to its junction with the Missouri River near Toston, then northerly down the east bank of said river and the east shore of Canyon Ferry Reservoir to Canyon Ferry Dam and Route 284, then southwesterly along said route to US Highway 12-287, then westerly along said highway to Route 518 at East Helena, then southerly along said route to the junction with Interstate 15, then southerly along said interstate to Boulder the point of beginning.



**Figure 1:** New HD 380 D/E Boundary.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to meet the Directors Office's charge to simplify regulations which includes eliminating portions, reducing the number of LPTs, standardizing opportunity ending dates, etc. It is also hoped that the proposed changes will increase the harvest level of elk that are predominately associated with private land year-round in HD 380, while lessening the level of elk harvest on national forest lands to some

degree. Comments from area landowners over the years and results from the Elkhorns elk radio collar study indicate that we have large numbers of elk that are using private lands and public land areas (DNRC, BLM parcels) that are intermingled in and closely associated with private lands across the HD for large portions of the year. These elk aren't just utilizing private property during the winter but are found in these areas throughout the rest of the year as well. Having large numbers of elk associated with private property in these areas throughout the year has and is straining landowner tolerance in many areas.

It's felt that expanding the antlerless elk harvest opportunity on a General License in these areas will be more effective in targeting private land associated elk than just using B Licenses alone, while at the same time simplifying the regulations and reducing hunter confusion associated with the old portions. Often landowners that have elk and provide some level of hunting access are rarely contacted by B License holders particularly if they are small property owners. Results from the Elkhorns radio collared elk study showed that elk are making use of small parcels (i.e. rural subdivision areas) in the Montana City/Clancy/Jefferson City area throughout the year. Often times, small landowners may be reluctant to let people they don't know into hunt and people they would let hunt - family, friends - may not draw antlerless Elk B Licenses. By allowing individuals a greater opportunity to hunt for antlerless elk on a General License more hunting pressure may occur on those smaller parcels i.e. maybe able to make greater use of friends/family members that may otherwise act as quasi refuge areas during the hunting season.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of the regulation simplification portion of the proposal is implied. The expanded general antlerless proposal will be deemed a success if more antlerless elk harvest, particularly on private land, occurs in the areas affected by the proposal. Landowner comments and game damage complaints will be monitored to determine if targeted elk populations are being reduced. Annual aerial elk surveys of HD 380 will be used to monitor the overall population status and distribution of the elk population in HD 380. Elk harvest in the HD will be monitored via the Department's annual telephone harvest survey.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

A total of 2,416 elk (see Figure 3) were observed in HD 380 in 2020 which is believed to be the last reliable trend survey. It was felt that a large number of elk were missed during the 2021 survey due to survey timing issues and that observed numbers were not reflective of the current population trend. While the total number of elk observed in 2020 was slightly above the Department's observed objective range of 1,700 – 2,300 (2,000 ± 15%) for the HD, that is primarily the result of large numbers of elk now being found in areas of the HD where few or no elk were found when the 2005 Elk Plan was written. One of those areas is the southeast portion of the HD between the Missouri River and U.S. Hwy 287 that is being proposed to be added to HD 390. Elk that likely originated out of either the Horseshoe Hills (HD 312) or the Sixteen Mile Creek area (HD 312 or 390) have become established in this area since the 2005 Elk Management Plan was written. Management wise this elk herd fits better under the Bridger EMU (HDs 312, 390, 393, 451) then it does under the Elkhorns EMU (HD 380).

As mentioned, there are also issues related to elk distribution in the hunting district. Far more elk are found throughout the year on private land and areas of public land (DNRC, BLM parcels) that are closely associated with private land in the old south and north portions of the HD than are desired. See attached for HD survey and harvest information.

**ELK AERIAL TREND COUNT SUMMARY FORM**

HUNTING DISTRICT: **380**

DATE	BTBs	YRLG	COWS	CALVES	Uncl	UNCL.	TOTAL	Bulls/	Bulls/	% Bulls of	% BTB of	% BTB of	Calves/	Calves/
	Bulls				Antler-			100 Cows	100 Antlerless	Total	Total	Bulls	100 Cows	100 Adults
3/12/2021*	127	70	717	247		625	1,786	27.5	20.4	11.0%	7.1%	64.5%	34.4	27.0
3/16/20	102	67	1,081	289		877	2,416	15.6	12.3	7.0%	4.2%	60.4%	26.7	23.1
3/16/2019*	71	70	911	176		210	1,438	15.5	13.0	9.8%	4.9%	50.4%	19.3	16.7
2/13/18	246	51	1,339	450			2,086	22.2	16.6	14.2%	11.8%	82.8%	33.6	27.5
2/13/17	198	109	1,372	421			2,100	22.4	17.1	14.6%	9.4%	64.5%	30.7	25.1
3/18/16	59	64	1,402	507			2,032	8.8	6.4	6.1%	2.9%	48.0%	36.2	33.2
3/4/15	77	57	1,547	497			2,178	8.7	6.6	6.2%	3.5%	57.5%	32.1	29.6
3/24/14*	14	25	1,083	275		48	1,445	3.6	2.9	2.7%	1.0%	35.9%	25.4	24.5
1/21/13*	107	41	994	295		219	1,656	14.9	11.5	8.9%	6.5%	72.3%	29.7	25.8
2/15/12	155	68	1,206	310			1,739	18.5	14.7	12.8%	8.9%	69.5%	25.7	21.7
3/4/11*	41	26	792	171		82	1,112	8.5	7.0	6.0%	3.7%	61.2%	21.6	19.9
2/28/10*	85	33	1,025	282			1,425	11.5	9.0	8.3%	6.0%	72.0%	27.5	24.7
3/1/09	107	78				2,222	2,407			7.7%	4.4%	57.8%		
2/20/08	177	58	996	246		624	2,101	23.6	18.9	11.2%	8.4%	75.3%	24.7	20.0
2/25/07	165	71	1,387	373		33	2,029	17.0	13.4	11.6%	8.1%	69.9%	26.9	23.0
3/27/06	75	35	455	111		1373	2,049		19.4	5.4%	3.7%	68.2%	24.4	19.6
2/25/05	57	65	1,201	321		39	1,683	10.2	8.0	7.2%	3.4%	46.7%	26.7	24.3
2/12/04	153	45	1,314	279		20	1,811	15.1	12.4	10.9%	8.4%	77.3%	21.2	18.5
2/15/03*	115	21	1,158	191			1,485	11.7	10.1	9.2%	7.7%	84.6%	16.5	14.8
2/15/02	136	88	1,159	307		16	1,706	19.3	15.3	13.1%	8.0%	60.7%	26.5	22.2
2/23/01	136	24	1,373	241			1,774	11.7	9.9	9.0%	7.7%	85.0%	17.6	15.7
2/13/00	142	91	1,122	319		398	2,072	20.8	16.2	11.2%	6.9%	60.9%	28.4	23.5
3/6/99	51	33				1,636	1,720		5.1	4.9%	3.0%	60.7%		
<b>Ave</b>	<b>113</b>	<b>56</b>	<b>1125</b>	<b>300</b>	<b>1636</b>	<b>485</b>	<b>1837</b>	<b>15</b>	<b>12</b>	<b>9.1%</b>	<b>6.1%</b>	<b>64.6%</b>	<b>26.5</b>	<b>22.9</b>
('99-'21)														

**HD 380 Objective: 2,000 (1,700 - 2,300)**

\*Surveys not reliable indicators of trend because of survey quality issues

Note: Table includes corrections to old survey numbers where errors were discovered

BTB Note for 2021 survey - large number of BTBs observed in southeast herd unit that likely came from HD 312 or HD 390

**Figure 1: HD 380 elk survey summary.**



HD 380 Elk Harvest Information (2004 - 2020)

Year	Total								# 380-20 Permit			380-Antl/Perm		
	Harvest	Males	SpikeBulls	<6pts	>6pts	Females	Calves	Unk	Permits	Harv	% Success	Total # Antl-Permits/Lic	B-Licenses	Antl-Harv
2020	795	327	182	53	92	426	42		137	88	64.1%	750	110	318
2019	725	320	195	39	87	380	24		135	89	65.6%	575	102	279
2018	644	281	199	21	62	333	29		137	59	43.0%	475	94	249
2017	808	368	237	34	97	394	46		136	98	71.8%	800	168	255
2016	452	219	113	32	74	209	24		120	63	52.6%	800	114	110
2015	716	342	241	11	89	347	27		120	74	61.7%	700	179	169
2014	711	345	242	18	82	330	35		120	75	62.5%	525	127	228
2013	487	248	195	10	43	228	12		80	40	50.0%	525	90	126
2012	489	267	183	18	66	200	21		80	53	66.3%	526	114	106
2011	546	267	199	22	46	267	12		80	46	57.5%	524	144	128
2010	738	312	192	36	84	398	28		110	76	69.1%	900	277	139
2009	638	282	180	30	72	315	41		110	67	60.9%	900	246	108
2008	502	240	153	29	58	236	26		110	52	47.3%	675	133	127
2007	762	420	302	46	72	324	18		110	74	67.3%	675	187	141
2006	737	357	252	39	66	330	44	6	110	72	65.5%	675	219	148
2005	552	299	200	24	75	236	18		110	71	64.5%	300	89	73
2004	405	252	153	24	75	136	13	5	110	66	60.0%	300	59	30
<b>Ave</b>	<b>630</b>	<b>303</b>	<b>201</b>	<b>29</b>	<b>73</b>	<b>299</b>	<b>27</b>	<b>6</b>	<b>113</b>	<b>68</b>	<b>60.6%</b>	<b>625</b>	<b>144</b>	<b>161</b>

('04-'20)

Note: Numbers are point estimates only (confidence intervals are associated with estimates) and are rounded

Note: Numbers may not add up due to 'illegal' harvest reports, i.e. HD 380 harvest reported on license/permit types not valid in HD 380

Figure 2: HD 380 elk harvest summary.

Year	# Licenses/Permits				Harvest				License Success Rates				Antl-Harv
	380-00	380-01	380-02	380-70	380-00	380-01	380-02	380-70	380-00	380-01	380-02	380-70	
2020	150	350	250		32	43	35		21.5%	12.1%	14.0%		318
2019	150	250	175		26	45	31		17.5%	17.8%	17.9%		279
2018	150	150	175		37	18	39		24.6%	12.1%	22.0%		249
2017	125	350	325		28	73	67		27.9%	20.9%	20.6%		255
2016	125	350	325		17	35	62		13.8%	10.0%	19.0%		110
2015	125	250	325		49	84	46		39.5%	33.7%	14.3%		169
2014	250	150	125		42	32	53		16.8%	21.3%	42.4%		228
2013	250	150	125		31	37	22		12.4%	24.7%	17.6%		126
2012	251	150	125		58	32	24		23.1%	21.3%	19.2%		106
2011	250	150	124		65	45	34		26.0%	30.0%	27.4%		128
2010	550	150	200		188	32	57		34.2%	21.3%	28.5%		139
2009	550	150	200		142	65	39		25.8%	43.3%	19.5%		108
2008	400	125	150		76	39	19		19.0%	31.2%	12.7%		127
2007	400	125	150		111	26	50		27.8%	20.8%	33.3%		141
2006	400	125	150	*	146	37	35	*	36.5%	29.6%	23.3%		148
2005	150	75	75	136	46	19	24	89	30.7%	25.3%	32.0%	65.4%	73
2004	150	75	75	141	38	9	11	59	25.3%	12.0%	14.7%	41.8%	30
2003	150	50	50	95	59	18	17	52	39.3%	36.0%	34.0%	54.7%	6
2002	200	75	75	200	71	19	24	77	35.5%	25.3%	32.0%	38.5%	8
<b>Ave</b>	<b>251</b>	<b>171</b>	<b>168</b>	<b>143</b>	<b>66</b>	<b>37</b>	<b>36</b>	<b>69</b>	<b>26.2%</b>	<b>23.6%</b>	<b>23.4%</b>	<b>50.1%</b>	<b>145</b>

('02-'20)

380-00 - License valid entire district

380-01 License valid south portion

380-02 License valid north portion

380-70 - A7 license, valid only private land outside of 5-week general season

\* License type eliminated

Note: Numbers are point estimates only (confidence intervals are associated with estimates) and are rounded

Note: Numbers may not add up due to 'illegal' harvest reports, i.e. HD 380 harvest reported on license/permit types not valid in HD 380

Figure 3: HD 380 antlerless elk harvest summary.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The Elkhorns Cooperative Management Area (ECMA) within HD 380 is designated as a special USFS wildlife management unit (unique in the nation). The ECMA is managed cooperatively by the USFS (Helena & Beaverhead/Deer Lodge National Forests), Montana Fish, Wildlife & Parks, BLM and the NRCS. Hunting access is generally good throughout the HD between all the accessible USFS, BLM and DNRC land in the hunting district and 20+ FWP Block Management areas. In addition, many private landowners in the HD who aren't in block management also allow at least some level of public hunting access or are at least open to hunting for friends and family. The proposed change will increase resident and nonresident hunting opportunity off national forest lands in the HD. Further opening up areas off of national forest land for antlerless elk hunting opportunity may decrease hunter numbers utilizing national forest land in the HD which would be good thing. We currently get some complaints from 380-20 either-sex elk permit holders about the number of hunters hunting in the Elkhorn Mountains which is mostly national forest land. As mentioned previously, the population related objective of the proposed change is to try and increase the level of harvest of elk that are predominately associated with private land year-round across HD 380 which will hopefully help address some chronic game damage issues in the HD. Weather conditions this past winter (2020/21) were extremely mild, so elk calf survival and recruitment should have been good. However, the area has been impacted by extreme to exceptional drought conditions this summer and fall, so forage conditions on native range were likely negatively impacted in at least some areas which could lead to issues this winter

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal is an amended version of the original proposal that was put out for the initial round of public comment. The original version called for the 5-wk general antlerless opportunity to be restricted to private land only and for having a second antlerless Elk B License (380-01) that would have been valid everywhere in the HD except on national forest lands. After further consideration, it was decided for both elk management purposes and enforcement concerns, given the complex landownership pattern in HD 380, to make the general antlerless elk opportunity valid for everywhere in the HD 380 except on national forest lands, rather than restricting it to private land only. The few comments received on the original proposal also generally called for expanding the area of general antlerless elk opportunity to include BLM and DNRC lands, i.e. not restricting the antlerless opportunity to private lands only. The elimination of the second Elk B License that was called for in the original proposal further simplifies the regulations and will also hopefully offset some of the potential population impacts to elk that inhabit the larger blocks of BLM land in the HD particularly in the Iron Mask area on the east side of the Elkhorns.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Elk HDs 318, 335, 339, & 343 Convert Antlerless Elk Permits to Licenses**

**Hunting Districts:** HDs 318, 335, 339, & 343

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Convert antlerless permits to antlerless licenses for regulations simplification proposed to be applied statewide. There is no biological justification to make this change for HDs 318, 335, 339, or 343. See "Related Factors" and "Contact Summary" below for social aspects and comments relevant to this change.

**Proposed Change:**

Convert Elk 394-00 from BTB/Antlerless Elk Permit to Antlerless Elk License (Qta 300, Range 100-500).  
Convert Elk 396-00 from BTB/Antlerless (HD 343), Spike/Antlerless (HD 339) to Antlerless Elk License (Qta 300, Range 200-600).  
Limit holders of LPT to harvest of only one elk within area where LPT is valid.

**Prior History:**

HDs 318 and 335: Prior to 2010, antlerless permits were used. antlerless licenses were only used from 2010-2015. Beginning with the 2016 season, the hunting district specific antlerless license was eliminated in HDs 318 and 335, and an Elk Management Unit (EMU) wide antlerless permit was introduced, which was valid in HDs 215, 318, and 335 and excluded holders from hunting antlered elk in any of these districts. From 2018-2021, the antlerless permit was only valid in HDs 318 and 335.

HD 339: managed by antlerless permit from 1988-2009 and 2018-2021. In 2012-2013, antlerless harvest was offered with a General License for the full, 5-week general rifle season. antlerless licenses were only used from 2010-2011 and 2014-2017.

HD 343: managed by antlerless permit from 1981-1984 (included that portion that would become HD 339), 1985-2009 and 2018-2021. In 2012-2013, antlerless harvest was offered with a General License for the full, 5-week general rifle season. antlerless licenses were only used from 2010-2011 and 2014-2017.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Regulations simplification.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

HDs 318 and 335 and the Granite Butte Elk Management Unit (EMU; HDs 284, 293, 339, and 343) are within population objectives.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

An antlerless permit is preferred for these districts, due to hunter congestion and consequent hunter and landowner complaints, as well as the lack of the necessity to have hunters harvest two elk.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to the short timeline, and late receipt of comments emailed to the agency at large, only those comments submitted through the online survey portal for Region 3 or received directly (email, other pers. comm.) and those inclusive of Helena area HDs (deer/elk HDs 318, 335, 339, 343, and 388 [also pronghorn]) were able to be reviewed and included in this proposal by the deadline. Additionally, comments that were not specific to a proposed change may not be captured in the list below, but they were considered, notably when making adjustments to initial recommendations for the Helena area. All comments submitted during the Sept/Oct comment period are to be considered along with comments that will be submitted during the traditional comment period in December and January.

Sept/Oct comment included:

**General**

3 Opposed to process: take input from hunters and landowners before proposals are put together, not after; pause and engage public first; use traditional process for changes.

**318/335 Elk**

3 Oppose converting from antlerless elk permits to licenses in HD 335 or HDs 318 and 335.

1 Opposed to antlerless elk permits or licenses that would be valid in both HDs 318 and 335. (Note: The existing antlerless elk permit is valid across both HDs.)

1 Limit bull hunting and issue more antlerless elk licenses in HD 335.

**293/339/343 Elk**

2 Oppose converting from antlerless elk permit to license in HD 343 or in HDs 293, 339 and 343.

1 Support to make antlerless elk licenses valid in both HDs 339 and 343.

1 More antlerless elk opportunity could be provided in HD 293: only allow license holders to harvest antlerless elk in HDs 293, 339, and 343.

3 Opposed to antlerless elk licenses valid in both HDs 339 and 343 or valid both east and west of the continental divide (HDs 339/343 and HD 293). (Note: The existing antlerless elk permit is valid across both HDs.)

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R3\_Elk\_Structure\_WC WMA Youth Regulation**

**Hunting Districts:** 322

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The Wall Creek WMA Special Hunt Area has long had a limited elk license for public safety reasons. In 2019, the Region 3 youth elk regulation was standardized to either-sex. This change was not meant to take effect within the Wall Creek WMA Special Hunt Area but did.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Maintain a limited number of elk licenses valid within the special hunt area to minimize risk to human safety.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Change HD 313 & 317 Antlerless Opportunity**

**Hunting Districts:** 313, 317

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The HD 317 shoulder season was established with a limited quota B License because it was intended as a tool to manage elk distribution to limit brucellosis risk (in contrast to most other shoulder seasons which were intended as tools to reduce the elk population). In recent years, elk numbers in HD 317 have trended up, and more liberalized antlerless harvest is warranted. This change also serves to meet the direction for regulation simplification by eliminating an Elk B License. This would reduce confusion for hunters that don't understand why a General License can be used during some shoulder seasons, but not in HD 317.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify elk regulations by allowing late shoulder-season antlerless elk harvest on the General Elk License instead of on a limited quota B License. Additionally, this proposal is intended to reduce elk numbers toward objective, and limit both game damage and brucellosis risk complaints.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured through annual elk survey flights and harvest estimates. Additionally, hunter satisfaction with this change will be gauged during regular conversations with sportsmen to determine if this change has the desired simplification effect. Finally, the number of game damage and brucellosis risk complaints will provide another measure of success.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The 2021 total count observed during a winter survey flight (1897) was a 34 percent increase from the 2019 count of 1414 (Figure 2). This year's total count was 55 percent higher than the 10-year average (1221) and 95 percent higher than the long-term average of counts since 1990 (970, SE = 64.8). The increased number of elk observed this year as compared to the 2019 count was driven by increases in the Livingston Peak, Livingston Peak to Mill Creek, and Emigrant Creek to Sixmile Creek (Emigrant Face) subunits of HD 317. It is likely that part of the increase in the Emigrant Face area is due to movement of elk from the Northern Yellowstone Herd wintering north of Sixmile Creek, but it is not possible to determine the exact proportion. It is not uncommon for the number of elk wintering in HD 317 at a given time to be influenced by movements from neighboring hunting districts; these movements can result in annual fluctuations in wintering elk numbers that are due to movement patterns rather than actual population increases or declines between years.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change will maintain the late shoulder season implemented in HD 317 and in the portion of HD 313 north of Dome Mountain WMA, which is an important tool to manage brucellosis risk concerns for local livestock producers.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to the accelerated timeline for this season setting process, outreach and comment has been somewhat limited. The proposed change has been shared multiple times via the area biologist's (Michael Yarnall) email listserve, discussed at the Region 3 Regulation Simplification Open House (13 October 21), and between the area biologist and a handful of local landowners and sportsmen. Thus far public response has been mixed: some support this change. However, others point out that the maintenance of a portion in HD 313 allowing shoulder season harvest is inconsistent with the direction to eliminate portions.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 350 and 370**

**Hunting Districts:** 350,370

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Elk populations in HDs 350 and 370 have often been managed together since the two populations often mix in the Whitetail Valley and management concerns were similar between the 2 populations. However, free public access to elk in HD 370 has gotten increasingly restrictive in the past 8 years, making harvest opportunity disparate between HDs and having a greater impact on the HD 350 population. This has led to managing each unit and its respective herd separately in order to maximize available harvest opportunity commensurate with access to the resource while maintaining a viable population.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of managing the elk populations in these combined HDs as separate PORTIONS is to allow for regulation simplification for 5 other game species (WTD, MD, Antelope, Lion, Moose) at the minor cost of managing a 6th species (ELK) under the same HD. If the ELK population cannot be managed as PORTIONS of the new combined HD, then it is best to keep HDs 350 and 370 as separate HDs.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured if the elk population in HD 350 trends upward while the elk population in HD 370 trends downward. Trend data will come from annual winter aerial surveys.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Currently HD 350 elk population is below population objective (195) while HD 370 elk population is above objective (604). The objective for each hunting district is 300 +/- 20% (240-360), based on the number of elk observed during annual winter aerial surveys.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Access to free public hunting is greater in HD 350 than in HD 370. In HD 350 there are many legal access routes to public land in addition to 4 BMAs, 3 of which that provide a significant amount of access to private land in the Whitetail Valley. In HD 370 free public access has decreased in the past 10 years with the withdrawal of many private lands from BMA. There is only one legal access to public lands on the east side of HD 370.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been vetted far and wide through FWP media and website, R3 open house, R3 wildlife and enforcement staffs, Butte biologist's email distribution list, and several local sportsmen clubs.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**



## Combine Deer/Elk Hunting Districts 320 and 333

**Hunting Districts:** 320 and 333

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove the northeast portion of HD 333 that sits east of State Highway 359, south of Interstate 90, and west of U. S. Highway 287. Combine the remainder of HD 333 and HD 320 into one HD. The new HD would be numbered 320.

Proposed regulations:

General License: Brow-tine bull or antlerless elk;

Elk B License: 320-01: Antlerless Elk. Not valid on National Forest land; Quota 200; Quota Range 100-500;

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Statewide regulations simplification.

From a biological perspective, the HD combination expands the HD to the Tobacco Root Elk Management Unit scale, which is the scale that elk and mule deer use the landscape. Removal of the northeast portion of the HD will focus the HD on the Tobacco Root Mountain Range. Elk and mule deer regulations have been common across the two hunting districts for many years.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 301 + S. 311 remove B License**

**Hunting Districts:** HD 301

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

1) To comply with regulations simplification effort guidance to combine hunting districts and remove portions, this proposal is to combine what was the south portion of HD 311 with HD 301.

This change was driven by needs in HD 311: HD 311 was a district split by Highway 84 into a north portion (private land, small farms and agriculture) and a south portion (mountainous Spanish Peaks Wilderness Area and a 100,000 acres private land preserve). In the north portion, elk were managed liberally to prevent game damage, brucellosis risk, and conflicts with agriculture. Notably, in the north portion of HD 311, there is a resident elk herd which never extends south of Highway 84 to the Spanish Peaks wilderness.

Given the need to 1) eliminate portions of districts and 2) have fewer districts overall, we could not simply split HD 311 into two different districts, as that would make more districts. Therefore, we proposed putting the south half of HD 311 into HD 301 where management similarity could sustain a district combination.

2) To comply with the regulations simplification effort guidance to make clear hunting district boundaries informed by biology, this proposal suggests a boundary change from "the Dudley Creek-West Fork Gallatin Divide to Wilson Peak and Hellroaring Creek - West Fork Gallatin-Spanish Creek Divide" to the more simple "West Fork Gallatin to Highway 64 to Gallatin-Madison Watershed Divide" . Elk GPS data suggest the elk which are resident in the Spanish Peaks Wilderness/Dudley Creek/Beehive Basin are more likely to be "HD 311 elk" than "HD 360 elk".

3) To comply with the regulations simplification effort guidance to reduce LPTs by eliminating LPTs with small numbers, this proposal suggests eliminating the 301-01 Elk B License.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of these changes was to follow regulations change guidelines to include 1) fewer and larger hunting districts with no portions, 2) clean hunting district boundaries informed by biology, and 3) to eliminate LPTs where possible.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be qualitative and difficult to measure, whether this change contributed to simplification efforts or not.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

HD 301 and HD 311 have different elk herds. GPS data in HD 311 do not indicate the elk herd enters 301 with any regularity. However, the areas have common habitat of large areas of forested mountains, foothills, and substantial accessible public land.

Both HD 301 and the south half of HD 311 are within population objective, and thereby require moderate management instead of a more liberal package.

The 50 B Licenses available in HD 301 were offered on private land only to prevent game damage. These licenses became available in 2020, and according to hunter harvest surveys, no elk were harvested on this license type in that year.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change was proposed for regulation simplification and to combine adjacent hunting districts with similar management strategies.

As both herds are within population objective, the "split season" (first 2 weeks of rifle season = BTB/antlerless, last 3 weeks = BTB only) is an appropriate management tool for management. Old HD 301 has more road access and is more sensitive to harvest than the south portion of old HD 311. In adding this portion of HD 311 to new HD 301, some opportunity will be lost, as it used to be BTB/antlerless season-long.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to accelerated timeline of this season change process, public comment has been more limited than usual. This proposal was included in an email to the interested party list serve kept by biologist Julie Cunningham (>250 people representing diverse interests and values) and was discussed at the Region 3 Open House meeting 10/13/21.

To date, one commenter requested Beehive Basin area remain in HD 360. Many commenters are requesting MFWP looks into the HD 309/301 boundary, with HD 309 being a weapons-restriction area. Commenters had a common theme - to remove some private lands from the north portion of HD 301 and put them into HD 309.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 310 Boundary Change**

**Hunting Districts:** HD 310

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

HD 310 is a largely public-land district with a resident herd that winters on public land. This herd has been below objective since 2006 and has had a restrictive regulation (bulls only) to help encourage population growth. Recent GPS data from research efforts reveals this herd uses the Buck Ridge portions of HD 360 near Big Sky. Check stations and experimental mandatory reporting efforts in HD 360 (2012-2014) have shown substantial cow harvest can occur in this area.

The boundary change as proposed will encompass the Buck Ridge area into HD 310 and afford greater protections to the reproductive segment of the HD 310 elk herd.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to provide regulatory protection to the HD 310 elk herd to encourage this below-objective population to grow and to reach population objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be measured through annual population counts and trend data.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The HD 310 elk herd went below population objective in 2006 and has remained below ever since. Population objective is 1,500 elk, yet it has recently averaged just over 400 elk for winter counts; just 30% of population objective. Late season hunting ceased in 2004 on this herd, by 2009 there was no way to legally harvest an antlerless elk in HD 310 (not during archery season, not from PTHFV, not youth, no permits).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

There are many factors influencing the ecology of the HD 310 elk herd. As a public-land herd, it can experience high hunting pressure. It lives year-round in high-elevation forested habitats where snowpack can be severe. The migratory component of the population may have differentially high survival rates, encouraging migratory over resident strategies. Year round predatory influences (wolves and bears) may be higher for resident HD 310 elk. The habitat in HD 310 has also experienced changes. Logging through the 1980s opened the forest canopy, but logging ceased and the forests became thicker. Browse vegetation was once suppressed by high elk numbers, and remaining elk presence seems to have kept browse suppressed in many areas (exclosures are studied in Crown Butte and Porcupine Creek). There are signs of potential vegetative release in other areas, and habitat improvement projects to restore aspen through use of logging and fire can help.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to accelerated timeline of this season change process, public comment has been more limited than usual. This proposal was included in an email to the interested party list serve kept by biologist Julie Cunningham (>250

people representing diverse interests and values) and was discussed at the Region 3 Open House meeting 10/13/21. Only 1 comment was received on this proposal and it was favorable.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 321 and 334**

**Hunting Districts:** 321, 334

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

These 2 HDs comprise summer range for elk that migrate in from ID (HD 321) and East Fork Bitterroot (HD 334). Both populations of elk migrate back to respective winter range by early November, thereby shortening the 5-week general season to about 10 days. These 2 HDs have existed in their present state since 2010. Prior to that they were one HD, HD 321. this proposal sets these HDs back to the original format, HD 321, that extends from Skinner Meadow Rd to the Beaverhead-Deer Lodge County line at Pintler Creek.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

To address regulation simplification by reducing the number of HDs. Since both of these HDs represent elk summer range with early departure to winter range, albeit 2 separate elk herds, they likely can be managed under one common regulation.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of this proposal to combine these HDs will be measured by population trend within each herd unit. If aerial surveys suggest that herds are trending disparately, then common management will be reconsidered.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Currently, the elk population in HD 321 is stable between 800-1,000 observed elk during annual summer aerial surveys. The elk population in HD 334 has shown increase in the past few years, using the number of observed elk during annual summer aerial surveys as the metric.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Access for public hunters is greater in HD 321, both to public and private land. There is a large block of private land with suitable elk habitat that typically does not provide any public access to elk hunters. This creates a refuge which is likely why this elk population is increasing while that in HD 321 has held stable for the past 10 years.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been vetted widely via FWP social platforms and website, R3 Open House, through Butte biologist email distribution list, to R3 wardens and wildlife staff, and at several local sportsmen groups.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 311 Boundary Change**

**Hunting Districts:** HD 311

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposed change is to take what was the north portion of old HD 311 and make it a stand-alone hunting district.

The proposed change includes adding a part of old HD 333 north and east of State Route 359. This area has a herd of elk which moves back and forth between old HD 333 and HD 311. This herd shares management challenges and similar management strategies under the same hunting district umbrella would be ideal.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The primary objective is to follow the guidance of regulation simplification by eliminating portions of districts.

The second objective is to use what we know of elk movements across highway 287 north of state route 359 to inform the new district boundaries to help manage a similar herd of elk similarly.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be difficult to measure as it is a qualitative measure of whether the public perceive this as a simplification.

Success in management of the elk herd north and east of state route 359 will be implied through conversations with local landowners experiencing game damage complaints.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Regulations simplification - eliminate portions and to combine hunting districts where possible.

The north portion of old HD 311 represents farms and ranches where elk were rarely if ever present during the 2005 Elk Plan process. There was no elk objective for this area, yet elk have moved into the area causing brucellosis risk and substantial game damage. Elk in the north portion of old HD 311 have been successfully managed using a shoulder season regulation since 2017, and that regulation should be maintained for continued success.

The new districts HD 311 and 301 reflect old portions for elk and deer management, so elk and deer management would not change in the new HD 311. However, elk management would become slightly more conservative in the south half of old HD 311 if it were combined with HD 301.

The addition of the part of old HD 333 north and east of State Route 359 into new HD 311 was driven by the observed biology of a local elk herd which shares habitat and elk management challenges, and the areas could be managed similarly.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The majority of the new HD 311 will not experience any change from past management. They will retain the shoulder season for elk, retain mule deer and white-tailed deer B Licenses.

The major change will be to the landowners in the new area north and east of state route 359 who will now be allowed to have a shoulder season on elk.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to accelerated timeline of this season change process, public comment has been more limited than usual. This proposal was included in an email to the interested party list serve kept by biologist Julie Cunningham (>250 people representing diverse interests and values) and was discussed at the Region 3 Open House meeting 10/13/21.

Landowners in the 333 area north and east of State Route 259 that would be put into new HD 311 have not yet been contacted so it is unknown how they would receive being placed into a shoulder season. Some may appreciate the opportunity to manage elk, others may have different concerns.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Eliminate HD 313 Antlerless Elk Permits**

**Hunting Districts:** 313

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

In response to declining elk numbers during the 2000s antlerless harvest opportunity was progressively reduced including a reduction and eventual elimination of the Gardiner late hunt opportunity. In response to improved and stabilizing recruitment in the early 2010s (Figure 2), antlerless harvest opportunity was increased slightly in 2016, with 60 antlerless permits available (30 are youth-only permits). This proposal is to eliminate both these antlerless elk permits and replace them with a single Elk B License named 313-00 that is open to all applicants.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to eliminate antlerless elk permits while retaining a conservative antlerless opportunity. Additionally, it removes the first-choice requirement on the 313-45 bull permit.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied because the objective is simply to eliminate antlerless elk permits and replace them with a single B License and to remove the first choice requirement for the bull permit.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

In 2021, calf:cow ratios (19.0 calves observed per 100 cows for the whole survey area) in both the MT and YNP portions of the Northern Yellowstone survey area increased slightly from 2019 levels, but remain below the long-term averages (Long-term averages are 25.1 (SE = 2.5) for MT and 20.4 (SE = 1.5) for the whole survey area). Increased recruitment coincided with a relatively mild winter: in 2020-2021 winter conditions were late to arrive, and though we did experience some periods of deep snow and cold temperatures, these conditions did not persist into late winter. Despite the increased recruitment observed this year (Table 2) calf:cow ratios, remain slightly below the threshold of 20 calves per 100 cows that is generally considered necessary to maintain a stable elk population in this area.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This limited level of antlerless harvest will not have significant population-level impacts.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to the accelerated timeline for this season setting process, outreach and comment has been somewhat limited. The proposed change has been shared multiple times via the area biologist's (Michael Yarnall) email listserve, discussed at the Region 3 Regulation Simplification Open House (13 October 21), and between the area biologist and a handful of local landowners and sportsmen. Thus far response has been mostly indifferent, although one or two sportsmen have expressed concern at the loss of a special opportunity for youth hunters.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HD 331 and 332 for D/E/L**

**Hunting Districts: HD 331**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Combine HD 331 East Pioneer and HD 332 West Pioneer into one district named HD 331 Pioneer Mountains. Remove split season for antlerless elk and Elk B License 399-00 and replace with district specific antlerless B License opportunity. Extend mule deer either-sex management throughout the new district. This proposal has been put forward to simplify hunting regulations and reduce the number of hunting districts. Both districts fall within the Pioneer Elk Management Unit and have been managed essentially as one unit for elk since 2014. Another hunt district (HD 329) is also included in the Pioneer Elk Management Unit. However, management has frequently differed in HD 329 due to differences in elk populations relative to objective. Mule deer in HD 331 have been managed with either-sex general season harvest since 2016. Mule deer management in HD 332 has been buck only during the general season with no antlerless opportunity since 2009.

Currently mountain lion are managed in both districts under one Lion Management Unit. This proposal would have no effect on mountain lion management.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposal is to simplify regulations and consolidate hunting districts.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied as it combines hunting districts. Its success in meeting larger goals of regulations simplification is qualitative and subjective based on the experiences of individuals.

Populations will continue to be monitored via surveys and hunter interviews to determine if changes have resulted in negative population consequences.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

**Elk**

The current Elk Plan from 2005 sets the following objectives for elk in the Pioneer EMU:

**Maintain 2,700-3,200 elk observed during winter surveys in the EMU. Including a maximum of: 900 elk in HD 329; 1,400 elk in HD 331, and 900 elk in HD 332. Maintain a minimum of 10 bulls:100 cow in surveys.**

Overall, the EMU is meeting overall population and bull: cow ratio in objectives. However, this is primarily driven by population growth to the south in HD 329 which is over objective. Average winter counts in HD 331 and 332 have been low enough to trigger restrictive antlerless harvest in recent years (i.e. < 1,180 in HD 331 and < 760 in HD 332).

**Mule Deer**

The Pioneer Mountains fall within the **MOUNTAIN FOOTHILL POPULATION MANAGEMENT** for mule deer management. The primary objective is: **Maintain the total number of deer observed on trend areas within 25% of the Long-Term Average.** Long term (since 1986) spring green up surveys averaged 558 mule deer.

Average spring counts over the past 10-years have averaged 335 deer which is less than 25% of the long-term average. In 2016, this district went to an either-sex mule deer general season. It has been monitored closely for potential population consequences. To date no negative population effects have been observed since implementing either-sex harvest and the population has grown by an estimated 1.2% annually. Buck harvest in this district has shown a corresponding growth in this district.

No population surveys are conducted in the West Pioneers (HD 332) however, buck harvest has declined since 1986. The following depicts the long-term and 10-year averages in buck harvest in HD 332 decline in buck harvest has been evident since the 1980's.

**Average Since 1986: 59 Bucks; Standard deviation 29.9**

**25%below avg = 44**

**25%above avg = 73**

**Average Since 2012: 41 Bucks; Standard deviation 11.7**

Mule deer management in West Pioneers has been strictly buck only since 2010 and has shown no signs of improvement in buck harvest. Initiating an either-sex general season is not expected to have negative population consequences because: 1. Monitoring of neighboring districts have shown no negative population consequences for either-sex management to date (Southwest Montana Mule Deer Either-sex Management Area Summary – Year 5); 2. The West Pioneers is not a prominent mule deer hunting area and receives only limited hunting pressure; 3. Most mule deer migrate out of the West Pioneers relatively early in the Fall and are subject to little hunting pressure during the general season.

**Elk Population Survey Data in HD 331**

Year	Total elk	Brow-tined bulls	Yearling bull	Cows	Calves	Unclassed	Calf: 100 cow	Yrlg bull: 100 cow	BTB bull: 100 cow	TBull: 100 cow
2012	1188	15	73	614	177	309	29	12	2	14
2013	953	34	49	411	106	353	26	12	8	20
2014	604	20	23	384	101	76	26	6	5	11
2015	1071	24	37	666	141	203	21	6	4	9
2016	799	13	33	306	72	375	24	11	4	15
2017	938	32	37	547	147	175	27	7	6	13
2018	938	51	26	488	111	262	23	5	10	16
2019	753	37	31	320	108	257	34	10	12	21
2020										
2021	1290	76	47	589	118	460	20	8	13	21
Average	948	34	40	481	120	274	25	8	7	16
SD	202.3	18.7	14.3	124.2	28.9	108.9	4.0	2.5	3.5	4.1

**Figure 1: Elk Population Survey Data in HD 331.**

**Elk Population Survey Data in HD 332**

Year	Total elk	Brow-tined bulls	Yearling bull	Cows	Calves	Unclassed	Calf: 100 cow	Yrlg bull: 100 cow	BTB bull: 100 cow	TBull: 100 cow
2012	396	1	7	325	62	1	19	2	0	2
2013	582	2	28	439	113	0	26	6	0	7
2014							33	4	1	6
2015	882	35	46	646	155	0	24	7	5	13
2016	796	20	32	634	110	0	17	5	3	8
2017	976	32	27	496	145	276	29	5	6	12
2018	994	42	45	563	173	171	31	8	7	15
2019	742	21	2	350	123	246	35	1	6	7
2020										
2021	511	18	28	296	110	59	37	9	6	16
Average	735	21	27	469	124	94	28	5	4	9
SD	205.9	13.8	14.7	129.3	31.9	111.0	6.5	2.6	2.6	4.3

**Figure 2:** Elk Population Survey Data in HD 332.

**Long-term and 10-year Mule Deer Harvest Buck Harvest in HD 332**

<b>Average Since 1986</b>	<b>59 Bucks</b>
<b>Standard deviation</b>	<b>29.9</b>
<b>25%below avg</b>	<b>44</b>
<b>25%above avg</b>	<b>73</b>
<hr/>	
<b>Average Since 2012</b>	<b>41 Bucks</b>
<b>Standard deviation</b>	<b>11.7</b>

**Figure 3:** Long-term and 10-year Mule Deer Harvest Buck Harvest in HD 332.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The central portion of the Pioneer Mountains are made up of high elevation forests that provide important maternal and summer habitat for elk. Seasonally, elk migrate from the high elevation central portion of the pioneers as winter progresses and snow accumulates. A large number of elk migrate south into hunt district 329. However, there are resident animals that winter on the skirts of the Pioneer Mountains. Winter surveys show substantial growth in the number of wintering elk in HD 329 which is currently over objective. In contrast, survey numbers in the East (HD 331) and West (HD 332) Pioneers have remained relatively stable and on the low end of objectives.

Mule deer also migrate seasonally into the central Pioneers in summer. The low elevation margins of the Eastern Pioneers provide winter range for mule deer. Mule deer in the West Pioneers largely leave for winter range into the East Pioneers or Idaho. GPS data from mule deer from Idaho has shown that mule deer summering in the West Pioneers migrate out of this area early in the Fall, typically before rifle season. Thus, mule deer in the West Pioneers are subject to very limited hunting pressure.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The current proposal is a modification of an earlier proposal that included the entire Pioneer EMU (HD 329, HD 331 and HD 332) in one hunting district. Due to accelerated timeline of this season change process, public comment was likely further limited than usual. The original proposal was posted on the FWP Website on September 20th which allowed people to comment online. The original proposal was included in an email to the interested party list serve kept by biologist Jesse Newby and was discussed at the Region 3 Open House meeting 10/13/21. Jesse Newby also discussed this proposal with several Beaverhead County landowners and sportspersons, along with the Beaverhead County Chapter of the Mule Deer Foundation.

A total of 31 people made specific comments on the proposal via the website. In addition, several people contacted Jesse Newby directly to ask questions or express their opinions on combining these districts. Over 80% of online comments were opposed to combining all three districts in the EMU. Comments made directly to the biologist were similarly opposed and sometimes very strongly opposed. Most of the comments centered on the differences in elk population performance between HD 329 and the districts in the Pioneer Mountains. There was also concerns from a few individuals about managing mule deer the same across all three districts. One person was concerned about the effects on mountain lion quotas and harvest if HD 329 were combined with HD 331 and HD 332. Many people felt it would hamper current and future ability to manage for objectives across these diverse areas.

In contrast, the majority of people that directly contacted the biologist were supportive of combining the East Pioneers (HD 331) and the West Pioneers (HD 332) but leaving the Big Hole Pass/Horse Prairie area (HD 329) separate.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Elk HD 340 remove split season and permits**

**Hunting Districts:** 340

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove the split season and Either-sex permits from ELK HD 340. Replace with BTB on the General License during the General Season and 340-xx Elk B Licenses valid during archery and general season.

HD 340 has had a split season for the past 6 years, plus a long history of Either-sex permits since early 2000's (except 2010-13 when they were converted to B Licenses).

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the regulations in HD 340 while maintaining suitable harvest to keep the elk population within objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by population trend; specifically, whether the number of elk observed in HD 340 during annual winter aerial surveys stays within population objective.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population in HD 340 has stayed within population objective (800 - 1,000 observed elk during annual winter aerial survey) since 2016. From 2013-15 it was above that objective. Liberalizing a portion of the season helped to bring the population back within objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

There is sufficient free public access to public and private lands throughout much of HD 340, especially where elk tend to concentrate.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been vetted broadly through FWP channels, R3 Open House, R3 wildlife and enforcement. Butte biologist email distribution list, and numerous sportsmen groups.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 360 and 362 combine**

**Hunting Districts:** 360 and 362

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposed change is to combine HD 360 and HD 362, and make a small boundary adjustment in HD 360 near Big Sky for the purposes of simpler boundaries to follow regulations guidelines and as informed by elk biology.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change was to meet regulations simplification guidelines to combine hunting districts.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied as it combines hunting districts. Success of meeting larger goals of regulations simplification is qualitative and subjective based on the experiences of individuals.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

There were three long-recognized herd units in HD 360 and HD 362: the northern HD 360 elk (Jack Creek area), the southern HD 360 elk (Bear Creek area) and the HD 362 elk herd. However, modern collar data from research studies 2018-2020 indicated the southern HD 360 elk and the HD 362 elk no longer show any appreciable differences in movement habits. Thanks to the research information, we can now be more comfortable combining these two districts.

Elk in the east-side Madison Valley have recently been managed similarly across both districts 360 and 362. The 398-00 Elk B License was valid in either district. Game damage hunts, management hunts, and brucellosis hazing occur across both districts.

The elk sub-herds in HD 360 and HD 362 are often at the high end of objective range, fluctuating between being within or over objective depending on their distributions at the time of counting.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change will be mainly administrative as HD 360 and HD 362 are managed so similarly, it will make little difference on the ground to hunters or landowners. Opportunities will not change, except in the small area around Big Sky where HD 360 has been redistricted.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to accelerated timeline of this season change process, public comment has been more limited than usual. This proposal was included in an email to the interested party list serve kept by biologist Julie Cunningham (>250 people representing diverse interests and values) and was discussed at the Region 3 Open House meeting

10/13/21. Julie also discussed this proposal with a handful of Madison Valley residents and sportspersons, and general comments are favorable because this proposal is not likely to change management on the ground.

One comment indicated one person would rather HD 360 include the Beehive Basin area to include those elk in HD 360 instead of new HD 301.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 390 AMENDED elk changes**

**Hunting Districts:** 390

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to revert the existing season structure in HD 390 back to what it was for the 2018/19 biennial. The proposal would extend the existing post-season shoulder season in the district from January 1 to February 15 per Commission direction (Commission changed the 2021 ending date from January 1 to February 15). The proposal would also reestablish an early-season shoulder season on private land only using the 397-00 antlerless Elk B License which would again become valid in HD 390. The current printed regulation shoulder season restriction was put in place as the result of action by a previous FWP Commission and was not based on a recommendation by the Region. The current 389-00 Elk B License (valid in HDs 390 & 393) would be eliminated.

The proposal would also add the southeast portion of HD 380 (area between the Missouri River and U.S. Hwy 287) to HD 390. Elk that likely originated out of either the Horseshoe Hills or the Sixteen Mile Creek area have become established in this area since the 2005 Elk Management Plan was written. Management wise this elk herd fits better under the Bridger EMU (HDs 312, 390, 393, 451) then it does under the Elkhorns EMU (HD 380).

New HD 390 legal description :

Those portions of Broadwater, Gallatin and Meagher Counties lying within the following-described boundary: Beginning at the junction of I-90 and the east bank of the Jefferson River near Three Forks, then west on I-90 to its intersection with U.S. Hwy 287, then north and east on U.S. Hwy 287 until its junction with the Missouri River near Toston, then northerly along the east bank of said river to the mouth of Greyson Creek, then easterly up said creek to its junction with the Ridge Road, then south and east along the Ridge Road to the junction of the Dry Creek Road cutoff, then southerly to the Dry Creek Road, then easterly along the Dry Creek Road to the Meagher-Broadwater County line, then southerly along said line to the Meagher-Gallatin County line, then east along said line to Sixteenmile Creek, then northeasterly along said creek to Ringling, then southerly and westerly along the Ringling-Maudlow Road to its junction with Dry Creek Road and Sixteenmile Creek at Maudlow, then westerly along said creek to the east bank of the Missouri River, then southerly along the east bank of said river to the mouth of the Jefferson River, then southwesterly along the east bank of the Jefferson River to the point of beginning.

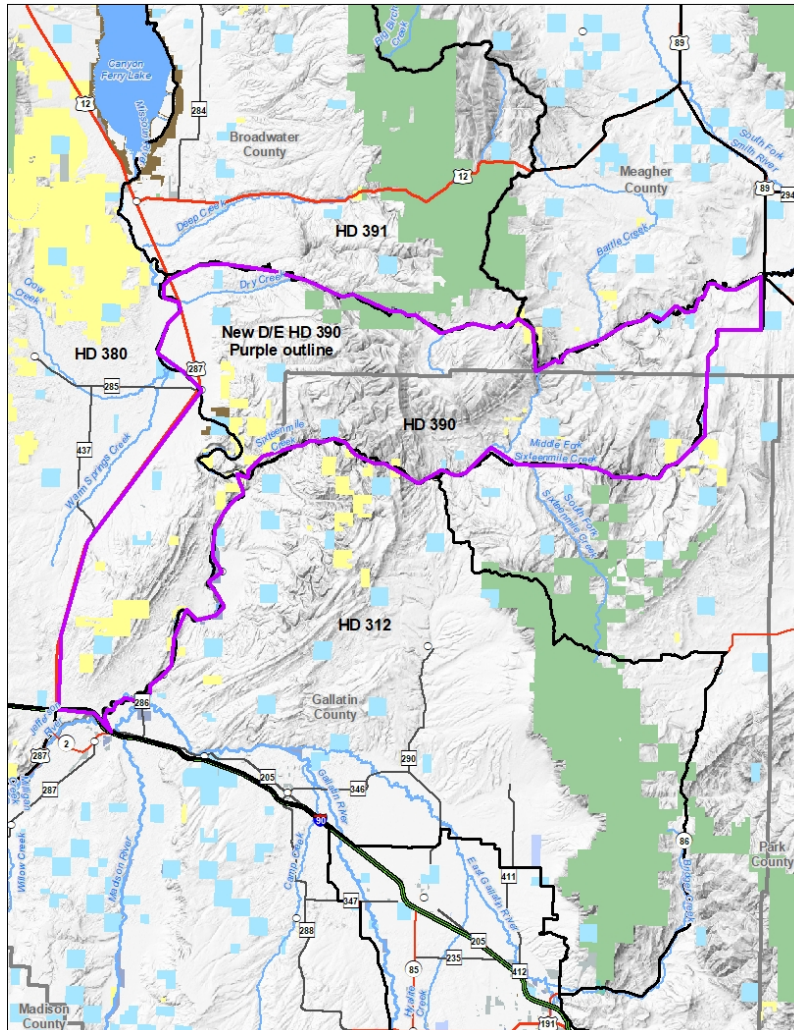


Figure 1: New HD 390 D/E boundary.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to try to simplify and standardize elk regulations, to include starting and ending dates, across at least most of the Bridger EMU to increase elk harvest in the hunting district (HD) to reduce elk numbers in the HD and in the EMU. The goal is to start moving the elk population back down towards the HD and EMU population objective as the HD and EMU are both currently well over objective.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied regarding regulation simplification. One objective is to reduce LPTs which this change does. The proposal also works to standardize season starting and ending dates across at least most of the Bridger EMU (HDs 312, 390, 393). Annual aerial elk surveys of HD 390 will be used to monitor the status of the elk population to determine if the population objectives of the proposed change are being met, i.e. decreasing elk numbers. Harvest success will be monitored via the Department’s annual telephone harvest survey.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The Bridger elk management unit has several sub-herds. One herd moves between the Horseshoe Hills in HD 312 and crosses Sixteenmile Creek into HD 390. HD 312 also has 2 smaller local elk herds which do not move out of district. HD 393 has northern and central herds which move between 390 and/or 315, and a southern elk herd which resides mostly in HD 393. Because of these elk movement patterns it is desired to have consistent regulations across the entire EMU to help reduce elk numbers back down to objective.

A total of 1,431 elk were observed in HD 390 during the 2021 aerial survey of the HD. However, given the lateness of the survey and the survey conditions, it was felt that this year's results were likely not indicative of trend in the HD. The observed point objective for HD 390 (portion of Bridger EMU) is only 900 elk, so regardless elk numbers are well over objective in the HD (based on 2021 observed numbers – 159% of objective). Elk numbers are particularly high on the west side of the HD. Survey information and harvest information for HD 390 is provided.

ELK AERIAL TREND COUNT SUMMARY FORM

HUNTING DISTR 390

DATE	BTBs	YRLG	COWS	CALVES	Uncl	UNCL	TOTAL	Bulls/ 100 Cows	Bulls/ 100 Antlerless	% Bulls of Total	% BTB of Total	% BTB of Bulls	Calves/ 100 Cows	Calves/ 100 Adults
	Bulls				Antler-									
3/30/21	416	70	591	160		194	1,431	82.2	64.7	34.0%	29.1%	85.6%	27.1	14.9
2020*														
3/3/19	269	127	1,007	284		116	1,803	39.3	30.7	22.0%	14.9%	67.9%	28.2	20.2
3/11/18	316	149	1,117	316		6	1,904	41.6	32.4	24.4%	16.6%	68.0%	28.3	20.0
4/10/17	355	148	1,276	363			2,252	39.4	30.7	22.3%	15.8%	70.6%	28.4	20.4
2/23/16	101	159	1,476	585			2,321	17.6	12.6	11.2%	4.4%	38.8%	39.6	33.7
2/22/15	281	129	856	323		195	1,784	47.9	34.8	23.0%	15.8%	68.5%	37.7	25.5
3/13/14	229	118	841	208	551	59	1,997	41.3	33.1	17.4%	11.5%	66.0%	24.7	17.5
2013*														
2/8/12	266	76	774	269		20	1,405	44.2	32.8	24.3%	18.9%	77.8%	34.8	24.1
3/7/11	199	54	879	220			1,352	28.8	23.0	18.7%	14.7%	78.7%	25.0	19.4
2/22/10	283	85	530	148		97	1,143	69.4	54.3	32.2%	24.8%	76.9%	27.9	16.5
3/11/09	289	172	1,021	255		390	2,127	45.2	36.1	21.7%	13.6%	62.7%	25.0	17.2
2/28/08	139	107	1,152	220			1,618	21.4	17.9	15.2%	8.6%	56.5%	19.1	15.7
3/10/07	62	82	1,237	361			1,742	11.6	9.0	8.3%	3.6%	43.1%	29.2	26.1
3/27/06	94	93	1,131	295			1,613	16.5	13.1	11.6%	5.8%	50.3%	26.1	22.4
2/11/05	59	50	673	213			995	16.2	12.3	11.0%	5.9%	54.1%	31.6	27.2
2/23/04	43	85	1,499	116			1,743	8.5	7.9	7.3%	2.5%	33.6%	7.7	7.1
2/27/03	115	63	731	167			1,076	24.4	19.8	16.5%	10.7%	64.6%	22.8	18.4
2002*														
2/12/01	46	70	573	180		553	1,422	20.2	15.4	8.2%	3.2%	39.7%	31.4	26.1
2/18/00	138	107	966	238			1,449	25.4	20.3	16.9%	9.5%	56.3%	24.6	19.7
2/20/99	110	51	345	100		278	884	46.7	36.2	18.2%	12.4%	68.3%	29.0	19.8
2/4/98	78	45	627	113			863	19.6	16.6	14.3%	9.0%	63.4%	18.0	15.1
2/4/97	83	65	610	171		46	975	24.3	19.0	15.2%	8.5%	56.1%	28.0	22.6
<b>Ave</b>	<b>181</b>	<b>96</b>	<b>905</b>	<b>241</b>	<b>551</b>	<b>178</b>	<b>1541</b>	<b>33.3</b>	<b>26.0</b>	<b>17.9%</b>	<b>11.8%</b>	<b>61.2%</b>	<b>27.0</b>	<b>20.4</b>
(*97-'21)														

\* - No survey flown; # - Partial survey flown only, results not comparable for trend

HD 390 Objective: 900 (250 - Ryegrass herd; 250- Middle Fork 16-mile herd, 400 - Toston Herd)

Figure 1: HD 390 elk survey summary.

HD 390 Elk Harvest Summary 2004-2020:

Year	Total Harvest	M	F	Calves	# B-Liceses/ Permits	B-License Harvest**	%Succ	Antl- Harv General
2020	288	133	152	4	1688^	63	-	83
2019	194	66	116	12	1456*	40	-	82
2018	318	102	207	9	1581*	70	-	141
2017	453	214	210	29	1624*	83	-	152
2016	273	78	189	5	1722*	25	-	148
2015	309	146	154	10	150	50	33.3%	108
2014	272	130	129	13	150	27	17.7%	113
2013	206	103	95	8	150	31	20.7%	70
2012	215	116	92	7	150	11	7.3%	78
2011	124	58	55	10	150	20	13.3%	45
2010	239	117	109	14	403	45	11.2%	81
2009	183	62	103	18	400	29	7.3%	90
2008	285	107	160	18	401	54	13.5%	118
2007	495	249	212	34				226
2006	291	145	131	15				144
2005	230	81	128	22	35	8	22.9%	142
2004	196	62	128	6	35	2	5.7%	132
<b>Ave</b>	<b>269</b>	<b>116</b>	<b>139</b>	<b>14</b>	<b>202</b>	<b>37</b>	<b>15.3%</b>	<b>115</b>
'04-'20								04-'15

^B-License valid in HDs 390, 391 (south of Duck Creek only), 393. Not valid on USFS land.

\*B-License valid in HDs 312, 390 and 393. Valid on private land only.

\*\*Number harvested in HD 390 only

Note: Numbers are point estimates only (confidence intervals are associated with estimates) and are rounded

Note: Numbers may not add up due to 'illegal' harvest reports, i.e. HD 390 harvest reported on license/permit types not valid in HD 390

**Figure 2:** HD 390 elk harvest summary.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Revising the current shoulder season regulation will increase the hunting opportunity for both residents and nonresidents by decreasing the amount of time they can hunt; although, access is always a major consideration in the HD. Weather last winter and spring was very mild, so elk survival and in particular elk calf survival should have been quite good. Unfortunately, precipitation levels since last spring have been well below average and the area is currently in exceptional drought conditions. Unless we get a really good elk harvest this fall, forage conditions will be a major concern going into this winter particularly with the extremely high elk numbers.

There is not a lot of accessible public land in the hunting district. The overwhelming majority of the land in the HD is private land with a large portion of it being leased for outfitting or some other fee hunting enterprise. The amount of publicly accessible private land during at least most of the general rifle season is pretty limited in the hunting district. There are currently only a couple of BMAs in the HD which get a tremendous amount of hunting pressure. Some of the outfitted properties do typically allow cow hunters in the last week of the season and during the shoulder season. There are a number of landowners that currently do not allow hunting access during the shoulder season.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Originally, HD 390 was being proposed to be combined with the existing HDs 312 and 393, which are also part of the Bridger EMU, to form a new larger HD 312. The proposal was sent out through email to interested parties served by individual biologists. It was also on the FWP survey monkey website and Region 3 discussed it at our 10/13/21 public meeting. Several public comments were opposed to joining the three elk districts, and several more public comments were unhappy with the resulting changes that would have happened for deer management, if we were to have combined the three districts into one.

FWP staff took into account the public concerns and after further consideration, it was decided not to recommend combining the three HDs based on biological management and public concerns. However, there is still a desire to

standardize elk management within the Bridger EMU to meet regulations simplification guidance, and this proposal allows that to happen without combining the districts or influencing deer management.

No comments were received about the originally proposed post-season shoulder season in what would have been the 'new' HD 312 during this year's early comment period. However, in the past a number of the landowners in HD 390 have been opposed to having the post-season shoulder season go clear until Feb 15. While current elk numbers in the HD are of a concern with some of the landowners in the HD including some of those that outfit, the length of the hunting season with the inclusion of shoulder seasons is also an issue. Given the short turnaround time associated with this amended proposal, there was no opportunity for public comment specifically on it.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 391 Amended elk changes**

**Hunting Districts: 391**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Originally HDs 391 & 392 were being proposed to be combined for the 2022/23 biennial, but that proposal is being dropped primarily because of differences in desired management of mule deer between the two HDs. The amended proposal is to eliminate the current shoulder season in the south portion of the HD 391 (south of Duck Creek) and the corresponding antlerless Elk B License (389-00). The 391-00 Elk B License is being proposed to be valid everywhere in the HD off of national forest land. For the 2020/21 biennial the license was only valid north of Duck Creek off national forest lands. The youth/PTHFV general archery/rifle opportunity is also being proposed to be eliminated.

HD 391 Elk Harvest Summary 2002-2020:

Year	Total Harvest	M	F	Calves	HD 391 B-Licenses/Perm	B-License Harvest	%Succ	389-00 B-Licenses	389-00 Harvest	% Succ	Antl- Harv General
2020	323	184	123	16	125	20	15.9%	1688	25	1.5%	90
2019	375	204	169	4	400^	45	11.3%				118
2018	505	212	272	21	400^	75	18.8%				202
2017	841	343	448	50	350	98	28.1%				358
2016*	613	224	367	22	350	56	16.0%				268
<b>Ave</b>	<b>531</b>	<b>233</b>	<b>276</b>	<b>23</b>	<b>275</b>	<b>59</b>	<b>18.0%</b>	<b>1688</b>	<b>25</b>	<b>1.5%</b>	<b>207</b>
'16-'20											
2015	498	270	204	24	475	99	20.9%				88
2014	406	239	152	15	300	109	36.2%				59
2013	311	181	119	11	250	80	32.1%				50
2012	307	216	79	12	250	51	20.4%				42
2011	262	140	105	17	250	85	34.0%				42
2010	377	212	154	10	250	84	33.6%				78
2009	306	199	95	12	250	83	33.2%				21
2008	259	185	66	5	250	44	17.8%				27
2007	354	198	147	9	250	105	42.0%				48
2006	347	185	134	22	250	88	35.2%				63
2005	294	173	109	11	250	68	27.2%				52
2004	272	159	95	17	249	59	23.8%				52
2003	317	185	119	9	250	64	25.6%				54
2002	280	151	117	11	250	111	53.9%				11
<b>Ave</b>	<b>328</b>	<b>192</b>	<b>121</b>	<b>13</b>	<b>270</b>	<b>81</b>	<b>31.1%</b>				<b>49</b>

('02-'15)

^ - B-licenses valid until Feb 15.

\*Major boundary change implemented in 2016, so results aren't comparable to previous years

Note: Numbers are point estimates only (confidence intervals are associated with estimates) and are rounded

Note: Numbers may not add up due to 'illegal' harvest reports, i.e. HD 391 harvest reported on license/permit types not valid in HD 391

**Figure 1: HD 391 elk harvest summary.**

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The shoulder season is being eliminated as overall elk numbers in the HD are expected to be back down to around objective following this year's hunting season. In addition, few elk were harvested during the shoulder season because of the lack of access to private land in the area that was open to the shoulder season. The youth/PTHFV either-sex opportunities are being eliminated in the interest of simplifying and standardizing regulations, as the regulation wording related to those opportunities was confusing and no such opportunity existed on the east side of the Big Belts in HD 446. Eliminating that opportunity will result in more similar elk regulations across the entire Big Belt Mountains.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of the regulation simplification effort is implied. Annual aerial elk surveys of HD 391 will be used to monitor the status of the elk population, while overall harvest success will be monitored via the Department's annual telephone harvest survey.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

A total of 1,250 elk were observed in the HD during the 2021 survey. The point objective for the HD is 975 (780-1,170). While observed numbers in 2021 were still slightly above the observed objective range, observed elk numbers are expected to be closer to, if not within the objective range when the 2022 survey is flown later this winter. It's estimated that 90-95%+ of the elk in the HD are found on private land with little to no public hunting access during the hunting season while the bulk of the hunting pressure in the HD occurs on National Forest land. Elk numbers/presence on National Forest land is generally abysmal during the hunting season even though National Forest land comprises approximately 40% of the HD. Elk hunter success rate on National Forest land in the HD is estimated to be in the low single digits at best. Elk use of private property during the remainder of the year is also quite common in the HD.

HD 391 is currently part of the Bridger EMU but will be combined with HD 392 to become part of the West Big Belts EMU under the new elk plan (provided FWP continues to have EMUs under the new plan).

**ELK AERIAL TREND COUNT SUMMARY FORM**  
**HUNTING DISTRICT: 391 (data is for 'new' HD 391 effective 2016, result of major boundary change)**

DATE	BTBs	YRLG	COWS	CALVES	ANTL-	UNCL.	TOTAL	Bulls/		% Bulls of	% BTB of	% BTB of	Calves/	Calves/
								100 Cows	100 Antlerless	Total	Total	Bulls	100 Cows	100 Adults
2021	102	75	507	202		364	1,250	34.9	25.0	14.2%	8.2%	57.6%	39.8	29.5
2020 - NS														
2019	27	85	538	125		407	1,182	20.8	16.9	9.5%	2.3%	24.1%	23.2	19.2
2018	31	115	1032	361			1,539	14.1	10.5	9.5%	2.0%	21.2%	35.0	30.6
2017	61	166	1046	380		191	1,844	21.7	15.9	12.3%	3.3%	26.9%	36.3	29.9
2016\$	43	123	612	197		404	1,379	27.1	20.5	12.0%	3.1%	25.9%	32.2	25.3
2015	13	96	1,091	351		501	2,052	10.0	7.6	5.3%	0.6%	11.9%	32.2	29.3
2014*														
2013*														
2012	13	121	1,177	337		15	1,663	11.4	8.9	8.1%	0.8%	9.7%	28.6	25.7
2011	18	131	1,242	302			1,693	12.0	9.7	8.8%	1.1%	12.1%	24.3	21.7
2010	2	63				1070	1,135			5.7%	0.2%	3.1%		
2009	7	63				1,477	1,547			4.5%	0.5%	10.0%		
2008	6	81	777	123		262	1,249	11.2	9.7	7.0%	0.5%	6.9%	15.8	14.2
2007	9	73	885	199			1,166	9.3	7.6	7.0%	0.8%	11.0%	22.5	20.6
2006	2	37	683	157		23	902	5.7	4.6	4.3%	0.2%	5.1%	23.0	21.7
2005	10	56	657	207			930	10.0	7.6	7.1%	1.1%	15.2%	31.5	28.6
2004	6	57	921	136			1,120	6.8	6.0	5.6%	0.5%	9.5%	14.8	13.8
2003	12	49	469	151			681	13.0	9.8	9.0%	1.8%	19.7%	32.2	28.5
<b>Ave</b>	<b>17</b>	<b>88</b>	<b>856</b>	<b>233</b>		<b>483</b>	<b>1339</b>	<b>13.3</b>	<b>10</b>	<b>7.7%</b>	<b>1.2%</b>	<b>14.1%</b>	<b>27.0</b>	<b>23.8</b>
('03 - '20)														

\* - Complete survey of current district not flown  
 \$ - Major hunting district boundary change in 2016  
**HD 391 Objective: 975 (780 - 1,170)**

**Figure 1: HD 391 elk survey summary.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Given the private land access situation in HD 391, the proposed regulation change will likely have little impact on the existing hunting opportunity for both resident and nonresident hunters in the HD. The proposed change will eliminate the ability of youth and PTHFV individuals to harvest yearling bulls in the HD which some people will like and others will be opposed to. While approximately 40% of the HD is National Forest land, most of the elk in the

HD are found on properties with little to no public hunting access during the hunting season. Most of the private property in the HD with elk during the hunting season is either outfitted or has little to no public hunting access. There are several block management areas in the HD, all of which get a lot of hunting pressure, and elk presence on those BMAs during the hunting season is generally pretty minimal.

Weather this past winter (2020/21) was extremely mild, so elk calf survival and recruitment should have been good. The area has been impacted by exceptional drought conditions this summer and fall, so forage conditions on native range were likely negatively impacted in at least some areas which could lead to issues this winter. The Deep Creek and Woods Creek wildfires this year will also likely negatively impact elk to some degree at least in the short-term. Fortunately, much of the area in HD 391 that burned during the Woods Creek fire wasn't that great of elk habitat.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Received only two comments during the early comment period related to eliminating the elk shoulder season and/or eliminating the youth/PTHFV opportunities in HD 391. Both comments were in support of the proposals. As mentioned previously, some individuals will be supportive of eliminating the youth/PTHFV opportunities because they want to see increased yearling bull elk survival, while other individuals may be opposed to the idea. Regarding the shoulder season elimination, support for the HD 391 shoulder season has always been a mixed bag with some landowners and hunters liking it and other landowners and hunters hating it.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R3-Elk-Structure-HD 392 Amended elk change**

**Hunting Districts: 392**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Originally HDs 391 & 392 were being proposed to be combined for the 2022/23 biennium, but that proposal is being dropped primarily because of differences in desired management of mule deer between the two HDs. The amended proposal is to just eliminate the special youth/PTHFV general archery either-sex opportunity in HD 392 in an effort to simplify regulations. The general archery season would then be brow-tined bull or antlerless elk for all hunters. The youth/PTHFV opportunity to hunt antlerless elk during the general season was eliminated for the 2020/21 biennial due to low elk numbers in the HD.

HD 392 Elk Harvest Summary 2002-2020:

Year	Total Harvest	M	F	Calves	# B-Licenses/ Permits	B-License Harvest	%Succ	Antl- Harv General
2020	127	95	32	0	25	4	17.6%	25
2019	113	81	28	4	50	6	12.8%	24
2018	187	118	69	0	50	13	25.0%	53
2017	158	97	53	8	75	12	16.3%	43
2016*	131	81	47	3	75	12	16.5%	32
<b>Ave</b>	<b>143</b>	<b>94</b>	<b>46</b>	<b>3</b>	<b>55</b>	<b>9</b>	<b>17.6%</b>	<b>35</b>
16-20'								
2015	457	167	277	13	500	140	28.0%	111
2014	350	174	164	12	425	97	22.8%	76
2013	317	162	150	5	425	115	27.1%	39
2012	240	159	81	0	425	56	13.2%	25
2011	360	158	188	14	425	135	31.8%	64
2010	488	161	282	46	525	214	40.8%	111
2009	337	157	165	16	525	139	26.5%	42
2008	251	122	122	7	525	118	22.5%	9
2007	404	192	212	0	400	138	34.5%	67
2006	353	172	163	18	400	124	31.0%	55
2005	310	139	155	17	400	111	27.8%	60
2004	307	125	139	12	400	124	31.0%	58
2003	403	191	194	19	400	128	32.0%	65
2002	307	162	129	17	400	112	28.0%	28
<b>Ave</b>	<b>349</b>	<b>160</b>	<b>173</b>	<b>14</b>	<b>441</b>	<b>125</b>	<b>28.3%</b>	<b>58</b>
'02-'15								

\*Major boundary change implemented in 2016, so results aren't comparable to previous years.

**Figure 1: HD 392 elk harvest information.**

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The youth/PTHFV either-sex general archery opportunity is being proposed to be eliminated in the interest of simplifying and standardizing regulations. No such opportunity exists on the east side of the Big Belts in HD 446, and the youth/PTHFV opportunities are also being proposed to be eliminated in HD 391. Eliminating the special youth/PTHFV opportunity will result in more similar elk regulations across the entire Big Belt Mountains.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of simplifying the regulations is implied. Annual aerial elk surveys of HD 392 will be used to monitor the status of the elk population, while overall harvest success will be monitored via the Department's annual telephone harvest survey.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

A total of only 137 elk were observed in the HD during the 2021 survey. HD 392 comprises the West Big Belts EMU which following a major boundary change that was implemented in 2016 has an observed objective of 400 elk (320-480). Given that elk numbers are well below objective, the Restrictive Regulation package is called for which is six-weeks brow-tined bull/antlerless elk for archery and 5-weeks brow-tined bull with few antlerless Elk B Licenses. Overall observed bull numbers are also an ongoing issue. Although, it is believed that more elk are found in the hunting district during the hunting season than winter in the HD.

**ELK AERIAL TREND COUNT SUMMARY FORM**  
**HUNTING DISTRICT 392 (data is for 'new' HD 392 effective 2016, result of major boundary change)**

DATE	BTBs	YRLG	COWS	CALVES	ANTL-	UNCL.	TOTAL	Bulls/ 100 Cows	Bulls/ 100 Antlerless	% Bulls of Total	% BTB of Total	% BTB of Bulls	Calves/ 100 Cows	Calves/ 100 Adults
3/26/21	0	7	105	25			137	6.7	5.4	5.1%	0.0%	0.0%	23.8	22.3
2020*														
3/14/19	2	22	107	26			157	22.4	18.0	15.3%	1.3%	8.3%	24.3	19.8
3/25/18	0	25	205	52		7	289	12.2	9.7	8.7%	0.0%	0.0%	25.4	22.6
3/26/17	0	23	139	36			198	16.5	13.1	11.6%	0.0%	0.0%	25.9	22.2
3/30/16\$	3	15	131	23		22	194	13.7	11.7	9.3%	1.5%	16.7%	17.6	15.4
2/17/15	3	23	219	86			331	11.9	8.5	7.9%	0.9%	11.5%	39.3	35.1
2014*														
2013*														
2/13/12	5	29	45	25			104	75.6	48.6	32.7%	4.8%	14.7%	55.6	31.6
2011*														
2/21/10	0	14				252	266			5.3%	0.0%	0.0%		
3/2/09	0	3				210	213			1.4%	0.0%	0.0%		
2/29/08	0	18	118	34			170	15.3	11.8	10.6%	0.0%	0.0%	28.8	25.0
2/25/07	2	24	221	41			288	11.8	9.9	9.0%	0.7%	7.7%	18.6	16.6
3/17/06	10	30	101	43			184	39.6	27.8	21.7%	5.4%	25.0%	42.6	30.5
2/12/05	0	12	131	41			184	9.2	7.0	6.5%	0.0%	0.0%	31.3	28.7
2/22/04	6	22	159	39			226	17.6	14.1	12.4%	2.7%	21.4%	24.5	20.9
2/27/03	2	15	217	70			304	7.8	5.9	5.6%	0.7%	11.8%	32.3	29.9
<b>Ave</b>	<b>2</b>	<b>20</b>	<b>149</b>	<b>43</b>		<b>123</b>	<b>222</b>	<b>21.1</b>	<b>15.5</b>	<b>11.3%</b>	<b>1.3%</b>	<b>8.4%</b>	<b>30.5</b>	<b>24.9</b>
(*03 - '19)														
* - No survey flown														
\$- Major hunting district boundary change in 2016														
<b>HD 392 Objective: 400 (320 - 480)</b>														

**Figure 1: HD 392 elk survey summary.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal will have little impact on resident and nonresident hunting opportunity. The proposed change will eliminate the ability of youth and PTHFV individuals to harvest yearling bulls in the HD, but they will still be able to harvest brow-tined bull or antlerless elk just like everybody else. Some people will be supportive of this and others will be opposed to it. Most of the HD is public land (over 90%) comprised of USFS & BLM land with only a small amount of private land (mostly smaller inholding parcels) so access is very good in the HD. There are a couple of small outfitted properties in the HD.

Weather this past winter (2020/21) was extremely mild, so elk calf survival and recruitment should have been good. However, the area has been impacted by extreme/exceptional drought conditions this summer and fall, so forage conditions on native range were likely negatively impacted in at least some areas which could lead to issues this winter.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Only received one comment during the early comment period related to eliminating the youth/PTHFV opportunity (in support of). As mentioned previously, some individuals will be supportive of eliminating the youth/PTHFV opportunity because they want to see increased yearling bull elk survival, while other individuals may be opposed to the idea.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HD 329 and west half of HD 328**

**Hunting Districts:** HD 329

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Combine HD 329 with the west half of the current HD 328.

Extend the south-west boundary of D/E/L HD 329 to follow the length of Route 324 from Clark Canyon Reservoir to Bannock Pass at the MT/ID border. HD 329 would now encompass the west half of what is currently HD 328. Combined with changes proposed for HD 302, this would result in the elimination of HD 328. Eliminate portion of HD 329 in which Elk B License: 321-00 was valid.

Mule deer in HD 329 and HD 328 have been managed under either-sex archery and general season harvest without B Licenses since 2016. The proposed changes would not affect mule deer harvest.

Since 2016 elk in HD 302 and HD 328 have been managed with brow-tined bulls and antlerless harvest throughout the archery and general season. An antlerless Elk B License 399-00 has been valid in both districts since 2016. In addition, HD 329 contained a portion in its north-east corner in which an Elk B License: 321-00 was valid. The only change to elk season structure would be the elimination of the HD 329 portion.

Both districts are within a common Lion Management Unit with a winter either-sex quota of 10 lions and female subquota of 5.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Consolidation of hunt district 329 and the west portion of hunt district 328, along with the elimination of portions, was proposed to simplify regulations and not for biological reasons. However, GPS data from cow elk collared in Montana and Idaho show that elk freely move between HD 329 and the west half of HD 328. This is further supported by ground and aerial observations that show seasonal movement between these two areas.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success is implied as it combines hunting districts. Its success in meeting larger goals of regulations simplification is qualitative and subjective based on the experiences of individuals.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Both HD 328 and 329 are currently over objective. Elk objectives in HD 329 call for a maximum winter elk count of 900 elk. Winter elk counts in HD 329 have averaged 1,114 elk over the past 10-years. HD 328 has an objective of 550-700 elk. Winter elk counts in HD 328 have averaged 735 elk over the past 10-years.

GPS data from collared cow elk show regularly inter- and intra-seasonal movements between HD 329 and the western portion of HD 328. This data is corroborated by aerial and ground observations that the elk herd using the west half of 328 also use HD 329 regularly.

Mule deer in both HD 329 and HD 328 are managed under the Mountain Foothill Population Management Unit, with an objective of remaining within 25% of the long-term average of trend areas. No trend surveys have been conducted in either-district. No count data is available for mule deer in either HD 329 or HD 328.

Estimated harvest of mule deer buck HD 329 has averaged 74 bucks annually for the past 10-years. This is within 25% of the long-term average of 96 bucks/year. Estimated harvest of mule deer buck harvest in HD 328 has averaged 32 bucks over the past 10-years, which is less than 25% of the long-term average of 49 bucks per year. Buck harvest in both districts has been increasing over the past 10-years by an estimated amount of 10% annually in HD 329 and 12% annually in HD 328.

Both districts are managed under a one Lion Management Unit with a winter quota of 10 cats and a female sub-quota of 5. These quotas have not been reached since they were established.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Both these districts have shared common management for mule deer, elk and lion since at least 2016. This proposal will not change season structure or quotas for any of these species, except for the elimination of the elk portion in HD 329. The number of elk harvested in the HD 329 portion with the Elk B License 321-00 has averaged 1.8/year over the past 7 years. This constitutes approximately 0.7% of annual elk regularly harvested in HD 329.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The current proposal is a modification of an earlier proposal that also included the entire Pioneer EMU (HD 329, HD 331 and HD 332) in one hunting district. Due to accelerated timeline of this season change process, public comment was likely more limited than usual. The original proposal was posted on the FWP Website on September 20th which allowed people to comment online. The original proposal was included in an email to the interested party list serve kept by biologist Jesse Newby and was discussed at the Region 3 Open House meeting 10/13/21. Jesse Newby also discussed this proposal with several Beaverhead County landowners and sportspersons, along with the Beaverhead County Chapter of the Mule Deer Foundation.

A total of 30 people made specific comments on the proposal via the website. In addition, several people contacted Jesse Newby directly to ask questions or express their opinions on combining these districts. A total of 80% of online comments were opposed to combining all the districts in the EMU. Comments made directly to the biologist were similarly opposed and sometimes very strongly opposed. Most of the comments centered on the differences in elk population performance between HD 329 and the districts in the Pioneer Mountains. One person was concerned about the effects on mountain lion quotas and harvest if HD 329 were combined with HD 331 and HD 332. Many people felt it would hamper current and future ability to manage for objectives across these diverse areas.

In contrast, the majority of people that directly contacted the biologist or left comments online were supportive of combining HD 329 with the west half of HD 328. There was no opposition expressed concerning the consolidation of HD 329 and the west half of HD 328 into one Big Hole Pass/Horse Prairie area.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Rename HD 300 to HD 303**

**Hunting Districts:** HD 300

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Rename Deer/Elk/Lion HD 300 - Lima Peaks-Nicholia to HD 303 - Lima Peaks-Nicholia. This proposal would not affect district boundaries, season structures or quotas for these species.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

This proposal is designed to improve the reliability of hunter harvest statistics. Currently it appears some unknown number of hunters refer to Region 3 in general as HD "300". This inflates harvest and hunter number estimates by an unknown amount.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Currently it is unknown how many hunters may mistakenly refer to HD 300 in hunter surveys. However, this district has a limited buck mule deer permit, set at 30 permits since 2009. The average estimated mule deer buck harvest has exceeded the number of permits by 32.4% annually over the past 13 years. This proposal will be deemed successful if estimated mule deer buck harvest better agrees with the number of permits offered.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

No change in elk season are proposed at this time. Data from 60 collared cow elk captured in the Tendoy's shows these cows rarely crossed between HD 300 and HD 302 during seasonal movements. This suggests the Lima Peaks elk population is relatively distinct from adjacent districts in Montana and primarily movements are within HD 300 or into Idaho.

Elk population objectives are set at 700-900 elk in winter surveys. Elk numbers in winter surveys average 1,110 elk over the past 10-yr's of survey data. However, there is some indication that numbers may have declined slightly towards objective over this time period. Objectives also call for a bull:cow ratio of at least 10 bulls:100 cows. Currently this objective is being met with a bull: cow ratio average of 33 bulls:100 cows over the past 10-years.

This area is managed with a limited mule deer buck permit and general season antlerless harvest. The mule deer AHM calls for buck: doe ratios of at least 25 bucks:100 does and at least 40% of buck harvest consisting of 4 year old or better deer. Buck: doe ratios in post-season surveys has been over 40 bucks:100 does for the past 3 years. Sample sizes of ages are too small to evaluate the proportion of bucks 4 years old or greater in harvest. However, among successful buck permit holders the proportion of bucks with 4-points or better has averaged 84.4% over the past 10 years.

Mountain lions in this district are managed in the HD 300, 302, 328, 329 LMU with an either-sex winter quota of 10 and female winter quota of 5. Quotas have not been reached since they have been established. This proposal would not affect mountain lion seasons.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Accurate data and the flexibility to manage hunting pressure specific to HD 303 will be important because of the intense, and increasing, hunting pressure and relative ease of access. Estimated hunter numbers/mile<sup>2</sup> of public land is 1.5X to 2X that of the adjacent district to the north (HD 302), which is also considered a high pressure area.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to accelerated timeline of this season change process, public comment has been more limited than usual. This proposal was included in an email to the interested party list serve kept by biologist Jesse Newby and was discussed at the Region 3 Open House meeting 10/13/21. Jesse Newby also discussed this proposal with several Beaverhead County landowners and sportspersons. This proposal was also presented to the Beaverhead County Chapter of the Mule Deer Foundation.

This proposal does not include any changes to elk and mule deer seasons. Only 3 people submitted written comments directly related to this proposal and 2 were supportive and 1 implied support by highlighting the need for better harvest data. No comments, written or verbal, opposed changing the hunt district name. All comments were supportive of retaining the hunt district with its current boundaries.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 319 and 341**

**Hunting Districts:** 319 and 341

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Combine HDs 319 and 341 for Deer, Elk, and Mountain Lion. Elk, WTD, MD and Lion structure will remain as it is currently in HD 319. B License quotas for MD and Elk, along with Mountain Lion quotas will be adjusted next year during the regular quota setting schedules for these species.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Combine 2 HDs with shared populations of deer, elk and lions and similar management.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This action will prove successful, or at least not detrimental, to species population management if harvest remains well distributed across both current HD's.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk in both HD 319 and 341 are within objective and have been for the past 8 years. MD trend in both HDs are stable to decreasing. Mountain lion trends appear stable.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Both HDs receive a large amount of hunting pressure primarily from being in close proximity to the communities of Butte and Anaconda. In addition, nonresident hunter numbers have increased in both districts in the past few years.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been vetted far and wide across the state via the FWP website, R3 open house, with local rod and gun clubs, and with R3 staff as well as wildlife staff in adjacent R2.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove HD 314 Portion**

**Hunting Districts: 314**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Elk harvest structures in HD 314 have varied in response to the diverging population trends north versus south. From 2004-2007, either-sex harvest was allowed with a General License. Brow-tined bull or antlerless harvest was allowed on a General License from 2008-2010; additionally, up to 1000 B Licenses were available. As the population was reduced within objective (Figure 2, Figure 3), antlerless opportunity was reduced: in 2011 the B License quota was reduced to 200. During the season setting process for 2012-2013, the season structure was changed from liberal to standard, allowing only brow-tined bull harvest on the General License and 400 B Licenses were issued. As elk numbers grew in northern 314 but declined south of Big Creek, a structural change was made in 2014 to split HD 314 into 2 portions divided by Big Creek. From 2014-2017, brow-tined bull or antlerless harvest was allowed with a General License north of Big Creek, while only brow-tined bull harvest was allowed south of Big Creek on the General License. Twenty-five antlerless B Licenses were valid throughout the district and youth hunters were allowed to use a General License to harvest antlerless elk south of Big Creek. To address continued population growth north of Big Creek, 500 antlerless B Licenses valid north of Big Creek were added for 2018-2020. In 2020, the youth opportunity was changed to either-sex as part of a region-wide effort to simplify regulations related to youth opportunity. For the 2021 season, the number of B Licenses available north of Big Creek was 1000 to address continued over-objective elk numbers in northern 314.

This proposal will eliminate the division of HD 314 into north and south portions. Instead, the B License will be valid throughout the district and the General License will be valid throughout the district for brow-tined bull or antlerless harvest. The either-sex youth opportunity with a General License will remain unchanged.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to remove hunting district portions.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success in removing the portions is implied. Success in whether this is actually viewed as a positive simplification will be difficult to measure.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

There is no biological justification for eliminating the portion. It is proposed solely meet the direction to simplify regulations by eliminating portions. Elk numbers in the northern subunits defined in the 2005 Elk Plan are above objective and warrant liberalized antlerless harvest. Subunits immediately south of Big Creek are near objective; farther south elk numbers are substantially below objective, liberalized antlerless harvest is not warranted based on the subunit objectives in the 2005 Elk Plan.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**



Limited hunter access to private lands and the relative remoteness of public lands will likely keep antlerless harvest in the southern end of HD 314 to a low level.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to the accelerated timeline for this season setting process, outreach and comment has been somewhat limited. The proposed change has been shared multiple times via the area biologist's (Michael Yarnall) email listserve, discussed at the Region 3 Regulation Simplification Open House (13 October 21), and between the area biologist and a handful of local landowners and sportsmen. Thus far, most of the public comment has been in opposition to the removal of this portion and some sportsmen are concerned that this portion will be removed, while a portion on the other side of Paradise Valley in HD 313 will be maintained.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 314 - Change Shoulder Season**

**Hunting Districts:** 314

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

In August 2021, the Fish and Wildlife Commission added a shoulder season to HD 314 from the end of general season through 15 Feb 2022. There was substantial confusion among landowners and sportsmen regarding the timing of the season (i.e. was an *early shoulder season in place during August*), what licenses could be used during this season, and what landownership would be included. For the 2021 season, only the 314-00 Elk B License is valid on private lands north of Big Creek.

This proposal is to expand the ability for hunters to use their General License during the shoulder season, and add an early season component. Note that a separate proposal, as part of the regulation simplification effort removed north and south portions of HD 314; these shoulder season changes will apply to the entire HD.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to provide additional tools to increase antlerless elk harvest and help manage the population to objective in HD 314. Additionally, this change is intended to address game damage complaints in the northern end of HD 314.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Annual elk population surveys and harvest estimates will provide information on how effective these changes are for increasing antlerless harvest. Additionally, the number of game damage complaints related to elk in HD 314 will provide another measure of success.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in HD 314 have been above objective in recent years. However, this has been driven primarily by elk numbers north of Big Creek: north of Big Creek elk numbers have been over objective for most years since 2002 (except for a period within objective from 2010-2012), while elk numbers south of Big Creek have generally been below objective since 2011. This year, elk numbers were within objective south of Big Creek due to increased numbers of elk between Point of Rocks and Rock Creek; numbers were above but near objective between Big Creek and Point of Rocks and substantially below objective south of Rock Creek. This year's total count for HD 314 (3975) was a 7-percent increase from the 2019 count of 3716 (Figure 2). This year's total count was 15 percent higher than the 10-year average (3446) and 16 percent higher than the long-term average of counts since 1990 (3421, SE = 109.5). North of Big Creek, elk numbers were 9 percent lower than in 2019 and 29 percent higher than the long-term average of counts since 1990 (2156, SE = 128.8). South of Big Creek, elk numbers were 86 percent higher than in 2019 but remain 6 percent lower than the long-term average of counts since 1990 (1264, SE = 84.2). The increased number of elk south of Big Creek this year was driven primarily by a sharp increase in the number of elk wintering between Point of Rocks and Rock Creek.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The ability of hunters to access concentrations of elk in areas that have previously provided refuge to elk will strongly impact whether this change effectively increases elk harvest.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Due to the accelerated timeline for this season setting process, outreach and comment has been limited. In previous conversations related to potential shoulder seasons in HD 314, some landowners have expressed support for expanded shoulder season opportunity and some sportsmen have expressed opposition. Additional comments are expected during the next comment period.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HDs 411/412 archery/shoulder seasons/quotas**

**Hunting Districts:** 411, 412

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

For the upcoming 2022/2023 hunting seasons:

- Remove HDs 411 and 412 from the 900-20 archery only elk permit.
- Create a new, 411-21 either-sex archery only elk permit, valid in HDs 411 and 412, with a quota of 800 (quota range 600 to 1100).
- Specific to HD 411:
  - Increase the quota on the 411-20 elk permit from 300 to 400.
  - Increase the quota on the 411-00 Elk B License from 800 to 1200.
  - Reintroduce an early shoulder season (August 15 – the day before the start of archery season) for antlerless elk on the general, 411-00 B, and 004-00 B elk licenses valid on private land only.
  - Extend the late shoulder season on the general, 411-00 B, and 004-00 B elk licenses to February 15. The general and 004-00 Elk B Licenses will not be valid on National Forest lands for this time period. The 411-00 Elk B License would be.
  - Remove any district “split” in HD 411 at Red Hill Road—manage the entirety of HD 411 as one unit.
  - Changes proposed for General Elk License, 411-20 elk permit, 411-00 Elk B License, and 004-00 Elk B License (which parallels 005-00) are consistent with proposed changes in HDs 511/530, or new HD 535.
- Specific to HD 412:
  - Eliminate “dead week” shoulder season on general and 004-00 Elk B Licenses.

Language in the 2022 Montana Hunting regulations for Elk in HDs 417 and 426 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 411 – Snowy Mountains</b>						
<b>Elk</b>						
General Elk License	Spike Bull or Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 27	
	Antlerless Elk	-	-	-	Aug 15-Sep 02 Nov 28-Feb 15	Private land only. Not valid on National Forest lands.
Elk Permit: 411-20	Either-sex Elk	April 1	<del>300</del> 400	Sep 03-Oct 16	Oct 22-Nov 27	Only valid in HDs 411, 511, and <del>530</del> and 535.
Elk Permit: 411-21	Either-sex Elk	April 1	800	Sep 03-Oct 16	-	ArchEquip only. Only valid in HDs 411 and 412.
<del>Elk Permit: 900-20</del>	<del>Either-sex Elk</del>	<del>April 1</del>	<del>4,000</del>	<del>Sep 03-Oct 16</del>	-	<del>First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.</del>
Elk B License: 411-00	Antlerless Elk	June 1	800 1,200	Sep 03-Oct 16	Oct 22-Nov 27 Aug 15-Sep 02	Valid in HDs 411, 511, and 530, and 535. Valid in HDs 411 and 535. Private land only.
				-	Nov 28-Feb 15	Valid in HDs 411, 511, and <del>530</del> and 535. 411-00 license holders may also use an unused General Elk License to harvest antlerless elk. 411-00 and General Elk License not valid on National Forest lands after general season.
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16 -	Oct 22-Feb 15 Jan 15 Aug 15-Sep 02	Not valid on National Forest lands, RWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except 410 and 455 as listed under each HD. Only valid on private land. Valid in all Region 4 HDs except 410 and 455 as listed under each HD.

Figure 1: Proposed HD 411 2022 Regulations.

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 412 – Judith and Moccasin Mountains</b>						
<b>Elk</b>						
General Elk License	Spike Bull or Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 27	
	Antlerless Elk	-	-	-	Aug 15-Sep 02 Oct 18-Oct 22 Nov 28-Feb 15	Only valid on private land
Elk Permit: 412-20	Either-sex Elk	April 1	120	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 411-21	Either-sex Elk	April 1	800	Sep 03-Oct 16	-	ArchEquip only. Only valid in HDs 411 and 412.
Elk Permit: 900-20	Either-sex Elk	April 1	4,000	Sep 03-Oct 16	-	First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16	Oct 22-Feb 15	Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.
				-	Aug 15-Sep 02 <del>Oct 18-Oct 22</del>	Only valid on private land. Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.

Figure 2: Proposed HD 412 2022 Regulations.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The overarching objectives of this proposed change are to have consistency across the entire Snowy EMU (with one exception), improve local archery hunting opportunity, and assist landowners in managing elk on their properties to reduce game damage. The biggest proposed change herein is the removal of the 900-20 archery elk permit, and in an additional step since public scoping, the separation of archery hunting between HDs 411 and 511/530 (i.e., 535). The main drivers behind these changes are improving the drawing odds for area

landowners and sportsmen to be able to “hunt their backyard,” while ebbing the increasing number of archery hunters in the Snowy Mountains, i.e., maximize opportunity while reducing pressure.

**Archery:** Removing HDs 411 and 412 from the 900-20 bundle will lower the size of the pool of applicants competing to hunt multiple HDs. A new archery permit, with a quota set above the level of existing hunter pressure, should ensure that individuals desiring to hunt HDs 411 and/or 412 will have the opportunity to draw a permit (Table 1). Coupled with a possible statewide change in which hunters who draw a permit can only hunt the district for which that permit is valid, draw odds and hunter participation should improve.

Due to other proposed changes in Region 5, we recommend separating archery hunting between HD 411 (north side of the Big Snowies) and HDs 511/530 (proposed HD 535, southern Big Snowies and Little Snowies). Ideally, the Snowy mountain range would be managed with all LPTs as one unit, however Region 5 is proposing their archery elk permits to be bundled into a singular permit, similar to the 900-20. Public comment gathered prior to and during the scoping process indicates that sportsmen hunting HD 411 wanted to see this district out of the 900-20 bundle and by default, anything like it. Management issues with elk along the Musselshell River/Highway 12 deem it difficult for Region 5 to split their new HD 535, which includes the southern Snowies, from the Bull Mountains. The Snowies are one mountain range and will continue to be managed together for shoulder seasons and the general rifle season for the sake of managing elk populations towards objectives. However, maintaining archery opportunity for locals and landowners that hunt HD 411 while minimizing potential crowding issues on limited publicly-accessible lands dictates the department bundle HDs 411 and 412 together in a separate, smaller permit.

**411-20 Permit Increase:** Bull numbers across the Snowy Mountains have been increasing, but the Elk Management Plan (EMP) speaks to managing for older age class bulls. Maintaining limited-entry archery permits in addition to a modest increase in either-sex rifle permits ensures older bulls are protected but provides additional means to harvest and manage this increasing bull population.

**Shoulder seasons:** Making shoulder seasons consistent across the entire Snowy Elk Management Unit, where possible, greatly simplifies the regulations and improves opportunities for antlerless elk harvest in these districts, which are over objective. All antlerless license/permit types (LPTs) across the entire EMU will have an early shoulder season beginning August 15 (valid only on private land), and archery only season, a break for dead week, and a late shoulder season extending to February 15. Except for the 411-00 LPT, all late shoulder seasons will not be valid on National Forest lands.

**411-00 Quota Increase:** Particular to the increase in the 411-00 quota, landowners in the Snowy Mountain complex have varying levels and tolerances for elk on their properties. Given the status of the Snowy elk population relative to objective, increasing the license quota will further provide area landowners the tool they need to manage elk on their properties. This license will likely not sell out before the end of the late shoulder season, so it provides opportunity for landowners and sportsmen to utilize it no matter the season timing.

**Eliminate the Red Hill Rd/Hwy 238 district split in HD 411:** Elk are over their sub-objectives on both the east and west ends of HD 411, with legitimate impacts to landowners on both “sides” of the boundary. This is one population of elk and needs to be managed as such. Large, singular parcels of private land do not exist on the west end of the Snowies like they do to the east, and landowner tolerance for large concentrations of elk is lower in western HD 411/511. Thus, these landowners need the same tools to manage elk on their properties afforded to landowners east of Red Hill Road.

### **3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The components of this proposal lend several metrics for measuring success. Related to elk archery, an improvement in drawing odds and hunter participation, with a reduction in comments/complaints about too much pressure will be one indication of success. Increased antlerless harvest across the shoulder and general seasons among all valid licenses will be another. Finally, increased bull harvest via an increase in the rifle permit quota will be a third measure. Game damage complaints may decrease, and if antlerless and total harvest were to exceed recruitment, overall elk populations numbers may decline towards objective.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

In February 2021, area biologists observed 8755 total elk across the Big and Little Snowy Mountains (2257 bulls, 4502 calves, 1884 calves, 112 unclassified antlerless). Overall, elk in the Snowies are 1067% over the objective of 800 total elk. Additionally, in HDs 511/west 411 (i.e., west of “Red Hill Road”), biologists observed 1061 elk (372 bulls, 478 cows, 211 calves). Elk on the west end of the Snowies are 165% over the sub-objective of 400 elk. In HD 412, the area biologist observed 779 total elk in February 2021 (355 bulls, 283 cows, 141 calves). The survey objective for HD 412 is to observe 300 elk post-season, thus elk are 159% above objective. The EMP for the Snowy EMU also speaks to managing for “older age class bulls.”

Table 1 shows elk harvest by sex/season since 2013, including the 2016-2020 shoulder seasons, for HDs 411, 412, 511/530, and the Snowy Mountains (411, 511, and 530 combined). Across all districts and years, archery/general harvest has exceeded shoulder season harvest, one of the criteria set for their continuation. Other shoulder season criteria state cow harvest and total harvest must exceed annual recruitment. For the Snowies, these criteria have not been met, but for HD 412, these criteria have been met (Table 2).

Year	HD(s)	Shoulder Season Harvest			Archery/General Season Harvest			Total Harvest		
		Cow	Bull	Total	Cow	Bull	Total	Cow	Bull	Total
2013	411	-	-	-	155	150	315	155	150	315
	412	-	-	-	108	53	170	108	53	170
	511/530	-	-	-	33	51	84	33	51	84
	Snowies	-	-	-	188	201	405	188	201	405
2014	411	-	-	-	145	125	295	145	125	295
	412	-	-	-	132	79	228	132	79	228
	511/530	-	-	-	35	72	129	35	72	129
	Snowies	-	-	-	199	197	424	199	197	424
2015	411	-	-	-	147	166	313	147	166	313
	412	-	-	-	137	52	207	137	52	207
	511/530	-	-	-	48	47	98	48	47	98
	Snowies	-	-	-	195	213	434	195	213	434
2016	411	111	0	131	195	154	364	306	154	495
	412	51	0	51	57	64	127	108	64	178
	511/530	65	0	67	40	107	150	105	107	217
	Snowies	176	0	198	235	261	514	411	261	712
2017	411	120	0	126	280	205	502	400	205	628
	412	41	2	52	107	61	173	148	162	225
	511/530	38	4	45	88	80	177	126	84	222
	Snowies	158	4	171	368	285	679	526	289	850
2018	411	177	3	180	173	188	379	350	191	559
	412	66	0	66	62	72	140	127	72	206
	511/530	81	3	94	96	81	186	177	84	280
	Snowies	258	6	274	269	269	565	527	275	839
2019	411	241	0	250	166	187	365	407	187	615
	412	44	0	44	71	83	160	116	83	208
	511/530	104	0	113	86	62	153	190	62	266
	Snowies	345	0	363	252	249	518	597	249	881
2020	411	109	0	113	228	344	586	337	344	699
	412	12	3	15	67	93	132	79	96	175
	511/530	15	6	27	107	82	189	122	88	216
	Snowies	124	6	140	335	426	775	459	432	915

**Figure 1:** Table 1. Elk Harvest by sex and season in the Snowy EMU, 2013-2020.

Year	HDs	Recruitment (required harvest)			Criteria Met?		
		Cow	Bull	Total	Archery/general harvest > SS harvest	Recruitment Harvested	
						Cows	Total
2016	Snowies*	468	379	847	Yes	No	No
	412	86	57	143	Yes	Yes	Yes
2017	Snowies	912	608	1520	Yes	No	No
	412	31	21	52	Yes	Yes	Yes
2018	Snowies*	1295	863	2158	Yes	No	No
	412	80	54	134	Yes	Yes	Yes
2019	Snowies	1273	848	2121	Yes	No	No
	412	36	24	60	Yes	Yes	Yes
2020	Snowies*	1375	917	2292	Yes	No	No
	412	79	53	132	No for cows	Yes	Yes
2021	Snowies	1286	857	2143	Yes	No	No
	412	100	67	167	Yes	Yes	Yes

\*Incomplete survey years; the east end of HD 411 is flown only on odd years. In the absence of such data, current calf counts for HDs 411 (west), 511, and 530, plus the previous year's calf count for 411 (east) are used to estimate recruitment.

**Figure 2:** Table 2. Elk recruitment estimates and shoulder season criteria for the Snowy Mountains and HD 412, 2016-2020.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The majority of elk in both HDs 411 and 412 reside on private lands year-round. When elk are on public lands (mainly USFS in the Snowies and BLM in the Judiths/Moccasins) it is primarily during summer months or early fall. With vegetation senescence, hunting pressure, and winter snows, these elk migrate out of the mountains into the surrounding foothills—primarily agricultural lands bisected by creek drainages and timbered ridges.

Elk numbers in the Snowy Mountains have been increasing exponentially since the mid-2000s, mostly related to population expansion and growth on the east end. Conversely, up until ~2016, elk on the west ends of HDs 411 have remained relatively steady at ~subobjective elk since 1991. Since 2016, this localized elk subpopulation has grown to over twice objective. Despite this recent growth, habitat limitations (winter snow on the north slope, marginal availability of water and succulent forage) is the primary limiting factor for these elk. While habitat quality seems to be excellent on the north slope of the Big Snowy Mountains, elk fail to use this area for much of the year, and save an occasional observation (15-75 elk), most of the elk summer and winter on the far west side. This “west end” group of elk has caused numerous game damage complaints from area landowners. Additionally, during severe winter weather, these elk congregate and move into the flats west of the mountain, sometimes crossing the highway. During hunting season, better access, high visibility, and a general either-sex regulation leave them vulnerable to “elk shootouts.” There is no shoulder season in HD 418 where this occurs, but outside of the general season, the large congregation of elk results in numerous game damage complaints and necessary management hunts. The larger the herd, the more likely they are to cross; thus, it is imperative to keep these elk at or near objective levels.

It is no surprise that elk have fared much better on the east ends of HDs 411 and in (former) HD 530. Large swaths of land in both districts have been effectively closed to hunting for almost the last two decades (there is limited hunting pressure but this has little to no effect on the elk population). These lands also contain abundant food sources, few predators, and elk productivity is high under these circumstances. Shoulder seasons, which began in the 2016 hunting season, have increased the average number of antlerless elk harvested the last few years, but harvest of antlerless elk is still insufficient towards meeting management objectives.

Based on hunter effort data, an average 700 hunters who drew the 900-20 archery permit chose to hunt either HDs 411 or 412 (Table 3). The 900-20 averaged 78% draw odds overall (landowner, resident, non-resident), and 90% draw odds for residents. Hunter effort data from Table 3 indicates that at least for residents, draw odds should be close to or meet 100% if the same people that choose to hunt these districts year to year apply for the 411-21 permit.

Multiple iterations of elk shoulder seasons currently exist across the Snowy Mountains and HD 412. This proposal greatly simplifies shoulder season structure by keeping season dates consistent across all LPTs and districts. The



assorted Elk B Licenses also have similar season structures (i.e., General License structure is the same for 411, 412, and 535, 004-00/005-00 season structures are the same, etc.).

# Permits offered	HD	# Elk Archery Hunters				
		2015	2016	2018	2020	Average
3700-4000 <sup>1</sup>	411	421	467	564	732	546
	412	154	125	171	165	154
	<b>411/412</b>	<b>575</b>	<b>592</b>	<b>735</b>	<b>897</b>	<b>700</b>
	511	41	52	59	81	58
	530	146	180	238	228	198
	<b>Snowies only</b>	<b>762</b>	<b>824</b>	<b>1032</b>	<b>1206</b>	<b>956</b>

<sup>1</sup> Valid in 21 total HDs, including HDs 411, 412, 511, and 530.

**Figure 1:** Table 3. Elk Archery Hunter Participation, 2015-2020.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Earlier in this process, in order to simplify regulations by reducing the number of HDs and LPTs, one potential proposal brought forward for public scoping was to eliminate HD 412, combining it with HDs 419, 417, and 426. Elk move between the Moccasins in HD 412 into the Judith River breaks of HD 426, as well as between the Judith Mountains of HD 412 into Armells Creek of HD 417. Some, but very little movement of elk occurs between the Snowies (HD 411) and Judiths. Additionally Region 5 combined several of their HDs and changed their archery regulations, with the Bull Mountains and southern Snowy Mountains keeping their limited archery permits while the remainder of the region moved to general, either-sex archery opportunity. The region proposed two separate permits, one for the Snowies (to include HD 411) and one for the Bull Mountains. After public scoping Region 5 made the determination to alter this proposal and include all limited-entry archery into one permit, which no longer tied with Region 4 objectives. Preliminary phone calls with local sportsmen in the Lewistown-area suggest that sportsmen prefer to keep the entire Snowy Mountain range together for archery, however, not if 411 would simply be rolled into a region-wide archery permit for Region 5. Their next preference was to keep 411 and 412 together, bundled into a smaller permit. In responding to these early public comments, it was thus necessary to remove HD 411 from proposed HD 535 as well as maintain HD 412 as an HD, managed for archery opportunity with HD 411.

For HD 411, there have been mixed comments related to archery and rifle permit numbers. Archers want to be able to draw a permit every year, but many sportsmen agree that the limited-entry nature of the permit structure should be maintained. Some landowners also agree, and some landowners/outfitters would prefer a general archery season. For landowners whose priority it is to draw an archery permit every year to hunt their lands, this is possible under landowner preference and would remain so with the current changes. For archery hunting, an average 11 resident and 11 non-resident landowners applied for the 900-20 across all 21 districts this permit was valid. With a landowner preference quota of 485, draw odds under landowner preference were always 100%, and again, this is not likely to decrease under this proposed change.

In addition to landowner preference, changes to the “454 Agreement” structure allows almost any landowner to apply for and receive an elk permit valid on their property. Thus, for archery and rifle permits, almost any landowner in either HD should now be able to receive an either-sex elk permit. For landowners along the Region 4/Region 5 boundary, if they are concerned about having to choose between archery hunting either district, they can still either apply for landowner preference for the rifle permit (411-20) and enjoy 60-100% draw odds, or apply for a rifle permit under the auspices of the 454 program and hunt both regions 4 and 5 during the archery and rifle seasons.

Regarding the HD 411 district split at Red Hill Road, much effort went into removing this “sub-boundary” during the 2020/2021 season-setting process. It was not in the 2020 or 2021 regulations, but misconceptions about the status of the herd and regulation language resulted in 2020 shoulder season changes to bring this split back into the fold. During the public scoping, landowners on the west end specifically addressed this, and emphasized wanting equal opportunity to managing elk on their properties as landowners east of Red Hill Road. Furthermore, despite some sportsmen concerns about the west-end elk segment being more vulnerable to overharvest and under-objective, this herd has been increasing in number each year and has been over objective since 2016.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts:** 441, Portion of 441

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

FWP proposes to change elk regulations in HD 441 for the Archery Season from Either-sex Elk to Brow-tined Bull or Antlerless Elk, and from Antlered Bull Elk to Brow-tined Elk in the Bob Marshall Wilderness Portion of HD 441. This hunting district has had a variety of season types since 1984, when either-sex elk hunting was allowed the first two weeks of the general hunting season, with antlered bulls for the remainder of the season. An antlered bull-only season was initiated in 1985. In 1986, bull harvest was allowed only in the National Forest portion of the hunting district with either-sex permits (10) valid in the entire area. This season type was continued until 1990, when antlered bulls were legal only in the Bob Marshall Wilderness portion of the HD with limited either-sex permits outside of the Bob Marshall Wilderness. These season structure for antlered elk has continued until 2021 with various number of either-sex permits valid outside the Bob Marshall Wilderness.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Regulation Simplification by align season types in adjoining HDs where biologically possible. The objective of this proposal is providing consistency for Region 4 elk HDs where elk harvest opportunity exists on a General Elk License that are adjacent to elk HDs in Region 1 or adjoining other elk HDs in Region 4 with a Brow-tined or Antlerless elk regulation.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Regulations Simplification effort. The success of this proposal will be determined by acceptance from the FW Commission and public.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The 2005 Montana Elk Management Plan describes the population objectives and season types for HD 441. For HD 441, the population management objective is +/- 20% of 500 (400 -600) observed elk. The Standard Regulation package call for maintaining antlered bull on a General License in the Wilderness Portion of HD 441 if the antlered bull to cow ratio is at least 15. The Elk Plan does not outline a Liberal Regulation package for antlered elk. The Restrictive Regulation package calls for limited permits for the entire HD if the antlered bull to cow ratio falls below 15. Recent surveys indicate the population is within objective (See HD 441 Chart) and the bull to cow ratio exceeds the threshold for the Standard Regulation package See (HD 441 Table).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposed change is based solely on the Regulation Simplification process.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Only one comment was received. The comment was opposed to Brow-tined Bull/Antlerless regulations anywhere in the state.

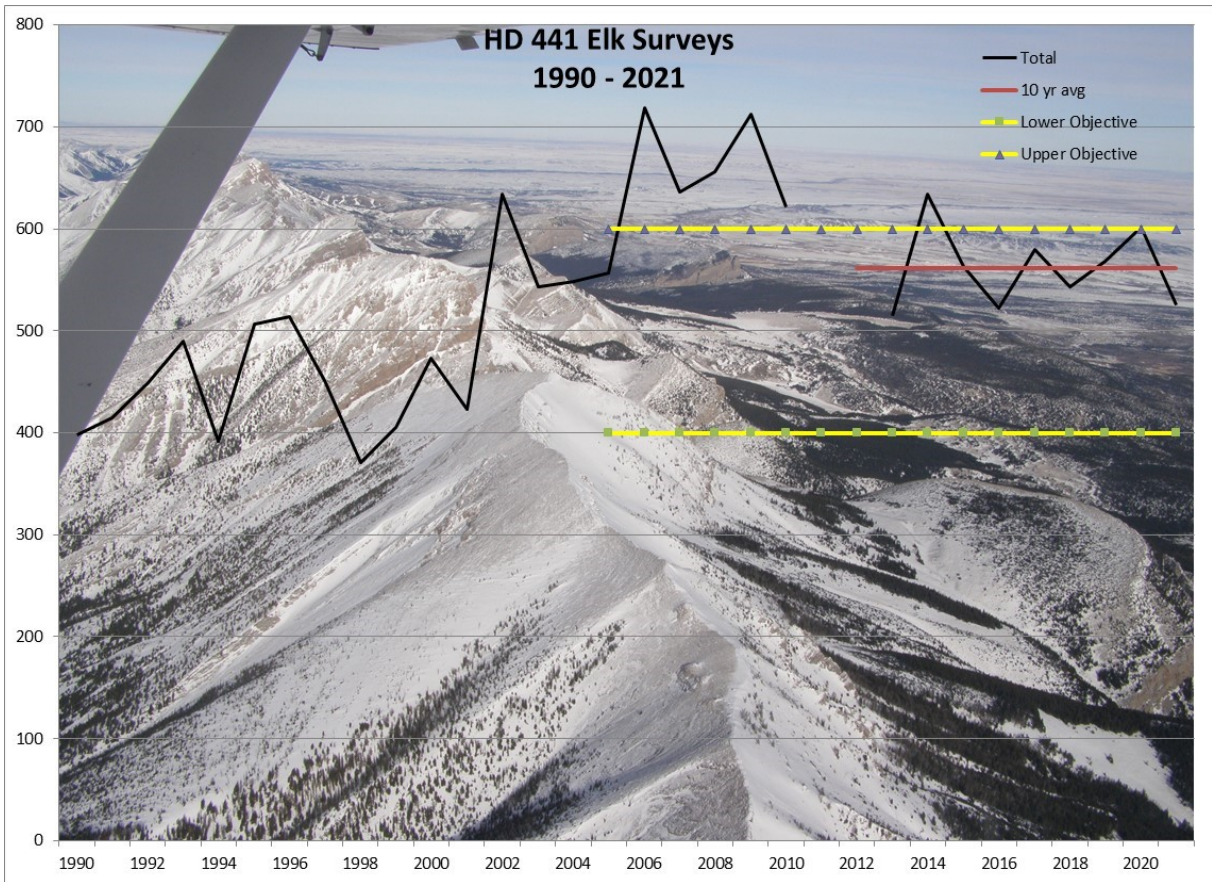


Figure 1: 2021 HD 441 Chart.

Maximum Elk Counts and Production Ratios, HD 441										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Suney Type
2/26/1990	398	28	7	21	258	90	20	35	11	G-P
1/3/1991	415	46	13	33			369			FW-C
3/12/1992	449						449			H-C
4/1/1993	490	61					429			FW-P
3/24/1994	392	71	42	29	60	16	245	27	80	FW-C
1/5/1995	507	38	35	3	33	13	423	39		H-C
2/16/1996	514	71	24	47	245	116	82	47	29	G-P
4/11/1997	451	41					410			FW-C
4/7/1998	371						371			H-C
4/3/1999	405	21	3	18	297	86	0	29	7	G-P
3/2/2000	473	82	67	15	37	13	341			H-C
3/20/2001	423	21		21	324	78		24	6	G-P
2/25/2002	634	46	40	6	36	5	547	14		FW-P
3/17/2003	543	39	18	21			504			H-C
2/11/2004	548	25	8	17	264	81	178	31		G-P
4/11/2005	557				66	11	480			H-C
2/25/2006	719	96	57	39	439	142	42	32	22	FW-C
3/15/2007	636	59	36	23	264	85	272	32		H-C
4/8/2008	656	145	107	38	390	121		31	37	H-C*
1/26/2009	712	**45	10	35	509	158	0	31		FW-P
3/15-16/2010	621	127	127							
2011										
2012										
3/26/2013	515						515			H-C
2/25/2014	634	63	46	17	196	67	313	34	32	FW-C
2/16/2015	563	58	19	39	371	134		36	16	FW-C
1/1/2016	522		30	42	222	113	112	52	32	FW-C
2/2/2017	580	88	69	19			492			FW-C
3/21/2018	543						543			RW-C
1/17/2019	568	86	62	24	388	94		22	24	FW-C
2/18/2020	602	109					493			FW-C
1/21/2021	525	61	28	33	331	133		40	18	FW-C

Figure 2: 2021 HD 441 Table.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 420 Es to BTB/A-**

**Hunting Districts:** 420

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk regulation. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts:** 403

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

FWP proposes to remove HD 403 from LPT 401-20 and change from Antlerless Elk to Either-sex Elk for both the Archery and General Season.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Regulation Simplification - The objective of this proposal is removing 2 LPTs from HD 403.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be determined by acceptance from the FW Commission and public.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The 2005 Montana Elk Management Plan describes the management objectives for HD 403. HD 403 is in the Golden Triangle EMU. Because more than 90% of the EMU is devoted to agricultural production, the management goal is to prevent permanent occupancy by elk because of landowner intolerance and to avoid certain game damage to agricultural crops. No population monitoring for elk occurs in this EMU.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposed change is based solely on the Regulation Simplification process.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

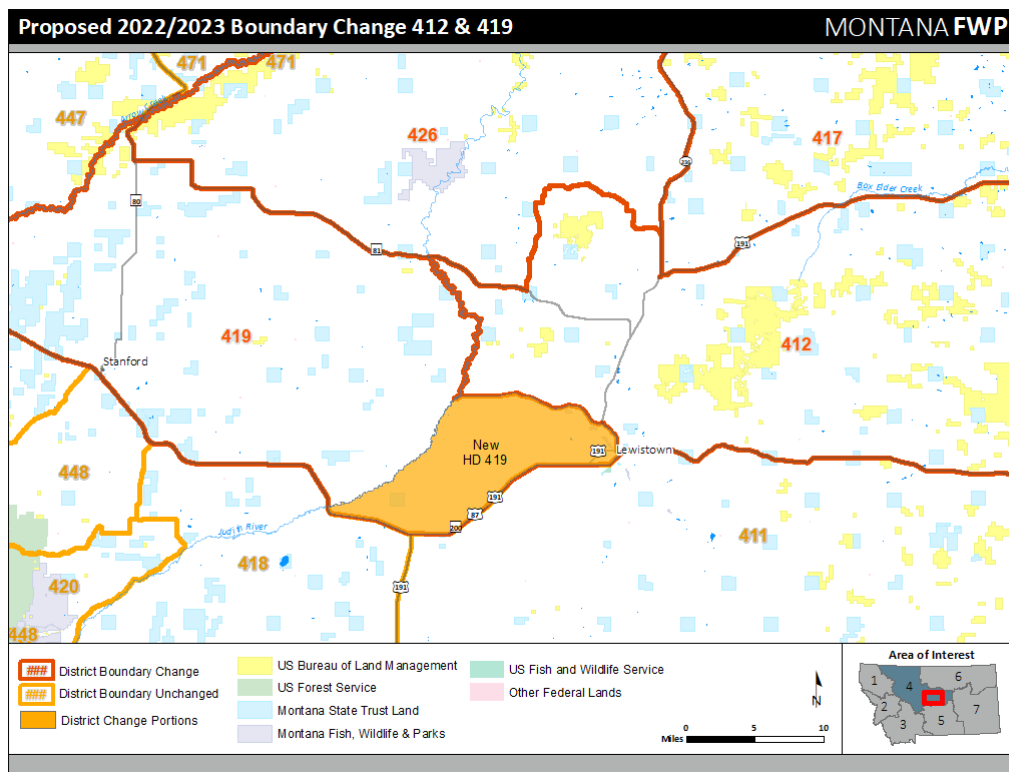
The draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Three comments were received. All were in support of the proposed change.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
HD 412/419 Boundary Change Deer/Elk/Lion**

**Hunting Districts:** 412, 419

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Change the boundary between HDs 412 and 419 such that the portion of HD 412 south of Hanover Road to Highway 200 would be absorbed by HD 419.



**Figure 1:** Map of proposed boundary change between HDs 412 and 419.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

With expanding elk populations across central Montana, moving the portion of HD 412 south of Hanover Road, primarily farmground, into HD 419 will reflect the similarities in habitat types between that area and HD 419.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

There are no real metrics of success associated with this proposal. It is more of a “housekeeping” proposal.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

N/A

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Wildlife and enforcement staff discussed this proposal and agree that it makes sense to move these boundary lines. Additionally, a version of this proposal was presented for public scoping and received positive feedback.



**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts:** 401

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

FWP proposes to remove HD 401 from LPT 900-20 and change the Archery Season from Antlerless Elk to Either-sex Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Guidance from the 2021 Regulation Simplification directs the department to eliminate and/or combine LPTs so there are fewer types where biologically possible. The department is proposing to eliminate the archery LPT 900-20 which allows successful applicants to hunt either-sex elk in several HDs including HD 401. Previously, archery hunters could only pursue antlerless elk on General License in HD 401. With the proposed elimination of LPT 900-20, the objective of this proposal is to allow either-sex elk hunting in HD 401 on a General License during the archery season only. This proposal would remove 1 LPT from HD 401. All other LPTs in HD 401 would remain unchanged. HD 401 was included in LPT 900-20 by the FW Commission in 2013.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Regulations Simplification. The success of this proposal will be determined by acceptance from the FW Commission and public.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The 2005 Montana Elk Management Plan describes the management objectives for HD 401. The population management objective for HD 401 is +/- 20% of 350 observed elk (280 – 420). The management objective for antlered elk is maintaining an antlered bull to cow ratio of at least 15 bulls per 100 cows. The Liberal and Standard regulation packages call for maintaining a six-week either-sex archery season while the Restrictive Regulation package requires limited archery permits for both antlered and antlerless elk. The most recent complete population survey (1/29/2020) in HD 401 had 511 observed elk indicating the population is above objective (See HD 401 Chart). That same year, the bull to cow ratio was 18 bulls per 100 cows, exceeding the Standard Regulation package of 15 bulls per 100 cows (See HD 401 Table). The most recent survey (1/16/2021) was only a partial survey.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposed change is based primarily on the Regulation Simplification process to eliminate LPTs, in this case LPT 900-20.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Most comments were in favor of the proposal. Some comments were received about potential increased archery hunting pressure. However, the LPT 900-20 success

rate was over 85% for residents in 2021 and 95-100% previously indicating this limited permit did not limit residents. On average, approximately 93 elk archery hunters hunt HD 401 per year. Some landowners have expressed an interest in archery hunting elk on their own land without having to sacrifice the opportunity to apply for limited permits in other districts.

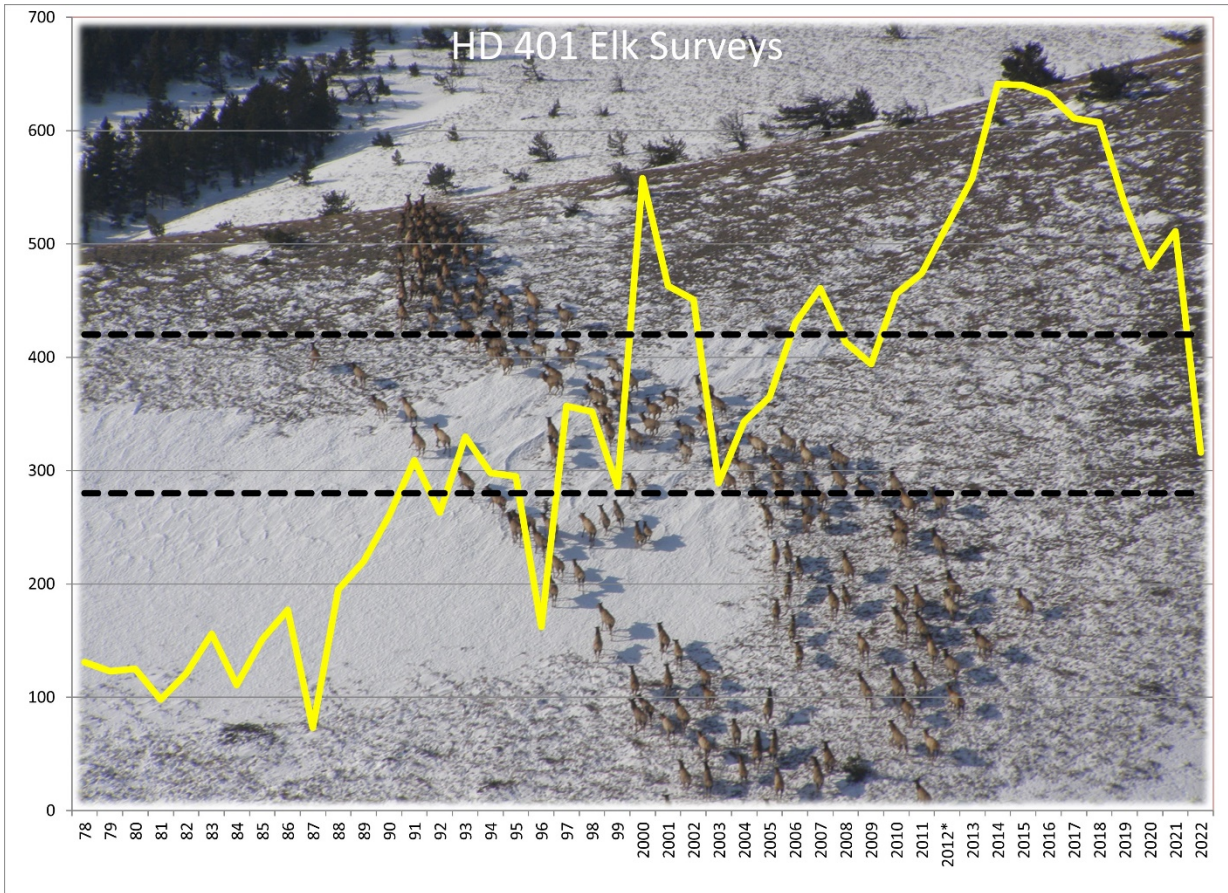


Figure 1: 2021 HD 401 Chart.

Maximum Winter Elk Counts and Production Ratios, HD 401										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Survey Type
11/21/1978	131	14			83	34	0	41	17	FW-C
4/2/1979	123						123			FW-C
1/29/1980	125	11	4	7	78	36	0	46	14	FW-C
1/14/1981	98	7	6	1	70	21	0	30	10	FW-C
3/26/1982	121	5	1	4	92	24	0	26	5	FW-C
1/15/1983	156	22	12	10	56	22	57	39	39	RW-C
5/1/1984	111	10			82	19	0	23	12	RW-C
1/7/1985	151	23	1	7	38	10	80	26		RW-C
3/3,3/13/86	177	16	6	10	74	29	58	39	22	RW-P, G-P
2/27,3/12/87	73	16	6	10	42	15	0	36	38	G-P, G-P
6/21,7/7/88	195	11	2	3	124	60	6			G-P, G-P
4/13,4/21/89	220	7	0	7	98	35	80	36	7	FW-P, G-P
2/27/1990	260	34	8	26	58	20	148	34		FW-C
3/13/1991	309						309			FW-C
3/9/1992	263	16	5	11			247			FW-C
1/18/1993	330						330			FW-C
4/27/1994	298	29					269			FW-C
3/7/1995	295	31	13	18			264			FW-C
1/12/1996	162	23	23	0	2		137			RW-C
1/14/1997	357	30	28	2	2		325			RW-C
3/24,4/2/98	352	55	14	41	174	110	13	63	32	G-P, G-P
3/24/1999	286	35	2	33	152	99	0	65	23	G-P
1/12/2000	558	8	8				550			RW-C
4/19/2001	463	13					450			FW-P
4/26/2001	147	6			92	49		53		G-P
4/30/2001	168	8			107	53		49		G-P
1/27/2002	426						426			RW-C
3/21/2002	451						451			FW-C
7/25/2002	332						332			FW-C
1/6/2003	289	14	13	1			275			RW-C
2/3/2004	343						343			FW-P
2/26/2005	365	27					338			FW-P
1/19/2006	430	51	15	13	114	38	227	33		RW-C
1/13, 2/24/07	461	33	21	12	128	48	252	38		RW/FW-C
1/16/2008	413	50		50	258	100	5	39		FW-C
2/17/2009	394	49	4	45	263	82	0	31		FW -C
2/3/2010	456	27	0	27	309	113	7	37		FW -C
1/11/2011	474	54	7	47	299	112	9	37	18	FW-C
1/22/2013	558	77			374	107	0	29	21	RW-C
1/23/2014	641	70	9	61	397	174		44	18	FW-C
12/4/2014	640						640			FW-C
12/23/2015	632	14					618			FW-C
1/10/2016	611	63			373	175		47	17	FW-C
1/3/2017	570	18	18				552			FW-C
1/11/2017	607	88	10	78	349	170		49	25	RW-C
12/31/2017	530							37	20	FW-C
1/21/2018	535									RW-C
12/26/2018	470									FW-C
1/14/2019	480									RW-C
1/29/2020	511	51	19	32	281	119	60	42	18	RW-C
1/16/2021	316						316			RW-P

FW= fixed wing, G= ground, RW= Rotary Wing, P= partial survey, C= complete survey

Figure 2: 2021 HD 401 Table.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts:** 455

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposed change is to create hunting district-specific either-sex archery-only elk permits in HD 455. Presently HD 455 is a part of the 900-20 archery elk permit bundle. Should the 900-20 archery elk permit bundle dissolve, these new archery-only elk permits would replace that opportunity. The 900-20 archery elk permit was implemented on the BTWMA in 2020 with public support. Prior to that either-sex elk archery hunting was an opportunity on the General License.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to continue to provide satisfactory levels of elk archery hunting opportunities in HD 455, and improve upon those opportunities when possible. Should the 900-20 permit bundle be removed, local biologists would make available 100 archery-only, either-sex elk permits valid only in HD 455 and establish a quota range of 50-150 permits. At this introductory level, the numbers of permits are expected to completely replace the opportunity presently provided. Going forward, annual adjustments to the number of permits available could be made through collaboration with local FWP biologists, landowners, and Devil's Kitchen and Beartooth WMA elk hunters to fine tune harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of the proposal could be measured by comparing the number of bulls harvested during the archery season, total number of bulls harvested both during the archery and rifle season, hunter and landowner satisfaction, and the ability manage for older age class bulls as is presently being done in HD 455 and neighboring HD 445.

Since 2015, about 31% of the elk hunters in HD 455 hunted during the archery season (average taken from years 2015, 2016, 2018 and 2020 when effort data is available). This equates to approximately 83 archery hunters on average. Approximately 8 bulls have been harvested annually during the archery season on average (data since 2015) suggesting the bull harvest success rate during the archery season is about 10%; which is similar to other districts within Region 4 (see HD 447). Improving hunter success and satisfaction using an analysis such as this could be done to assess the results of this change.

It should be noted that in 2020 fewer hunters archery-hunted in HD 455 likely because of the sudden switch to the 900-permit bundle and not recognizing the need for a permit. Likely only a little more than half the hunters that usually hunt the Beartooth WMA during the archery season hunted it in 2019 (49 hunters compared to an estimated 104 hunters in 2015, 75 in 2016, and 105 in 2018). It is estimated 90 to 100 people archery hunted the BTWMA to some degree in the years prior to the 900-bundle switch; reports of archery-hunter numbers increasing were becoming more common. Beginning with 100 archery permits in 2022, knowing that not all successful applicants may show up to hunt, should strike a balance between the general opportunity and the 900-permit bundle if the permit bundle is dissolve in Region 4.

Check station harvest data at the BTWMA in 2021 suggests 15 bull elk were harvested during the archery season this year. A 10% success rate on bull elk is expected by archery only permit holders who are able to hunt each year at least initially with this proposed change. Reevaluation of the rifle and archery permit quota ranges will remain ongoing.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Since 2016, area biologists have detected between 3460 and 4363 elk during winter surveys each year across both HD 445 and 455 known as the Devil's Kitchen Elk Management Unit, EMU. During 2016 an all-time high of 4363 elk were observed; but since then survey observations have declined. In 2021, 3460 elk were counted during the winter survey but 1915 were counted not too far into neighboring HD 446 (Big Belts EMU. It is likely about half of these elk are normally observed in HD 445/HD 455 but due to weather the elk moved into HD 446 at the time of the survey. Similar to the total count, the brow-tined bull count peaked in 2018 (890 bulls) but this number has since declined. In 2020 the brow-tined bull count was 467 which was unusually low. The bull count in 2019 and 2020 was considered low due to the difficulty observing bulls during the survey period likely due to warmer weather. Because survey observations as well as hunter and landowner feedback suggested bull numbers were low; the *rifle* permit numbers were decreased for the 2021 season (presently 50; quota range 50-75, rifle permits).

Regional FWP staff feel elk numbers are still at all time highs because harvest data suggests not enough antlerless elk are being harvested to drastically reduce population size. Devil's Kitchen elk frequently move between HD 445 and HD 455 (Beartooth WMA) and sometimes into small portions of HD 392, 413, and 446. During winter its not uncommon to observe half of the elk present in the EMU on the Beartooth WMA.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 455 is entirely public land encompassing the majority of the Beartooth WMA and the north portion of the Gates of the Mountains Wilderness. Either-sex elk permits are required to harvest bull elk during the rifle season. Elk B Licenses are required to harvest antlerless elk without an elk permit. This set of regulations was developed to maximize harvest of cow elk and provide excellent opportunities to harvest older age class bulls. Prior to the current set of regulations and also a recent set of seasonal road closure rules, increasing hunting pressure on the WMA commonly kept elk from using it until after the hunting season. Region 4 feels overcrowding on the WMA can impact elk harvest opportunities during the archery season, just as it has in the past during the rifle season. In 1992, the elk regulations in HD 445 were crafted by the Devil's Kitchen Working group with the goal of improving age diversity among bull elk. Multiple changes to the elk regulations in HD 455 soon followed leading to the ones we have today. Since then, the Beartooth WMA has become a premier elk hunting destination in Montana. Most sportsmen who've had the opportunity to hunt the WMA look forward to coming back.

Being apart of the Devil's Kitchen Elk Management Unit, both HD 445 and 455 are managed for older age class bulls. The WMA serves as a safe wintering area for elk after the rifle season closes and successfully relieves pressure from neighboring private lands.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal generated several comments during the scoping period. Almost 75% of the comments supported the change. A few of the comments were tied to another proposed change to include Whitetail Prairie into HD 455 (presently a portion of the Beartooth WMA is in HD 445). The majority of the comments for the change were tied to support for dissolving the 900-20 permit bundle. A comment or two against the change reflected concern over the possibility of difficult draw odds if permits are tied specifically to HD 455. At least one individual felt archery hunting should be made available on the General License with no permit and that past experiences, when that was the case, was satisfactory. It is thought neighboring landowners support the change. The Devil's Kitchen Working Group had no formal comment on this change.

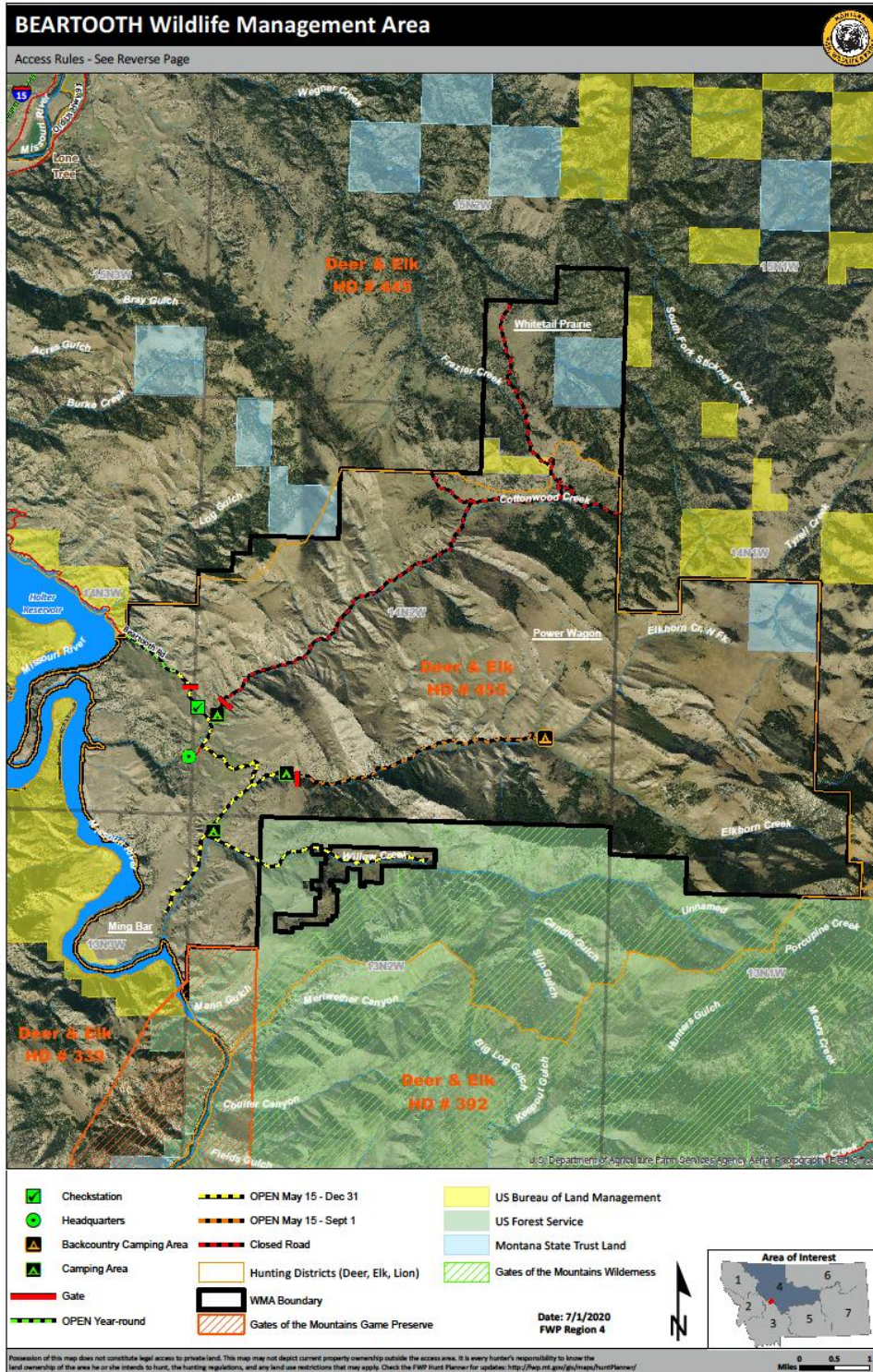


Figure 1: Beartooth Wildlife Management Area.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts: 447**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposed change is to create hunting district-specific either-sex archery-only elk permits in HD 447. Presently HD 447 is a part of the 900-20 archery elk bundle. Should the 900-20 archery elk bundle dissolve, these new archery-only elk permits would replace that opportunity.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to continue to provide satisfactory levels of elk archery hunting opportunities in HD 447, and improve upon those opportunities when possible. Should the 900-20 permit bundle be removed, local biologists would make available 300 archery-only elk permits valid only in HD 447 and establish a quota range of 100-400 permits. At this introductory level, the numbers of permits are expected to completely replace the opportunity presently provided. Going forward annual adjustments to the number of permits available could be made through collaboration with local FWP biologists, local landowners and Highwood Mountains elk hunters to fine tune harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of the proposal could be measured by comparing the number of bulls harvested during the archery season, hunter and landowner satisfaction, and the ability to manage for bull age diversity as is presently being done in HD 447.

Since 2015, about 29% of the elk hunters in HD 447, hunted during the archery season (average taken from years 2015, 2016, 2018 and 2020 when effort data is available). This equates to approximately 300 archery hunters on average. Approximately 30 bulls have been harvested during the archery season (since 2015) suggesting the bull harvest success rate during the archery season is about 10%. 13% of the bulls harvested were harvested by non-residents. Improving hunter success and satisfaction using an analysis such as this would be a goal following this change.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Since 2016, area biologists have detected between 1321 and 1828 elk during winter surveys each year. During 2016 an all-time high of 1828 elk were observed; but since then numbers have declined. In 2020, 1563 elk were counted during the winter survey. Similar to the total count, the brow-tined bull count peaked in 2016 (355 bulls) but has declined (e.g. the 2020 count was 310 brow-tined bulls).

While shoulder seasons have seemingly slowed the growth of the elk population, elk numbers are still over twice the objective set in 2005 at 700 elk. HD 447 presently has an early shoulder season beginning August 15th and a late shoulder season ending February 15th.

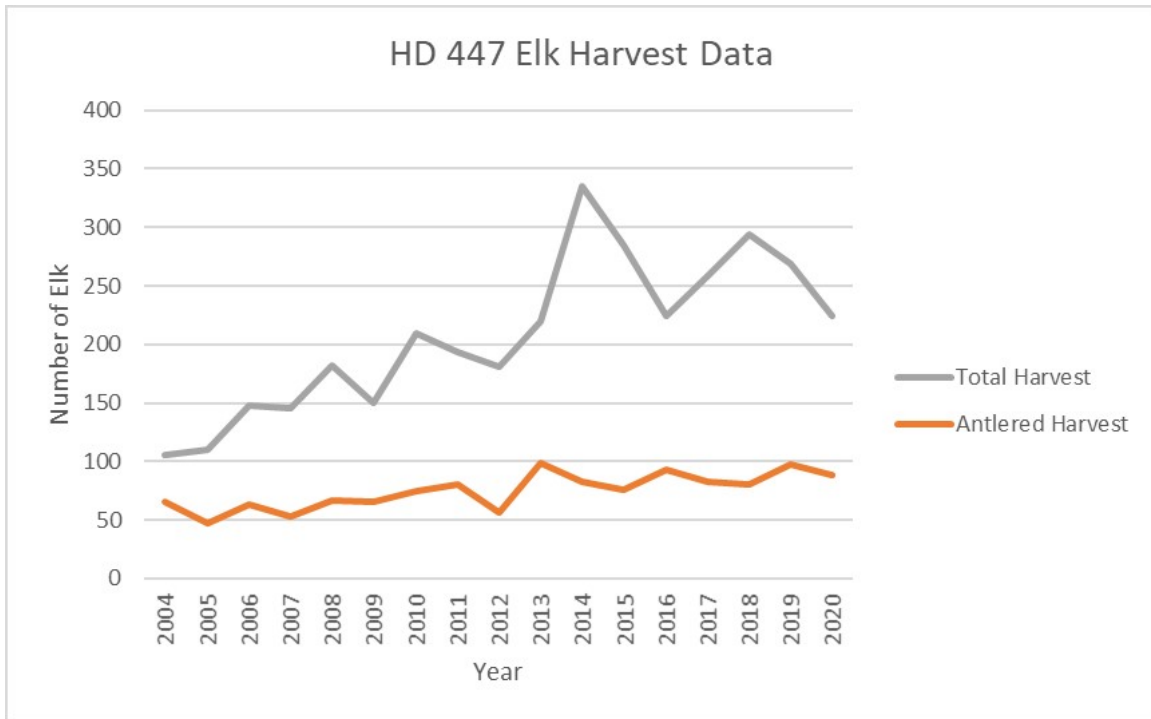


Figure 1: HD 447 Elk Harvest Data.

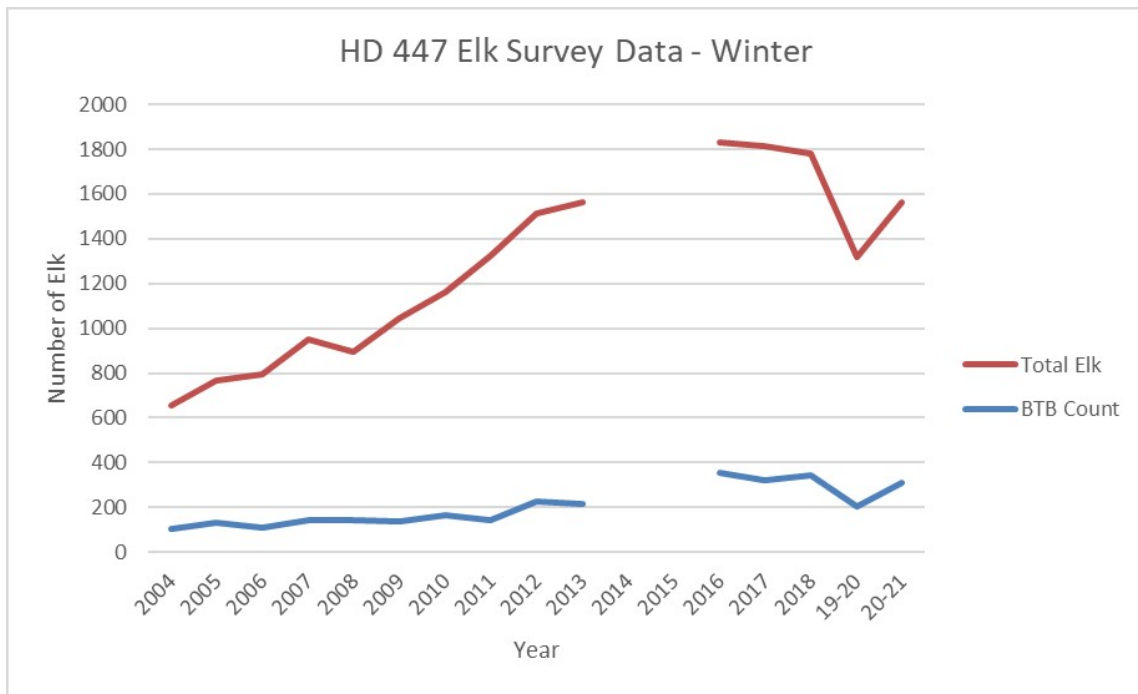


Figure 2: HD 447 Elk Survey Data – Winter.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

HD 447 is unique in that the Highwood Mountains are an island mountain range with a relatively small/large portion of the mountainous terrain being public land/national forest (approximately 55,000 acres). Much of the best elk habitat occurs on private land surrounding the Forest, albeit good elk hunting opportunities occur on the Forest as well. Nearly all of the elk winter range in HD 447 is privately owned. While a reasonably good number of



farm and ranch operations exist around the Highwoods and a good number of those landowners grant excellent public elk hunting opportunities, in particular for cow elk during the shoulder seasons; some hunters find gaining access to private land difficult, especially when hunting bulls. Some outfitting occurs, some leasing occurs, some properties simply do not allow hunting while others do. The district presently has one Block Management Area and one Conservation Easement that provide elk hunting opportunities. Public hunters are encouraged to explore the National Forest, visit with private landowners, build relationships and ask politely to hunt for elk on private land in HD 447.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Given the nature of this year's season setting process, little local outreach has been made to fully collect feedback from landowners and sportsmen. With that being said, surprisingly very little comment was received during this year's scoping comment period. Three individuals commented for the change, four individuals commented against the change.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 416 and 454**

**Hunting Districts:** 416

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal would combine current Deer/Elk hunting districts 416 and 454 into a single new hunting district 416. Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to simplify the hunting regulations by reducing the number of Deer/Elk hunting districts.

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts.

Secondarily, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured by the extent to which hunting regulations are simplified.

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Current HDs 416 and 454 have identical Deer/Elk regulations and are physically adjacent. Both historic survey data and population objectives can be combined without hindering future management of the new, expanded, hunting district. Current HD 416 has been over the 2005 Elk Plan objective since the objective was first implemented. Current HD 454 winter elk counts are variable, but observed elk in that hunting district are generally within or slightly above the 2005 Plan objective.

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change should not affect opportunity, land use, habitat, or wildlife monitoring.

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts' elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released to the public for initial review. No significant comment has been received to date.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 418 Elk ES to BTB/A-**

**Hunting Districts:** 418

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 Elk HD 448 ES to BTB/A-**

**Hunting Districts:** 448

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 453 ES to BTB/A-**

**Hunting Districts:** 452

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 417/426 Boundary Change Deer/Elk/Lion**

Hunting Districts: 417, 426

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Change the boundary between HDs 417 and 426 such that the portion of HD 426 north and east of PN Bridge Road to Stafford Ferry would be absorbed by HD 417.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposed change is to simplify the legal descriptions of the above HDs by reducing the number of junctions and keeping boundaries to highways, major rivers, and routes. Additionally, the boundary change between HDs 417 and 426 will better reflect elk movements and distribution in the northeastern corner of HD 426/northwestern corner of HD 417.

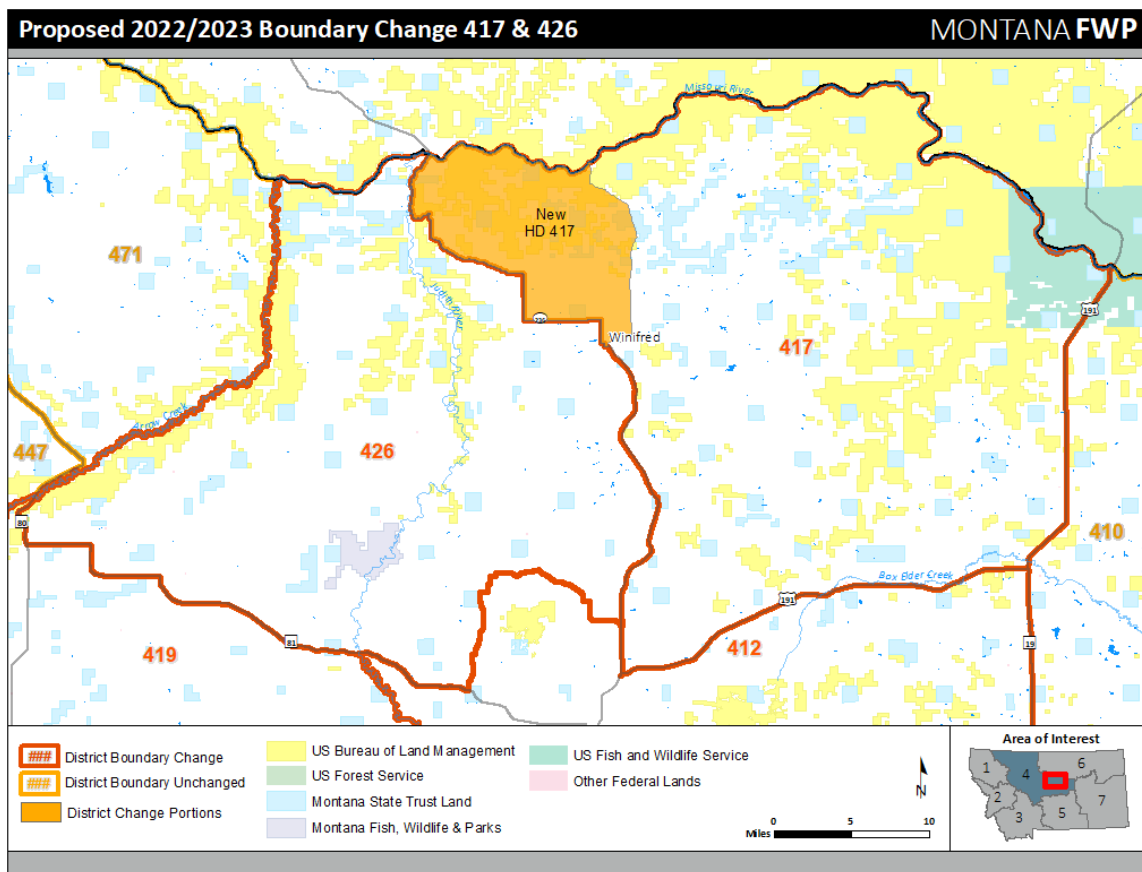


Figure 1: Proposed new boundaries for HDs 417 and 426.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

There are no real metrics of success associated with this proposal. It is more of a “housekeeping” proposal.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

N/A

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Wildlife and enforcement staff discussed this proposal and agree that it makes sense to move these boundary lines. Additionally, a version of this proposal was presented for public scoping and received positive feedback.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**

**Hunting Districts:** 445/455

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposed change is to incorporate the Whitetail Prairie Addition (~2,840 acres) of the Beartooth WMA (35,174 acres total) into HD 455 which also includes the Beartooth WMA. When FWP purchased the property in 2014, the existing HD 445/455 hunting district boundary was described as a fence line around the north end of the Beartooth WMA proper, south of the newly acquired Whitetail Prairie Addition. After the purchase, the old “boundary fence” was removed and a new boundary fence was constructed around the Whitetail Prairie Addition making it reasonable to now consider changing the hunting district boundary so the Beartooth WMA is all one single unit. Prior to the Whitetail Prairie Addition, the HD 455 boundary was the “fenced boundary” of the WMA on the east, north and west ends of the WMA.

HD 445 and HD 455 presently have different deer and elk regulations; meaning across the Beartooth WMA, there are two sets of regulations in place for managing deer and elk. In HD 455, an elk permit is required to harvest a bull elk during both the archery and rifle seasons. Without a permit, a WMA-specific Elk B License is required to harvest an antlerless elk. In HD 455, a hunter may harvest any white-tailed deer on the General License during the archery seasons, but a permit is required harvest a mule deer buck or any white-tailed deer during the rifle season. In HD 445 hunters may harvest any elk on the General Elk License during the archery season. They may also harvest any elk on the General License during *only* the first two weeks of the rifle season. A permit is needed to harvest a bull elk during the last three weeks of the rifle season in HD 445. Antlerless elk harvest is allowed on the General License throughout the season, including early and late shoulder seasons and with a 004 Elk B License, not valid on the WMA. An either-sex, either species deer opportunity exists on the General License presently in HD 445.

The regulations in both hunting districts have been finely tuned over the years to manage for older age class bull elk, maximize antlerless elk harvest across both districts, reduce game damage on private lands, and strike a balance between public and private land access across both hunting districts. Since the purchase of the Whitetail Prairie Addition an increasing number of hunters have begun traveling through HD 455 to take advantage of the different opportunities. The existing regulations complicate the hunting regulations not necessarily *between* HD 445 and 455 but on the Beartooth Wildlife Management Area specifically.

New HD 455 Boundary: Beartooth Wildlife Management Area

*Those portions of Cascade and Lewis and Clark Counties lying within the following-described boundary: Beginning at the mouth of Meriwether Canyon on the east side of the Missouri river, then northeasterly up the Meriwether Canyon-Mann Gulch divide to the Meriwether Canyon-Willow Creek divide, then northeasterly along said divide to Willow Mountain, then southeasterly along Slip Gulch-Meriwether Canyon-Big Log Gulch divide to Bear Prairie, then northeasterly along Candle Gulch-Hunters Gulch divide to Candle Mountain, then easterly along Willow Creek-Hunters Gulch-Moors Creek divide to Moors Mountain, then northeasterly along the Willow Creek-Elkhorn Creek-Porcupine Creek divide to the posted Beartooth Wildlife Management Area boundary, then east along said boundary to the east boundary fence of the Beartooth Wildlife Management Area near Hump Cabin, then north and west along said WMA boundary fence to Holter Lake, then southerly up said lake and the east shore of the Missouri River to the mouth of Meriwether Canyon, the point of beginning.*

Old HD 455 Boundary: Beartooth Wildlife Management Area

*Those portions of Cascade and Lewis and Clark Counties lying within the following-described boundary: Beginning at the mouth of Meriwether Canyon on the east side of the Missouri river, then northeasterly up the Meriwether Canyon-Mann Gulch divide to the Meriwether Canyon-Willow Creek divide, then northeasterly along said divide to Willow Mountain, then southeasterly along Slip Gulch-Meriwether Canyon-Big Log Gulch divide to*

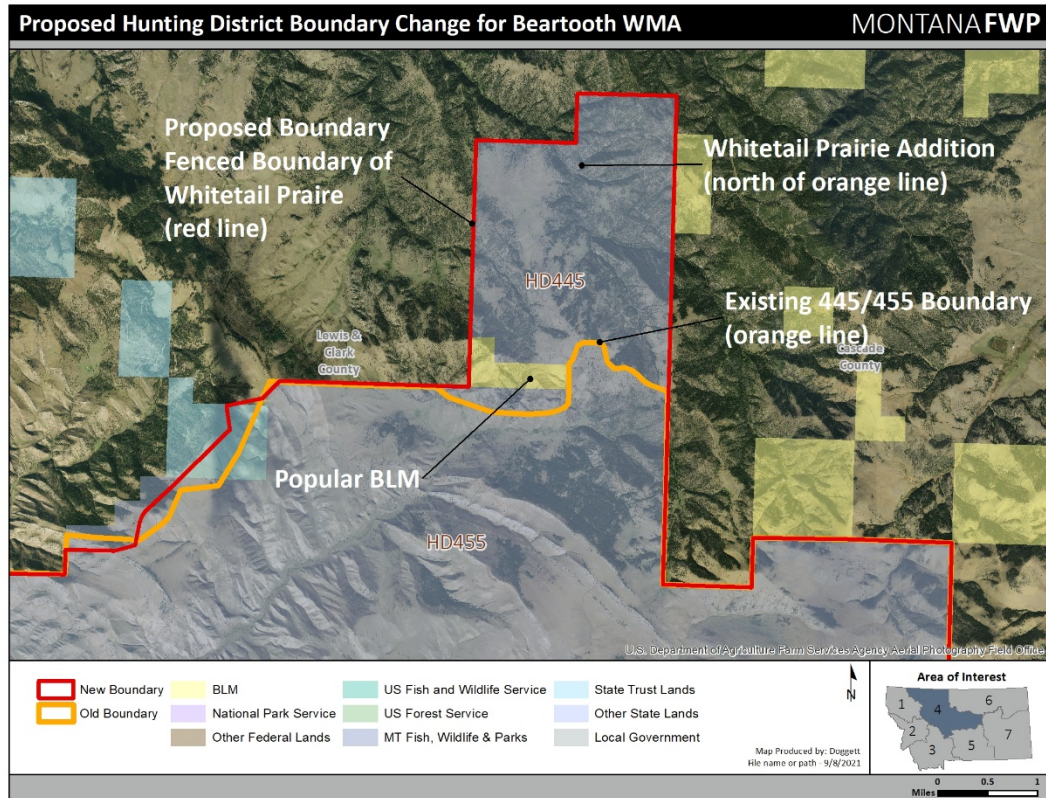
*Bear Prairie, then northeasterly along Candle Gulch-Hunters Gulch divide to Candle Mountain, then easterly along Willow Creek-Hunters Gulch-Moors Creek divide to Moors Mountain, then northeasterly along the Willow Creek-Elkhorn Creek-Porcupine Creek divide to the posted Beartooth Wildlife Management Area boundary, then east along said boundary to the east boundary fence of the Beartooth Wildlife Management Area near Hump Cabin, then north and west along said boundary fence, ~~or posted HD boundary~~, to Holter Lake, then southerly up said lake and the east shore of the Missouri River to the mouth of Meriwether Canyon, the point of beginning.*

New HD 445 Boundary: Hound Creek

*Those portions of Cascade, Lewis and Clark, and Meagher Counties lying within the following-described boundary: Beginning at Ulm, then southeasterly down the south bank of the Missouri River to the mouth of the Smith River, then southerly up the west bank of said river to the mouth of Two Creek, then westerly up said creek to the divide between Trout Creek and Black Canyon/Rock Creek, then westerly along said divide to the Hound Creek-Rock Creek divide then westerly along said divide to the Beaver Creek-Hound Creek divide (Meagher and Lewis and Clark County line), then westerly along said divide to the posted Beartooth WMA boundary fence near Hump Cabin, then north and west along said WMA boundary fence, to Holter Lake, then down said lake and the east bank of the Missouri River to the Missouri River Bridge in Cascade, then west and north through Cascade to the Interstate 15 interchange, then northeasterly along said interstate to Ulm, the point of beginning.*

Old HD 445 Boundary: Hound Creek

*Those portions of Cascade, Lewis and Clark, and Meagher Counties lying within the following-described boundary: Beginning at Ulm, then southeasterly down the south bank of the Missouri River to the mouth of the Smith River, then southerly up the west bank of said river to the mouth of Two Creek, then westerly up said creek to the divide between Trout Creek and Black Canyon/Rock Creek, then westerly along said divide to the Hound Creek-Rock Creek divide then westerly along said divide to the Beaver Creek-Hound Creek divide (Meagher and Lewis and Clark County line), then westerly long said divide to the posted Beartooth WMA boundary fence near Hump Cabin, then north and west along said WMA boundary fence, ~~or posted HD boundary~~, to Holter Lake, then down said lake and the east bank of the Missouri River to the Missouri River Bridge in Cascade, then west and north through Cascade to the Interstate 15 interchange, then northeasterly along said interstate to Ulm, the point of beginning.*



**Figure 1:** Proposed Changes on the Beartooth WMA.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The primary objective is to simplify the regulations and the hunting district boundary on the Beartooth WMA.

Regardless of which hunting district the Whitetail Prairie Addition is in, the harvest prescription in HD 455 can be adjusted to manage both hunters and wildlife appropriately; however, management would be easier to understand and change in the future, if the Beartooth WMA was all in one hunting district.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

If the proposal is accepted, the results would be simplified hunting regulations on the Beartooth Wildlife Management Area (HD 455).

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk:

The greater Devil’s Kitchen elk herd which spans multiple hunting districts, primarily HD’s 445 and 455, is well above the objective of 2,200 elk. Total counts since 2016 have ranged from 3,460 to 4,363 elk. During winter and after the hunting season is closed, it’s common for about half the elk in the EMU to be on the Beartooth WMA most of the remaining winter. During the hunting season elk use of the WMA is conditional upon weather. Active elk GPS collar data from collared cow elk show many elk make multiple trips across the EMU from the Smith River to the Missouri River annually. A common elk corridor cuts through the Beartooth WMA across Cottonwood Creek, the popular pathway for hunters headed to the Whitetail Prairie Addition.

The Devil's Kitchen Chapter of the Elk Management Plan which includes both HD 445 and HD 455 describes objectives for managing for older age class bull elk. Recently, there has also been a growing emphasis on the harvest of antlerless elk. The opportunities on the Beartooth WMA (HD 455), have been crafted to maximize the harvest of antlerless elk while at the same time acceptably limit the harvest of bull elk. Past management on the WMA has shown that high hunting pressure on the WMA can reduce antlerless elk harvest. Since the elk population is over objective and game damage occurs on neighboring private land, allowing elk to move onto the WMA for harvest is a priority for FWP. For bull elk, allowing HD 455 either-sex permit holders to hunt the Whitetail Prairie Addition, if this proposal is accepted, could spread out hunting pressure over HD 455 while at the same time continue to maximize hunter opportunity, for both bulls and cows.

Deer:

Limited entry deer permits were implemented in 1992 for both mule and white-tailed deer. The small size of the hunting district, competition with elk and white-tailed deer, and habitat availability in the area are factors affecting mule deer management in this hunting district. Permit-only mule deer hunting for the entire general rifle and archery seasons has been driven by the overwhelming presence of elk and numbers of elk hunters in the district. The hunting district does not support large numbers of mule deer, so the opportunity for substantial harvests of older bucks is minimal. The stated objective of 50% of harvested bucks 4 point or greater is normally met on an annual basis. However, the objective  $\geq 20$  bucks:100 does post-season is met less frequently mainly due to lack of consistent post season survey data. Harvest success is generally high, with harvest being split between mule and white-tailed deer.

HD 445 and HD 455 have become well known for the opportunity to harvest an older age class bull elk, mule deer and white-tailed buck. Since public access is so to speak restricted in both districts, hunters are taking advantage of the opportunities in the Whitetail Prairie Addition (primarily elk hunting opportunities). If all of the WMA was within HD 455, FWP could more simply adjust the quotas and regulations when improvements are desired.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Elk:

The current proposal is difficult not only for the HD 455 B License holders without a bull permit, who can still technically harvest a bull and a cow on the Beartooth WMA (i.e. hunt bulls in the Whitetail Prairie Addition the first two weeks of the rifle season and cows the rest of the season in HD 455); but also for those hunters who are regularly unsuccessful in drawing either the HD 445 or 455 either-sex rifle permits, (drawing odds are about 5-10% for either-sex elk permits).

While FWP feels HD 445 and HD 455 permit holders appreciate limited access to older age-class bulls, the HD 455 permit holder could experience reduced permit numbers in HD 455 to account for greater harvest in the Whitetail Prairie Addition, if bull harvest continues to increase, making drawing the permit even more difficult.

Many hunters do not understand that in HD 455, the permits and B Licenses were put in place largely to control overcrowding, enhance harvest success of antlerless elk, and manage for older age class bulls. In HD 445, the permits were put in place not only to grow older age class bulls, but also to provide the public an opportunity to draw a permit and hunt bull elk on private lands in a limited fashion. Private landowners presently allow HD 445 elk permit holders an opportunity to harvest a bull elk during the last three weeks of the season.

Although adding the Whitetail Prairie Addition to HD 455 removes an opportunity for a hunter to harvest a bull on the General License where older age class elk exist, leaving things as is would continue to add complexity to an already unique set of regulations.

Deer:

Mule deer numbers are presently below the long-term average and the number of HD 455 permits reflects this status. Presently, HD 455 deer permit holders are restricted to hunting mule deer bucks in HD 455 only. Occasionally, older whitetail bucks are harvested in the Whitetail Prairie Addition.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has generated a significant number of comments compared to other proposals in the region. Nearly all comments were directed towards elk hunting on the Beartooth WMA. Comments were mixed, with some in favor of the change and some strongly against the change. Because of the attention it is receiving, Region 4 recommends moving the proposal forward to the commission and possibly another public comment period.

The Devil's Kitchen Working Group which includes a mixture of private landowners, sportsmen and agency personnel has been influential in crafting the elk regulations in both districts over the years, in particularly in HD 445. The group supports keeping the general elk regulation structure the same in HD 445, either-sex elk the first two weeks on the General License and permits for bulls the last three weeks.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022**

**Hunting Districts:** 415

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

FWP proposes to change elk regulations in HD 415 from Either-sex Elk to Brow-tined Bull or Antlerless Elk for both the Archery Season and General Season.

HD 415: Elk season in this HD has varied. For some time prior to 1990, the season was 1 week either-sex elk, 4 weeks antlered bull elk. For 1991 and 1993, the season was 2 weeks either-sex elk and 3 weeks antlered bull. The season returned to 1 week either-sex elk and 4 weeks antlered bull until 2014 when the season changed to either-sex elk for the entire season until the present.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Guidance from the 2021 Regulation Simplification directs the department to align season types in adjoining HDs where biologically possible. The objective of this proposal is providing consistency for Region 4 elk HDs where elk harvest opportunity exists on a General Elk License that are adjacent to elk HDs in Region 1.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Regulations Simplification. The success of this proposal will be determined by acceptance from the FW Commission and public.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The 2005 Montana Elk Management Plan describes the population objectives and season types for HD 415.

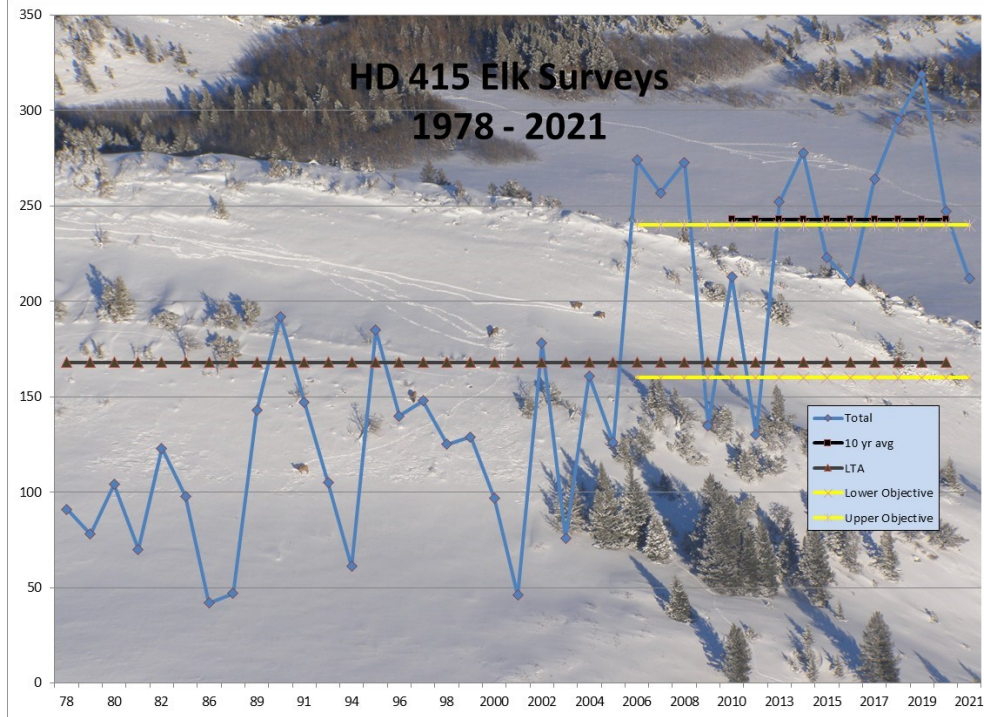
For HD 415, the population management objective is +/- 20% of 200 (160 -240) observed elk. In the most recent survey (2021), the observed number of elk are within objective. Previous surveys indicate the population varied between over and within objective (see HD 415 Chart) but is currently within objective. The Standard Regulation for antlered elk is at least 15 bulls per 100 cows are observed post-season. The most recent survey (2021) indicates 47 bulls per 100 cows (see HD 415 Table).

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposed change is based solely on the Regulation Simplification process.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Two comments were received. One comment was opposed to hunting antlerless elk in HD 415 and another comment was opposed to Brow-tined Bull/Antlerless regulations anywhere in the state.



**Figure 1: 2021 HD 415 Elk Chart.**

Maximum Winter Elk Counts and Production Ratios, HD 415										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Survey Ty
11/20/1978	91	14			35	16	26	46	40	FW-P
4/25/1979	78					18	0			FW-P
12/28/1979	104	7	5	2	40	22	35	55	18	FW-P
3/13/1981	70	3					67			H-P
2/22/1982	123	8	0	8	90	25	0	28	9	FW-P
3/15/1985	98	6	1	5	61	28	3	46	10	G-P
3/5/1986	42				27	10	5	37		H-P
2/9/1987	47				37	6	4	16		FW-P
4/7/1989	143	16	2	14	84	39	4	46	19	G-P
2/26/1990	192	11	5	6	89	22	70	25	12	FW-P
3/14/1991	147	11	5	6	70	35	31	50	16	G-P
4/1/1993	105				24	5	76			FW-P
4/29/1994	61						61			FW-P
3/7/1995	185	22	16	6	1		162			FW-P
3/6/1996	140	10	2	8	68	18	44	26	15	H-P
2/5/1997	148	13			57	20	58	35	23	FW-P
5/8/1998	125	16					109			FW-P
3/17/1999	129	17	9	8	86	26	0	30	20	H-P
3/4/2000	97	10	4	6	72	15	0	21	14	H-P
1/9/2001	46	2		2	35	9		26		H-P
2/25/2002	178	17	15	2	69	19		28	25	FW-P
2/24/2003	76						76			FW-P
3/11/2004	161	5	1	4	126	30		24		H-C
5/13/2005	126						126			FW-P
2/18/2006	274	28	15	13	89	31	126	35	31	FW-C
2/24/2007	257	19	8	11	151	54	3	36	13	FW-C
1/16/2008	77	2		2	21	4	50			FW-C
2/17/2008	273	20	20		12	1				FW-C
1/26/2009	135	31	18	13	76	22	3	34	41	FW-C
2/17/2009	264	13	6	7	121	37	93	30		FW-P
1/6/2010	213	19	11	8	134	42	18	31	14	FW-C
1/31/2011	130	45	42	3	67	18				FW-C
2/10/2011	201	7		7	152	42				FW - Carr
<b>Total 2011</b>	<b>331</b>	<b>52</b>	<b>42</b>	<b>10</b>	<b>219</b>	<b>60</b>		<b>27</b>	<b>24</b>	
2/14/2013	252	10			197	45		23	5	FW-C
2/25/2014	278	19	13	6	204	55		27	9	FW-C
2/16/2015	223	10	3	7	149	64		43	6	FW-C
1/1/2016	210	10	2	8	112	56	32	50	5	FW-C
2/2/2017	264	30	22	8	165	69		42	18	FW-C
4/12/2017	226						226			FW-P
2/15/2018	295						295			FW-C
2/14/2019	319	60	52	8	183	49	27	27	33	FW-C
2/18/2020*	247	43	33	10	163	41	0	25	26	FW-C
2/12/2021*	212	54	45	9	115	43	0	37	47	FW-C

FW= fixed wing, G= ground, H= helicopter, P= partial survey, C= complete survey  
 \* Unable to locate 1 group of cow/calves

Figure 2: 2021 HD 415 Elk Table.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 444 Boundary Change**

**Hunting Districts:** 444 & 422

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Move east portion of HD 422 boundary to Highway 287. Move west boundary of HD 444 boundary to Hwy 287. Remove HD 444 elk shoulder season language and maintain all existing season deer/elk season types.

For HD 422, the general elk hunting season has been either-sex for at least the last 30 years. Beginning in 1999 and in response to consistent landowner requests for late hunting opportunity on late arriving elk, a fixed and pre-determined late hunt season structure was initiated. Starting at the end of December, twenty antlerless permits were valid each weekend for six weeks (120 total permits) in a portion of the hunting district. This structure was in place until the winter of 2002-2003 when all of 100 (permits were lowered) antlerless permits were made valid throughout the entire hunting district from the day after the general season ends through February 15. Beginning in 2006 the late season structure was eliminated as part of a statewide effort to close late season hunts and make the general season the priority to harvest elk. The 422 specific Elk B Licenses have remained in place, but have been limited to the normal archery/general season hunting period and valid the entire HD. Unlimited over-the-counter R4 B Licenses were made available beginning in 2003. These licenses became limited later on, but ultimately are currently still sold via surplus over the counter. Beginning in 2016/17, special late season (Jan. 1 – Feb. 15) ‘shoulder season’ hunting was established and specific to the regional Elk B License in accordance with the criteria adopted by FW commission in October 2015. Other special or spontaneous game damage hunts have been completed off and on during these same time periods. Beginning in 2018, general and Elk B Licenses were further liberalized to include the entirety of the late shoulder season. For the 2020 and 2021 seasons, shoulder seasons were reduced to focus harvest only in late summer (August 15 to the beginning of archery season) and January 1 – February 15.

For HD 444, the general elk hunting season has also been either-sex for at least the last 30 years. This HD does not normally have significant and/or consistent elk presence, perhaps best described as a transitory presence more than anything. This HD belongs to the Golden Triangle elk management unit (EMU) which has minimal management goals and population objectives due to the very sporadic and minimal nature of elk presence, although this is changing at least specific to HD 444 and further described in this proposal. The only regulation package identified in the elk plan pertains to a six-week either-sex archery season and a five-week either-sex general rifle season on the General Elk License. Unlimited over-the-counter R4 Elk B Licenses were made available beginning in 2003. Beginning in 2018, general and Elk B Licenses were also included in the shoulder season structure to assist in managing harvest as/if elk from HD 422 redistribute themselves during portions of the winter period into portions of HD 444. For the 2020 and 2021 seasons, shoulder seasons were reduced to focus harvest only in late summer (August 15 to the beginning of archery season) and January 1 – February 15.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Inclusion of HD 444 served to allow additional harvest opportunity as/if elk do ‘show up’ in immediately adjacent portions of this HD with respect to HD 422. Specifically, this area primarily is speaking to the southwest area of HD 444 just east of the Dearborn River area. Depending on winter weather conditions and hunting pressure, significant elk presence can occur in this area, thereby making them inaccessible to harvest based on current regulations. This change would move elk management in this area into one HD rather than be split between two HDs. Deer management would remain unchanged.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of this proposal will be measured by simplifying elk management in this broader context. This change would also remove the shoulder season LPTs from existing HD 444 regulations, thereby meeting the needs of the current direction to simplify and reduce regulation language. Ultimately, this will not affect elk management given the consistency in application of regulations as is currently prescribed.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The current elk plan for the Birdtail EMU calls for population level observations to be within 20% of 500 elk during post season aerial trend surveys. 2021 dedicated aerial winter surveys gave way to a minimum observation of just under 1,000 elk in this area. Elk populations within this EMU are currently above objective levels and have been for several years, albeit at much lower levels than they were 5-10 years ago.

HD 444 has no set population objectives given the lack of routine elk presence. As previously stated, only in recent years during the winter period are elk becoming more "common" in southwest portions of this HD. Given the significant amount of land in this HD that is devoted to agricultural production and certain damage potential of elk with regard to recreational potential, it is FWP's intent to prevent permanent occupancy of elk in this area.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The vast majority of wintering elk in these four HDs persist primarily on private lands. Some elk will be closely associated with private lands throughout the year (HD 422). Although a number of private properties entertain significant levels of hunting pressure during the general season, certain areas are either closed or mostly closed to hunting. This reality, as it creates relatively secure areas for elk to move into, will continue to limit potential gains any season adjustment stands to generate. Within HD 422, game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

Additionally, despite more recent hard winters (2018 & 2019), impacts on elk have been minimal. Late spring and summer vegetation growing conditions have also been relatively good during this time. Both of the latter factors have allowed for continued fair to good elk recruitment and survival from year to year.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Conversations and phone messages have been had or left with some of the landowners pertinent to this proposed change. It is generally felt that this proposed change will be welcomed and provide less confusion and added clarity to regulations specific to this area. Although not specifically addressed in this proposal, maintenance of the shoulder season regulation types in this area may also be met with some resistance, as has been the case since they were initiated. Although general acceptance, for now, of this season type has been maintained. With longer seasons does come added work to some degree (more telephone calls, hunter requests, etc.). Although it is also believed the reduction in shoulder season harvest opportunity that was initiated in 2020 has helped to limit impacts to those landowners and/or hunters that do not prefer these longer seasons.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 410 archery permit/license structure/quota**

Hunting Districts: 410, 417

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

For the upcoming 2022/2023 hunting seasons:

- Remove HD 417 from the 410-21 Elk Permit and 410-01 Elk B License (both Archery Only).
- Create a quota range on the 410-21 Elk Permit, with a minimum of 1000 and maximum of 1900, and lower the quota on the 410-21 Elk Permit from 1900 to 1500.

Language in the 2022 Montana Hunting regulations for Elk in HD 410 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 410 – Missouri River Breaks</b>						
<b>Elk Hunting by Drawing Only</b>						
Elk Permit: 410-20	Either-sex Elk	April 1	150	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 410-21	Either-sex Elk	April 1	1,500 <del>4,900</del>	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 410-00	Antlerless Elk	June 1	100	Sep 03-Oct 16	Oct 22-Nov 27	
Elk B License: 410-01	Antlerless Elk	June 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 410-02	Antlerless Elk	June 1	1000	Sep 03-Oct 16	Oct 22-Feb 15	Only valid south of Crooked Creek (Sacagawea River). Not valid on CIMR Refuge. Successful 410-02 license holders may use General Elk License to harvest 2 <sup>nd</sup> antlerless elk in the same area where the 410-02 is valid for the same duration the 410-02 is valid.

Figure 1.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

In order to simplify regulations by reducing the number of license-permit types (LPTs), one potential proposal brought forward for public scoping was to eliminate the 410-01 archery-only Elk B License, valid in HDs 410 and 417. Removing or keeping this LPT has no biological consequences; on average 32 antlerless elk/year are harvested in HD 410 on this LPT. Its removal on the other hand would result in a loss of hunting opportunity, particularly for archery hunters, and the public largely opposed this change during scoping. Alternatively, we propose to maintain this LPT, removing HD 417 (where it is redundant with additional general/004-00 license opportunity and therefore underutilized).

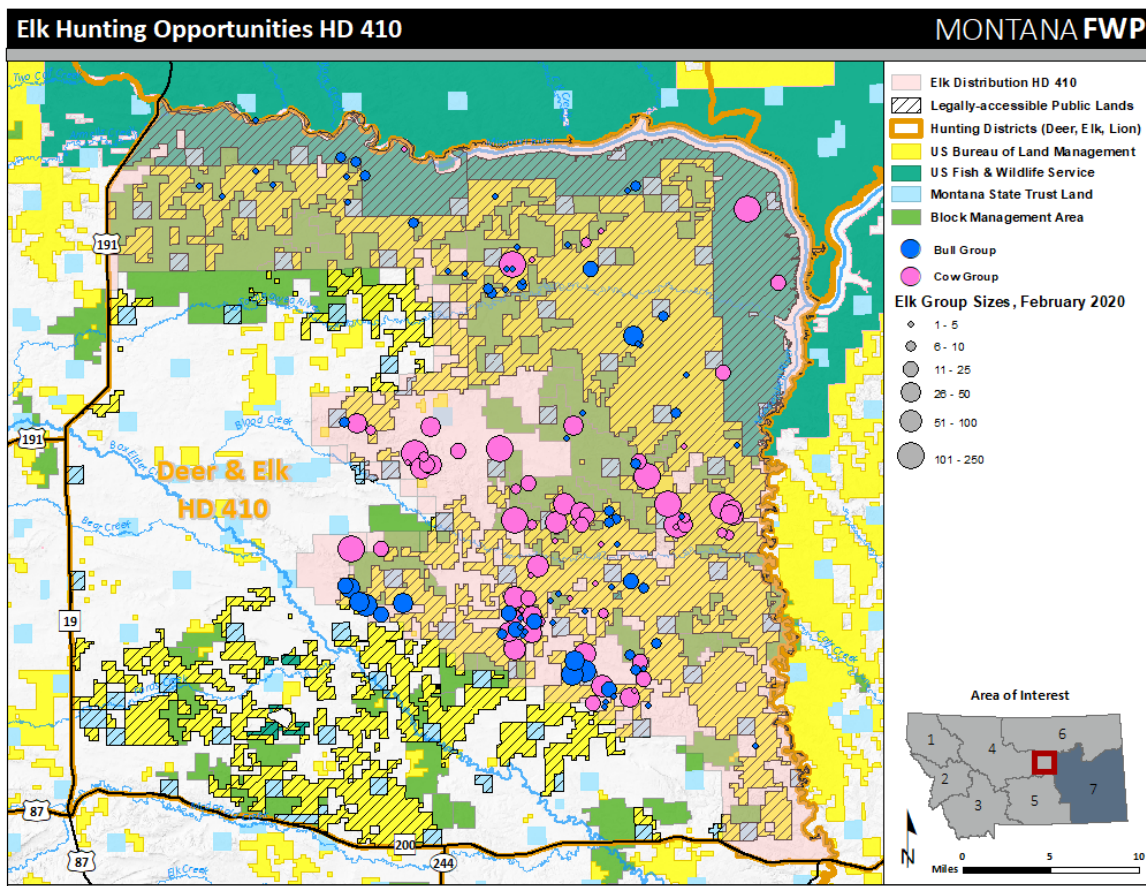
Proposed changes relative to the 410-21 elk permit are in part due to proposed changes occurring in nearby districts, primarily HDs 417 and 426, and to address public comment gathered during the public scoping period speaking to crowding issues in HD 410 during the archery season. Removing HD 417 from the 410-21 archery permit will reduce additional archery season pressure if the proposed archery structure changes involving HDs 417 and 426 occur (combining either-sex archery hunting for these districts into a single permit). While HDs 410, 417, and 426 are all considered part of the Missouri River Breaks Elk Management Unit (EMU), elk distribution and population size relative to objectives, the public-private land interface, access opportunities, and hunter pressure differ among the districts.

Approximately 79% of elk habitat in HD 410 is open to public hunting, whether it is legally accessible public land or currently land enrolled in MFWP’s Block Management Program. Additional private lands in the district also offer free public hunting opportunity. Conversely, in HDs 417 and 426, only 46% and 10% respectively, of the elk habitat are legally accessible public lands or lands enrolled in Block Management (Figures 2 and 3). If given the option, hunters drawing an archery permit valid for all of these HDs may opt for the “better hunting opportunity” HD 410 if they fail to gain access elsewhere, compounding the already-occurring issues with hunter density in this district.

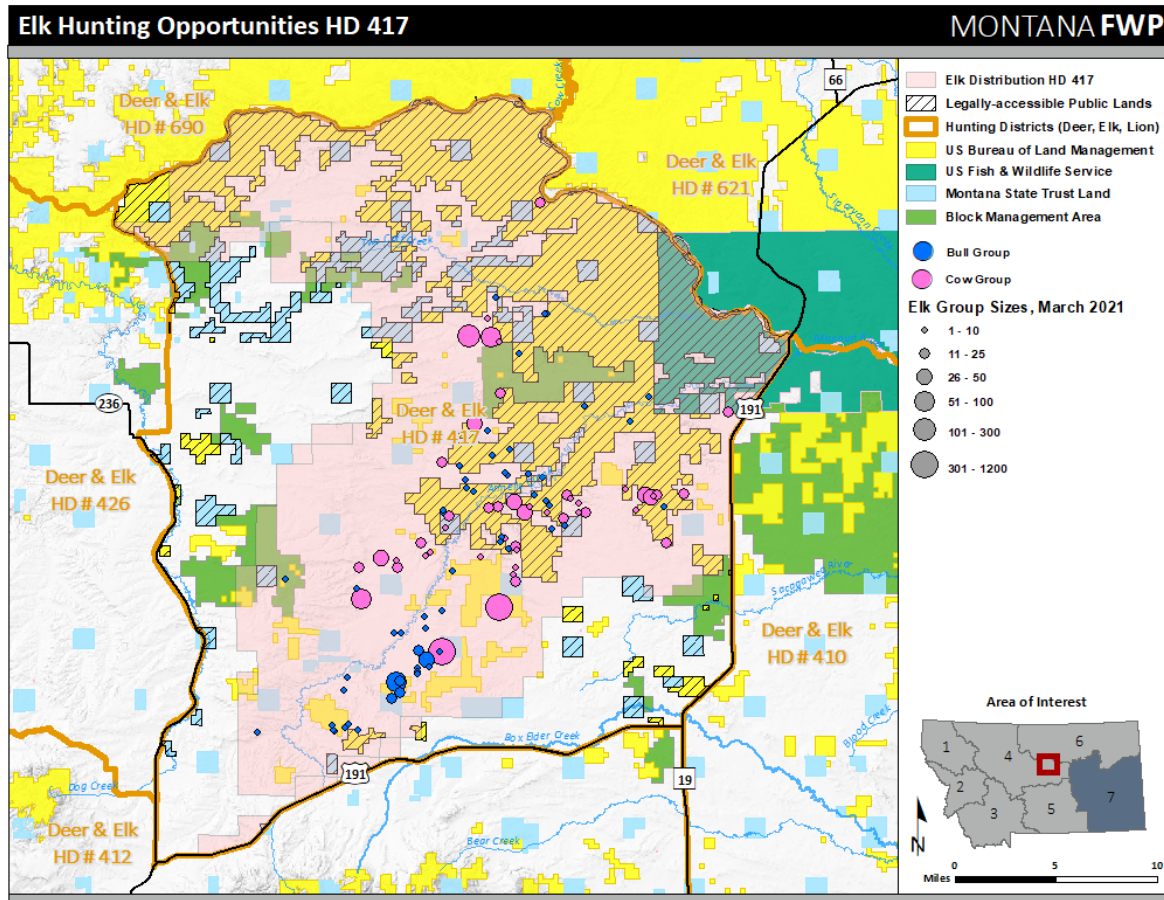
Furthermore, during the 2021 public scoping, a significant number of comments pertaining to HD 410 spoke to crowding issues during the archery season. Some comments spoke directly of a need to reduce the number of archery permits valid in HD 410, *whether or not HD 417 was removed from the 410-21 permit*. Lowering the quota from 1900 to 1500 will respond to these concerns while still providing adequate opportunity for archery hunters, based on the number of archery hunters that draw the permit and opt to hunt HD 410 (Table 1).

Approximately 70% of the 410-21 permit holders hunt elk in HD 410, and if this percentage is maintained, with a reduction in the quota, there would be reduced hunter numbers in the district (i.e., 70-100% of 1500 permits equals 1050 – 1500 total hunters).

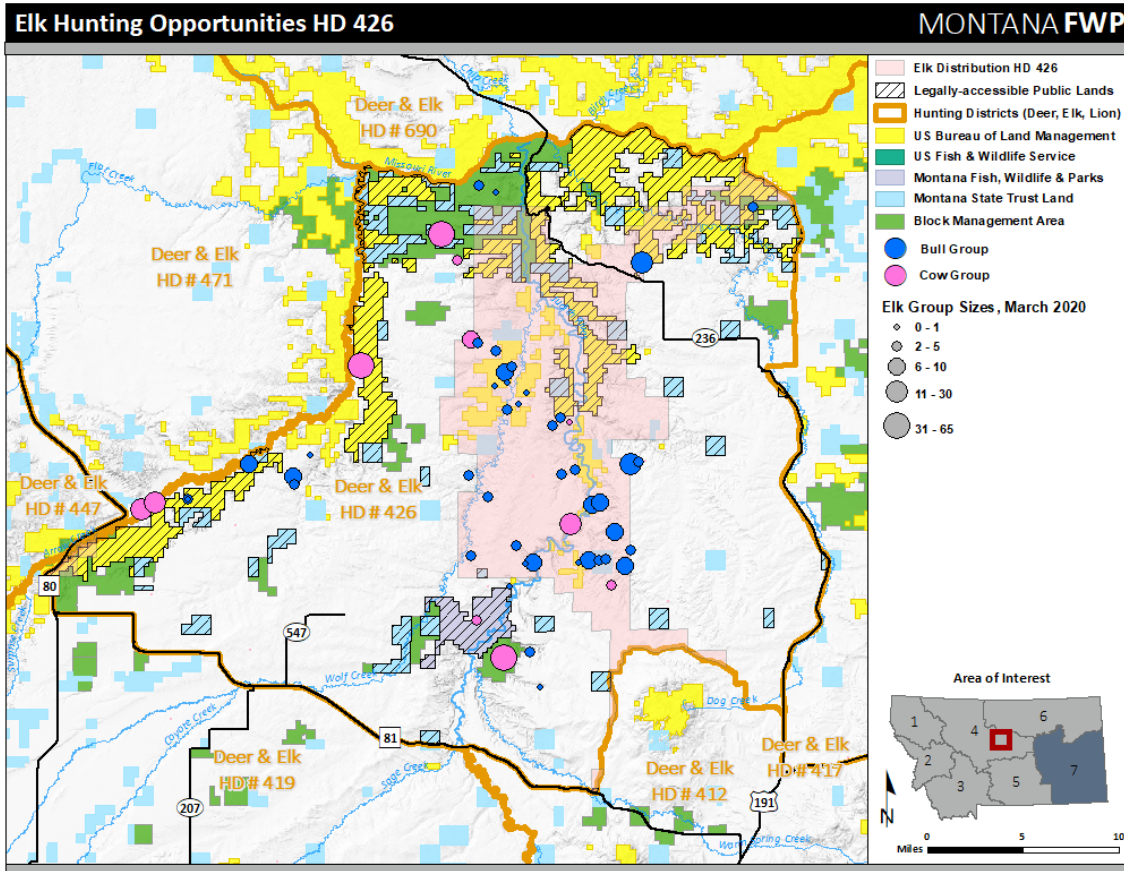
Additionally, with other statewide proposals, including to limit successful permit holders to only hunting elk in the district from which they drew, one can also surmise that those seriously interested in hunting a given district will put in for that permit, thus representing a *possible decrease* in the number of applicants and maintaining fairly high drawing odds for the district despite a reduced quota. In the first year of such changes (combination quota decrease and the statewide proposal), it will be difficult to estimate these actual numbers, however implementing a quota range will allow for future changes, as early as the 2023 season, to account for either continued overcrowding or unacceptably reduced drawing odds.



**Figure 1:** Figure 1. Elk distribution, survey locations, and “hunting opportunity” in HD 410.



**Figure 2:** Figure 2. Elk distribution, survey locations, and “hunting opportunity” in HD 417.



**Figure 3:** Figure 3. Elk distribution, survey locations, and “hunting opportunity” in HD 426.

# Permits offered	HD	# Elk Archery Hunter Numbers					% of permit holders that hunted
		2015	2016	2018	2020	Average	
1900 <sup>1</sup>	410	1278	1282	1318	1343	1305	69%
	417	116	130	125	181	138	7%
3700-4000 <sup>2</sup>	426	80	91	85	76	83	2%
Total		1474	1503	1525	1600	1526	n/a

<sup>1</sup> Valid in HDs 410 and 417

<sup>2</sup> Valid in 21 total HDs, including HDs 412 and 426

**Figure 4:** Table 1. Elk Archery Hunter Participation, 2015-2020.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

If the Department receives fewer complaints regarding overcrowding during the archery season, hunter harvest surveys reveal that a higher percentage of successful applicants for the 410-21 archery permit hunt HD 410, and the drawing odds for the 410-21 archery permit are maintained or improved, this proposal will be considered a success. The creation of a quota range on this permit will help mitigate failure immediately following the first hunting season under its structure should this proposal not succeed in any of the above criteria.

Overcrowding and pressure can also cause elk to move from accessible lands to inaccessible, “refuge” lands, thereby reducing hunter success. Reduction in crowding and hunting pressure may in turn increase hunter success.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The last HD 410 elk survey occurred in February 2020. This survey is flown only on even years, due to the amount of time and cost required to complete it. In 2020, the area biologist observed 3253 total elk (790 bulls, 1583 cows, and 755 calves), with a calf:cow ratio of 48:100 and a bull:cow ratio of 50:100. Hunting district 410's survey objective is 2000-2300 elk, thus elk are 51% above objective.

Archery hunting is generally viewed as an "opportunity," rather than a management tool. Elk numbers in HD 410 are over objective, but not to the same degree as neighboring districts. This proposal will likely not hurt elk management efforts, and addressing crowding issues during archery season may help keep elk distributed on public lands or other areas where they will likely be more vulnerable to harvest into the rifle season, which would further aid in elk management efforts.

In order to reduce hunting pressure on elk that reside in the northern portion of the district, primarily on public land, while addressing elk management issues and game damage complaints in the central/southern portion of the district, primarily on private lands, MFWP made changes to both general season antlerless Elk B Licenses (410-00 and 410-02) during the last season-setting process. The 410-02 Elk B License became valid on all lands south of Crooked Creek (Sacagawea River) with the quota increased to 1000. Additionally, holders of the 410-02 could harvest a second antlerless elk with a General License. The 410-00 license remained valid district-wide, maintaining some opportunity for hunting the public lands north of Crooked Creek (including the Charles M. Russell National Wildlife Refuge; CMR), but with a reduced quota of 100. This change was enacted to maintain hunting opportunity across the district, encourage elk re-distribution to the north, and provide landowners ample opportunity to manage elk on their properties. At the time of this current proposal's development, its second hunting season is underway, but an aerial survey has not yet been completed to gauge possible effects on elk numbers. Anecdotal reports suggest this change is working, and antlerless elk harvest increased 165% from the previous 10-year average. Thus, regardless of this current archery-only proposal, which mainly addresses opportunity, efforts to improve elk management in HD 410 are underway and show early signs of success.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Hunting district 410 is relatively unique, considering the amount of accessible public lands that contain elk throughout the hunting season. Despite this, changing land uses and values have resulted in reduced hunting on some private lands, inhibiting MFWP's ability to manage elk to objective. This proposal will likely not *significantly* impact elk archery opportunity; rather it will mainly reflect the removal of HD 417 and those hunters from the 410-21 archery permit and to a small extent respond to numerous hunter complaints about too much archery pressure in the district.

While this year most of Montana experienced severe drought conditions, resulting in lower natural forage availability, some of private properties grow alternative crops that provide additional and highly attractive, nutritious forage for elk that draws them to these areas during the late summer/fall months and likely bolster over-winter survivorship. Winter 2017-18 was one of the harshest on record for the last few decades, yet elk survival and recruitment remained relatively high the following year. The next survey, to be flown in early 2022, will aid the area biologist in recommending changes to any quota numbers (mainly antlerless licenses, and/or permits if necessary) following this upcoming winter.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The main contacts made regarding this proposal occurred during the public scoping process. This pre-proposal was made available to the general public, including sportsmen and landowners, and received a variety of responses. Most of the feedback spoke to 1) maintaining the 410-01 archery Elk B License, 2) supporting the removal of HD 417 from the 410-21 archery elk permit, and 3) lowering or maintaining (not increasing) the quota to account for the removal of HD 417 from the archery elk permit. Numerous comments mentioned over-crowding and a diminished hunting experience with the high number of archery permits currently available. Some additional

comments, primarily from outfitters and non-resident landowners, preferred more archery permits or unlimited archery permits.

Some sportsmen support this proposal for the reasons mentioned above. Some sportsmen do not support this proposal, as they are concerned about reduced drawing odds. The possible statewide proposal (a hunter may only hunt elk in the district for which they drew a permit) will go a long ways to mediating this latter concern, as a potential consequence of its passing would be fewer people applying for a district they may not intend to hunt.

This proposal does not affect elk management or overall populations, the primary concern we hear about from traditional landowners. However, also from a landowner's perspective another important consideration is their ability to draw a permit to hunt elk on their properties. At 1900 permits, the landowner preference quota is 285, or 15% of the total quota. Any landowner with 640 acres of land in 410 may apply for the 410-21 archery elk permit. Since 2011, an average 13 landowners have applied annually for the 410-21 under landowner preference, thus draw odds for landowners who apply for this permit are, and will likely remain at, 100%. In addition to landowner preference, changes to the "454 Agreement" structure allows almost any landowner to apply for and receive an elk permit valid on their property. Anticipating more of these "454" permits to be issued over the coming years provides another possible justification for reducing the 410-21 quota, to order to keep archery hunter numbers in HD 410 near current levels.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 413 ES to BTB/A-**

**Hunting Districts:** 413

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk regulation. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting district. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has been released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Archery permit/shoulder season HDs 417/426**

Hunting Districts: 417, 426

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

For the upcoming 2022/2023 hunting seasons:

- Remove HD 417 from the 410-21 Elk Permit and 410-01 Elk B License (both Archery Only; separate proposal under HD 410).
- Create a new, 417-21 either-sex Elk Permit, Archery Only, valid in HDs 417 and 426, with a quota of 300 (quota range 200 to 500).
- Extend the late shoulder season end date for antlerless elk on General License and 004-00 from January 15 to February 15.
- Remove HD 426 from the 900-20 Elk Permit (separate, state-wide proposal).

Language in the 2022 Montana Hunting regulations for Elk in HDs 417 and 426 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 417 – Amells Creek</b>						
<b>Elk</b>						
General Elk License	Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Feb 15 <del>Jan-15</del>	Only valid south of D-Y Trail to intersection with Knox Ridge Road, and south of Knox Ridge Road thereafter.
Elk Permit: 410-21	Either-sex Elk	April 1	1,500	Sep 03-Oct 16	-	Only valid in HDs 410 and 417.
Elk Permit: 417-20	Either-sex Elk	April 1	225	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 417-21	Either-sex Elk	April 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 417 and 426.
Elk B License: 004-00	Antlerless Elk	April 1 June 1	6,000	Sep 03-Oct 16	Oct 22-Feb 15 <del>Jan-15</del>	Only valid south of D-Y Trail to intersection with Knox Ridge Road, and south of Knox Ridge Road thereafter. Not valid on National Forest-Lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except 410 and 455 as listed under each HD.
Elk B License: 410-01	Antlerless Elk	June 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 417-02	Antlerless Elk	June 1	100	Sep 03-Oct 16	Oct 22-Nov 28	

**Figure 1:** Proposed new regulations HD 417.

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 426 – Winifred</b>						
<b>Elk</b>						
General Elk License	Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 28	
Elk Permit: 426-20	Either-sex Elk	April 1	60	Sep 03-Oct 16	Oct 22-Nov 27	
<del>Elk Permit: 417-21</del>	<del>Either-sex Elk</del>	<del>April 1</del>	<del>300</del>	<del>Sep 03-Oct 16</del>	<del>-</del>	<del>ArchEquip Only. Only valid in HDs 417 and 426.</del>
<del>Elk Permit: 900-20</del>	<del>Either-sex Elk</del>	<del>April 1</del>	<del>4,000</del>	<del>Sep 03-Oct 16</del>	<del>-</del>	<del>First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.</del>
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16	Oct 22-Nov 28	Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.

**Figure 2:** Proposed new regulations HD 426.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

In order to simplify regulations by reducing the number of license-permit types (LPTs), one potential proposal brought forward for public scoping was to eliminate the 410-01 archery-only Elk B License, valid in HDs 410 and 417. Removing or keeping this LPT has no biological consequences; on average <1 antlerless elk/year are harvested in HD 417 on this LPT. Its removal on the other hand would result in a loss of hunting opportunity, particularly for archery hunters, and the public largely opposed this change during scoping. Alternatively, we propose to maintain this LPT, removing HD 417 (where it is redundant with additional general/004-00 license opportunity and therefore underutilized).

Potential changes in other HDs and the overall regulations simplification effort have resulted in the elimination of the 900-20 archery elk permit and the need to accommodate archery hunters from HD 426. Given its proximity to HD 417, the fact that HD 426 is also considered part of the “Missouri River Breaks” Elk Management Unit (EMU), and similar elk management issues and distribution across public/private lands in both districts, the most plausible solution is to combine some aspects of elk management (i.e., archery permit) for both HDs. The districts possibly could be combined, however landowners across HD 426 have been adamant against an elk shoulder season, and the mule deer populations differ between districts—combining them into one HD would confound some elk management as well as mule deer management. Additionally, the scale on which elk are over-objective in HD 417 far exceeds HD 426—landowners in HD 426 could be overrun with hunter permission requests, and considering they have been reluctant to raise the number of either-sex permits beyond 60, would likely not support such a proposal. On the other hand, maintaining 417 archery hunting with HD 410, in addition to adding 426, could result in exacerbated overcrowding issues in HD 410 (see HD 410 justification). Thus, in this and a separate document, MFWP regional staff also propose to remove HD 417 from the 410-21 archery elk permit.

Based on hunter effort data, an average 221 hunters who drew either the 410-21 or 900-20 archery permits chose to hunt either HDs 412, 417, or 426 (Table 1). At their separate quota levels, each permit averaged 75% and 78% draw odds respectively overall (landowner, resident, non-resident), and 87% and 90% draw odds respectively for residents. Hunter effort data from Table 1 indicates that at least for residents, draw odds should be close to or meet 100% if the same people that choose to hunt these districts year to year apply for the 417-21 permit.

Currently, an elk shoulder season exists in HD 417, valid in the central/southern portion of the district, to help landowners manage elk game damage issues on their properties but ends on January 15. Extending this date to February 15 will better facilitate antlerless elk harvest while simplifying and making consistent late shoulder season regulations across the area where shoulder seasons occur.

# Permits offered	HD	# Elk Archery Hunter Numbers				
		2015	2016	2018	2020	Average
1900 <sup>1</sup>	410	1278	1282	1318	1343	1305
	417	116	130	125	181	138
3700-4000 <sup>2</sup>	426	80	91	85	76	83
<b>Total 426 and 417</b>		196	221	210	257	221

<sup>1</sup> Valid in HDs 410 and 417

<sup>2</sup> Valid in 21 total HDs, including HD 426

**Figure 1:** Table 1. Elk Archery Hunter Participation, 2015-2020.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This proposal represents more of a “housekeeping” effort, the need to account for and maintain archery opportunity following the removal of the 900-20 permit. However, if the Department receives fewer complaints regarding overcrowding during the archery season in HD 410 and the drawing odds for the 417-21 archery permit are maintained at current percentages or improved to 100%, this proposal will be considered a success. The addition of a quota range on this permit will help mitigate failure should this proposal not succeed in any of the above criteria. Additional antlerless elk harvest in HD 417, particularly after January 15, will also indicate success of the extended shoulder season.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Hunting district 417 surveys occur during odd years, given the amount of time and cost required to complete them (HD 410 surveys are flown even years). The last survey in HD 417 occurred in March 2021, when the area biologist observed 3442 total elk (652 bulls, 1941 cows, and 849 calves). The observed bull:cow and calf:cow ratios were 34:100 and 44:100, respectively. The survey objective for HD 417 is to observe 350-400 elk and maintain a bull:cow ratio of 30 bulls:100 cows. The last survey indicates elk are 818% over objective in HD 417, and the bull ratio is roughly at objective.

The last, best complete survey of HD 426 occurred in March 2020. In February 2021, we flew HD 426 but extremely windy and warm conditions yielded poor visibility and a suppressed count. In 2020, we observed 367 total elk (157 bulls, 126 cows, 61 calves, 21 unclassified antlerless), with bull:cow and calf:cow ratios of 125:100 and 48:100, respectively. Due to it being predominately agricultural lands, the survey objective for HD 426 is 75 total elk, with a bull:cow ratio of 30 bulls:100 cows. Hunting district 426 is 389% above objective, and the bull:cow ratio is also above objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Both HDs 417 and 426 are characterized by agricultural lands and sagebrush grassland interspersed with breaks/badlands of the major drainages bisecting them (Arrow Creek/Coffee Creek, Wolf Creek, Judith River, Armells Creek) and the Missouri River to the north. The larger river breaks contain conifer stands that provide excellent cover, especially juxtaposed with adjacent agriculture. While much of this timbered/breaks habitat is public land, it is also either land-locked or difficult to access. The majority of both districts are private lands, and over the last decade, elk have expanded in their distribution from timbered drainages into more of the private/agricultural interface.

Due to the area’s topography, elk movement patterns, and variable hunting pressure, elk harvest is insufficient to meet management objectives in both HDs. Several, albeit key landowners restrict hunting access to the public, and elk use these areas as refugia during the archery and general seasons. Even with relatively good public access, hunting conditions and retrieval are challenging in these districts for several reasons.

For HD 417, most elk reside in the southern portion of the district, predominantly private land. These elk get limited hunting pressure on several properties that also contain abundant agricultural forage resources. Later, after the general season, they will move onto more traditional ranches that cannot tolerate these large elk concentrations. The northern portion of the district has majority public land. When general/004-00 licenses were initiated in HD 417, there was suddenly a disproportionate amount of hunting pressure in the northern half of the district. Hunters who previously had to draw a limited license to hunt the Missouri Breaks now had relative free rein in one of the districts, and this pressure, in addition to the relative security and abundance of forage on southern private lands likely exacerbated the redistribution of elk to those areas. Changes to the 2020/2021 season structure have attempted to rectify this by limiting antlerless harvest in the northern portion of the district while still maintaining liberal antlerless opportunity on majority private lands in the southern portion of the district.

Elk in HD 426 primarily reside in the Judith River, Wolf Creek and Arrow Creek breaks and commonly use adjacent private agricultural lands (wheat and hay fields). When these elk travel between drainages or back and forth between the Judith/Moccasin Mountains, they must also cross wheat and hay fields. Both residency and movement activities have caused crop damage and landowner complaints and is the reason for the low population objective in this HD.

Other challenges specific to elk management in HD 426 include:

- An elk's visibility and vigilance on the flat, farmed benches is high, and they can easily move into steep, timbered breaks and become difficult for sportsmen to pursue and retrieve.
- Harvest of crops is usually over by the start of the hunting season, and elk are less visible and "available" on the benches and spend more time in the breaks. Pressure from a large volume of archery hunters also encourages elk to move from certain, huntable areas into steep breaks or private "refuge" lands. This is another reason to maintain "limited entry" archery permits here.
- Permit holders sometimes forgo harvesting a cow or smaller bull in hopes of harvesting a trophy; and many who do so miss their one and only shot opportunity. For people hunting antlerless elk, cows usually congregate in large groups on private "refugia" by the start of the general season.
- The pattern of private lands (numerous smaller properties relative to daily elk movements) in this HD also it difficult for hunters to gain permission on multiple landowners at one time, when elk may be present on an adjacent property to where they have permission.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This archery portion of proposal will not affect elk management or overall populations, the primary concern we hear about from traditional landowners. However, also from a landowner's perspective another important consideration is their ability to draw a permit to hunt elk on their properties. At 1900 permits, the landowner preference quota is 285, or 15% of the total quota. Any landowner with 640 acres of land in 417 could have applied for the 410-21 archery elk permit. Since 2011, an average 13 landowners between both HDs 410 and 417 have applied annually for the 410-21 under landowner preference, thus draw odds for landowners who apply for this permit are, and will likely remain at, 100%.

For HD 426 and the 900-20, and average 11 resident and 11 non-resident landowners applied for the 900-20 across all 21 districts this permit was valid. With a landowner preference quota of 485, draw odds under landowner preference were always 100%, and again, this is not likely to decrease under this proposed change.

In addition to landowner preference, changes to the "454 Agreement" structure allows almost any landowner to apply for and receive an elk permit valid on their property. Thus, for archery and rifle permits, almost any landowner in either HD should now be able to receive an either-sex elk permit.

The shoulder season extension of this proposal received broad support from HD 417 landowners during the 2020/2021 season-setting process, and that support has not wavered. Being as the shoulder season affects mainly private and land-locked public lands, it will have minimal impact to area sportsmen.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 450 Season Structure/Boundary Change**

**Hunting Districts:** 450 & 442

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove HD 450-20 either-sex elk permits (by default 900-20 archery licenses go away and becomes a general archery season) and replace with a General Elk License brow-tined bull/antlerless season type. Move west boundary of HD 450 from Bellview/Battle Creek road to National Forest boundary. Five either-sex elk permits have been available in HD 450 for at least the last 20 years. Ten antlerless elk permits were available in HD 450 from 1991 through 2001. Prior to 1991, there was no elk season in HD 450. For the 2002 season, 30 antlerless elk permits were made available. As per a request from several landowners, 80 permits were made available in 2003. In their beginnings, these antlerless permits were also valid in HD 441 to the north. That changed for the 2002 season as the antlerless permits were separated from HD 441 to the north and validated for a portion of HD 442 to the south. In 2004, these permits were once again reduced to 30, intending to better match permit numbers with what appears to be effective harvest access to elk. Additionally, B Licenses were added in 2004 as well. Beginning in the early 2010's, antlerless permits were removed and replaced with a general antlerless elk license regulation for the entire HD with additional harvest available on the Region 4 antlerless B License (004-00).

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

As per FWP direction, a primary objective of this proposed change serves to remove a limited number of permits in an area in which elk numbers, to include bulls, remain well above objective levels. General interest as viewed by hunter permit applications for this limited number of licenses is fair at best (3-year 1st choice applications = 29), with low harvest success according to FWP harvest estimates. As well, elk within HD 450 readily move back and forth between HDs 450 and 442. HD 442 elk are managed as Sun River elk and focuses on elk south of the Sun River and within US Forest Service lands to the west. Adjusting the boundary as proposed between HD 450 and 442 will allow for better focused management ability related to separate elk groups within this area. As is further described below, elk hunting regulations and opportunity will ultimately remain unchanged within the 'new' portion of HD 450 (as proposed) based on current elk hunting regulations. Deer management would also remain unchanged as it is currently prescribed.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of this proposal will be measured by simplifying elk management in this broader context and allowing added flexibility in elk hunting opportunity for hunters and landowners alike. Elk population levels within this area are well above management objectives so reduced elk numbers in time will also be a successful measure of these changes.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The general management goal for this area and as outlined in the current elk management plan, is to maintain some presence of elk for public enjoyment, within landowner tolerance levels, and attempt to provide maximum use of general public hunting to manage elk population level. The current elk plan for the Teton River EMU calls for maintaining 75-100 total elk observed during post-season aerial surveys, to include 25-35 total bulls, of which not less than 15 are brow-tined bulls. Most recent current surveys from winter 2021 aerial surveys produced not less than 557 elk with 113 classified bulls (76 brow-tined bulls, 32 spikes and 6 unclassified bulls). There are two

primary groups of elk within this area, Teton River and Deep Creek area elk. In recent years, Teton River elk (cow/calf/yearling group) typically numbers in the 100-150 range depending on observability. Deep Creek area elk (cow/calf/yearling group) typically number in the 300 to nearly 400 range depending on observability. Scattered groups of bulls are observed within and between these areas.

Both groups of elk have strong ties to private land, subsequently, most hunting/harvest access is dictated by such. Some public lands are accessible where elk can and do get hunted on a regular basis. However, both locations have proved to be difficult to hunt due to either thick riparian habitat (Teton River), generally open grassland habitat (portions of Deep creek area), and/or general access at time depending on elk distribution during the primary fall hunting periods. Estimated annual harvest for HD 450 over the last 5 years is just over 30 elk per year with a rough split between bull and antlerless harvest. Allowing added flexibility in season regulations in this area should aid in improving harvest success, at least in places.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Most elk in this area persist primarily on private lands with intermixed state lands (DNRC) throughout the year. As is described in the elk management plan, maintaining an appropriate level of antlerless harvest related to access to private land is important. Developing regulation types, season formats and ongoing communication with private landowners is an ongoing management priority related to public hunting access and subsequent harvest. As previously noted, habitat security related to harvest is variable and provides difficult hunting conditions at times.

As well, these elk have strong ties to more riparian, agriculture and grassland/mountain foothill type habitat, and subsequently overall elk production in this area has been strong, albeit in general, population numbers appear to have peaked based on recent observations (albeit at a high level). Game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

General landowner tolerance of elk is low to good depending on the area within this HD. While there's interest in lowering overall numbers, there's also interest in maintaining some level of elk (albeit in more tolerable levels). Ultimately, landowner access will dictate most significant hunter opportunity in this HD. Maintaining flexibility in harvest related to such while allowing more liberal seasons for both hunters and landowners alike, is important and an ongoing balance. During late summer 2021 and based on landowner concerns of elk game damage (cultivated ground along the Teton River), a management hunt was held. While the hunt (by design) and harvest were minimal, it was one step in hopefully the right direction to build onto in the future. Through this effort, some landowner comments were obtained at least specific to this area related to these proposed season changes and no significant opposition was noted. Additional conversation is planned to consider future special hunts and/or 'shoulder season' type management options.

Through the initial 'scoping' phase of the 2021/22 season setting process, several comments were taken in opposition to this change – primarily geared towards the boundary adjustment. However, in reading these comments, individuals had primary concern over lost opportunity to hunt elk within the new portion of HD 450 (formally east portion HD 442) with the assumption this area would also now become limited to the either-sex elk permit system. However, as is described in this proposal, elk regulations and hunting opportunity within the 'new' portion of HD 450 will remain unchanged – hunters will continue to have a general brow-tined bull/antlerless elk season type within this area. It is important to note that the boundary adjustment as proposed will only work as/if the proposed season change in HD 450 (removal of the 5 permits) is similarly adopted.

With that clarification, it is generally felt that these proposed changes will be acceptive and provide less confusion and added clarity to regulations specific to this area, while maintain liberal harvest opportunity. However, there will likely be some concern related to the loss of the limited permits given their long-standing presence in this area. Nonetheless, given strong elk numbers (to include bulls), liberalizing regulations in this area is warranted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 442 Boundary Change**

**Hunting Districts:** 442/450

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Move the east boundary of HD 442 (west boundary of HD 450) from the Bellview/Battle Creek/Pishkun Canal Road to the US Forest Service Boundary.

The general elk season in HD 442 has been based upon a quota system since at least 1964. More recently, conservative quotas in the late 1990's and early 2000's reflected the desire to increase observed elk numbers up to the Elk Plan objective of 2,500 animals. Beginning in 2001-02 and each year through the 2014/15 season all objectives have been reached and/or exceeded (Table 2) and quota increases (along with additional Elk B License opportunity) have been proposed and implemented to help check population growth. Beginning in 2016 and based on elk numbers trending in a downward direction, reduced quota levels began to be proposed along with reductions in antlerless harvest opportunity in HD 425 (weekly license quota levels and eventual reduction in number of weeks valid for these licenses). The HD 442-00 antlerless Elk B Licenses were established in 2008 and quota levels have ranged from 50 to 300 over the last 13 years. Antlerless Elk B Licenses (formerly permits) in HD 425 were removed from the Sun River elk quota system (HDs 424 and 442) in 1998 to allow flexibility in setting quotas and to ensure that permits were valid even after conservative harvest quotas had been met. HD 425 elk harvest is factored in related to total elk harvest for this herd when setting HD specific quota levels and/or other B License levels (and vice versa).

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

As per FWP direction, the primary objective of this proposed change serves to manage elk within the HD 442/450 are in a more consistent fashion and based on current management strategies for groups of elk in this area. During the general rifle season, these elk spend time in both HD 442 and 450. Elk harvest within HD 442 has historically been based on a quota system that is tracked via the Augusta check station (general rifle season). However, as/if the HD 442 elk quota is met, antlerless harvest ceases. In 2017, language was added addressing this specific area to allow continued harvest of antlerless elk as/if the HD 442 quota was met, while at the same time, still protecting the management needs the quota serves for Sun River elk. Adjusting the boundary as proposed between HD 450 and 442 will allow for better focused management ability related to separate elk groups within this area and reduce unnecessary language within the regulations. As is further described below, elk hunting regulations and opportunity will ultimately remain unchanged within the 'new' portion of HD 450 (as proposed) based on current elk hunting regulations. Deer management would also remain unchanged as it is currently prescribed.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success of this proposal will be measured by simplifying elk management in this broader context and allowing added flexibility in elk hunting opportunity for hunters and landowners alike. Elk population levels within the HD 450 area are well above management objectives so reduced elk numbers in time will also be a successful measure of these changes.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**



For HD 450, most recent aerial surveys from winter 2021 produced not less than 557 elk with 113 classified bulls (76 brow-tined bulls, 32 spikes and 6 unclassified bulls). There are two primary groups of elk within this area, Teton River and Deep Creek area elk. In recent years, Teton River elk (cow/calf/yearling group) typically numbers in the 100-150 range depending on observability. Deep Creek area elk (cow/calf/yearling group) typically number in the 300 to nearly 400 range depending on observability. Scattered groups of bulls are observed within and between these areas.

Through winter and early spring 2021 observations, overall 'Sun River' elk numbers (HDs 424, 425 and 442) (n = 2,328) are in the bottom range of objective levels of +/- 10% of 2500 elk with continued good bull/cow ratios and fair at best calf/cow ratios.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Most elk in this area (HDs 450/442) persist primarily on private lands with intermixed state lands (DNRC) throughout the year. As is described in the elk management plan specific to this area, maintaining an appropriate level of antlerless harvest related to access to private land is important. Developing regulation types, season formats and ongoing communication with private landowners is an ongoing management priority related to public hunting access and subsequent harvest. As previously noted, habitat security related to harvest is variable and provides difficult hunting conditions at times.

As well, these elk have strong ties to more riparian, agriculture and grassland/mountain foothill type habitat, and subsequently overall elk production in this area has been strong, albeit in general, populations numbers appear to have peaked based on recent observations (albeit at a high level). Game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Through the initial 'scoping' phase of the 2021/22 season setting process, several comments were taken in opposition to this proposed boundary adjustment. However, in reading these comments, individuals had primary concern over lost opportunity to hunt elk within the new portion of HD 450 (formally east portion HD 442) with the assumption this area would also now become limited to the either-sex elk permit system. However, as is described in this proposal, elk regulations and hunting opportunity within the 'new' portion of HD 450 will remain unchanged – hunters will continue to have a general brow-tined bull/antlerless elk season type within this area. It is important to note that the boundary adjustment as proposed will only work as/if the proposed season change in HD 450 (removal of the 5 either-sex elk permits and change to a brow-tined bull/antlerless season) is similarly adopted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Create New HD 525**

**Hunting Districts:** 525

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Simplify hunting regulations by combining HD 560 and the western portion of HD 520 into new HD 525. This combines two HDs that are within the Southern Mountain PMU as defined in the Mule Deer AHM Plan. Mule deer population trends are similar throughout the new HD. Elk population trends are also similar.

Add early antlerless season dates, Aug 15 to Sep 3, for Antlerless Elk on the General Elk License and the 005-00 Elk B License that are only valid on private land.

Add late antlerless season dates, Dec 19 to Jan 8, for Antlerless Elk on the General Elk License and the 005-00 Elk B License that are not valid on National Forest Lands or FWP WMAs.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify the hunting regulations by combining HD 560 and a portion of HD 520.

The objective of adding the early and late season dates to the license is to increase the opportunity for both resident and nonresident hunters to harvest antlerless elk in these districts. These additional dates will give private landowners who wish to reduce elk numbers on their lands another tool to utilize if they decide to do so.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Harvest will be monitored via the statewide hunter questionnaire survey. Mule deer and elk population trends will be monitored through annual aerial surveys.

With the addition of the early and late season dates we should see the annual growth rates of the antlerless segment of the elk herd gradually decline in these districts. We should also see an increase in antlerless harvest from the annual hunter harvest survey. We also expect a decrease in game damage complaints.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Mule deer populations are below objective. Elk populations are above objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Severe winter weather in recent years has resulted in lower mule deer survival. Weather has not significantly impacted elk populations.

Hunter access for antlerless elk hunting varies across the Region. Elk habitat within these districts generally consists of mountain foothills or timbered breaks habitat. These habitat types are highly productive for elk. They generally provide quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

Game damage complaints from elk are common, especially during severe winters. Providing the same amount of Elk B Licenses but reducing the confusion of having to pick a B license reduces hunter confusion while maintaining the opportunity. Reducing the elk populations to objective is desirable to reduce game damage complaints from private landowners.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public review during the initial public comment period. Few comments were received, however in past public comment opportunities we received comments against early and late hunting season dates. We anticipate some opposing comments to this proposal because it includes early and late antlerless season dates.

In past public comment sessions we also received comments opposing late season dates on National Forest Land. We listened to that and are not proposing any late season National Forest opportunity for biological reasons. The biological reason is to encourage elk to use winter habitat areas on National Forest Land which the Forest Service manages through habitat and travel closures. Elk wintering on National Forest Land also reduces disease transfer opportunities between elk and livestock. In addition, elk wintering on National Forest are not causing game damage to private lands.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Create HD 555**

**Hunting Districts:** 555

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Creates a hunting district that encompasses the herd range of the Silver Run elk herd. This results in being able to eliminate the portion designation in old HD 520. Elk, especially bulls, in this area interchange with elk in HD 502. Therefore, it is appropriate to manage bulls in both HD 555 and 502 with limited permits. This approach is supported by the Montana Elk Plan.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplifies regulations by eliminating a portion designation.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Harvest will be measured through the statewide questionnaire survey. Post winter helicopter surveys will assess elk population trends.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Population is below objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Robertson Draw fire in the summer of 2021 burned 30,000 acres of elk and mule deer habitat significantly reducing the security cover for elk. Retaining elk permits essential in controlling harvest in the face of this habitat disturbance.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

We presented this proposal to the Sunlight Ranch hunting coordination group. The group voiced the need for continued bull and antlerless elk permits to control harvest in the face of lost elk security.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
590 portion removal**

**Hunting Districts:** 590,590 North Portion, 590 South Portion

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to remove the north and south portions of HD 590. This includes removing the 590-21 either-sex permits which were valid in the south portion of the district. This would also include combining the number of permits from both portions combined and adding an additional 80 permits to the existing 590-20. Early antlerless season would be added starting on August 15th. Late antlerless season would be added and would run Dec 19 to Jan 8. The 900-20 archery permit requirement would also be removed.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify regulations and increase elk harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured in two ways. First, hunter harvest surveys will be used to monitor changes in elk harvest. Second, aerial elk surveys will be used to monitor changes in the elk population.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Two thousand six hundred and ninety elk were observed in the north portion of HD 590 during the 2019 winter survey. Four hundred forty-two elk were observed in the south portion of HD 590 in 2021. The objective for the two portions combined is 1050 elk and there are currently 3,132 elk in this district. The population in the north portion has continued to grow reaching a record high of 2703 in 2017. The southern population has remained relatively stable.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather or habitat factors. Hunter access to elk on private lands is considered a limiting factor to harvest in district 590. The 2005 Elk Management plan contain language specific to managing for older age class bulls in HD 590.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The proposal was available for public comment during the initial public comment period. Few comments were received. Some concern was voiced regarding the combination of the north and south portions of HD 590, including a perceived reduction in the opportunity to draw a permit.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine 511 and 530 into new 535**

**Hunting Districts:** 511, 530, 535

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is to combine deer/elk hunting districts 511 and 530 into new deer/elk district 515. Both districts provide similar habitat and access opportunities for elk and deer.

Habitat on the south side of the Big Snowy Mountains (HD 511) and Little Snowy Mountains (HD 530) is characterized by less precipitation, more south facing Ponderosa pine/shortgrass prairie winter range that transitions into sagebrush grassland habitat further south and east. Habitat on the north side of the Big Snowy Mountains (HD 411) is characterized by more precipitation with more aspen, riparian, and timbered habitat with interspersed wet meadows. Elk winter in larger numbers in 511 and 530, in part, because of these habitat differences. In addition, the landownership in HDs 511 and 530 is composed of larger acreage parcels with mountain foothill habitat transitioning to shortgrass prairie. While HD 411 has some large acreage parcels it also has more subdivision and smaller landownership parcels consisting of more timbered habitat with wet meadows. There is some elk movement on the west end of 411 and 511 between the districts and some elk movement on the east end of 411 and 530, which is why the entire Big and Little Snowy Mountains should be managed together for elk.

There are also a growing number of year round resident elk in the ponderosa pine habitat in the southern portion of HD 530. Along with elk that cross back and forth into HD 590 south of the Musselshell River. These elk have been growing in number for the last decade and will be surveyed for the first time in the 2022 winter. They have been counted occasionally when traveling between mule deer surveys in HD 530 or traveling to the Roundup airport as part of other aerial surveys. The current General License spike bull or antlerless elk regulation type increases overall bull and antlerless harvest in these districts that are over objective, while maintaining the either-sex elk permit is needed to manage for older age class bulls is in accordance with the management objective in the elk plan. An increase in the 411-20 Either-sex Elk Permit from 300 to 400 is also proposed. Along with an increase in the 411-00 Elk B License from 800 to 1,200. Both of these increases are proposed to increase harvest in response to increased elk population numbers.

Add early antlerless season dates, Aug 15 to Sep 3, for Antlerless Elk on the General Elk License, the 005-00 Elk B License and the 411-00 Elk B License that are only valid on private land.

Add late antlerless season dates, Dec 19 to Jan 8, for Antlerless Elk on the General Elk License and the 005-00 Elk B License that are not valid on National Forest Lands or FWP WMAs.

Change the late season ending date from Feb 1 to Jan 8 on the 411-00 Elk B License that are valid in HDs 411 and 535.

This proposal maintains the management objective in the elk plan for managing for older age class bulls in the Snowy Mountains. The proposal allows for liberal antlerless harvest. Early and late season dates address game damage concerns on private lands. Simplifies the regulations by having one district on the north side of the Big Snowy Mountains (HD 411) and one hunting district on the south side of the Big Snowy Mountains and Little Snowy Mountains (HD 535).

Deer: The north and south side of the Big and Little Snowy Mountains should not be managed together for other species like mule deer because mule deer populations are at or well below long term averages in HDs 511 and 530 and have been in restrictive season types for many years, while HD 411 mule deer has been under an either-sex standard regulation type. The proposed combination of districts 511/530 allows us to maintain historical harvest and survey data for future population analysis and simplifies the regulations for hunters.

Create a 535-50 Antlered Buck Mule Deer Permit to replace the 530-50 Antlered Buck Mule Deer Permit that was removed. This proposal offers 850 of the 535-50 Antlered Buck Mule Deer permits. These permits would be valid in hunting district 535. These permits would be offered through the drawing, any remaining permits would be sold surplus after the drawing. The associated quota range is proposed to be 500 to 1,100. Permit numbers can be adjusted annually to track changes in mule deer populations. The General Deer License would be valid for Antlerless Mule Deer and Either-Sex White-tailed Deer. In addition 50 of the 535-00 Antlerless Mule Deer B Licenses would be available to address localized game damage concerns.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Elk: The objective of the proposal is to simplify hunting regulations by combining similar districts. These changes should also allow for increased elk harvest on the bull segment and antlerless segment of the population.

The objective of adding the early and late season dates to the license is to increase the opportunity for both resident and nonresident hunters to harvest antlerless elk in these districts. These additional dates will give private landowners who wish to reduce elk numbers on their lands another tool to utilize if they decide to do so.

Mule Deer: The objective of the proposal is to simplify hunting regulations and to increase mule deer buck:doe ratios across the district and increase mule deer numbers on the western side of the district.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk: This proposal is directed at regulations simplification. With the addition of the early and late season dates we should see the annual growth rates of the antlerless segment of the elk herd gradually decline in these districts. We should also see an increase in antlerless harvest from the annual hunter harvest survey. We also expect a decrease in game damage complaints. Success will be measured by tracking annual elk harvest and population trends. An increase in elk harvest and corresponding reduction in elk numbers would signify success from a biological perspective.

Mule Deer: This proposal is directed at regulations simplification and to address the low buck:doe ratio in HD 511. Success would be an increase in the buck:doe ratio in response to the mule deer buck permit.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk: In February 2021, area biologists observed 8,755 total elk across the Big and Little Snowy Mountains (2,257 bulls, 4,502 calves, 1,884 calves, 112 unclassified antlerless). Overall, elk in the Snowies are 1067% over the objective of 800 total elk. The elk populations in the Snowies have been increasing since the mid 2000's.

Mule Deer: The mule deer buck permit was initially created to address chronically low buck:doe ratios in HD 530 in 1987. These low buck:doe ratios have also been observed in HD 511 more often than not the last 18 years. The low habitat security and hunting access contributes to the low buck:doe ratios in HD 530 and HD 511. Increased permit numbers will allow for the increase in hunting district size covered by the mule deer buck permit. Also the increased permit numbers will help to maintain the buck:doe ratio while still managing the CWD risk of having older age mule deer bucks on the landscape.

The HD 530 mule deer buck permit has proven effective at maintaining a buck:doe ratio over 25 as stated in the AHM guidelines. Permit numbers have been increased the last couple years to maintain higher buck:doe ratios but decrease the risk of CWD transmission. HD 511 has more years of low buck:doe ratios than not in the last 18 years. Many landowners in HD 511 do not allow mule deer hunting because of their concern of low mule deer numbers compared to historical numbers. HD 511 has been in a restrictive season package for 12 years in an effort to increase mule deer numbers but has not been successful. There will be a loss of mule deer buck hunting opportunity in HD 511 by including this area in the mule deer buck permit area.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access factors. Hunter access for elk hunting varies across Hunting District 535. Elk habitat within these districts generally consists of mountain foothills and prairie grassland with scattered ponderosa pine savanna habitat. This combination of habitat types generally provides quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

Elk and mule deer game damage complaints occur during severe winters. Providing an increased amount of Elk B Licenses along with increased time periods to use the licenses will hopefully result in increased harvest. Reducing the elk populations to objective is desirable to reduce game damage complaints from private landowners. Providing a limited number of Mule Deer B Licenses allows for increased antlerless mule deer harvest in localized game damage situations.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Elk: The proposal was available for public review during the initial comment period. Comments were mixed with no overwhelming support or opposition in either direction. Some landowners voiced concern about increased hunting pressure and hunter access requests when permits increased from 200 to 300 several years ago and now permits are proposed to increase from 300 to 400. Some landowners voiced support for keeping limited-draw permits to manage the number of hunter access requests they receive for access.

Few comments were received, however in past public comment opportunities we received comments against early and late hunting season dates. We anticipate some opposing comments to this proposal because it includes early and late antlerless season dates.

In past public comment sessions we also received comments opposing late season dates on National Forest Land. We listened to that and are proposing limited late season National Forest opportunity for biological reasons. The biological reason is to encourage elk to use winter habitat areas on National Forest Land which the Forest Service manages through habitat and travel closures. Elk wintering on National Forest Land also reduces disease transfer opportunities between elk and livestock. In addition elk wintering on National Forest are not causing game damage to private lands. Allowing a limited number of these B Licenses to be valid throughout the hunting district can help move elk around as hunting pressure changes on the landscape throughout the hunting season.

Mule Deer: The proposal was available for public review during the initial comment period. Some comments supported combining these districts but did not want to see it managed with a mule deer buck permit. Other comments were supportive of the proposed change.



**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove 580-00 Elk B License**

**Hunting Districts:** 580

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to remove the 580-00 Elk B License opportunity. These B Licenses have been in place in 580 since 2016. They are valid on all lands, including National Forest during late shoulder seasons. Elk harvest on these licenses has been minimal, and they have created confusion for hunters about which B License they can use at different times and locations.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify regulations. The 580-00 opportunity will be replaced by the 005-00 B License which is valid in most R5 districts during early, general season, and late shoulder seasons.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The proposal is directed at regulations simplification. There are no biological measures for success associated with this proposal.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Four thousand two hundred fifteen (4,215) elk were observed in HD 580 in January and February 2021. This total includes 441 bulls, 2,817 cows, and 957 calves. This was a 9% decline from 2020. The 580 elk population remained mostly stable from 2000 to 2007, averaging 1,477 elk during that time. The population increased steadily from 2008 to 2017 reaching a record high of 4,846 elk in 2017. From 2018-2021 the population appears to have stabilized and started to decline. The population objective for this district is 975 elk.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access factors.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The proposal was available for public comment during the initial comment period. No comments were received regarding this proposal.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Create 595-20 Either-Sex Elk Archery Permit**

**Hunting Districts:** 502, 535, 555, and 590

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Several districts in the 900-20 bundle in Region 5 are proposed to go to General Elk License Either-sex elk opportunity, so an archery permit is not needed. In the remaining Region 5 districts with Either-sex Elk permit hunting we propose the 595-20 Either-sex Elk Archery permit that would be valid in HDs 502, 535, 555, and 590. The elk plan management objectives for all these districts are to manage for older age class bulls. To achieve this management goal, limited-draw permits are needed. Archery permits are needed to manage for older age class bulls and to manage the archery hunting pressure that has steadily increased in these districts over the years.

Create a 595-20 Either-Sex Elk Archery permit to replace the 900-20 Either-Sex Elk Archery permit that was removed. This proposal offers 1,500 of the 595-20 Either-Sex Elk Archery permits. These permits would be valid in hunting districts 502, 535, 555, and 590. These permits would be offered through the drawing, any remaining permits would be sold surplus after the drawing. The associated quota range is proposed to be 800 to 2,000. Permit numbers can be adjusted annually to track changes in elk populations.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify the regulations and provide opportunity for both resident and nonresident hunters to harvest either-sex elk during the archery season.

The elk plan management objectives are to manage for older age class bulls in the Snowy Mountains EMU, Bull Mountains EMU, HD 502 and that portion of HD 520 that is now part of HD 555. These districts are proposed to continue being managed with limited entry either-sex elk permits. The remaining R5 districts that are part of the 900-20 archery permit bundle and are currently over objective with elk but don't have elk plan language speaking to the management of older age class bulls are proposed to go to General Elk License Either-sex Elk regulation type.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The smaller archery permit hunting district bundle in this proposal allows for more precise archery hunter distribution on the landscape. These smaller archery permit hunting district bundles should address overcrowding complaints from sportsmen, and the local hunter frustration who do not draw the 900-20 permit and the assumption that many 900-20 permit holders are hunting in R7 because of the record bulls harvested in recent years.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations in the hunting districts covered by this proposal are all over total elk population objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access issues. Hunter access for either-sex elk hunting varies across the Region. Elk habitat within these districts generally consists of mountain foothills or timbered breaks habitat. These habitat types are highly productive for elk. They generally provide quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public review during the initial public comment period. We initially proposed two archery permits in Region 5. One archery permit valid in the Snowy Mountains HDs 411 and 535 and another archery permit that would cover HDs 502, 555, and 590. We received comments and phone calls from the public requesting one archery permit that would allow them to hunt elk on the north (HD 535) and south (HD 590) sides of Hwy 12 along the Musselshell River in Region 5. Elk move across this boundary in the archery season. All of these hunting districts were together under the 900-20 archery permit that is proposed to be removed so it makes sense biologically and socially to have one Region 5 elk archery permit that is valid in HDs 502, 535, 555, and 590.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
Increase 005-00 Elk -B Quota and Range**

**Hunting Districts:** 502, 515, 525, 535, 540, 575, 580, 590

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Increase the 005-00 Elk B License quota and quota range to account for the removal of the 595-00 Elk B License opportunity. Currently 2,500 of the 005-00 Elk B Licenses are available and 3,500 of the 595-00 Elk B Licenses are available.

This proposal offers 6,000 of the 005-00 Elk B Licenses. These licenses would be valid in Hunting Districts 502, 515, 525, 535, 540, 575, 580, and 590. All of these hunting districts have elk populations that are over objective. They will be offered through the drawing, the remaining licenses would be sold surplus after the drawing. The associated quota range is proposed to be 2,000 to 8,000. License numbers can be adjusted annually to track changes in elk populations.

Add early antlerless season dates Aug 15 to Sep 3 that are only valid on private land.

Add late antlerless season dates starting Dec 19 to Jan 8 that are Not valid on National Forest Lands or FWP WMAs.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify the regulations and provide more opportunity for hunters to harvest elk in different parts of Region 5 on the same license.

The objective of adding the early and late season dates to the license is to increase the opportunity for both resident and nonresident hunters to harvest antlerless elk in these districts. These additional dates will give private landowners who wish to reduce elk numbers on their lands another tool to utilize if they decide to do so.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This proposal is directed at regulations simplification. With the addition of the early and late season dates we should see the annual growth rates of the antlerless segment of the elk herd gradually decline in these districts. We should also see an increase in antlerless harvest from the annual hunter harvest survey. We also expect a decrease in game damage complaints.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations in the hunting districts covered by this proposal are all over total elk population objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access issues. Hunter access for antlerless elk hunting varies across the Region. Elk habitat within these districts generally consists of mountain foothills or timbered breaks habitat. These habitat types are highly productive for elk. They generally provide quality summer and winter range

resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

Game damage complaints from elk are common, especially during severe winters. Providing the same amount of Elk B Licenses but reducing the confusion of having to pick a B License reduces hunter confusion while maintaining the opportunity. Reducing the elk populations to objective is desirable to reduce game damage complaints from private landowners.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public review during the initial public comment period. Few comments were received, however in past public comment opportunities we received comments against early and late hunting season dates. We anticipate some opposing comments to this proposal because it includes early and late antlerless season dates.

In past public comment sessions we also received comments opposing late season dates on National Forest Land. We listened to that and are not proposing any late season National Forest opportunity for biological reasons. The biological reason is to encourage elk to use winter habitat areas on National Forest Land which the Forest Service manages through habitat and travel closures. Elk wintering on National Forest Land also reduces disease transfer opportunities between elk and livestock. In addition elk wintering on National Forest are not causing game damage to private lands.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Create new deer/elk district 565**

**Hunting Districts:** 560,565

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to take the existing portion of district 560 south of Falls Creek, and make that portion a new deer/elk hunting district.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify the hunting regulations for new district 525, and for all R5 elk districts by removing the district portion which has caused confusion in the past. The elk, mule deer, and whitetail deer opportunity in this new district will be the same opportunity as was available in the past.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The proposal is directed at regulations simplification. There are no biological measures of success associated with this proposal.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The Upper Boulder is a timbered winter range with relatively few open areas, which makes counting, and classifying elk extremely difficult. A helicopter survey provides the best opportunity to count elk, but classification is still difficult due to the timber. The population objective for the upper Boulder is 300 elk.

There is considerable movement and mixing of elk herds in the Natural Bridge area especially during the spring. GPS collar data indicate that McLeod Basin elk regularly mix with Main Boulder elk in this area. Some elk counted during the spring helicopter survey of the Main Boulder around Natural Bridge have likely already been counted during the January SuperCub survey of the McLeod Basin area. This adds a degree of uncertainty to actual elk numbers in the upper Main Boulder. Looking only at elk observed south of Falls Creek during the spring helicopter survey may give a more accurate representation of upper Boulder elk herd numbers.

The spring 2021 flight was about a week early of perfect green up. Three hundred thirty-four elk were observed- 17% higher than the last survey in the spring of 2019. However, all but two of these elk were observed north of Falls Creek. No elk were observed around Hawley Mtn or Speculator area. The upper Main Boulder elk appeared to still be at low elevation near Natural Bridge and Baker Draw at the time of survey.

Spring green up in 2019 was about two weeks later than normal. Only 23 elk were observed in the Upper Boulder. These elk consisted of three unclassified bulls, 17 cows and three calves. No elk were observed on the Hawley Mtn winter range. In mid May I received reports of 20-40 elk in the Hawley Mtn area. The 2019 flight was likely too early and many elk were missed because green up had not progressed far enough.

In 2018, there were 140 elk observed including 10 unclassified bulls, 100 cows and 30 calves.

In 2017, 136 elk observed south of Falls Creek including four unclassified bulls, 106 cows and 26 calves.

In 2016, 168 elk were observed south of Falls Creek.

One hundred thirty four elk were observed south of Falls Creek in 2015.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access factors.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public comment during the initial public review period. The only comment received expressed concern for clarifying the boundary/legal description. The existing 'portion of 560' description has been in use for more than 10 years with minimal conflict/confusion. FWP has evaluated the boundary/legal description and made it as simple as possible.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove 595-00 B License**

**Hunting Districts:** 502, 515, 525, 540, 575, 580, and 590

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove the 595-00 Elk B License and replace these licenses by increasing the 005-00 Elk B License.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify the regulations and provide more opportunity for hunters to harvest elk in different parts of Region 5 on the same license. No change in overall Region 5 elk harvest is recommended or anticipated with this proposal.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This proposal is directed at regulations simplifications. No biological measures of success are associated with this proposal.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk populations in the hunting districts covered by this proposal are all over total elk population objective.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access issues. Hunter access for either-sex elk hunting varies across the Region. Elk habitat within these districts generally consists of mountain foothills or timbered breaks habitat. These habitat types are highly productive for elk. They generally provide quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public review during the initial public comment period. Few comments were received and none opposed this proposal.



**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
HD 575 ES Elk**

**Hunting Districts: 575**

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Simplify the hunting regulations by eliminating the ES permit and instituting an ES hunting opportunity for the archery and the general season. Currently 800-900 elk are being counted annually in this hunting district. The elk plan objective for HD 575 is 225 elk. The elk plan does not contain any language regarding bull age structure.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Simplify season structure and increase hunter opportunity with the goal of reducing elk numbers.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Harvest will be monitored via the statewide hunter questionnaire survey. Late winter/spring aerial surveys will track elk population trends.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The elk population objective is 225 elk. This population has been over objective since 2011. In the last five years we have typically counted 750 to over 900 elk.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 502 Elk Structure**

**Hunting Districts:** 502

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Increase hunting opportunity in HD 502 by increasing ES permits and establishing early and late shoulder seasons

Elk population objective for this hunting district is 50 elk. The population has been over objective since at least 2002. Over the last five years the average count has been 165 elk.

Elk, especially bulls, from this HD often cross into HD 555 and vice versa necessitating managing bulls with the same season type. The elk plan recognizes the public demand for maintaining ES elk permits in this area.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Increase elk harvest through more liberal season structure.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Harvest will be monitored via the statewide hunter questionnaire survey. Annual aerial surveys will track elk population trends.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk population objective for this hunting district is 50 elk. The population has been over objective since at least 2002. Over the last five years the average count has been 165 elk.

Elk, especially bulls, from this HD often cross into HD 555 and vice versa necessitating managing bulls with the same season type. The elk plan recognizes the public demand for maintaining ES elk permits in this area.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The Sunlight Ranch is one of the major landowners in this HD and provides the majority of the access. The Sunlight Ranch Hunting Advisory Group supported this proposal.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove 580 Portion South of Sweet Grass Creek**

**Hunting Districts:** 580

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to remove the portion south of Sweet Grass Creek. This includes removing the 580-20 either sex elk permits which were valid in that portion. The entire district would become a general either sex elk season. The 900-20 archery permit requirement would also be removed. Early antlerless season would be added starting on August 15. Late antlerless season would run Dec 19 to Jan 8.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify regulations and increase elk harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured in two ways. First, hunter harvest surveys will be used to monitor changes in elk harvest. Second, aerial elk surveys will be used to monitor changes in the elk population.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Four thousand two hundred fifteen (4,215) elk were observed in HD 580 in January and February 2021. This total includes 441 bulls, 2,817 cows, and 957 calves. This was an 9% decline from 2020. The 580 elk population remained mostly stable from 2000 to 2007, averaging 1,477 elk during that time. The population increased steadily from 2008 to 2017 reaching a record high of 4,846 elk in 2017. From 2018-2021 the population appears to have stabilized and started to decline. The population objective for this district is 975 elk.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather or habitat factors. Hunter access to elk on private lands is considered a limiting factor to harvest in district 580. Game damage from elk frequently occurring during average and extreme winters. The district is over objective and the 2005 Elk Management Plan does not contain language specific to managing for older age class bulls. Thus supporting the removal of the either sex permits and additional length of shoulder seasons.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The proposal was available for public comment during the initial public comment period. Few comments were received and feedback was mixed. Some comments supported the removal of the either sex permits noting increased harvest opportunity. Other comments opposed the permit removal and noted concerns about reduction in older age class bulls and potential access changes.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine 500 and 570 into new 515**

**Hunting Districts:** 500, 570, 515

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to combine deer/elk hunting districts 500 and 570 into new deer/elk district 515. Both districts provide similar habitat and access opportunities for elk and deer.

Elk: The current elk season structure in both districts allows for antlerless elk and spikes to be taken on a General License. Either-sex elk may be harvested by permit only. The 900-20 archery permit is required to bow hunt elk in both districts. B License opportunity is also available, including early and late shoulder seasons. The elk management goal from the 2005 Elk Management Plan is: *Prevent elk populations from increasing and prevent elk from expanding into new areas where game damage is likely to occur. Elk damage to agricultural crops will be the primary factor driving management in this EMU. Elk numbers should be maintained at no more than current levels and, in most areas, reduced whenever possible.*

The proposed new elk season structure for 515 is a General License either-sex season for both archery and rifle seasons. Both hunting districts are over objective. There is no management direction in the 2005 Elk Management Plan directing FWP to manage for older age class bull elk. Early and late shoulder seasons will continue.

Mule Deer: Both 500 and 570 are managed under the Prairie Breaks Population Management Unit in the Mule Deer Adaptive Harvest Management Plan. Both districts follow similar population trends and it is appropriate to manage them as one district for mule deer. New 515 will continue to have an either-sex archery and rifle season with limited B License opportunity. 200 B Licenses will be offered with a quota range of 50-500. No changes in mule deer numbers, season structure, management direction, or hunter access are anticipated with this proposal.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Elk: The objective of the proposal is to simplify hunting regulations by combining similar districts and removing the limited either-sex permit for archery and rifle seasons. These changes should also allow for increased elk harvest on the bull segment of the population.

Mule Deer: The objective of the proposal is to simplify hunting regulations.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Elk: Success will be measured by tracking annual elk harvest and population trends. An increase in elk harvest and corresponding reduction in elk numbers would signify success from a biological perspective.

Mule Deer: This proposal is directed at regulations simplification. There are no biological measures of success associated with this proposal.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Elk: The management goal for district 500 is 60 elk, with not more than 10 of those elk being bulls. The management goal for district 570 is 100 elk, with not more than 20 of those being bulls. During the most recent

aerial elk survey, district 500 had 372 total elk including 117 bulls. District 570 had 690 total elk with 200 of those being bulls. The elk populations in both districts have been increasing for the past 15 years.

Mule Deer: Mule deer numbers in district 500 are 23% above long-term average. Mule deer numbers in district 570 are currently 17% below long-term average.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access factors. Hunter access for elk hunting varies across HD 515. Elk habitat within these districts generally consists of grassland prairie/ag cropland with scattered ponderosa pine savanna habitat. This habitat type generally provides quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

Elk game damage complaints occur during severe winters. Providing the same amount of Elk B Licenses but reducing the confusion of having to pick a B License reduces hunter confusion while maintaining the opportunity. Reducing the elk populations to objective is desirable to reduce game damage complaints from private landowners.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

Elk: The proposal was available for public review during the initial comment period. Some comments supported removing the either-sex elk permit and going to a General License either-sex season for archery and rifle seasons. Other comments recommended keeping the either-sex permit structure in place for archery and rifle season. Comments were mixed with no overwhelming support or opposition in either direction.

Mule Deer: The proposal was available for public review during the initial comment period. No comments were received specific to mule deer.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 590-20 quota change**

**Hunting Districts:** 590

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

The proposal is to remove the north and south portions of HD 590. This includes removing the 590-21 either sex permits which were valid in the south portion of the district. This would also include combining the number of permits from both portions combined and adding an additional 80 permits to the existing 590-20. Early antlerless seasons would be added starting on August 15th. Late antlerless season would be added and would run Dec 19 to Jan 8. The 900-20 archery permit requirement would also be removed.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify regulations and increase elk harvest.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Success will be measured in two ways. First, hunter harvest surveys will be used to monitor changes in elk harvest. Second, aerial elk surveys will be used to monitor changes in the elk population.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Two thousand six hundred and ninety elk were observed in the north portion of HD 590 during the 2019 winter survey. Four hundred forty-two elk were observed in the south portion of HD 590 in 2021. The objective for the two portions combined is 1050 elk and there are currently 3,132 elk in this district. The population in the north portion has continued to grow reaching a record high of 2703 in 2017. The southern population has remained relatively stable.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather or habitat factors. Hunter access to elk on private lands is considered a limiting factor to harvest in district 590. The 2005 Elk Management plan contain language specific to managing for older age class bulls in HD 590.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

The proposal was available for public comment during the initial public comment period. No comments were received regarding the additional 80 permits in this district.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Remove 540-00 license, add early and late dates**

**Hunting Districts:** 540

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove the 540-00 Elk B License to simplify the regulations. Only the 005-00 Elk B License would be valid in HD 540.

Add early antlerless season dates, Aug 15 to Sep 3, for Antlerless Elk on the General Elk License and the 005-00 Elk B License that are only valid on private land.

Add late season dates, Dec 19 to Jan 8, for Antlerless Elk on the General Elk License and the 005-00 Elk B License that are not valid on National Forest Lands or FWP WMAs.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of the proposed change is to simplify the regulations and provide more opportunity for hunters to harvest elk in different parts of Region 5 on the same license.

The objective of adding the early and late season dates to the license is to increase the opportunity for both resident and nonresident hunters to harvest antlerless elk in these districts. These additional dates will give private landowners who wish to reduce elk numbers on their lands another tool to utilize if they decide to do so.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

This proposal is directed at regulations simplification. With the addition of the early and late season dates we should see the annual growth rates of the antlerless segment of the elk herd gradually decline in these districts. We should also see an increase in antlerless harvest from the annual hunter harvest survey. We also expect a decrease in game damage complaints.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

One thousand seven hundred sixty-six (1,766) elk were observed in hunting district (HD) 540 in March 2021. This total includes 217 bulls, 1,107 cows and 442 calves (Table 1.) This was a 9% decrease from 2020. Survey conditions were very good with calm winds, clear sky and patchy snow cover.

The population objective for this district is 600 total elk. The second population objective is to maintain a minimum of 5% bulls among the total elk observed during post-season surveys. The 2021 count is 194% above objective and there were 12% bulls among the total elk observed during the survey. Historic elk numbers including bull:cow and calf:cow ratios are shown in Table 1. The observed population ratios were 20 bulls and 40 calves per 100 cows. Forty-eight percent (48%) of bulls observed were yearling (spike) bulls. Fifty-two percent (52%) of observed bulls were brow-tined bulls (2.5 years old or older).

Total harvest has averaged 213 elk per year since 2005 and varied from a low of 88 in 2007, to a high of 366 elk in 2017 (Table 2). In 2020, an estimated 262 total elk were harvested, 23% above the 15-year average. One hundred seventy-six antlerless elk were harvested, 46% above the 15-year average. Antlerless elk harvest decreased 27% from the previous year but was consistent with the previous 5 years harvest.

Table 1. Classification of elk in HD540, 2001-02 to 2020-21. Unclassified = Unc.

Year Month	Bulls				Cows	Calves	Unc	Total	Ratios	
	BTB	Yrl	Unc	Total					Bull:Cow:Calves	Bulls:100 Elk
2001 Mar	0	16		16	45	12	574	647	NA	2
2002 Apr	7	12		19	35	9	640	703	NA	3
2003 Apr	25	11		36	38	6	758	838	NA	4
2004 Apr <sup>1</sup>	2	20		22	107	61	439	629	NA	3
2005 Apr	26	8	21	55	0	0	720	775	NA	7
2006 Apr	6	15	3	24	12	2	856	894	NA	3
2007 Apr	3	5	59	67	82	12	818	979	NA	7
2008 Apr	75	24		99	0	0	1184	1283	NA	8
2009 Apr	24	52	24	100	85	13	1199	1397	NA	7
2010 Apr	3	47	8	58	38	4	1168	1268	NA	5
2011 Apr	29	96		125	17	3	1279	1424	NA	9
2012 Apr	23	96		119	1016	301	0	1436	NA	8
2013 May	-	-		-	-	-	1640	1640	NA	-
2014 May	-	-		-	-	-	1617	1617	NA	-
2015 Apr	58	104		162	36	25	1360	1583	NA	10
2016 Apr	31	67	19	117	523	255	891	1786	22:100:49	7
2017 Jan	96	56		152	34	26	1834	2046	NA	7
2018 Mar <sup>2</sup>	40	80		120	1149	572	0	1841	10:100:50	7
2019 Mar	75	123		198	1094	623	0	1915	18:100:57	10
2020 Mar	118	158		276	1190	484	0	1950	23:100:41	14
2021 Mar	113	104		217	1107	442	0	1766	20:100:40	12

<sup>1</sup>Very poor survey conditions, cloudy windy and elk may have been undercounted.

<sup>2</sup>Used the 2016 calf:cow ratio to calculate number of cows and calves in the large elk groups that couldn't be classified from the air.

Figure 1: Table 1. Classification of elk in HD 540, 2001-02 to 2020-21. Unclassified = Unc.

Table 2. Elk harvest trends for HD540, 2004-2020. General regulations have been Antlered Bull (AB), Either-Sex (ES) or Brow-tined Bull (BTB) and Antlerless (Ant-) elk.

Year	General Regulation	No. of Hunters	No. of Permits or Licenses	BTB	Spikes	Cows	Calves	Total
2004	Antlered Bull	938	175	42	12	77	10	141
2005	AB, Last 9 days ES	762	175	59	18	67	3	146
2006	AB, Last 9 days ES	664	175	69	22	54	2	147
2007	AB, Last 9 days ES	761	175	26	8	48	0	83
2008	Either-sex	831	50 <sup>3</sup>	54	18	43	3	118
2009	Either-sex	770	50	33	36	42	8	119
2010	Either-sex	1008	50	72	22	102	37	234
2011	Either-sex	1081	50	80	22	127	24	253
2012	Either-sex	1073	50	61	11	73	6	151
2013	Either-sex	-	50	68	19	60	7	153
2014	Either-sex	1012	1200 <sup>4</sup>	85	31	135	17	268
2015	Either-sex	1134	1200 <sup>4</sup>	65	44	147	22	278
2016	Either-sex	1178	1300 <sup>4,5</sup>	61	19	151	13	243
2017	Either-sex	-	1500 <sup>4,5</sup>	128	46	178	15	366
2018	BTB or Ant-	1058	1500 <sup>4,5</sup>	88	3	166	21	277
2019	BTB or Ant-			108	3	212	28	350
2020	Either-sex	1091	4657 <sup>4,5,6</sup>	65	21	162	14	262
Avg 2005-19		944		71	21	107	14	213
Dev. from Avg		16%		-8%	-1%	51%	2%	23%

<sup>1</sup> Starting in 1991 individuals who possessed an antlerless elk permit could not shoot a bull in the hunting district the antlerless permit was valid for.

<sup>2</sup> Between 1992 and 2003 antlerless permits for this area were valid 6 days prior to the general season and for the entire season instead of two separate time-periods.

<sup>3</sup> Prior to 2008 numbers in this column were for permits. Starting in 2008 the permits became a second license for antlerless elk.

<sup>4</sup> Elk B-licenses were combined and valid for most Region 5 elk hunting districts (Elk B license 005-00).

<sup>5</sup> 100 additional B-licenses were available in HD540 that were valid in entire district

<sup>6</sup> 3001 additional B-licenses were valid in most Region 5 elk hunting districts (Elk B-license 595-00).

Figure 2: Table 2. Elk harvest trends for HD 540, 2004-2020. General regulations have been Antlered Bull (AB), Either-sex (ES), or Brow-tined Bull (BTB) and Antlerless (Ant-) elk.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

The proposal is not related to weather, habitat, or access issues. Hunter access for antlerless elk hunting varies across Hunting District 540. Elk habitat within these districts generally consists of mountain foothills habitat. This



habitat type is highly productive for elk. Mountain foothills habitat generally provides quality summer and winter range resulting in high annual survival and high rates of recruitment. These factors result in robust and increasing elk herds even during periods of unfavorable weather conditions.

Game damage complaints from elk are common, especially during severe winters. Providing the same amount of Elk B Licenses but reducing the confusion of having to pick a B License reduces hunter confusion while maintaining the opportunity. Reducing the elk populations to objective is desirable to reduce game damage complaints from private landowners.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal was available for public review during the initial public comment period. Few comments were received, however in past public comment opportunities we received comments against early and late hunting season dates. We anticipate some opposing comments to this proposal because it includes early and late antlerless season dates.

In past public comment sessions we also received comments opposing late season dates on National Forest Land. We listened to that and are not proposing any late season National Forest opportunity for biological reasons. The biological reason is to encourage elk to use winter habitat areas on National Forest Land which the Forest Service manages through habitat and travel closures. Elk wintering on National Forest Land also reduces disease transfer opportunities between elk and livestock. In addition elk wintering on National Forest are not causing game damage to private lands.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**622-20 Quota Change**

**Hunting Districts:** 622

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is tied to the 622 Boundary change proposal. With the boundary change between 622 and 630, quotas will need to be adjusted to reflect the new boundary, opportunity and desired harvest. Historically there have been three either-sex LPT's that are directly tied to the HD 622 include the 620-21 either-sex archery permit, 620-20 either-sex rifle permit, and the 622-22 either-sex rifle permit. Due to the proposed HD expansion we propose the two quota increases (620-20 and 622-20) to corresponding with the increase in HD size and respective observed elk numbers.

- Elk 622-20 LPT: Proposed Quota 60 (increase from 50).
- 

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Overall objective is in line with the state simplification process and this LPT needs adjustment with the larger 622 boundary change proposal.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Trends in elk populations are monitored by completing biennial post-season surveys across the Missouri River Breaks. Total number of elk observed, as well as calf and bull to cow ratios from these surveys, are measured against population objectives within the Elk Management Plan to determine population status and trend of elk across the region as well as within hunting districts. Success of this proposal will be measured by the continual monitoring of the above parameters within HD 622 and adjacent HDs. Secondly, harvest surveys provide harvest estimates across the region as well as by HD. Elk harvest estimates provide another measure of population level and availability of elk for harvest, as well as prior year removal from the population and effectiveness of B Licenses types.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

During the biennial survey in February 2020, total elk numbers were 20% above the upper objective outlined in the elk management plan for HD 621 and 622. Calf ratios were below the long-term average (47 ca:100 cows) with a ratio of 40:100 cows. Bull ratio of 31 bulls:100 cows is below the LTA of 45 bulls:100 cows and slightly above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan. During the biennial survey in February 2020, total elk numbers (n = 405) were 16% above the upper objective outlined in the elk management plan for HD 631 and 632. Calf ratios were above the long-term average (52 calves:100 cows) with a ratio of 57:100 cows. Bull ratios 92 bulls:100 cows is above the LTA of 56 bulls:100 cows and is well above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposal is for a permit quota change but is directly tied to the HD 622 expansion, which will allow hunters to utilize management tools that are currently available in HD 622 to pursue elk when winter weather sometimes

drives them into HD 631 (proposed portion that is described) so now they will be available for harvest to a broader group when they were not previously. This also allows hunters more freedom and a larger area to locate elk across a mixture of private and public lands throughout the larger HD.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal is supported by the Breaks Elk Working Group with the recognition that it could help elk management. Some of the large landowners in the affected areas have been asked about this proposal, and there has been very few issues. However, there are hunters that do not support the new boundary change as it will impact their hunting habits and resulting hunter redistribution. The Region 6 CAC were also contacted about the proposal and recognized its strengths of better elk herd management but questioned if the expansion was large enough and if the archery either-sex permit should also be adjusted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**630 Consolidation**

**Hunting Districts:** 630

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

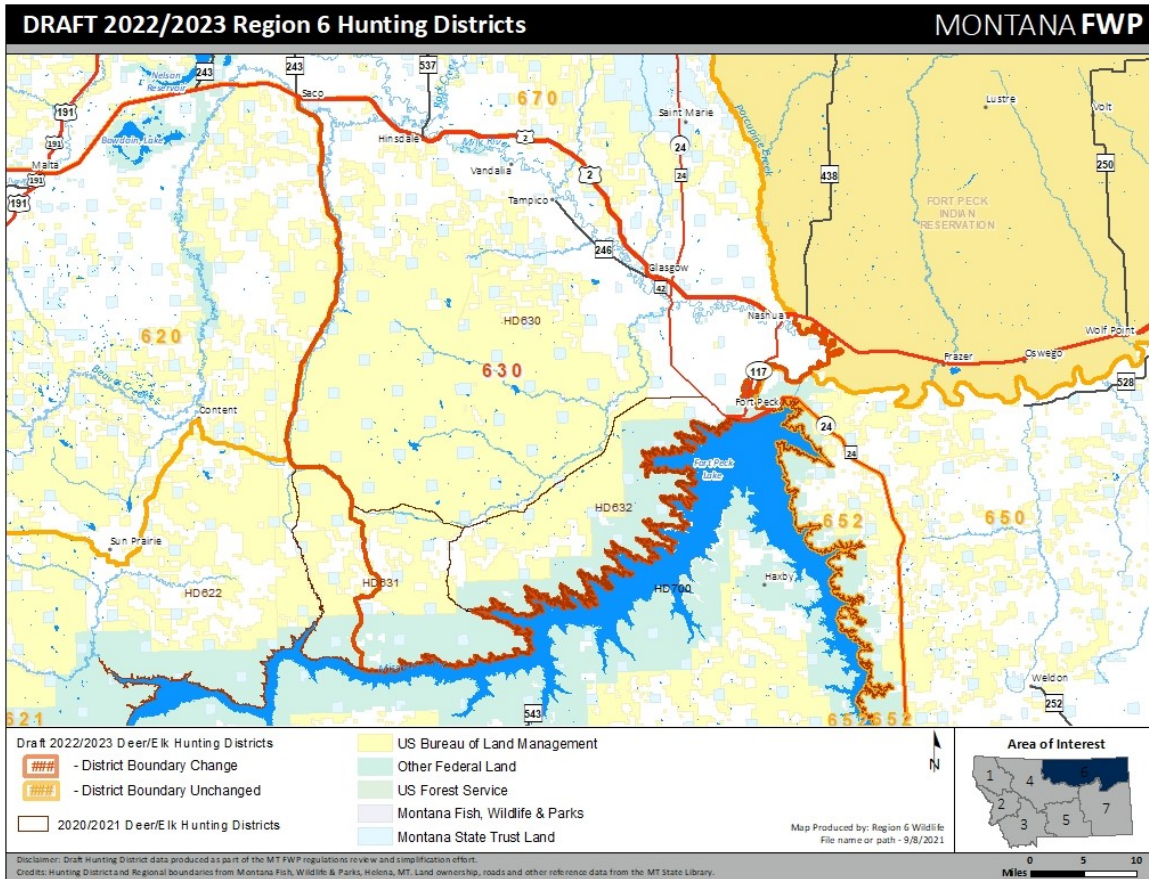
This proposal aims to combine Hunting District 630, the remainder of HD 631 (east of Ridge Road/Burke Ranch Road), and HD 632 into the new HD 630 (Figure 1.) Currently HD 630, 631, and 632 are all general districts for deer and have a Mule Deer B License that is valid across all three of those HDs already. There are multiple associated elk LPTs and antlerless Elk B Licenses for these HDs and they would be combined and have quota adjustments to account for the proposed consolidation of the multiple HDs. Note: Antelope and mountain lion HDs would see the corresponding changes as well.

Legal Description for the proposed consolidated HD 630 and proposed quota and quota range:

Those portions of Valley and Phillips Counties lying within the following-described boundary: Beginning at a point where the Larb Creek Road joins US Highway 2 at Saco, then south along said road to Ridge Road, then south along said road to Willow Creek Road, then southwesterly along said road to Burke Ranch Road, then south along said road to Charles M Russel National Wildlife Refuge (CMR) Boundary Road 425, then south along said road to the point where the road meets Fort Peck Reservoir, then easterly along said reservoir to Fort Peck Dam and State Route 24, then easterly along said route to the Missouri River at Fort Peck Dam, then northeasterly down said river to the Milk River, then north along said river to Porcupine Creek, then north along said Creek to US Highway 2, then northwesterly along said highway to the Larb Creek Road at Saco, the point of beginning.

Historically there have been two antlerless Elk B Licenses (631-00 and 632-00) tied to these HDs, as well as two archery either-sex permits (631-21 and 632-21) and two general season either-sex permits (631-20 and 632-20). Due to the proposed HD consolidation we propose that these two antlerless B Licenses be combined into one to cover the entire newly proposed HD and that the two archery either-sex permits and the two general season either-sex permits be respectively combined into one archery either-sex permit and one general season either-sex permit to cover the entire newly proposed HD.

- Elk antlerless B License: Range 1-200, Proposed Quota 50
- Elk archery either-sex permit: Range 100-300, Proposed Quota 200
- Elk either-sex permit: Range 25-75, Proposed Quota 25



**Figure 1:** Figure 1. Current hunting districts relative to the proposed consolidation of HD 630, remaining portion of HD 631 based off another proposal, and HD 632 to create a new HD 630.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The overall objective is to improve management of elk in the area as outlined by the Elk Management Plan (2005) as well as reduce the number of Hunting Districts and LPT's in Region 6 to help simplify regulations. Typically there has been some late season influx of elk from HD 622 during winter in the portion of HD 631 that was proposed to be added to HD 622, this then leaves the rest of the elk in the remainder of 631, 630, and 632 that are typically fewer in number and remain as their own standalone population. This change will help allocate those elk counted on winter surveys to the HD they are in during the fall, which in turn impacts how elk populations relate to population objectives. With this combination, elk populations within HD 620, 621, and 622 would remain over the population objective by 27% and HD 630, 631, and 632 would be 5% under the objective. Bull ratios from the 2020 elk survey would see similar alignments with the proposal. HDs 620, 621, 622 would increase from 31 bulls:100 cows to 36 bulls:100 cows. HDs 630, 631, 632 would decrease from 92 bulls:100 cows to 61 bulls:100 cows (Tables 1 & 2).

This change will also utilize harvest tools across the larger home range of these elk, which would allow LPT and B License holders the opportunity to have access to a larger area to pursue elk. This in turn could improve elk harvest of the herd.

HD	Bulls			Cows	Calves	Unclass.	Total	Ratios: 100 Cows	
	Yearlings	Adult	Total					Bulls	Calves
621	50	137	187	395	194	0	776	47	49
622	74	100	174	771	270	0	1215	23	35
Sub Total	124	237	361	1166	464	0	1991	31	40
631	30	96	126	166	87	0	379	76	52
632	1	25	26	0	0	0	26	NA	NA
Sub Total	31	121	152	166	87	0	405	92	52
Total	155	358	513	1332	551	0	2396	39	41

**Figure 1:** Table 1. Survey data for Hunting Districts 621, 622, 631, and 632 in the Missouri River Breaks during the winter of 2020.

HD	Bulls			Cows	Calves	Unclass.	Total	Ratios: 100 Cows	
	Yearlings	Adult	Total					Bulls	Calves
621	50	137	187	395	194	0	776	47	49
622	84	162	246	806	282	0	1334	31	35
Sub Total	134	299	433	1201	476	0	2110	36	40
631	20	34	54	131	75	0	260	41	57
632	1	25	26	0	0	0	26	NA	NA
Sub Total	21	59	80	131	75	0	286	61	57
Total	155	358	513	1332	551	0	2396	39	41

**Figure 2:** Table 2. Survey data that has been updated based on the proposed Hunting District boundary change to show a detailed breakdown of how the observed elk counts and ratios would look based on the data collected in the Missouri River Breaks during the winter of 2020.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Because the goal will expand and adjust boundaries, the B License quotas, LPT's, and their respective quota ranges for the proposed HD will reflect the current portion of HD 631, HD 630, and HD 632 and quotas will also reflect what the assumed hunting pressure and harvest is in that area.

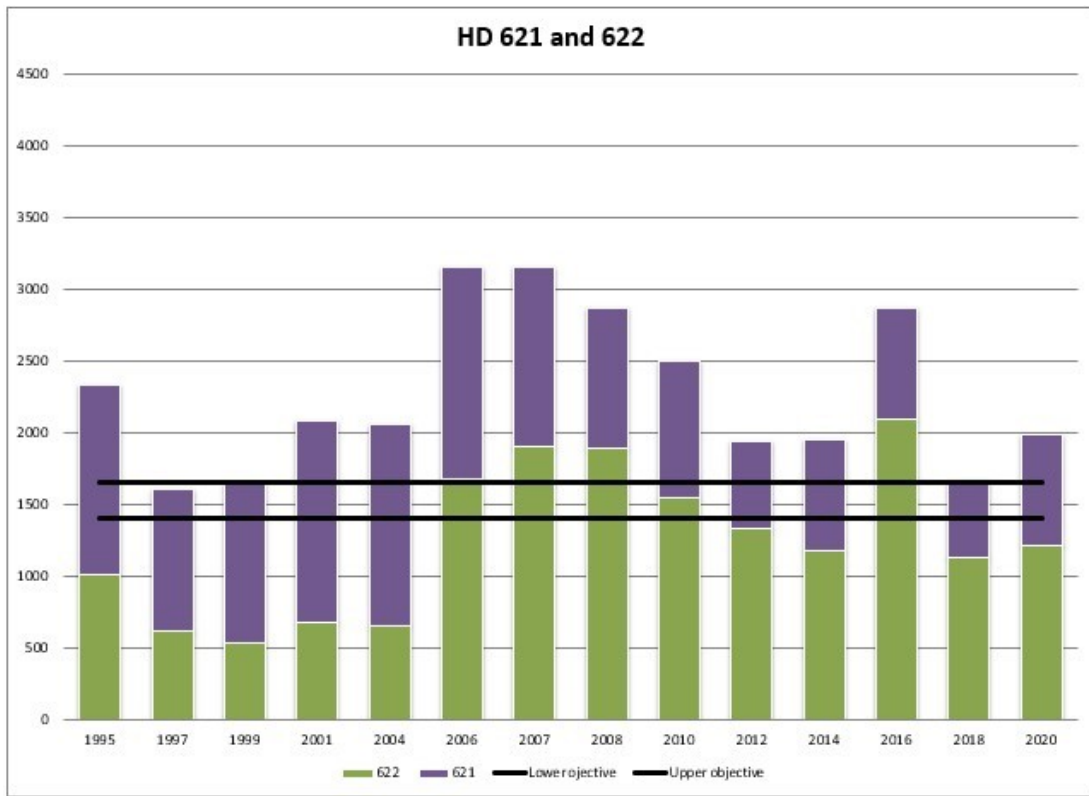
Trends in elk populations are monitored by completing biennial post-season surveys across the Missouri River Breaks. Total number of elk observed, as well as calf and bull to cow ratios from these surveys, are measured against population objectives within the Elk Management Plan to determine population status and trend of elk across the region as well as within hunting districts. Success of this proposal will be measured by the continual monitoring of the above parameters within HD 630 and adjacent HDs. Secondly, harvest surveys provide harvest estimates across the region as well as by HD. Elk harvest estimates provide another measure of population level and availability of elk for harvest, as well as prior year removal from the population and effectiveness of B License types.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

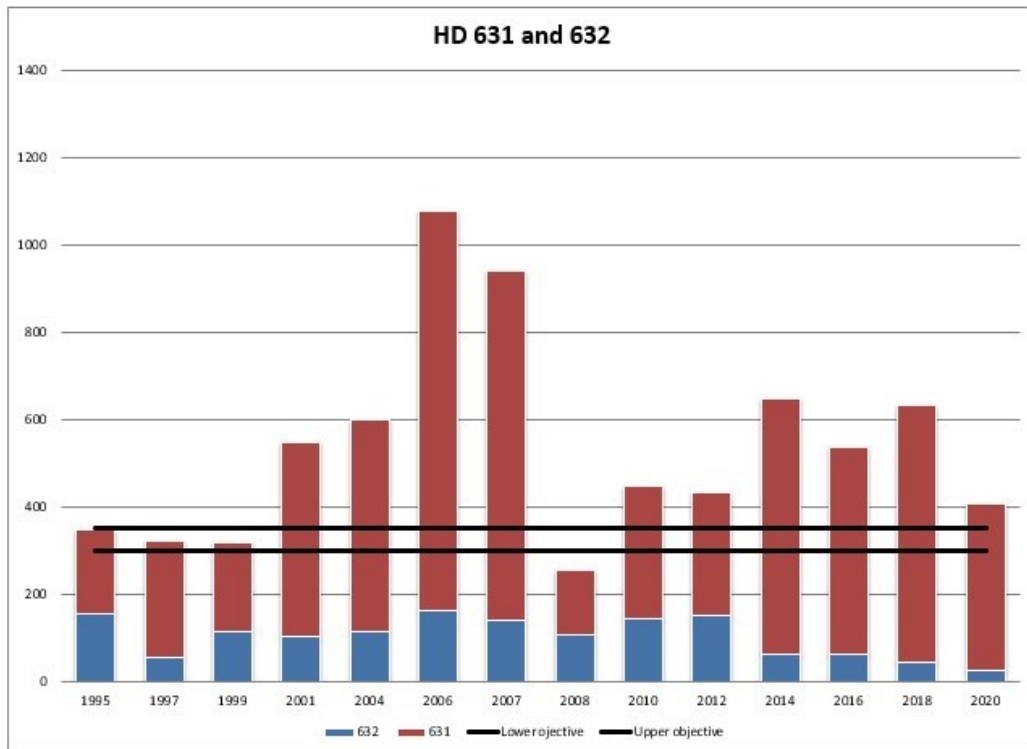
There are currently biennial surveys that occur in the HD 621 and 622 and then in HD 631 and 632 and their respective data are below.

During the biennial survey in February 2020, total elk numbers were 20% above the upper objective outlined in the elk management plan for HD 621 and 622. Calf ratios were below the long-term average (47 ca:100 cows) with a ratio of 40:100 cows. Bull ratios 31 bulls:100 cows is below the LTA of 45 bulls:100 cows and slightly above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.

During the biennial survey in February 2020, total elk numbers (n = 405) were 16% above the upper objective outlined in the elk management plan for HD 631 and 632. Calf ratios were above the long-term average (52 calves:100 cows) with a ratio of 57:100 cows. Bull ratios 92 bulls:100 cows is above the LTA of 56 bulls:100 cows and is well above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.



**Figure 1:** Figure 3. Hunting District 621 and 622 biennial elk survey data with corresponding lower and upper objective levels, 1995-2020.



**Figure 2:** Figure 4. Hunting District 631 and 632 biennial elk survey data with corresponding lower and upper objective levels, 1995-2020.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This HD expansion will allow hunters to utilize management tools across a larger, singular HD to pursue elk. This also allows hunters more freedom and a larger area to locate elk across a mixture of private and public lands throughout the larger HD.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal is supported by the Breaks Elk Working Group with the recognition that it could help elk management. Some of the large landowners in the affected areas have been asked about this proposal, and there has been very few issues. However, there are hunters that do not support the new boundary change as it will impact their hunting habits and resulting hunter redistribution. The Region 6 CAC were also contacted about the proposal and recognized its strengths of better elk herd management but questioned if the expansion was large enough and if the archery either-sex permit should also be adjusted.



**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
R6 Elk Structure LPT 699-01 Modification**

**Hunting Districts:** 690

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposed change would result in the LPT 699-01 antlerless elk youth license no longer being valid in HD 690. The license would still be valid in HDs 620, 621, 622, 630, 631, and 632. Five youth elk licenses (LPT 690-00) were first offered in HD 690 in 2006. The quota for this license was increased to 25 in 2007 and remained at that level through 2019. This license was only valid during the general season. In 2020, the three separate youth elk license types available in Region 6 were combined into one youth antlerless elk license (LPT 699-01) with a quota of 200 licenses, which was valid in HDs 620, 621, 622, 630, 631, 632, and 690. This license was valid starting two days prior to the general season. In 2020, hunting districts 680 and 690 were combined into one hunting district (690) and antlerless elk hunting was allowed with General Elk License. Resident youth hunters would still be able to hunt antlerless elk in HD 690 with their General Elk License.

Region 6 Youth Elk License Quotas 2014-2020							
LPT	2014	2015	2016	2017	2018	2019	2020
690-01	25	25	25	25	25	25	0
621-00	100	100	100	100	100	100	0
631-01	25	25	25	25	25	25	0
Total	150	150	150	150	150	150	200

**Figure 1:** Region 6 Youth License Quota History.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to simplify the elk regulations for Hunting District 690 through the removal of one license type.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal would be fewer elk license types for HD 690 in the 2022 Deer/Elk/Antelope hunting regulations.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent survey in this unit was completed in 2021 and counted 1026 elk. This is above the objective of 250 elk for the Bears Paw Elk Management Unit identified in the 2005 Elk Management Plan. Elk harvest in this district had averaged 111 total elk from 2015-2019. With the change to antlerless elk harvest on a General Elk License in 2020 total elk harvest increased to 207 elk.

Bears Paw Elk Management Unit Aerial Survey Data 2014-2021							
	2014	2015	2016	2017	2018	2019	2021
Total Count	731	415	435	523	647	190	1026
Calf: Cow Ratio	37	33	49	46	43	32	31
Bull: Cow Ratio	73	33	50	22	40	29	46

HD 690 Elk Harvest 2014-2020							
LPT	2014	2015	2016	2017	2018	2019	2020
<b>Antlerless Youth</b>	<b>3</b>	<b>6</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>8</b>	<b>3</b>
General Elk License	--	--	--	--	--	--	128
690-01 Antlerless	22	84	39	33	43	46	33
690-20 (Either-sex)	23	26	30	22	21	10	30
690-21 Either-sex Archery	23	21	15	17	14	24	26
696-00 Antlerless Shoulder Season	--	--	11	8	10	13	--
697-00 Antlerless Permit	--	--	20	6	17	5	--
Total	71	137	117	86	107	106	207

**Figure 1: HD 690 Aerial Survey and Harvest Data.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Weather in this district has not had a significant impact on elk populations or harvest. Recent winters have been relatively mild without long periods of deep snow. Even in more severe winters, elk in this unit generally do not experience significant levels of winter mortality. Drought conditions this year have been more severe and may have an impact on elk recruitment or production next year. The district has a very large percentage of private land and limited public access has been one of the primary factors restricting elk harvest in this hunting district.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

During the public comment period, there was one comment submitted that was opposed to this proposal. The primary reason for their opposition to this proposal was the loss of the early hunting opportunity (two days prior to general season) provided by this license. They indicated that hunting access was easier to obtain prior to the general season and provided better elk harvest opportunities for youth hunters and the youth license has a positive effect on recruitment of youth hunters. The Region 6 Citizen Advisory Committee also noted that the loss of the early hunting opportunity as a potential drawback of this proposal. During public meetings, another potential concern raised was that elimination of this license would require youth to use their General License to harvest an elk in this HD which may reduce their ability to harvest a second elk that same year.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
LPT 690-21 Quota Increase**

**Hunting Districts:** 690

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is to increase the either-sex general season elk permit (LPT 699-20) quota from 35 permits to 50 permits and adjust the quota range from 10-50 permits to a range of 15-100 permits. There were 30 permits offered in this district from 2007-2012. This quota was increased to 35 permits from 2013-2021. There are currently 50 either-sex archery permits, 150 antlerless Elk B Licenses (valid during the general season and shoulder season), and 200 youth elk licenses in this hunting district. In addition, antlerless elk harvest is allowed with only a General Elk License during the general season.

HD 690 Either-Sex Elk Permit Quotas									
LPT	2012	2013	2014	2015	2016	2017	2018	2019	2020
690-20 Either-Sex Permit Quota	30	35	35	35	35	35	35	35	35
690-21 Either Sex Archery Permit Quota	25	35	35	35	35	35	35	35	50

**Figure 1:** HD 690 Either-sex Elk Permit Quotas.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this change is to increase either-sex elk hunting opportunity in this district while maintaining a bull:cow ratio of at least 10 bulls per 100 cows. The expected average harvest with a quota of 50 permits would be 30-40 elk.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be measured by monitoring bull elk harvest and hunter effort through annual hunter harvest surveys and monitoring bull elk numbers and bull:cow ratios during biennial elk trend surveys.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent survey in this unit was completed in 2021 and counted 1026 elk. This is above the objective of 250 elk for the Bears Paw Elk Management Unit as identified in the 2005 Elk Management Plan. There were 267 bulls counted in the most recent survey and the bull:cow ratio was 46 bulls:100 cows. The average bull:cow ratios over the last 10 years has been 44 bulls:100 cows. This is above the bull objective for this unit of 10 bulls per 100 cows.

The average harvest on the 690-20 either sex elk permit over the last 10 years has averaged 23 elk. The success rate on these licenses has been 67%. The average harvest on the 690-21 archery either-sex licenses has been 20 elk and the success rate has been 55%.

Bears Paw Elk Management Unit Aerial Survey Data 2014-2021							
	2014	2015	2016	2017	2018	2019	2021
Total Count	731	415	435	523	647	190	1026
Calf: Cow Ratio	37	33	49	46	43	32	31
Bull: Cow Ratio	73	33	50	22	40	29	46

HD 690 Either-Sex Elk Harvest							
LPT	2014	2015	2016	2017	2018	2019	2020
<b>690-20 Harvest</b>	23	26	30	22	21	10	30
Quota	35	35	35	35	35	35	35
Management Success	66%	74%	86%	63%	60%	29%	86%
<b>690-21 Archery Harvest</b>	23	21	15	17	14	24	26
Quota	35	35	35	35	35	35	50
Management Success	66%	60%	43%	49%	40%	69%	52%

**Figure 1: HD 690 Population Survey and Harvest Data.**

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Weather in this district has not historically had a significant impact on elk population levels or harvest. Recent winters have been relatively mild without long periods of deep snow. Even in more severe winters, elk in this unit generally do not experience significant levels of winter mortality. Weather conditions also are not usually a significant factor affecting the distribution or availability of elk during the hunting season. Drought conditions this year have been more severe and may have an impact on elk recruitment or production next year. The district has a large percentage of private land and limited public access has been one of the primary factors restricting elk harvest in this elk management unit.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

During the season setting process in 2019, the archery permit quota was increased and at that time we did hear several comments that some landowners and hunters in this district would also like to see the either-sex rifle permit quota increased. We did also receive a comment during the most recent public comment period that indicated a preference for more either-sex rifle permits in HD 690. The primary concerns expressed in the past with increasing the either-sex rifle permit quota is the possibility for overcrowding due to the limited public access opportunities in this area and the potential impacts to the quality of bull elk harvested in the district.

**MONTANA FISH, WILDLIFE & PARKS  
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION  
Elk 2022  
690-01 Late Season Modification**

**Hunting Districts:** 690

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is to adjust the dates that the LPT 699-01 would be valid during the late season antlerless elk hunt. This license is currently valid during the general season and during the shoulder season from December 15th-February 15th. This proposal would still allow hunting during the general season, but the late season dates would be from December 19th -January 8th.

A shoulder season was first implemented in this hunting district in 2016. There were 100 antlerless elk licenses (696-00) valid from Dec 15th-December 31st. The length of this late season was extended in 2018 and ran from Dec 15th-January 15th. In 2020, antlerless elk hunting in this district was allowed on a General Elk License during the general season. This year there were 150 Elk B Licenses (690-01) valid during both the general season and the shoulder season which was extended and ran from Dec 15th-February 15th.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to simplify the regulations by having consistent season dates with late season antlerless elk seasons in other districts in the state.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The primary success of the proposal will be measured through the simplification of the 2022 regulations. Success of this season change will also be measured through annual hunter harvest surveys and biennial aerial elk surveys to determine the amount of harvest occurring during this season and the effect on elk population growth in this elk management unit.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

The most recent survey in this unit was completed in 2021 and counted 1026 elk. This is above the objective of 250 elk for the Bears Paw Elk Management Unit identified in the 2005 Elk Management Plan. Elk harvest in this district had averaged 111 total elk from 2015-2019. With the change to antlerless elk harvest on a General Elk License in 2020 total elk harvest increased to 207 elk.

Bears Paw Elk Management Unit Aerial Survey Data 2014-2021							
	2014	2015	2016	2017	2018	2019	2021
Total Count	731	415	435	523	647	190	1026
Calf: Cow Ratio	37	33	49	46	43	32	31
Bull:Cow Ratio	73	33	50	22	40	29	46

**Figure 1:** Bears Paw HD 690 Elk Survey Data.

<i>HD 690 Elk Harvest 2014-2020</i>							
<i>LPT</i>	2014	2015	2016	2017	2018	2019	2020
<i>General Elk License</i>	--	--	--	--	--	--	128
<i>690-01 Antlerless</i>	22	84	39	33	43	46	33
<i>696-00 Shoulder Season</i>	--	--	11	8	10	13	--
<i>697-00 Antlerless Elk Permit</i>	--	--	20	6	17	5	--
<i>690-20 Either-Sex</i>	23	26	30	22	21	10	30
<i>690-21 Either-Sex Archery</i>	23	21	15	17	14	24	26
<i>Youth Elk License</i>	3	6	2	0	2	8	3

**Figure 2:** HD 690 Elk Harvest.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Weather in this district has not historically had a significant impact on elk population levels or harvest. Recent winters have been relatively mild without long periods of deep snow. Even in more severe winters, elk in this unit generally do not experience significant levels of winter mortality. Weather conditions also are not usually a significant factor affecting the distribution or availability of elk during the hunting season. Drought conditions this year have been more severe and may have an impact on elk recruitment or production next year. The district has a large percentage of private land and limited public access has been one of the primary factors restricting elk harvest in this elk management unit.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal has not been vetted with sportsmen groups or landowner at this time.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**622 Boundary Change**

**Hunting Districts:** 622

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

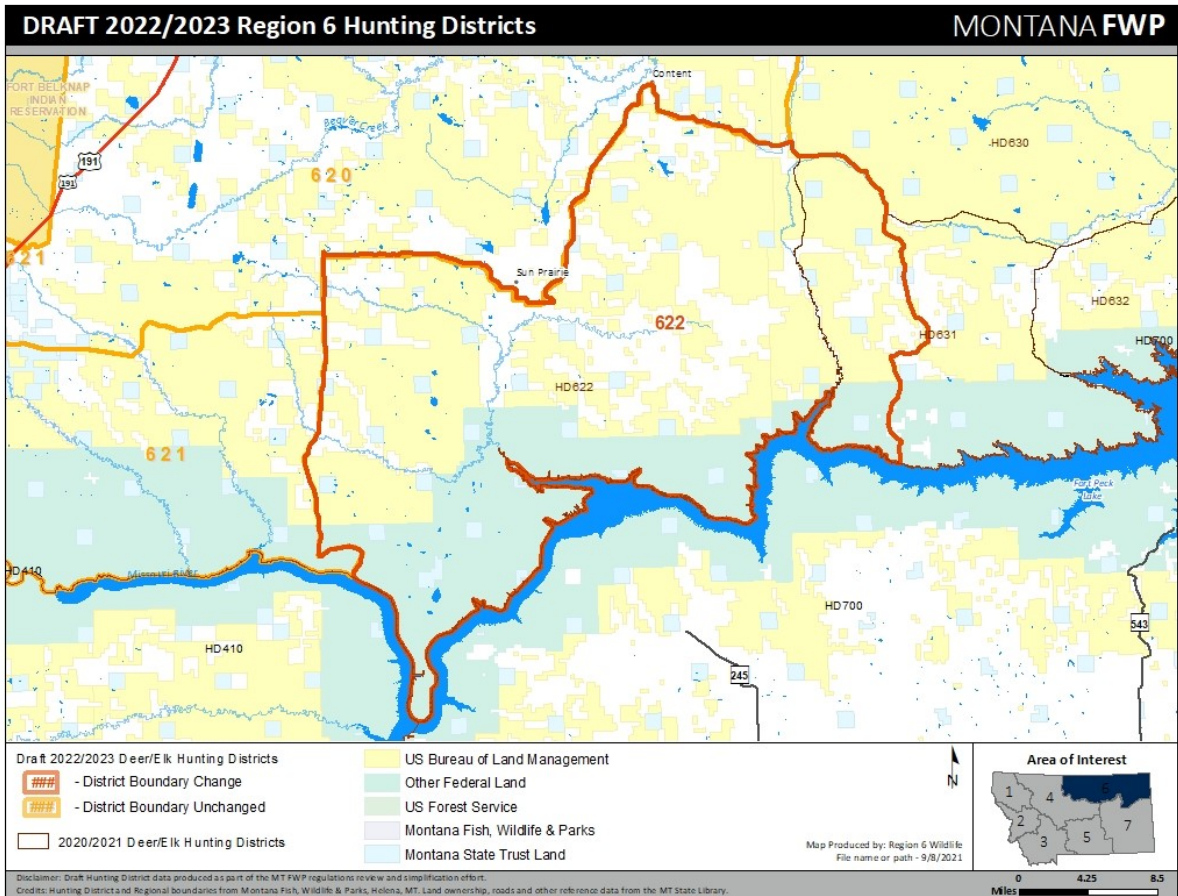
This proposal aims to expand HD 622 to now include a portion east of Timber Creek (currently a portion of HD 631). More specifically, the proposal is to add the portion of land that is between Timber Creek and Burke Ranch Road and Ridge Road. Currently HD 622 is a general district for deer, but has multiple associated LPT's for elk, and is part of the current 620 Antelope HD. Note: Antelope and mountain lion HDs would see corresponding changes as well.

Legal Description for the proposed expanded HD 622 and proposed quota and quota range:

Those portions of Valley and Phillips Counties lying within the following-described boundary: Beginning where the Charles M. Russell National Wildlife Refuge (CMR) Road 425 meets Fort Peck Reservoir, then north said road until Burke Ranch Road, then north on said road until Willow Creek Road, then northeasterly on said road to Ridge Road, then north along said road to Larb Creek Road, then west along said road to Larb Creek-Content Road, then northwesterly along said road to Content Road, then southerly along said road to Sun Prairie Road, then southerly along said road to First Creek Hall Road, then northwesterly along said road to First Creek Hall, then westerly along said road to the Midale Road, then southerly along said road to the CMR Boundary Road 212, then easterly along said road to CMR Road 201, then southeasterly along said road to CMR Road 219, then southwestwesterly along said road to Fort Peck Reservoir, then easterly along said reservoir to where CMR Road 425 meets the reservoir, the point of beginning.

Historically there have been three either-sex LPT's that are directly tied to the HD 622 include the 620-21 either-sex archery permit, 620-20 either-sex rifle permit, and the 622-22 either-sex rifle permit. Due to the proposed HD expansion we propose the two quota increases to corresponding with the increase in HD size and respective observed elk numbers.

- Elk 620-20 LPT: Proposed Quota 70
- Elk 622-20 LPT: Proposed Quota 60



**Figure 1:** Figure 1. Current hunting districts relative to the proposed HD 622 expansion.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The overall objective is to improve management of elk in the area as outlined by the Elk Management Plan (2005). Elk from HD 622 typically winter in the portion of HD 631 being added to HD 622. This has been documented through aerial survey data and previous research that involved collared elk locations (Figure 2). This change will help allocate those elk counted on winter surveys to the HD they are in during the fall, which in turn impacts how elk populations relate to population objectives. With this combination, elk populations within HD 620, 621, and 622 would remain over the population objective by 27% and HD 630, 631, and 632 would be 5% under the objective. Bull ratios from the 2020 elk survey would see similar alignments with the proposal. HDs 620, 621, 622 would increase from 31 bulls:100 cows to 36 bulls:100 cows. HDs 630, 631, 632 would decrease from 92 bulls:100 cows to 61 bulls:100 cows (Tables 1 & 2).

This change will also utilize the harvest tools currently available for HD 622 across the home range of these elk, including more liberal elk licenses and elk shoulder seasons. This in turn could improve elk harvest of the herd.

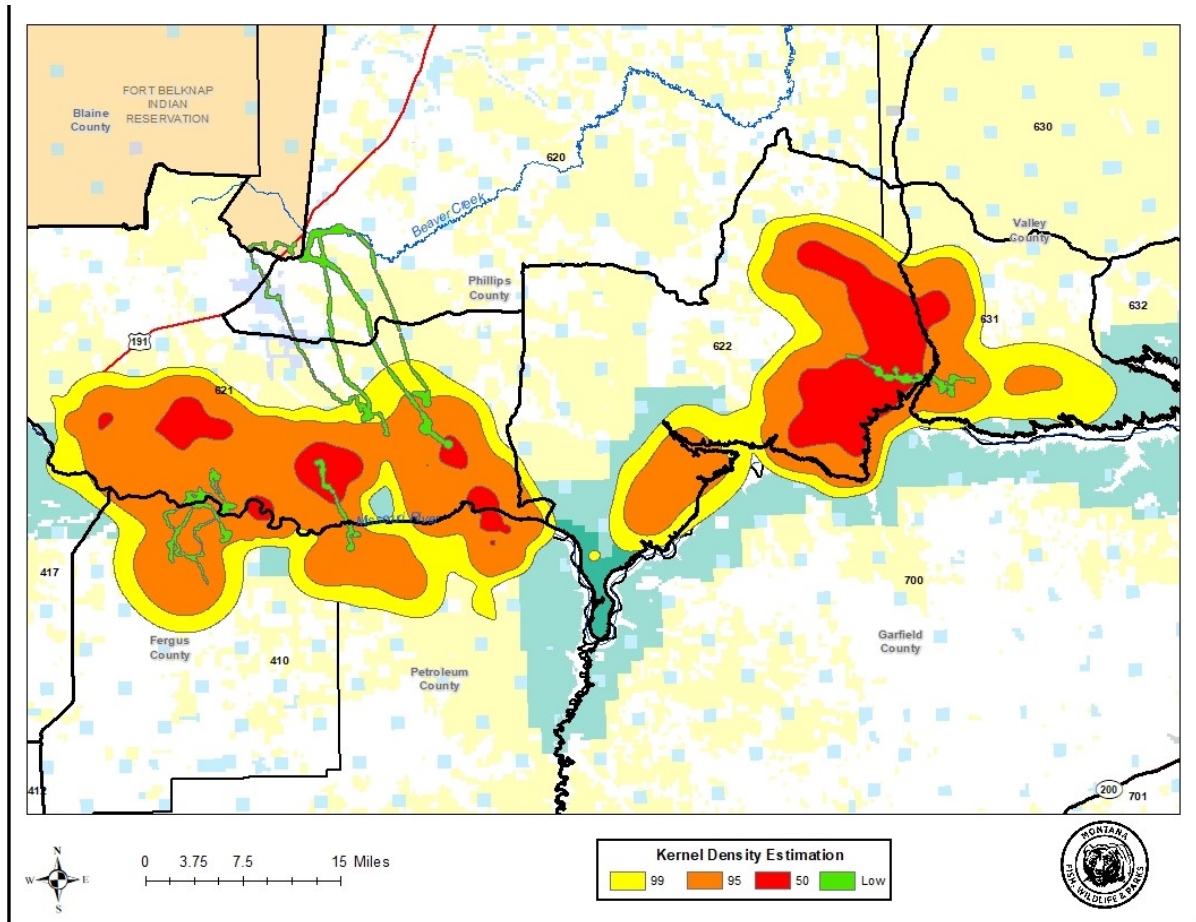


HD	Bulls			Cows	Calves	Unclass.	Total	Ratios:100 Cows	
	Yearlings	Adult	Total					Bulls	Calves
621	50	137	187	395	194	0	776	47	49
622	74	100	174	771	270	0	1215	23	35
Sub Total	124	237	361	1166	464	0	1991	31	40
631	30	96	126	166	87	0	379	76	52
632	1	25	26	0	0	0	26	NA	NA
Sub Total	31	121	152	166	87	0	405	92	52
Total	155	358	513	1332	551	0	2396	39	41

**Figure 1:** Table 1. Survey data for Hunting Districts 621, 622, 631, and 632 in the Missouri River Breaks during the winter of 2020.

HD	Bulls			Cows	Calves	Unclass.	Total	Ratios:100 Cows	
	Yearlings	Adult	Total					Bulls	Calves
621	50	137	187	395	194	0	776	47	49
622	84	162	246	806	282	0	1334	31	35
Sub Total	134	299	433	1201	476	0	2110	36	40
631	20	34	54	131	75	0	260	41	57
632	1	25	26	0	0	0	26	NA	NA
Sub Total	21	59	80	131	75	0	286	61	57
Total	155	358	513	1332	551	0	2396	39	41

**Figure 2:** Table 2. Survey data that has been updated based on the proposed Hunting District expansion of HD 622 to show a detailed breakdown of how the observed elk counts and ratios would look based on the data collected in the Missouri River Breaks during the winter of 2020.



**Figure 3:** Figure 2. Kernel density estimate contours from location data from elk collared from 2013-2015 that represent the smallest areas where the probability of relocating an individual from the herd is equal to 50, 95, and 99 percent, respectively.

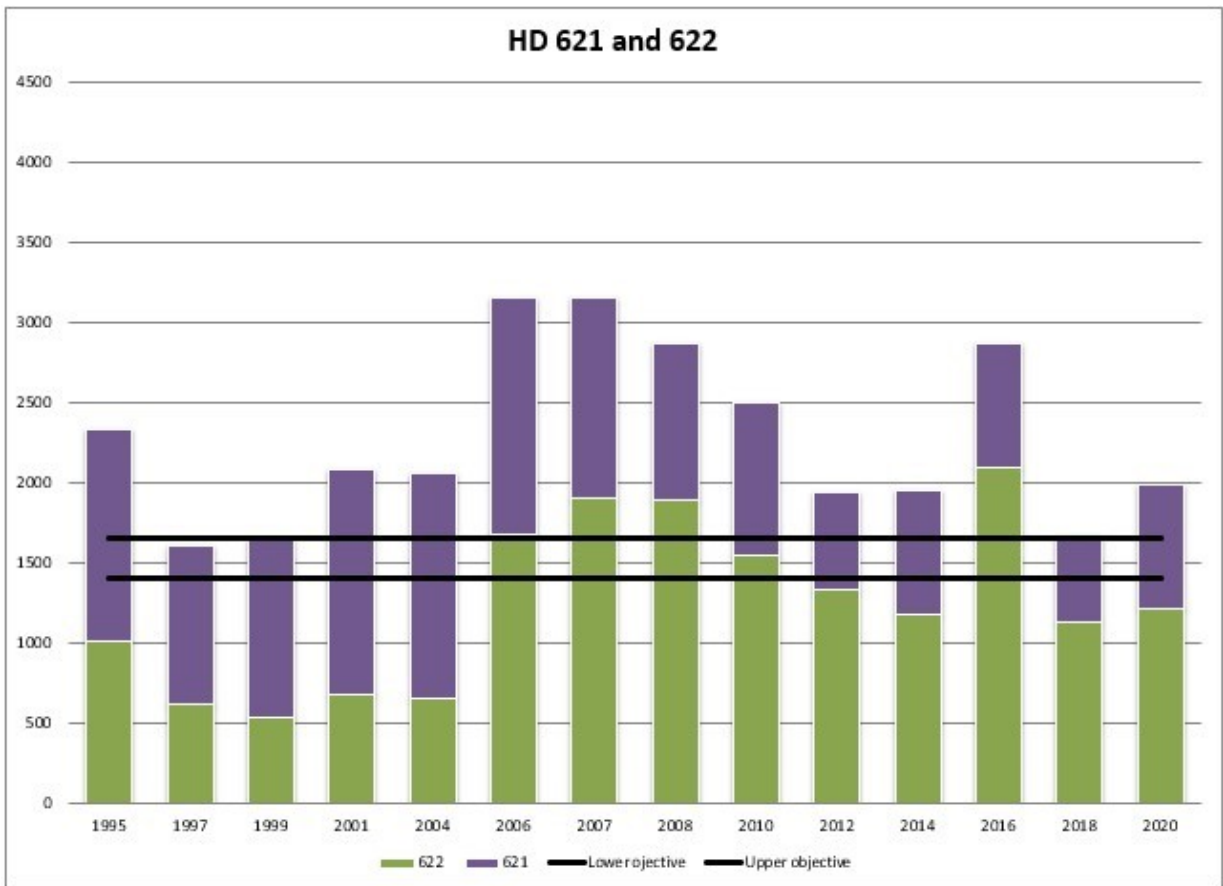
**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Because the goal will expand and adjust boundaries, the B License quotas and quota ranges for the proposed HD will reflect the current HD 622 and portion of HD 631 and quotas will also reflect what the assumed hunting pressure and harvest is in that area.

Trends in elk populations are monitored by completing biennial post-season surveys across the Missouri River Breaks. Total number of elk observed, as well as calf and bull to cow ratios from these surveys, are measured against population objectives within the Elk Management Plan to determine population status and trend of elk across the region as well as within hunting districts. Success of this proposal will be measured by the continual monitoring of the above parameters within HD 622 and adjacent HDs. Secondly, harvest surveys provide harvest estimates across the region as well as by HD. Elk harvest estimates provide another measure of population level and availability of elk for harvest, as well as prior year removal from the population and effectiveness of B License types.

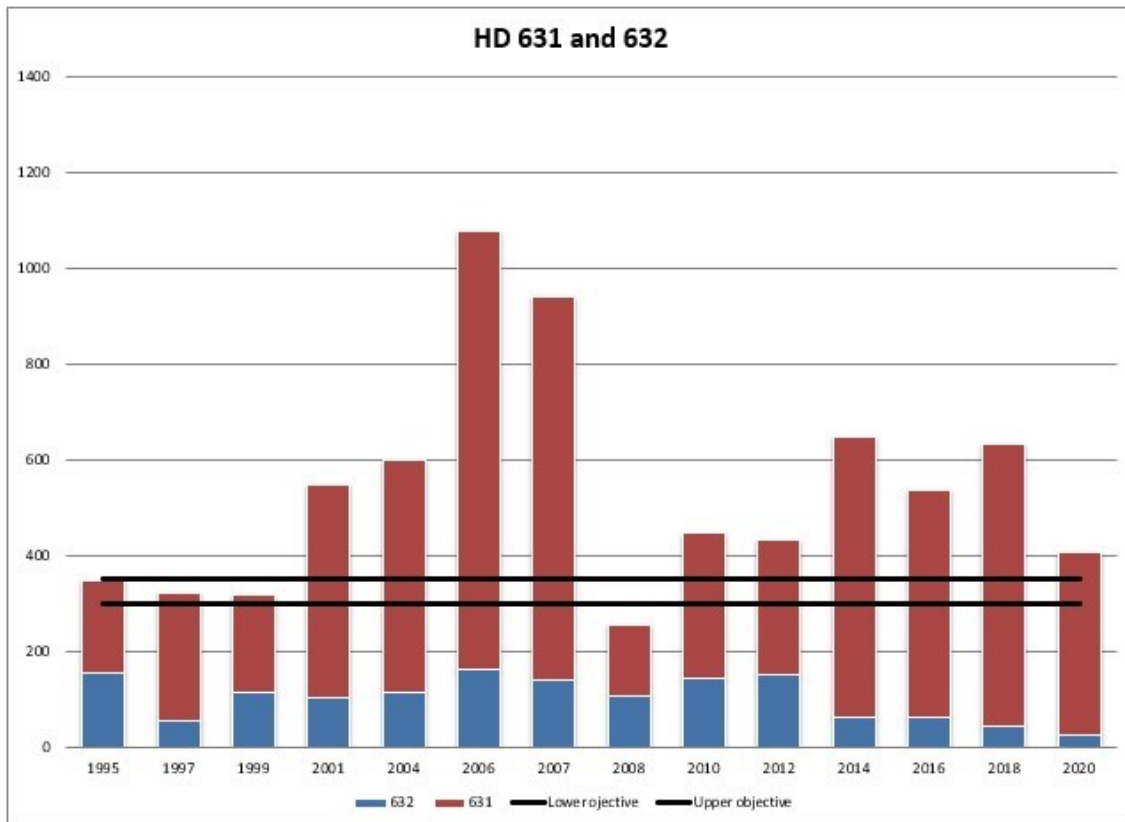
**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

There are currently biennial surveys that occur in the HD 621 and 622 and then in HD 631 and 632 and their respective data are below.



**Figure 1:** Figure 3. Hunting District 621 and 622 biennial elk survey data with corresponding lower and upper objective levels, 1995-2020.

During the biennial survey in February 2020, total elk numbers were 20% above the upper objective outlined in the elk management plan for HD 621 and 622. Calf ratios were below the long-term average (47 ca:100 cows) with a ratio of 40:100 cows. Bull ratios 31 bulls:100 cows is below the LTA of 45 bulls:100 cows and slightly above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.



**Figure 2:** Figure 4. Hunting District 631 and 632 biennial elk survey data with corresponding lower and upper objective levels, 1995-2020.

During the biennial survey in February 2020, total elk numbers (n = 405) were 16% above the upper objective outlined in the elk management plan for HD 631 and 632. Calf ratios were above the long-term average (52 calves:100 cows) with a ratio of 57:100 cows. Bull ratios 92 bulls:100 cows is above the LTA of 56 bulls:100 cows and is well above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This HD expansion will allow hunters to utilize management tools that are currently available in HD 622 to pursue elk when winter weather sometimes drives them into HD 631 (proposed portion that is described) so now they will be available for harvest to a broader group when they were not previously. This also allows hunters more freedom and a larger area to locate elk across a mixture of private and public lands throughout the larger HD.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal is supported by the Breaks Elk Working Group with the recognition that it could help elk management. Some of the large landowners in the affected areas have been asked about this proposal, and there has been very few issues. However, there are hunters that do not support the new boundary change as it will impact their hunting habits and resulting hunter redistribution. The Region 6 CAC were also contacted about the proposal and recognized its strengths of better elk herd management but questioned if the expansion was large enough and if the archery either-sex permit should also be adjusted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**620-20 Quota Change**

**Hunting Districts:** 620, 621 and 622 Not valid on CMR

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

This proposal is tied to the 622 Boundary change proposal. With the boundary change between 622 and 630, quotas will need to be adjusted to reflect the new boundary, opportunity and desired harvest. Historically there have been three either-sex LPT's that are directly tied to the HD 622 include the 620-21 either-sex archery permit, 620-20 either-sex rifle permit, and the 622-22 either-sex rifle permit. Due to the proposed HD expansion we propose the two quota increases (620-20 and 622-20) to corresponding with the increase in HD size and respective observed elk numbers.

- Elk 620-20 LPT: Proposed Quota 70 (increase from 60).

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

Overall objective is in line the state regulations simplification process and this permit needs adjustment with the larger 622 boundary change proposal.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

Trends in elk populations are monitored by completing biennial post-season surveys across the Missouri River Breaks. Total number of elk observed, as well as calf and bull to cow ratios from these surveys, are measured against population objectives within the Elk Management Plan to determine population status and trend of elk across the region as well as within hunting districts. Success of this proposal will be measured by the continual monitoring of the above parameters within HD 622 and adjacent HDs. Secondly, harvest surveys provide harvest estimates across the region as well as by HD. Elk harvest estimates provide another measure of population level and availability of elk for harvest, as well as prior year removal from the population and effectiveness of B Licenses types.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

During the biennial survey in February 2020, total elk numbers were 20% above the upper objective outlined in the elk management plan for HD 621 and 622. Calf ratios were below the long-term average (47 ca:100 cows) with a ratio of 40:100 cows. Bull ratios 31 bulls:100 cows is below the LTA of 45 bulls:100 cows and slightly above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.

During the biennial survey in February 2020, total elk numbers (n = 405) were 16% above the upper objective outlined in the elk management plan for HD 631 and 632. Calf ratios were above the long-term average (52 calves:100 cows) with a ratio of 57:100 cows. Bull ratios 92 bulls:100 cows is above the LTA of 56 bulls:100 cows and is well above the objective of 30 bulls:100 cows as outlined in the Elk Management Plan.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

This proposal is for a permit quota change but is directly tied to the HD 622 expansion, which will allow hunters to utilize management tools that are currently available in HD 622 to pursue elk when winter weather sometimes

drives them into HD 631 (proposed portion that is described) so now they will be available for harvest to a broader group when they were not previously. This also allows hunters more freedom and a larger area to locate elk across a mixture of private and public lands throughout the larger HD.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This proposal is supported by the Breaks Elk Working Group with the recognition that it could help elk management. Some of the large landowners in the affected areas have been asked about this proposal, and there has been very few issues. However, there are hunters that do not support the new boundary change as it will impact their hunting habits and resulting hunter redistribution. The Region 6 CAC were also contacted about the proposal and recognized its strengths of better elk herd management but questioned if the expansion was large enough and if the archery either-sex permit should also be adjusted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**698-00 Adjustment**

**Hunting Districts:** 620, 621 and 622

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Region 6 proposes to change the 698-00 antlerless Elk Permit to 698-00 antlerless Elk B License. This permit was initiated during the 2016 hunting season. Originally the permit was valid in HDs 620, 621, 622, 630, 631, and 632 and is only valid on land outside the Charles M. Russell National Wildlife Refuge (CMR) for antlerless elk. After working with the Breaks Elk Working Group in 2019 it was removed from HDs 630, 631, and 632 to help with elk distribution and focus efforts on the HDs with higher elk populations. Starting in 2020, the permit was valid in Region 6 Breaks EMU HDs 620, 621, and 622 off the CMR. The current quota is 300 and the quota range for these licenses is from 100-500 permits.

The number of permits that would be converted to licenses and include licenses from the proposed 699-00 license removal will be adjusted to 500 (currently 300 for each 698-00 and 699-00). This final 698-00 antlerless license will be valid in 620, 621 and 622 and not valid on the CMR Refuge.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The main objective of this proposal is to contribute to the simplification of the hunting regulations and licensing, by eliminating an antlerless elk permit and eliminating an antlerless elk license while retaining that opportunity as antlerless B Licenses valid in the same area with an increased quota.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The success of this proposal will be primarily measured using annual harvest surveys, aerial trend surveys, and hunter and landowner reports.

**4. What is the current population’s status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

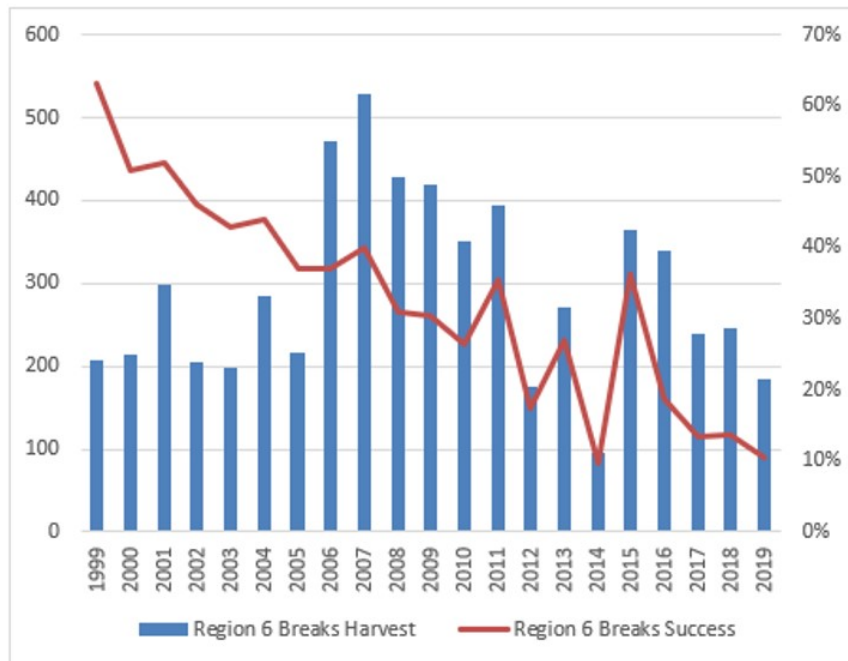
The population objective identified in the elk management plan is for 1700-2000 total observed elk for the Region 6 portion of the Missouri Breaks Elk Management Unit (EMU), with a sub-objective of 1400-1650 elk in hunting districts 620,621, and 622. The Region 6 Breaks EMU is currently surveyed biennially. Recent elk survey data is provided in Table 1. Annual harvest estimates for the 698-00 antlerless permit are provided in Table 2. Harvest information for antlerless licenses and antlerless LPTs as a whole as well as for the 698-00 permit are provided in Figures 1-3.

	2006	2007	2008	2010	2012	2014	2016	2018	2020
<b>Elk Observed HDs 620-621-622</b>	3149	3148	2868	2493	1935	1950	2869	1662	1991
<b>Elk Observed HDs 630-631-632</b>	1076	939	256	446	443	646	535	632	405
<b>R6 Breaks Total</b>	4225	4087	3124	2939	2378	2596	3404	2294	2396
<i>% over objective</i>	106%	99%	52%	43%	16%	27%	70%	15%	20%

**Figure 1:** Table1. Elk Aerial Survey data in Region 6 Missouri River Breaks Hunting District 2006-2018

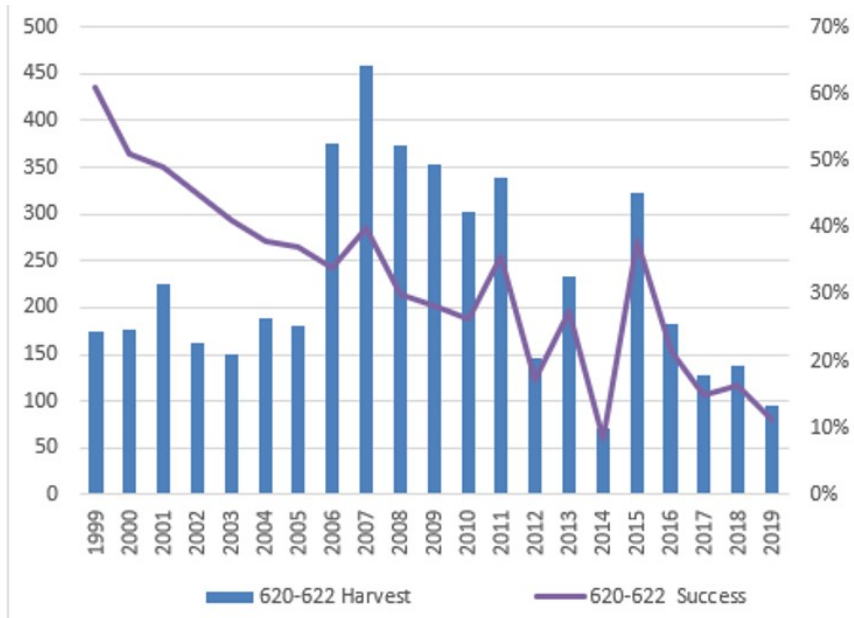
LPT	Year	Quota	Harvest
698-00	2016	300	57
698-00	2017	300	47
698-00	2018	300	41
698-00	2019	300	39
698-00*	2020	300	65

**Figure 2:** Table 2. Region 6 698-00 Permit Harvest in 2016-2020. Note: From 2016-2019 the 698-00 permit was valid in HD 620, 621, 622, 630, 631, and 632 and starting in 2020 it was only valid in HD 620, 621, and 622. At all times it was only valid on land off the Charles M Russell National Wildlife Refuge.

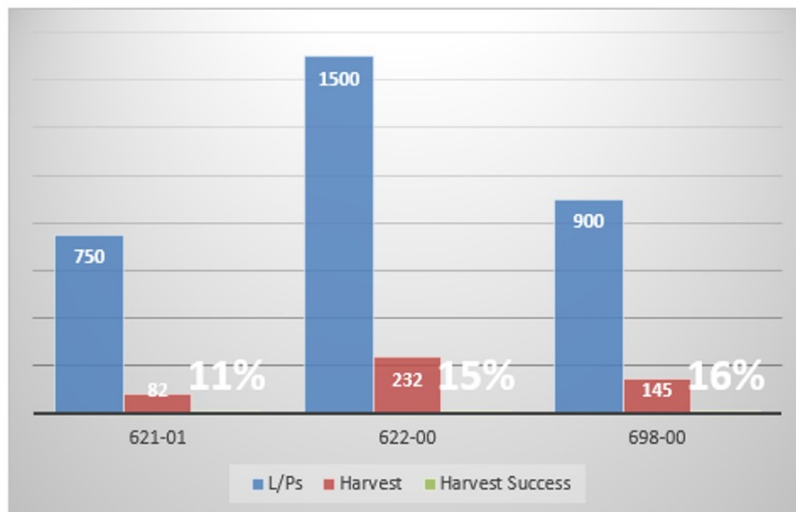


**Figure 3:** Figure 1. Trends of antlerless elk harvest during the general season for the Missouri River Breaks Hunting Districts 620, 621, 622, 630, 631, and 632 from 1999-2019.





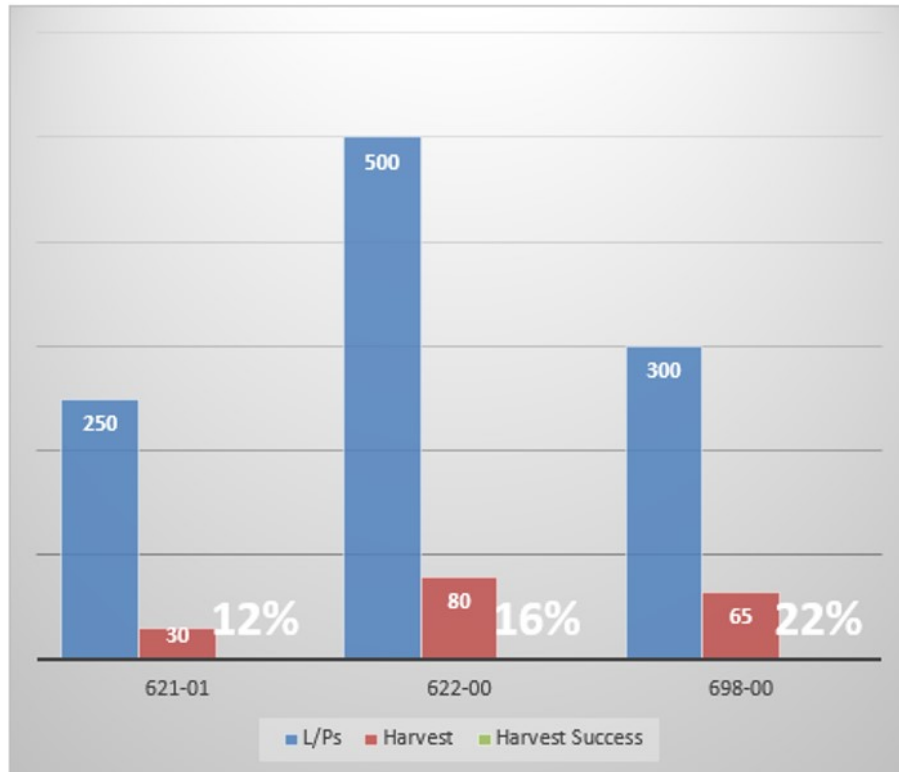
**Figure 4:** Figure 2. Trends of antlerless elk harvest during the general season for the Missouri River Breaks Hunting Districts 620, 621, and 622 from 1999-2019.



**Figure 5:** Figure 3. Total number of licenses provided by type from 2018-2020 for antlerless elk harvest during the general season for the Missouri River Breaks in Hunting Districts 620, 621, and 622 and associated total harvest for each respective license or LPT over that time and the management percent associated with those respective licenses and LPT.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

Hunter access across the 698-00 LPT area of coverage is good, but there are some areas, especially in HD 622, that are private land areas where little to no public access is provided and there is some larger concentration of elk there. Due to the permit being valid across three HDs (off the CMR though) hunters have the opportunity to move across the landscape to find elk. This can be, in part, attributed to the higher harvest success observed with this antlerless elk permit compared to B Licenses.



**Figure 1:** Figure 4. Total number of licenses provided by type in 2020 for antlerless elk harvest during the general season for the Missouri River Breaks in Hunting Districts 620, 621, and 622 and associated total harvest for each respective license or LPT over that time and the management percent associated with those respective licenses and LPT.

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

A discussion about the 698-00 LPT in the Missouri River Breaks was had with the Breaks Elk Working Group in 2019 and again in 2021. During the 2019 season setting process, FWP proposed eliminating this antlerless permit, but, due to public comment favoring the tool and recognition of its value for elk management, we recommended to the commission to keep the antlerless permit.

Hunters favor the tool because it provides an LPT (for those that are only interested in harvesting a cow) to obtain an antlerless elk permit annually. Antlerless Elk B Licenses are more sought after and have lower drawing odds and show a lower harvest success. The availability of the antlerless permit also facilitates some hunters in holding two antlerless elk licenses and addresses overcrowding concerns. In 2020, 22% of the permit holders held two antlerless elk licenses/permits.

The Region 6 CAC recognizes that eliminating 698-00 clears up confusion in the regulations, but also adds to possible hunter congestions issues on the CMR by reallocating those hunters to existing B Licenses (which are valid district-wide to include the CMR).

An original proposal (to allocate these permits to existing B Licenses) went out for 30 day public scoping. We heard public support to retain the antlerless permit for various reasons, but one particular reason we could effect was over-crowding on the CMR if we added these 300 licenses to existing B Licenses valid district-wide. Therefore, we adjusted this proposal by converting this antlerless permit to a B License valid across HDs 620, 621, 622- OFF the CMR, which mirrors where the current antlerless permit is valid.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**New Either-Sex Elk Archery-Only Permit for 702, 704, and 705**

**Hunting Districts:** 702, 704, and 705

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Remove hunting districts 702, 704, and 705 from the 900-20 archery-only LPT bundle. Create new archery-only, either-sex LPT (799-21) that is valid in these 3 HDs.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

This proposal aims to achieve multiple objectives. Archery either-sex elk hunting in HDs 702, 704, and 705 is currently managed via the 900-20 archery-only permit. This permit is valid across 22 HDs or partial HDs spanning 3 administrative regions. Over time, a steady increase (~50% increase from 2014 to 2020) in the use of these permits in these 3 HDs has occurred, and in particular for HD 704 (~88% increase from 2014 to 2020). The current Elk Management Plan lists an objective of 30-40 bulls:100 cows. Limited permits are needed to maintain this objective. By managing these 3 HDs together under their own archery-only permit FWP can better distribute harvest and hunting pressure. Finally, this change should make the regulations simpler and more consistent. The 799-20 "rifle" either-sex elk permit and 799-00 Elk B License are also valid for these same 3 HDs.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

The department will continue to assess data from check stations, phone harvest surveys, hunter use information, and gain feedback from hunters and landowners.

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

This population is currently over objective. However, the objective was established over 15 years ago when elk populations in the area were relatively new, numbers were much lower, and prior to FWP having established survey areas. The 2005 Elk Management Plan states that once survey areas have been established the objective for the Custer Forest EMU should be re-addressed. FWP now has established survey areas but is waiting to review the population objective during the current statewide Elk Plan update process. To manage the total number of elk in the population, FWP offers liberal opportunity to harvest antlerless elk in these HDs. In recent years bull:cow ratios have been between 30-40 bulls:100 cows, which is within the stated objective in the 2005 Elk Management Plan.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

FWP received 25 official public comments regarding this proposal, with 19 in favor, 4 opposed to the proposal or had different ideas for management, and 2 in which determining their stance was uncertain. In addition to strong support from public comments, the majority of discussions with the public have been favorable of or neutral to this proposal.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Limit elk permit holders to the district on permit**

**Hunting Districts:** All HDs with Elk Permits

**1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).**

Permits for either-sex elk or brow-tined bull-antlerless elk will limit the holder to hunting for antlered elk within the designated HD for the period identified on the permit. Antlerless elk may be pursued on any license in any open district, and antlerless elk hunting will not be limited by the permit. A general license may be used to hunt in any open district during dates outside of that identified on the permit.

**2. What is the objective of this proposed change? This could be a specific harvest amount or resulting population level or number of game damage complaints, etc.**

The objective of this proposal is to make requirements for elk and deer permit holders consistent with one another and thus simplify regulations.

**3. How will the success of this proposal be measured? This could be annual game or harvest surveys, game damage complaints, etc.**

**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

N/A: This proposal is not intended to have an impact on elk populations, but may affect hunter crowding, hunter distribution, and regulation simplification. Seasons and quotas could still be tailored to meet harvest objectives.

**5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).**

N/A

**6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).**

This statewide proposal was included during regional virtual open houses and was open for public comment from September 21 - October 20, 2021. In total, FWP received over 400 comments on the statewide proposals. This particular proposal had some support, although certainly not unanimous support.