

Montana Fish, Wildlife & Parks
Public comment on Extending Shoulder Seasons

1. Support shoulder seasons and support extending to public land as long as they are after the general season. Do not support shoulder seasons on public land before archery season

SEAN STROHM Lewistown, MT

2. Extend the shoulder season where it's needed

Jay Hintz Clinton, MT

3. I strongly oppose this proposed shoulder season policy. This is a blatant effort to privatize Montana's wildlife resource. This new FWP Commission should make a commitment to work on behalf of all Montana hunters and not endorse policies that benefit a tiny group of landowners.

Al Luebeck Butte, MT

4. I AM OPPOSED TO THE EXTENSION OF THE SHOULDER SEASON; THE ELK WOULD BE STRESSED WITH THE WINTER; THERE SHOULD NOT BE ANY SHOULDER SEASON IF THE LAND OWNER OR GUIDES DO NOT ALLOW THE GENERAL PUBLIC ACCESS DURING THE REGULAR SEASON! IT CREATE MORE CLOSED LAND AND REWARD GIVETHESE THE LAND OWNER AND GUIDES MORE POWER, THEY CREATED THE PROBLEM OF OVER POPULATION OF ELK; LET THEM LIVE WIITH THE DAMAGE! THIS PAST LEGISLATURE HAS GIVEN OUTFITTER THE ABILITY TO CONTROL THE NUMBER OF TAGS; THIS GOING TO LWEAD TO MORE LAND BEING CLOSED UP. EEEEVERY THING THIS PAST LEGISLATURE BENIFITS THE WEALTHY AND LEAVES THE GENERAL PUBLIC TO CLEAN UP THIER MESS!

HENRY MISCHEL GLENDIVE, MT

5. After reading several comments from others I believe proposing this extension is not in my public land hunters best interest and again benefits the private land owners looking to capitalize on the elk herds. I say no please.

Meg Sedgwick Whitefish, MT

6. No one should be allowed to charge an access fee during shoulder seasons. Landowners that do not allow public hunting during the regular season should have to allow damage hunts to reduce problem elk population. Those damage hunts have to use the roster for that district per battum. They cannot randomly pick any choose hunters as they see fit.

STEVEN FELTER East Helena, MT

7. Killing elk for 6 months out of the state is unsporting and unethical. There is something disturbingly wrong when, as a hunter told me, a calf the size of a Labrador retriever is pulled from an elk. We are done with hearing every tool in the tool box has to be used to reduce elk, followed by how to kill more wolves. This is not the Montana way. This is not responsible science based wildlife management. It is special interest, trophy market, outfitter privatization

driven, and social tolerance is rapidly diminishing along with hunting ethics and Montana's reputation as the last best place.

KC York Hamilton, MT

8. -Shoulder Seasons should never take place on public lands. It would be dishonest for the Commission and FWP to expand these seasons to public lands. Many hunting districts can't seem to keep elk on public lands anyway any more and it's those same districts you'd be now trying to shoot elk there too? Not a good plan. -Most elk objective numbers were set too low originally and have not been addressed for a very long time. I am not in favor of what most of the public sees as FWP's war on elk. Shoulder seasons are going too long and putting stresses on elk too late in the year. We can all see that so I hope you do the right thing and allow elk to be elk.

Steve Kamps OVANDO, MT

9. I am opposed to the continued use and extension of the Elk Shoulder Seasons and I agree with the following points: Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed on the ground since the last plan 16 years ago, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue. Thank you for your attention to this matter but please do not continue to promote the slow privatization of our wildlife that the use of Shoulder Seasons encourages. PLEASE manage wildlife for the general public and not for the benefit of private interests. Respectfully, Roger Furlong
Missoula MT, USA

Roger Furlong Missoula, MT

10. In favor of proposed season

Randy fey Red Lodge, MT

11. Commissioners, It feels like war has been declared on public land hunters and the wild animals they hunt. Extending the shoulder season to February 15 in 19 districts and including National Forest in these seasons is an affront to what the shoulder seasons were started for just a few years ago. The premise of these extended seasons is to reduce elk numbers on private property and possibly push the elk back to public land. These proposed changes will only push more public land elk on to private, because they can find safe refuge there unless the land owners opens it up to be hunted. Don't decimate our public land elk and in turn give private property owners their own "private" herds. The Commissions job is to manage wildlife for the good of all of Montana, not a few select property owners. Please do the right thing for these elk and

hunters, do not approve the proposed changes to the late elk shoulder season. Sincerely,
Chris McCarthy Belgrade, MT.

Chris McCarthy Belgrade, MT

12. No. I am opposed to extending the elk shoulder hunts.

Les Taylor Butte, MT

13. The Traditional Bowhunters of Montana (TBM) is opposed to the proposal to extend the elk shoulder seasons in hunting districts 262, 290, 298, 390, 391, 393, 411, 417, 502, 510, 511, 520, 530, 540, 560, 575, 580, and 590. TBM is an organization of nearly 200 members dedicated to the preservation and advancement of traditional bowhunting values in Montana. When FWP established the first shoulder seasons in 2015 they were not meant to be permanent fixtures. They were never intended to be a replacement for the already lengthy 11 week hunting season, and extending them is a bad faith move by FWP, countering the promises made to Montana hunters. At this point the data shows that shoulder seasons have been an abject failure and that they have not delivered on their promises of opening private lands to the public hunter nor have they forced elk on to public lands. The long-term effect of embracing and extending elk shoulder seasons means that the department is effectively waging war on elk, eliminating opportunities for hunters by forcing elk to private lands early in the season and then incentivizing land-owners to harbor elk throughout the season. There is the additional lack of ethics in pursuing pregnant cow elk through deep snows of winter when every ounce of energy is needed to survive. Montana is better than this and should be the standard-bearer for the ethical pursuit of our shared public resource. This proposal falls well short of that and should be considered an embarrassment and a black mark on the department. A department that appears to have lost its way and is no longer managing elk for Montanans, no longer using the best available data and has given up trying to actually manage wildlife.

Traditional Bowhunters of Montana Lewistown, MT

14. Elk shoulder seasons were initially not intended to be permanent, however they are in their 6th year now. It is time to revise the elk management plan. As a public land hunter, I don't want to see elk shoulder seasons extended. I don't believe that extending the hunting season will help in the management of elk on private land. Thank you.

Emily Sedgwick HELENA, MT

15. We all know that the open season on our elk for up to 7 mounts for the antlerless is not working. Now you want to open it up on all public lands, so the public, will no doubt chase the majority of elk back onto the private lands for the entire year. This could easily be the result. there are lands owners that charge a gun fee to hunt cows also. We need a law that for every paying hunter that a rancher or land holder has been paid to allow a hunter on their land to kill one of the public's elk. there should be a drawing for a tag for a non paying hunter to access to hunt the same animal that is public wild life that live on that ranch. I know one ranch that has leased out all their land to a hunting club to kill only Bulls and the (limited) public can come with permission to hunt antlerless only. Some of these land holders are able to stop access to the public lands that they have blocked off. this has to stop. that could be easily fixed in the

agreement when the land is put up for lease. the Forest service leases and BLM last for just 10 years as near as I have seen evidence of. Thanks for the opportunity to comment.

John p Simmons Absarokee, MT

16. Montana FWP: Shoulder seasons have not worked to reduce elk populations, and predictably have actually had the opposite effect – since Montana FWP somewhere along the way arbitrarily expanded the elk “shoulder season” to public BLM and Montana State Trust land, elk have been further driven to large private ranches where the elk are harbored for their hunting income potential. The elk “shoulder season” should be eliminated, and definitely not expanded. It is unethical to hunt elk for 6 months during the year and to shoot pregnant cows into January and February of the following calendar year. Everyone knows that the elk population concerns are a landowner tolerance issue as some large private ranches harbor incredible numbers of elk for their hunting income potential to the dissatisfaction of some other nearby farms/ranches. The elk population issues and concerns are clearly a landowner relations problem, and until Montana FWP understands the real issue and directly addresses it, elk numbers will continue to increase. Elk “shoulder seasons” are a disingenuous and ineffective approach designed to give the appearance that Montana FWP is doing something to reduce the elk population, rather than directly addressing the large private ranches where the elk are harbored for their hunting income potential and the associated nearby landowner relations problems that inevitably ensue. Sincerely, Eric J. Bashore (Billings, MT)

Eric J. Bashore Billings, MT

17. Shoulder seasons should shrink, not expand. If they aren't successful at reducing herd populations, then stop doing them. They should not expand to public land.

Brian Connelly Missoula, MT

18. No extensions.

Greg Houska Missoula, MT

19. NO to extension of Late Elk shoulder seasons !! Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed on the ground since the last plan 16 years ago, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue. Thank you for your time.

Eric Scranton Bozeman, MT

20. I am opposed to extending elk shoulder seasons beyond what now is allowed. The current elk shoulder seasons are currently being abused and extending these shoulder seasons only increases this abuse by hunters.

Arnold Sowa Helena, MT

21. Shoulder season should only be used for hunting elk on private land that has too many elk. It should be crafted to encourage land owners who want a reduction in elk numbers on their land to allow the public to access the elk.

Kevin romer great falls , MT

22. I would like to urge that Governor Gianforte's proposal to extend the late shoulder season be reconsidered. I believe this plan is an ill conceived attempt to back door outfitter controlled hunting on public lands and it fails to address the problem that engendered the adoption of shoulder hunts in certain Regions and Districts. That problem, plain and simple, is elk depredations on private land adjacent to public lands. Unless the proposal will require that all private lands within the proposed hunt areas be open to hunt during the extended seasons, this proposal will actually make the problem worse, driving the elk on to private lands that are not open to hunting. This seems rather to be aimed at benefiting outfitters, the landowners whose lands they lease, and their wealthy clients at the expense of Montana farmers and ranches and the many Montana hunters who can't or won't pay those outfitters thousands of dollars for the "privilege" of hunting in a State where hunting is a right.

Phil Moen Havre, MT

23. Shoulder seasons are not functioning how they were originally intended and have further exacerbated many problems. Elk do not need to be hunted for these extended seasons and instead harvest should be focused during the general season. Mandatory harvest reporting would provide much needed data. Elk are very much being pushed onto areas in which the public cannot access and therefore cannot aid in harvests. I oppose these shoulder seasons. There are better solutions to explore.

Nuridia Missoula, MT

24. You need to cancel the shoulder season because the Montana public has no access to their wildlife. Hunting has become too privatized and only for the rich.

RH Billings , MT

25. As a life long hunter and resident of Montana I am opposed to any public land being in a shoulder season hunting district !! There is no such thing as harboring wildlife on public land, shoulder seasons are for private land only. I testified at the very first FWP Commission approval of shoulder seasons. Public land were not approved to be included, that is a matter of record. Specific to HD290 and HD 298 , I am opposed to and lengthening over the 2020 season. what is in place has a positive history with the landowners.

Rod Bullis Lincoln, MT

26. Elk Shoulder season should NOT be expanded onto public lands. Private lands only. How can that possibly work

Mike Kantor Missoula, MT

27. Please don't extend shoulder seasons further. It is clear that they are less than effective, as units continue to remain over objective. Additionally, they should not be expanded to include public land. This would clearly further worsen wildlife harboring on private land, and discourage elk from utilizing public land. Utilize specific game damage hunts/rosters to manage problem areas, instead of using such a broad tool as shoulder seasons. Thanks for consideration.

David Fisher Billings, MT

28. I do not support the proposed extension of the 2021 late elk shoulder season. I do not support the use of shoulder seasons to manage elk populations.

Daniel Hoffman Missoula, MT

29. I have always opposed the long shoulder season on elk. Hunting all my life in 215 I witness the huge decline in cow elk. That being said the shoulder season did it's job. Mainly because land owners in the area allowed public hunting on their land.

Joel Worth Butte, MT

30. This is bound to drive more elk on to private ground, where they are not accessible to most hunters. Bad idea.

William Lowe Helena, MT

31. Dear FWP Commissioners and Director Worsech: Montana Sportsmen Alliance is affiliated with sportsmen's organizations all over the state of Montana. Those on our leadership board come from practically every hunting region in the state. We are adamantly opposed to expansion of the shoulder seasons in Montana. The approval of these seasons was intended to be short term and meet certain criteria to be evaluated before further use. Even though this extended season structure has been a moderate failure, the department intends to move forward and implement more shoulder seasons, and to include USFS lands. This goes against the original intent, which was to reduce game damage on private lands and move populations of elk to public lands where there might be more public harvests. Problematic elk are never hunting district wide. Please refine and revitalize the damage hunts and make those hunts a continual effective tool for managing isolated problematic elk herds. Many of us who deal with sportsmen's issues in Montana are trying to understand the reasoning behind the expansion of shoulder seasons. Knowing that this will fail further has us wondering why? If the department knows this will fail, what 's next? Is this the catalyst to send us further toward more privatization of our public resources because of this failure? Shoulder Seasons represent lazy, hands-off wildlife management. Please respect prior agreements with Montana sportsmen and stop this insanity. Our elk and other wildlife deserve more, and so do the citizens of our state. Montana Sportsmen's Alliance leadership.

Robert Wood Hamilton, MT

32. Late elk shoulder seasons should not be adopted until the Elk Management Plan that Montana Fish, Wildlife & Parks is preparing is finalized. The planning process is well under way with a citizens advisory group providing basic objectives and guidelines that the Fish and Wildlife Commission has already approved. This plan will provide updated information on elk populations and should be the basis for decisions on how to move forward with elk shoulder seasons.

Jessica french Challis, ID

33. This is a bad plan the sportsman of Montana all ready told you No . Don't forget you work for the sportsman of Montana . I say No .

Dean E Waltee Butte, MT

34. The science simply does not support extending the shoulder season. This issue has become nothing more than a political football with the extension being supported by a relatively small number private self absorbed landowners.

J Rodgers Free Missoula, MT

35. Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed on the ground since the last plan 16 years ago, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue.

Steve Stieler Townsend, MT

36. I think shoulder seasons are fine on private lands; I think it's a huge mistake to extend shoulder seasons onto public land. The biggest hurdle we face with populations that are above objectives is elk "refuging" onto deeded properties that don't allow any hunting. If we could come up with workable solutions to better distribute elk, we'd see populations more in line with objectives. Chasing/hunting elk off of public ground would only further exasperate the situation with more elk pushed onto "refuges"- just the polar opposite of what we should be striving for. If we're looking at all alternatives for over objective elk populations, we need to make it easier to kill elk during our primary seasons. We need to liberalize cow/calf harvest. In addition, let's make it easier for hunters to harvest elk, any elk. Why are we allowing brow tine bull and cows and calves to be harvested in units, but not allowing other bull harvest? How many cows are passed up in a season, because it might be a spike? Answer- lots. If a hunter has a license and is hunting in a unit that's over objective, let them shoot ANY elk. You'll see your cow harvest increase and most definitely a higher harvest! Thanks Mike Moore

Mike Moore Helena, MT

37. I fundamentally oppose these expansions of the shoulder season. This program is hurting our states resources in ways we can not see now, the continuous stress we are putting on these elk may have a far reaching impacts on calf recruitment and damage the future opportunities for our children to hunt and find elk. Please DO NOT EXPAND SHOULDER SEASONS. Can we please put effort into updating population objectives instead of assuming our land owner tolerance for elk is unchanged in almost 20 years!? Thank you.

Kaine Zetterberg VALIER, MT

38. Please do not let these shoulder hunts extend or even continue. These elk they call there elk are not that at all. I have personally watched some of these hunts and mostly they are disgusting, and I am and have been a hunter since I could hold a weapon. flock shooting, gut piles next to rds and excessive traffic on the side of the rds is giving hunters a black eye to the general public. we are not perfect but we love this wildlife and they deserve better. My opinion is that if you can't get your elk in the general archery or rifle season you have next season to try again. these land owners are lobbying politicians to have there cake and eat it too, please don't allow this.

Barry Robinson manhattan, MT

39. If this is actually plan to aid private land owners in controlling elk populations and elk damage on their land, much more thought needs to be put into how elk will react to this. Both private land owners and hunters know that elk are intelligent creatures and learn quickly that private lands are safe havens when hunting season comes around. So by extending the time period in which elk are pressured by hunters, we drive them more solidly onto private lands, thereby exacerbating the problem this plan intends to solve. More than likely, this will cause a decrease in hunting activity and harvest numbers in following years as numbers of publicly approachable elk decline due to their tendency to stay on private lands when pressured. Why would a hunter travel or spend a great deal of time in an area that elk have been pushed from by extended seasons. Late elk seasons are also illogical due to the public lands accessible at those times and the locations of elk herds. Many access points into large areas of public lands are closed to motor vehicles starting in December, meaning hunters have very limited accessible hunting grounds. Hunters who do decide to access these lands on foot will be disappointed as elk herds tend to move to lower elevations to survive the winter - which means they stick to private lands anyways during that time of year. Only those who don't put a lot of thought into the behavior of the animals they hunt, or those who desire the transfer of elk herds from public to private lands would support this plan. Taking into account the intelligence and habits of these animals we as Montanans are proud of, is of utmost importance in developing a proper wildlife management plan.

Alex Charbonneau Bozeman, MT

40. please do not extend shoulder season into the public lands. problem still access to elk during regular seasons and limited access during shoulder season

Bob Rooney wss, MT

41. You idiots, Get back to managing wildlife to benefit the hunters and wildlife Mt FWP are just a bunch of lazy bastards that don't want to put in the effort it takes to properly manage "OUR" game animals.

Louie Lamere Great Falls, MT

42. Totally against this. Shoulder seasons initially were supposed to last 3 years. Where's the data supporting these new areas being opened up? This is great for private landowners who can let paying hunters get the bulls and public hunters get what's left. Not good!!!!

Bill Story Livingston, MT

43. To whom it may concern, The 2015 Elk Shoulder Seasons were never intended to be a permanent feature on Montana's rich public land hunting legacy. The outdated elk management policy formulated 16 years ago does not reflect the current status and needs of elk distribution between private and public land. It badly needs to be revised. Please, don't let Montana's unique and valuable public lands hunting legacy become privatized and weighted towards wealthy, private individuals. We only need to look at neighboring states to see what we have to lose. Regards, James Robertson Missoula, MT

James Robertson Missoula, MT

44. Simplifying rules and regulations (by establishing uniform season dates as much as possible across hunting districts) is always a worthy endeavor and consistent with the "Final Elk Season Guidelines for Shoulder Seasons" document. That said, establishing February 15 as the uniform closing date for the current license year is not an emergency. FWP has an established policy that calls for a season setting review and modification process every two years. There is no compelling reason this consideration can't be held for the next cycle. I believe the next cycle begins this fall and any changes would be implemented during the 2022 license year. The same applies to adding a shoulder season to HD 314 along with the addition of any public lands. For credibility reasons, I believe it is important that FWP and the Commission to adhere to standard policies and procedures when addressing non-emergency issues. In this case, deviating from them (even if perfectly legal) risks giving the appearance that FWP and the Commission may be trying to slip one through when many stakeholders are preoccupied with things like summer, weddings, farming and vacations. Maintaining transparency is essential to building public trust in FWP and the Commission. To summarize, just defer these shoulder season considerations for now and incorporate into the normal cycle of season setting review and modifications. Respectfully, Jim Homison Stanford, Montana

Jim Homison STANFORD, MT

45. Please consider not extending shoulder season on private or public lands. This is a danger to our elm our problem is not that we have too many elm rather have them distributed in a way harmful to land owners and hunters. Use science not political parameters for policy. Learn from our errors! Tim Parks Col, USA Retired

Tim Parks Hamilton, MT

46. I do not feel that elk shoulder seasons on public lands will help the situation. This will reduce the population of elk on public lands and drive many onto private lands, making them inaccessible to the DIY public land hunter the majority of the hunting season. An in depth revision of the elk management plan needs to take place.

John Smith HELENA, MT

47. The shoulder seasons seem to have been proven ineffective, with the real pro alien being access, denied by landowners.

Justin Dalby Livingston , MT

48. I opposed shoulder seasons back in 2015 because I did not have enough faith that the season would stay on private lands that harbors large herds of elk in over objective Hunting Districts. Now this proposal is proving my point. ESS were supposed to be a three years trial period and now we are into six years. The root of the problem is private land owners that are harboring large herds of elk are not allowing access to the public. In no way expanding ESS to our national forest land will accomplish the original problem with chronically over objective elk herds. Once again please vote no on expanding shoulder seasons onto public land.

Martin F Petritz Butte, MT

49. Don't extend shoulder season on public land. It originally was established for the private rancher hunts who didn't let the public on there property during season.

Thomas E Wheeler Whitehall, MT

50. If I remember correctly the proposed shoulder season thing was only supposed to last three years and I think we have doubled the time frame. Also it was to reduce elk numbers where they are causing damage on private land not public land. Public land gets enough pressure and if a few more cow should be harvested before they migrate down to private land allow more draw B tags. I don't believe shoulder seasons work as hoped for. Elk go where the least pressure is and if private land owners don't allow access the elk hangout there. I'm not in favor of this proposal.

Kyle Reedy Great Falls, MT

51. The elk numbers are higher now then ever but the public access to these elk is getting less and less. All hunters seem to agree that the elk are moving to or even staying year round on private land. Shoulder seasons might have been good at first but not so.now. By extending the shoulder seasons the elk will stay even longer or perhaps permanently on land closed to the public. If there is the slightest chance that this will happen do not extend the shoulder season, increase the tags during the season

Erik Dubbe Helena, MT

52. The shoulder season was never meant to be permeant but here we are 6 years in and you want to expand it. Come on! It hasn't worked so stop it.

Richard Strong Bigfork, MT

53. Stop the elk shoulder seasons now! Sportsman have been ignored since the inception of this season. No more elk shoulder seasons!

Ryan Wayne Smith Bozeman, MT

54. This program was a temporary one to reduce elk on private lands. You're moving the goalpost on us and this is why we don't trust you. I'm with the rest of our state's hunting community in my pro public lands stance, and you're essentially reducing the elk numbers there and likely forcing them onto private lands again. Think about the long-term consequences here for once rather than immediate gratification. We need to take care of our elk herds so my children and grandchildren enjoy them, as well. I'll vote against every single one of you who screw this up and my family and friends will know your names.

Justin Riney Gardiner, MT

55. I am NOT in favor of a shoulder season on federal ground. We need stronger wolf management and the elk stuff with time will work it's self back out . We kill the elk during archery during rifle during late season on private now want to kill them in late season on federal land. All the while they are just trying to stay alive and avoid wolves so they reside on private . This is a wolf problem ladies and gentlemen not an elk!

Josh Jurek Plains, MT

56. Shoulder seasons were never supposed to be a permanent option. We have an access problem, not an overpopulation problem. If landowners want to make money on elk, so be it. They shouldn't come crying to FWP when they have overpopulation issues tho. I'd ask that no shoulder seasons be extended, and absolutely no addition of them on public land. Our elk are a valuable resource. Stop catering to wealthy landowners who only see our game animals as dollar bills.

Chris morgan Clancy, MT

57. Expanding season dates and allowing more public land harvest is not a good idea. Accessible public land elk herds are pressured enough. Allowing more opportunity to hunt on public will only drive more elk onto private land sanctuaries. Please vote no

Samuel Mckeeth Ulm, MT

58. I am not in favor of extending the shoulder seasons. In my opinion it is "not" ethical to hunt elk in the hot temperatures of mid August. Elk have a hard time surviving winter. The shoulder seasons stress them out when they are trying to survive. The shoulder seasons if continued, need to be better managed. There is a FWP coordinator that needs to be more involved with hunters and landowners. The coordinator needs to post on the FWP website which landowner needs hunters, along with contact phone numbers. I have attended some Devils Kitchen Working Group meetings. These landowners are blowing smoke. All landowners involved in shoulder seasons, should be required to report names of hunters, along with the harvests to the FWP to get an accurate count. Landowners that have too many elk, need to grant more access in the general season. Hunts along property borders of landowners that harbor elk or don't allow

hunting can be coordinated. Shoulder seasons should never be allowed on forest service lands.

Earl Lenci Great Falls, MT

59. Shoulder season was initiated to help alleviate elk issues on private land for a three year trial. It was not to be on public land and not to be extended, therefore, I oppose the proposed extension.

Patrick McGuffin Great Falls, MT

60. Please squelch any proposed extension to the Elk Shoulder Season(s) until Feb. 15th. Hunting elk for a full 6 months and well into mid-winter is unconscionable, and adds even more stressors to elk populations already contending with significant depredation by wolves and bears. Shoulder Seasons until mid-February are unnecessary and questionably effective based on FWP's published data, and does nothing to promote sportsman access to private lands. Also, please recall that the original 2015 Shoulder Season proposal, as developed by FWP, was a temporary "trial" (~3-year program) – it continues to be retained year-after-year, so please consider a sunset to the program rather than the currently proposed season extension. Thanks for your consideration.

Alden Beard Elliston, MT

61. No extension to Shoulder season. End shoulder season all together. Stop killing off our elk population in the name of ag

Hunter Lewis Billings, MT

62. Elk shoulder seasons should never be considered on public land. Shoulder seasons are intended to control elk populations on private land, and that is how they should remain. Shooting more cow elk on public lands will only increase the problem of poor elk distribution on public lands. It will only drive more elk onto inaccessible private land and create more of a harboring problem.

Derek White Billings, MT

63. FWP, Please reject the proposal to extend elk shoulder season hunts on public lands. There is clear evidence from multiple studies that show elk move to where the pressure isn't. While I'm all for shoulder season hunts and/or damage hunts where there is great need, these types of hunts are primarily on private land --and even then, those elk tend to move to other private lands where hunting isn't allowed or it is a pay to play type situation. Case in point: three seasons ago I was on a shoulder hunt near Helmsville. There were 400 head of elk on the next property over and they didn't allow hunting at all. There the elk stayed throughout the shoulder season. Adding more pressure to elk herds on public land will only drive them to private holdings offering safe haven...and then we won't accomplish target objective. Or worse, these elk will then be "sold" to those who can afford such hunts. While I respect every landowners right to offer guided hunts and pay to play type hunts on their property, our state government shouldn't be creating an atmosphere that enhances those types of hunts and damages public land opportunities with our elk - which are a public asset. Thank you for protecting this vital public asset.

Michael Karls Helena, MT

64. I would like to voice my concerns with the proposed extension. I think that it's important to look back on what the original goal of the program was. I believe that goal was address elk on private lands in units that were over objective. I understand that if these units are still over objective there is a desire to reduce herd numbers. However, I feel like there needs to be a careful approach as to how to accomplish this. I would like to see consideration for where elk winter in order to make sure the herds that do winter on public lands aren't furthered pushed onto private lands after the general season. I think a reasonable approach would be more Elk B tags that apply to the normal seasons, or keep shoulder seasons after the end of the general season to private lands only. It would be my assumption that this isn't working as intended, in which case I'd rather see more Elk B tags given to keep the hunting pressure to the general season.

Ian Fisher Montana City, MT

65. Please eliminate elk shoulder seasons in Montana. The experimentation with this type of management strategy has proven to be unsuccessful and has only conditioned elk to find sanctuary on private lands that do not allow public hunting access.

Kyle Paulson Belt, MT

66. I strongly support extending all the Shoulder Seasons to February 15. I would also suggest that you consider extending the Shoulder Seasons to the public lands as well as the private. Elk will find refuge on the public lands making them unattainable. By allowing hunting on public lands you will increase hunting opportunities for Montana public land hunters.

Paul Ellis Bozeman, MT

67. I oppose the proposed extension of the elk shoulder season on public land.

Dan Harper Missoula m, MT

68. Dear FWP: Please restrict shoulder seasons to private land only. The trouble with elk distribution is that too many have learned to seek shelter on big swaths of private land, where most public hunters aren't allowed access. If you need to cull herds in different districts, then go where the problem is and don't make public-land hunting worse by forcing more elk to seek out private refuges. Thanks for listening.

Bill Buckley Bozeman, MT

69. I am in favor of ESS on private lands like it was first established to further manage elk herds that left public land for safe haven on private and causing damage to private land owners. This forced animals back to public land. I am not in favor of opening extended shoulder seasons on public lands. Elk need time to recover from pressure. If we shorten that time they will be more susceptible to predation through the winter from growing and mismanaged predator populations.

Patrick Clay Missoula, MT

70. I support the Backcountry Hunters and Anglers position. It is logical and rational that what will be accomplished is only to train elk to stay on the private land.

Gary Root Columbia Falls, MT

71. Adamantly opposed to this new shoulder season proposal and disappointed that FWP would consider something that is so counter to the logic behind the original shoulder seasons. We don't have too many elk, we have distribution challenges that lead to elk holding up on private land that is inaccessible to hunters. Instead of managing for the social intolerance of elk, FWP needs to put more effort into working with landowners to address their concerns and provide incentives to allow public access. The public (particularly public land sportsmen and women) are not intolerant of elk on public land, so why would we haze them off? Why are our regulations and district objectives not enough? This is not science-based management, and the fact that this is where we are six years after FWP initiated what was supposed to be a 3-year project does not speak well of the agencies elk management. I realize FWP is in a very difficult situation, and I support you, but this is not the way. Please kill this ill-conceived plan that will only create more division between landowners and sportsmen, and result in more elk creating problems on private land that is inaccessible to public hunters.

David Nolt Livingston, MT

72. I oppose the proposed extension of shoulder seasons, particularly allowing harvest of cow elk on NF lands. The shoulder seasons as originally proposed were only meant to be short term and evaluated after 3 yrs. to meet the original harvest objectives. Obviously in some hunting districts they are not successful at meeting objectives mostly because of private lands being leased by outfitters and not allowing public hunting. This proposal would just exacerbate the situation by pushing elk off of public lands on to private and mostly outfitted lands which would just benefit the outfitting business. Shoulder seasons should be discontinued and there should be a return to "damage hunts". It would be a dis-service to the sportsman that went along with the initial shoulder season proposal, now it's time to take a new approach, update the elk objectives and populations and provide improved access opportunities for hunters.

Ted Hawn Helena, MT

73. I hunt in district 630 and when it comes to rifle cow permits it's gotten harder to find one to shoot and since the shoulder season it's made it even tougher to find one and almost impossible to fill your tag during the shoulder season. When FWP flies to do elk counts it's during elk migration or the elk are still in there wintering range so the numbers they come up with are not even close to the actual number of elk that live in these small units. Thank you

Travis Johnson Glasgow, MT

74. Do not allow shoulder season on public land.

Derrick Bruner Marion, MT

75. Over the last 3 years I have witnessed the disappearance of elk on the public lands between Maxville and Philipsburg. There is no surplus of elk that needs to be addressed with a shoulder

season on these public lands. Quite the contrary. I am up there extensively, on foot, year 'round.
Thank you, Bob Moore

Bob Moore Philipsburg, MT

76. I am a Montana Resident, a hunter, a parent that is raising a family on wild game that I and my children harvest, a parent that teaches responsible outdoor ethics, a landowner, and a voter. I am also strongly opposed to elk shoulder seasons. The idea of extending shoulder seasons to include some public lands is particularly distasteful to me. Usually, landowners who request shoulder season kills (these are not hunts) do so because either they or their neighbors have impeded harvest of elk by more ethical means, such as by tolerating natural predators or by hunting-based FWP management during regular elk seasons. Indeed, it is common for these same landowners to desire that only antlerless elk be harvested. This is because these same landowners "sell" opportunities to hunt antlered elk to paying guests during the regular season, and prevent the general public from hunting during these periods. "Problem elk" are only a problem when the landowner has not allowed normal public participation in FWP's hunting-based management activities. The idea that, now, these "problem elk" should be further pursued onto public land is particularly offensive. I strongly feel that all elk management by FWP should be restricted to the normal hunting seasons. Landowners who restrict access to elk during this period are causing the elk-damage problems, and should not be specially accommodated. I empathize with their neighbors who do participate in Block Management or other public hunting opportunities but are adversely impacted by large elk herds that seek refuge on these non-participating private lands. The correct solution, however, is not to use these private "reservoirs" of elk to as justification for harvesting more elk outside of these reservoirs and outside of normal hunting seasons. The correct solution is to convince these landowners to participate in on-season management through public hunting opportunities. Thanks FWP for your heroic efforts to keep Montana's ecosystems, animal herds, and outdoor recreational activities healthy through ethical science-based management!

Ed Schmidt Bozeman, MT

77. Please re-visit the entire Late Elk Shoulder Season. Do not expand it to public lands. Use science, not politics. Late shoulder seasons on public ground would only kill elk where we want them and train those not killed to move onto private land. This is such an inane plan, that it could only arise in government. Elk belong to everyone in our state. This plan only benefits private land owners and as such takes us down the dangerous road to privatizing our wildlife.

Joe Toth Missoula, MT

78. Please stop the abuse of our wild animals. Your game management is a joke, we need shorter seasons, not longer ones. All the animals have been chased off of public ground, due to your poor decisions in the past. Adding to the shoulder season's on any public ground, is a slap in the face to anyone who hunts public ground.

Jacob Butt Billings, MT

79. Extending the shoulder season to public land is ill fated. Please update the elk management plan based on sound science, then implement the plan.

BoLars Matson Whitefish , MT

80. I am a MT tax paying resident. I live in and contribute to MT because I love hunting. Particularly big game hunting on public land with my horses. I am opposed to all elk shoulder seasons especially when they are proposed to take place on public land. I have been hunting Forest Service for elk for 12 years and in recent years hunting pressure has increased exponentially in my favorite areas. This level of hunting pressure IMO is already unsustainable without adding additional hunting pressure through shoulder seasons. Hunting cow elk on high elevation public land during a late shoulder season will cause cow elk to abort their calves and only drive them back onto private land where they destroy haystacks and are difficult to manage. Please quit handing public wildlife out to landowners. Elk and deer populations could be effectively managed during the 5 week rifle seasons if landowners would just grant general season hunting permission. As it goes now FWP just grants more shoulder seasons which encourages landowners to block public access during the general season so they can have the trophy bulls and bucks for the wealthiest nonresidents. When it comes time to control the population and crop damage the landowner has shoulder seasons to kill starving pregnant cows with long range rifles, snow machines and pickup trucks. Quit selling out our big game to the landed gentry!

Drew Stuart Three Forks , MT

81. Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed on the ground since the last plan 16 years ago, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue.

Anthony Jackson Bozeman, MT

82. I am fully against any further expansion of the elk shoulder season. This is a poor management tool that only serves to habituate elk to find sanctuary on large private ranches, who restrict access, and then want excess elk off when they begin to receive property damage. I can't remember ever hearing any hunter or landowner for that matter ever say they saw too many elk or had too many elk around. NEVER. I'd like to see a hunt roster style system utilized to fill tags when private landowners have issues. FWP will make regional hunt roster lists of willing cow hunters and when a landowner has issues they already have a long list of people that will happily come out and help reduce numbers. Or just issue the damn ranch a set number of tags and let them remove the cows themselves. I firmly believe we have an elk distribution problem and not an elk numbers problem when looking at Montana's elk from a wider perspective. And if

we had better education and tools to manage predators on Montana's public lands we would see more elk living on the public where suitable habitat is abundant.

Zack Boughton Bozeman, MT

83. This is unnecessary and all shoulder seasons should be ended. Give the elk a break and quit educating them to stay on private land.

Michael Schaub Bozeman, MT

84. Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year-that was over 3 years ago. Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Fwp had a elk management plan way before a elk Shoulder Season was even thought of. The old plan is 20 years old and the edepartment is using it for managment? No elk Shoulder Seasons on public lands period.

joe hundley Darby, MT

85. Hello. Elk shoulder seasons are a direct attack on our elk populations. For some reason, there is a crusade that will not end until it has completely obliterated our local elk population in Montana. Shoulder seasons were a) meant to be a 3 year trial. We are on year 6. b) meant to be STRICTLY for private land. Public land shoulder seasons would be absolutely contradictory to a healthy elk population ecosystem. c.) Elk shoulder seasons are operating on an outdated, and uninformed management plan that is NOT current to our elk population in 2021 d) reducing elk populations on public land, has absolutely no impact on private land. Please stop this crusade on wiping out our elk populations. Stop bending the knee to every wish and whim of private land owners who worship the sacred cow, and want to destroy any/everything that is not their livestock. Thank you,

Dillon Wood Wisdom, MT

86. Please do not extend the elk should season.

DEBORA Poteet Missoula, MT

87. Please say no to extending elk shoulder seasons to public lands. This will do little to solve problems with elk on private lands and will more then likely push more elk onto private lands where the general public cant access them. I feel the answer would be working towards better private land owner relationships. The general public should not be held responsible for private land holders wildlife problems until they start to allow some sort of free access to the public. Its simply you scratch my back we'll scratch yours.

Thomas Miller Kalispell, MT

88. Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial year (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed on the ground since the last plan 16 years ago, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's

guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue. We need to think like hunters when constructing a plan. If one solution is implemented, what will the elk next do...where will they go? Does this plan make sense? What's our plan B? We need a revised elk management plan that addresses these issues. We need hunters and landowners willing to come to the table with a solution oriented mindset. We need more working groups to handle local, community private land-public elk management. What we DO NOT NEED is elk shoulder seasons on public land. Thanks in advance for your consideration. Respectfully, Rochelle Gravance MMH '20

Rochelle Gravance Columbus, MT

89. I do not support shoulder season hunting for elk on any land let alone public land. This is a terrible plan to "manage" elk populations. Thank you for the opportunity to comment.

Kevin Robinson Missoula, MT

90. I feel that I am one of the lucky minority that has access to private lands during the elk shoulder season and has been successful at killing several cow elk during those opportunities. Throughout the years I've hunted the shoulder season I have seen nothing but an increase of elk on the private land I hunt and fee the shoulder season has done little to disperse the elk onto public. Allowing shoulder seasons to happen on the adjoining public will do nothing but push more elk onto private land and therefore exacerbate the problem. The only way to solve the issue of too many elk on private land is to create programs that allow more average means hunters, such as myself, access to private lands during both the regular and shoulder season. I realize this is easier said than done but it is truly the only way to disperse the lopsided issue of where the elk choose to reside.

Cooper Bozeman, MT

91. I encourage you to consider the following: Elk Shoulder Seasons were never intended to be permanent. They were a 3-year trial (now going on their sixth year). Elk Shoulder Seasons were intended to address problem elk primarily on private lands in units above management objectives. Elk Shoulder Seasons are operating under an outdated elk management plan. A lot has changed in 16 years, since your last management plan was developed, including land ownership patterns, public hunting access and elk distributions and elk accessibility. We badly need to revise the elk management plan that's guiding these decisions. Elk Shoulder Seasons on public lands will not help the situation by reducing problem elk on private lands, but would actually kill the elk living where we want them (on public lands) and drive the rest where we don't (onto private lands). The real problem we're experiencing is an elk distribution issue, not an elk abundance issue.

Chad Jacobson Manhattan, MT

92. I would like to see no shoulder seasons for elk

Diann Baier Kalispell, MT

93. The shoulder seasons are getting out of control and are stressing elk to new heights. Do we want another repeat of the massacre south of white sulphur? It was a national embarrassment.

Jill Paul Billings, MT

94. I am not in favor of any shoulder seasons.

Paul Martin Kalispell, MT

95. The issue is an elk on private land that inhibits the owners use for farming/ranching. Extending it for elk that are remaining on public land should not be done. Elk herd size in the area is controlled by the hunting permits/hunters in the area.

Jeffrey Brewwe Bozeman, MT

96. I am against the proposed late Elk shoulder hunts. They are not a hunt at all. We don't need to hunt Elk for 6 months or more.

Jim Bjornemo Anaconda, MT

97. I am opposed to the proposed extension of the 2021 Late Elk Shoulder Season as I believe it will further compound the existing issue where elk post up on private land. Our policies should be tailored to the interests of the everyday common hunter in Montana and not the wealthy private parties and outfitters.

Jake Gunther Helena, MT

98. I don't think extending the shoulder seasons onto public lands is a good idea. The general elk season is already plenty long and this will only prolong the amount of time that elk are being chased around. There's got to be a better way to get the numbers to objective.

Kent Schlosser Helena, MT

99. I would hope that the fwp would see that there is plenty of season to manage elk without shoulder seasons. I don't know how to get the landowners to comply, but bending over backwards for them so they can protect their bulls and shoot cows later is not it. Also, extended seasons should never happen on public lands as it is only a tool to help the land owners with late season elk problems. If late season hunts "need to happen", then keep them on private only! Elk need some where to escape the non-sense

Kevin Larson Lewistown, MT

100. Do not extend this shoulder season. It is waging war on elk and is not keeping all stakeholders preferences in mind. Please strike down this terrible proposal.

Brian Sewell Missoula, MT

101. If you really want to reduce elk numbers, then the shoulder season should include public lands.

Doug Davis Missoula, MT

102. No to any shoulder season and lengthy hunting season for cow elk on public lands or private lands. If ranchers are suffering from depredation then they should allow more hunters onto their lands. It is wrong to hunt an animal so late into the year as you kill off five plus years of future elk by killing a cow elk.

Ron Smith STEVENSVILLE, MT

103. No public land shoulder seasons until landowners in over-objective hunting districts allow better access to elk sheltering there. This proposal will kill more of the wrong elk; the elk that need to be managed are locked up on private. Please do not advance this proposal.

Jeff Bangs Inverness, MT

104. Please do not extend the elk shoulder seasons onto public lands. The whole point of the shoulder seasons was to push elk off of private lands onto public lands. Pushing them off of the public lands--where they're welcome--and onto adjacent private lands--where they're often unwelcome--does not do a service to our elk herds, private landowners, or resident sportsmen.

Bert Lindler Missoula, MT

105. Public ground

Gavin French Whitehall, MT

106. I disagree with elk shoulder season extension. Elk already received tremendous amounts of pressure during the the regular hunting seasons. Additionally elk are receiving increased pressure as more humans move into their habitats and cut off migration routes. As a MT elk hunter I do not believe there is any legitimate standing to there being an overabundance of elk. Extended shoulder seasons would only hurt the elk populations. The shoulder season allow for hunters to hunt elk when they are most vulnerable in their winter ranges. Allowing for a disproportionate amount of elk to be taken. The elk shoulder season extension is a flawed idea that will only harm elk herds.

Benjamin Dallas Bozeman, MT

107. Please stop with this program on any public lands, have it only on private lands.

Paul Henze Deer Lodge, MT

108. I am against shoulder seasons - Unless: 1] private property owners allow unrestricted public hunting - i.e. hunters can go where the elk [wild life] are 2] any public hunting restrictions automatically reassigns the private farm/ranch/timber land to recreation land and is to be taxed appropriately. 6 weeks of hunting [longest in the lower 48 states] is adequate to manage Montana's wildlife. We must remember that wildlife is a Public Resource, not a private resource. If private property owners what to monetize a Public Resource then Montana needs to call a spade a spade and they no longer in agriculture but are really in the tourism industry and their property should be taxed appropriately. The damage hunt program can take care of what the general season cannot BUT only for private land owners who allow 6 weeks of public hunting for each animal over objective.

Randall Knowles Great Falls, MT

109. They shoulder season was designed to reduce the numbers of elk on private land. To being shoulder season to public land is a absolutely a joke. The elk used to go to private land to feel more safe and then the shoulder season ended that and now they can relax some what on public land after general season. It is crazy that you all would even bring this to the table. By bringing this up it shows you do not care anything about the animals. To have several weeks off archery and more rifle hunters then ever before and for 5 weeks let them animals be. In unit 350 and 370 fwp has killed way more elk then ever should of been taken and we the people were telling them that and also in several other units. This is a joke. 5 weeks off rifle and more predators now then ever and more hunters then let them animals have some what of a brake.

Mike Price Whitehall, MT

110. The shoulder season should not be allowed on public land. Those of us who do not have access to private land may struggle to find elk as is. The elk seek refuge on private land, it defeats the purpose to open it public land when they will all gather somewhere not huntable. Stop catering to ranchers who don't want to allow hunting but complain about crop damage or loss of crop, look out for the sportsman. Keep the shoulder season for private land only. Or cancel the whole thing.

Caden Sharp Helena, MT

111. As a life long resident and avid passionate elk hunter on public lands I am not in favor of extended elk hunting shoulder seasons on public land. I have hunted elk religiously for nearly 30 years and at no time have I witnessed too many elk on public land. These are clearly the wrong elk to go after, the reasoning behind this nonsensical proposal is beyond me. It's as if maybe someone or somebody's are practicing in bad faith,,, thinking maybe a hidden agenda to move the remaining public land elk onto private land. Get this right and bury this proposal enough of the nonsense!!!

Dave Blaskovich Butte, MT

112. Shoulder seasons should not include any National Forest, National Wildlife Refuge lands, or BLM lands. These are not the areas where elk numbers are over objective, our public lands already receive the heaviest hunting pressure and hold the fewest animals. Private lands are the only places where shoulder seasons should exist.

Vince Cebuhar Billings, MT

113. I do not believe extending the shoulder season to public lands is going to solve private landowners issues of over objective herds, but rather exacerbate existing issues by pushing elk back on to private, while simultaneously causing significant stress, calf abortment, and losses to the few elk residing on our public lands. I would encourage FWP to look for solutions outside of the shoulder seasons that bring Montana's elk seasons to nearly 6 months.

Jacob Ahmann Bozeman, MT

114. I am in support of extending shoulder seasons to Feb. 15th in units above elk objectives ONLY
IF: 1) The elk management plan is updated and elk management objectives are revisited,

taken into considerations the new on-the-ground realities of land owners, public access and elk distribution. 2) ESS are only valid on private lands, only for antlerless elk 3) ESS are only valid on private lands who have opened their property to public hunting access during the general season. These could include enrolling in block management, letting X number of public hunters hunt their property and/or taking part in the hunt roster damage hunt program. (if landowners aren't willing to let the public help with the public-resource problem during the time of year when it's ethical to hunt these animals, then they shouldn't be rewarded with assistance in January and February. Furthermore, if landowners are not providing public access and harboring elk during the general season so they can sell outfitted hunts to high-paying clients, only to then turn around and complain about there being too many elk after the general season, I don't think it's fair to reward this with 2.5 more months of elk slaughter). Unless these criteria are met, I see no reason why we would need to expand the shoulder seasons in these units, not when there are already common-sense solutions at our disposal and equitable tools in the toolbox that are not being used. I appreciate your careful consideration of these issues and encourage you to stick to the initial intent of the ESS adopted in 2015. Thank you. -Kevin

Kevin Farron Missoula, MT

115. I am absolutely opposed to an extension of any shoulder season, and shoulder seasons in general. There is no reason to be hunting elk 6+ months a year to appease private landowners that do not allow access otherwise. I personally think it's a joke to state that units like 411 and 417 are over objective when the units are 80% private. If the public does not have access to the elk to begin with they should not be counted towards the "objective population" of a district until landowners allow hunting during general season...or they can quit whining to FWP about the damage the animals are causing on their land.

Derrick Mueller GREAT FALLS, MT

116. I support the use of shoulder seasons in all hunting districts that are above the elk population objectives set forth in the elk management plan.

Jeff Darrah Stevensville, MT

117. Elk shoulder seasons belong on private land, not public land. Elk hunters need access to elk on private property in order to effectively manage elk herds. Hunting elk for 7 months on public land will only exacerbate the issue of growing elk numbers on the private side of the fence, which MTFWP will ultimately pay for.

RYAN M CALLAGHAN Bozeman, MT

118. I do not support an extended elk season. This is an outdated and narrow management philosophy.

Patrick Colbert Missoula, MT

119. Dear FWP, Please recognize the problem of distribution versus overpopulation and reconsider the motion to move this proposal forward. The extended hunting season could push what few public land elk we have in the Red Lodge region to permanently reside on private land, where the majority of the herds already are. I see no advantage to the herd nor the public land hunter

with this proposal. The few additional elk harvested will not be worth the long term consequences. Thank you for your time and thoughts on this matter. Sincerely, Bridget
Bridget Belliveau Red Lodge, MT

120. Stop extending shoulder seasons! Elk hunting should not be privatized and that's exactly what Hank is trying to do with today's FWP. We need a new director and a new governor
Eric Ennis, MT

121. I am only for extending the late shoulder season if it strictly states that it is private land only. Allowing shoulder season harvest on National Forest, State and BLM land only hazes elk off the public and onto private refugees. This in turn will lessen opportunity and also harvest numbers.
Cory Hess Billings, MT

122. Please do not move forward with this shoulder season plan. This is an access and distribution problem, not an overabundance problem. As such, please focus on improving access and incentivizing landowners to allow public hunting. All this will do is kill the elk on public ground and keep making the problem worse by teaching elk to stay on their sanctuaries.
Dan Gagner Helena, MT

123. Please do not consider extending the elk shoulder seasons, particularly to include national forest lands. The abundance of elk is mainly located on private lands, however private landowners are often times not allowing hunting on their property. Late season elk hunting on public lands will just push more elk onto private lands, exacerbating the issue. We already have enough issues with lower elk numbers on public lands, please don't worsen the problem. If ranchers don't want elk on their properties, they should allow more hunter on to harvest elk. This is the same argument everyone has been saying for several years, however it is still just as valid as it was when the shoulder seasons began. Thank you
Adam Hunt Great Falls, MT

124. I am strongly opposed to expanding any and all elk shoulder seasons in Montana. These seasons have been ineffective in significantly increasing antlerless elk harvest in any of the HDs. So much for "performance based", eh? Over objective elk populations are the result of access issues. FWP needs to focus its efforts on improving hunting access opportunities for hunters. The hunters (including myself) are available and eager to harvest antlerless elk. They just need access to them.
David Yerk Choteau, MT

125. I am opposed to all late season elk shoulder season hunting that is on public lands and I am opposed to any late season elk shoulder season hunts on private lands where the landowners do not allow public access. Elk are incredibly smart and adaptive animals - there are already too few elk on public lands and extending the hunting season will not only push the elk off of public lands for good but also ensure they remain on the private property where the hunting pressure is much lower. Private property owners have created this "excess" of elk due to their own resistance to allowing public hunting and/or "managing" the elk herds on their private property

as their “own” elk herds and then generating revenue through outfitters, guides, and/or charging access fees. Every sportsman in Montana knows that the State Legislator and our Governor prioritizes private land owners and guides over those whom hunt on public lands - extending the elk shoulder season and allowing hunting for these magnificent creatures to be hunted on public lands will only exacerbate the challenges that face elk populations that are beyond the acceptable tolerance level and only push elk further into private property enclaves.

Joel Cusker Helena, MT

126. We do not have an overabundance of elk. We have problematic distribution. Destroying elk populations on public lands will only make that worse. I oppose extended shoulder seasons in the 19 districts on public lands. We can't shoot ourselves into better distribution.

Grant Kelly Great Falls, MT

127. I'm no scientist but I don't think you need to be to know this is not going to work. What ever happened to common sense? If we have a problem with elk on private lands, maybe we should work with willing land owners and o hunt the elk on those lands. Not the public lands that the elk will be hunted on, and driven away from, on their way to private.

Zach Billings, MT

128. I do not believe that an extension of seasons on public lands would solve the deemed “issue”. Rather I believe we (Montana) should look for a route to increase public access to private lands with a distribution problem, to help meet herd quotas. Additionally, in theory this would assist in pushing herds off of that private land, back into our public lands.

Jacob Waltrup Billings, MT

129. I would like to state that I am strongly opposed to the extension of elk shoulder seasons, especially on public lands. This action will not solve over-population issues, which are primarily an issue on private land. Please decline this proposal to extend 2021 Late Elk Shoulder Season.

Jacob Zimmerer Bozeman, MT

130. Please stop this war on elk. Ranches should not be the drivers of all big game management in the state of Montana. FWP is responsible for managing the wildlife in trust for ALL the citizens of Montana, not just AG. No more shoulder seasons! However, since elk management is no longer science based but politically driven, at least have the wherewithal to keep the hunt exclusively on private lands.

Adam Neff Cashmere, WA

131. The current proposal does not solve the problem of elk management on private agricultural or ranch lands. Creating an extended shoulder season will keep elk populations on private lands longer. Please do not support an extended elk shoulder season.

Ryan Burkert Helena, MT

132. Please vote no on the extension of the late elk shoulder season. Shoulder seasons do nothing to address the mis-guided belief of "too many elk". This administration and FWP leadership's

war on elk is alarming. Attempting to manage for a biased objective by targeting only those accessible elk while completely ignoring the elk being harbored on inaccessible areas does nothing to units being over objective. When the vast majority of accessible elk are harvested or pushed to inaccessible places, what's next? In my 40 years of hunting in Montana, public land hunting is on a fast downward spiral. Please do not be part of the commission that puts the nail in the coffin and destroys public land hunting in Montana.

Brian Robbins Anaconda, MT

133. I am opposed to the shoulder seasons in general, but adamantly opposed to any shoulder seasons on public land. These elk get pressure for 11 weeks on public and we don't need to drive them off anymore; especially on the winter range!

Heath Hansen Whitehall, MT

134. I am opposed to the implementation of elk shoulder seasons for the 2021 season and beyond. 5 years ago, I attended the initial season setting meeting where shoulder seasons were proposed. They were adopted with assurances from FWP to the public of monitoring for success, compliance by district landowners for access- a whole range of criteria. None of that seems to have happened. By FWP's own admission, shoulder seasons are not working in many places. Hunting elk on accessible ground six months out of the year will do nothing but hurt the Montana Hunter, and send the few remaining Elk that spend time on accessible lands running for private land where they are safe and are not hunted. I acknowledge the financial suffering elk cause landowners, but we need more acute solutions, not these hunting district wide shoulder seasons that have just exacerbated the harboring of elk on private lands. By most metrics, shoulder seasons just flat out are not working. I oppose them and ask the commission to work with the Elk Citizens Advisory Council and take an active role in the new Elk Management Plan, to find a more acceptable way. Thank you for the opportunity to comment. -Bret Lian

Bret L Lian Jefferson City, MT

135. The original intent of elk shoulder seasons was to address populations that were over-objective, increase opportunity, and to reduce impacts to private landowners who had elk camped out on their property to avoid being hunted on public lands. The new proposal would include additional shoulder season hunting on public lands which will push elk onto private lands. This is the OPPOSITE of what the shoulder seasons were originally created for and it will make it more challenging for public land hunters to find elk because there will be a greater number on private property. Please, DO NOT adopt this proposed rule change.

Connor Parrish Livingston, MT

136. The shoulder seasons were developed to move elk off private lands because of crop/pasture damage. The national forests should not be part of the shoulder season. It's that simple. Thanks.

William McDowell Missoula, MT

137. Helena Hunters and Anglers Association is opposed to extending shoulder season elk hunts to February 15, 2022 within the proposed 18 Hunting Districts. Shoulder seasons were designed to

be performance based and they include rigorous evaluation criteria. Comprehensive performance evaluations have not been performed and shared with the public. This needs to happen before additional management alternatives can be considered. Finding acceptable means of increasing hunter access on private lands within the subject HDs during the regular archery and rifle seasons is our preferred method of reducing over-objective elk populations in these HDs. Later shoulder season hunts will not guarantee management success but will further alienate sportsmen and strain landowner/sportsmen relations. Please evaluate the monitoring data in detail and engage the public in searching for a wider array of management tools and approaches. Thank you, Gary Ingman Vice-president Helena Hunters and Anglers Association Helena, MT

Gary Ingman Helena, MT

138. I oppose the extensions of the 2021 late elk shoulder seasons. Public lands shouldn't be included in these seasons as they were sold to hunters as a way to help out a landowner. Further, bull elk should never be targeted during these seasons

Ryan K Florence, MT

139. The whole shoulder season program is a joke. Large private landowners harbor the elk all general season to profit off high paying bull hunters and then complaint about too many elk after the season. I understand there are those landowners that suffer the consequences of their neighbors actions but if a landowner does not provide public opportunity throughout the regular season then they should not receive any assistance from FWP to reduce numbers. More related to the specific topic on hand - elk should not be hunted for 6 months of the year. Give the darn elk a break over the winter and allow them to recover from getting chased all fall.

Matt Komac East Helena, MT

140. No no no. Management is critical i agree. Large private land owners who do not allow harvest unless you pay should have to suffer the consequences. Push them into access. The elk will spread out once over populated. This objective number is crap. 5 weeks of rifle is enough. I am a land owner and if numbers are high i let people harvest free. Stop putting a dollar amount on elk and helping those who do not help Montana's wildlife. How is it justifiable to hunt and chase only bulls during the 5 week general season for a paid amount but then once it is over ask for help. Wrong in all ethical ways. I live to hunt montana. Born and raised 37 years. I have 4 children in this state but am considering moving due to commercialization of our beautiful animals. Stop Private Land animal hoarding and make all animals fair game fair chase no value and the issue will cure itself.

Ernie Schmidt Great falls, MT

141. Last year at one of the FWP public hearings, I asked questions regarding data to support continuation of elk shoulder seasons in certain districts, notably in region 3. If FWP is tracking collared elk in the area, they should be able to share time-bound distribution of those elk populations during early shoulder, general archery and rifle seasons. FWP was either unwilling or unable to supply data as to how the shoulder seasons assist by reducing landowner burden of harboring resident elk outside the general hunting season. I've hunted many of the shoulder season districts - specifically, 511, 520 and 590 last year. There is no observational data to

support the need for elk shoulder seasons in many of these districts either. Elk are on private throughout the general season and aren't labeled as a problem for landowners, but are labeled as problematic after general season wraps. There are other levers FWP can use to manage harvest, engender cooperation between landowners and hunters, and push elk populations back onto public land and avoid game damage. I cannot support continuing shoulder seasons in many of the 19 districts mentioned.

Derek Casanovas Helena, MT

142. Shoulder seasons should not be extended to public lands. In fact they should be done away with completely. The effect they have is the opposite of what is intended in that they drive elk onto private land, not off it. In my opinion the game damage program should be what is used to prevent game damage, not shoulder seasons.

Ben walker Billings, MT

143. I am opposed to the extension of the shoulder seasons. Any "problem" with elk is a condition of the harboring of elk on private land. Allowing hunting on public land will just reduce the populations of elk that don't go on public, or force them to the same safe-harbor private lands. The shoulder season has become a 'Friends and Family' program for private landowners. The entire permitting process should be moved to the game damage hunt program where a more accurate assessment can be made of the actual damage elk are doing to private landowners and resident hunters can participate in the solution.

Steve Jones Billings, MT

144. The same elk numbers that are needing to be thinned are on either side of the fence. I think it would make sense to hunt elk during the shoulder season that are on public land.

Dean Blomquist Ryegate, MT

145. Elk Shoulder Seasons SHOULD NOT be on public land. They should continue to be held on private.

Winston Parker Helena, MT

146. Please do not extend the shoulder season to Feb 15. The elk have been hunted long enough at the close and should get a rest. Pregnant cows don't need to be chased around. The whole problem is the hoarding of elk on private lands in the first place. If elk need to be controlled, then do it by letting hunters control them. Do not set up further sweet deals with landowners that sell our elk. There is no reason to do this other than the department is following these landowners wishes. They can't have it both ways. Extending the shoulder season on our elk herds in these zones is a poor way to deal with the problem. If the elk can live on these lands most of the year, then the ranchers need to live with them for a few more months. Let the pregnant cows survive. This is not fair and equitable to Montana hunters or the elk at all.

Christopher Casey McAllister, MT

147. Shoulder seasons were sold to the public as a way to manage elk herds harboring on private lands, which has not been a success by any measure. Elk still harbor on private lands that don't

allow access for the entirety of the general season, and hunting them for 6 months is not the solution. Further, adding public lands to the shoulder hunts in some districts goes directly counter to the original goal, and will continue to diminish the elk available for hunters on public lands.

David McKay Clancy, MT

148. I like the shoulder season

KC LaFlesch Missoula , MT

149. I don't feel like shoulder season hunts should happen on public land prior to the general season opening up. Many of us have been putting in for special tags for many years without success and if that area has been hunted by shoulder season hunters before the general season starts it could ruin the entire purpose of these special tags. If the shoulder season is going to be extended longer past February 15th and to public lands after the season I think that could be very valid.

Jared Schmit Missoula , MT

150. Like to see the shoulder season continue. Had a couple years if it weren't for the shoulder season I would not have had meat in the freezer. Plus this gives me an opportunity to help the landowner and control the elk population. Would be nice to have a few more landowners cooperate on access. I hunt in the 412 district, have spoken to the biologist about this problem so FWP should know what's going on. I am speaking for my hunting partner as well who has no internet access. Thank you

Jim Herrly Belgrade , MT

151. Shoulder seasons for elk should be only on private lands. Districts that are continuing to be over desired numbers should be open to cow elk hunting only on private land. Hopefully this will get landowners who are harboring elk to allow more hunters on their land to help with this problem and get elk herds off of private lands so they can be hunted and their numbers reduced. I know that outfitters and others that are profiting from elk harboring will have a fit about this, but they're the ones causing this problem!!!

Paul Gierach Huson, MT

152. The proposed Late Elk Shoulder Season should under no circumstances be allowed to run concurrently with the new Muzzleloader Deer and Elk Season as mandated by the legislature. The whole purpose of the muzzleloading season would be negated by the use of high power rifles at the same time. The high power shooters have had the whole regular gun season, and a measly 9 days for muzzle loaders should not be ruined by shoulder hunts. The FWP can manage the muzzle loading hunt for success or failure. Make the right choice.

Rodney Beattie Forsyth, MT

153. Dear Commissioners, I understand the need for some shoulder seasons on private land but I am very opposed to any shoulder season on any public land. We do not have an elk numbers problem, we have an elk distribution problem. There is plenty of habitat for the number of elk

we have, they just need to be redistributed upon the landscape. The more we pressure them on public land the more they will find sanctuary on private, especially private land without access/hunting pressure. We should be working towards collaborating more with landowners and finding access for hunters. Please do not approve any shoulder seasons that include public land. Thank you.

Michael Laird Billings, MT

154. Dear Commissioner - I have been a (mostly) public land elk hunter in Montana since the mid 1980s. As such, I have seen many changes and have observed the phenomenon of thousands of elk moving onto private refuges throughout the elk season, causing a significant reduction of animals to hunt in the high country surrounding those private bottoms. I have been generally supportive of shoulder seasons on private land, and understand the challenge of managing elk populations and balancing private/public needs. As time has worn on, I believe we are subjecting our elk to TOO LONG A HUNTING SEASON. If we extended shoulder seasons to public land, elk would have NO refuge beside private land which didn't allow hunting. The public land shoulder season solution will absolutely compound the problem of too many elk on private land, thereby creating the need for yet another solution to limiting the elk population. I am strongly opposed to the expansion of shoulder seasons in any form, but I am absolutely opposed to allowing the elk shoulder seasons on public land. If the objective is to reduce numbers of elk which have changed their pattern to large private-land herding, then the remedy for that problem must focus on reducing numbers on private land through private land hunting, whether that is during the regularly scheduled seasons or on the shoulders.

Dan Kimzey Hamilton, MT

155. Extending elk shoulder seasons to public lands we will be counterproductive. hunting elk going into the general archery season on public lands will push elk onto private and reduce opportunity for hunters during the general season. it would be incredibly disingenuous and a slap in the face to public land hunters that have supported the elk shoulder seasons on private lands. I couldnt think of a worse idea and if this is implemented across the proposed districts i will strongly oppose all shoulder seasons moving forward. i cant believe this has been a late addition to the commissions august meeting agenda and isnt clearly outlined anywhere in the coversheet or final elk season guidelines for shoulder seasons provided for public comment and review. this is a massive change at the core of what the shoulder season program is and should not be adopted by the commission.

Mathew Deaton Helena , MT

156. Get rid of all shoulder seasons. We have seasons from Sept to end of November. Let the elk rest.

Laurien riehl Missoula, MT

157. Please extend the shoulder season in the considered districts onto Public Lands. Many private landowners do not allow any opportunities to harvest an elk despite complaining of the damage to their properties. Opening up to Public Lands would help the state get to objective population

levels or at least the opportunity to do so instead of scratching their heads on what else can be done. Thank you.

William C Clairmont HAMILTON, MT

158. Absolutely not! The elk are too pressured now. Pregnant cows do not need this pressure during winter. How about letting us access the elk during the regular season. Hunters are very good at killing elk, if we can access them. The outfitted lands keep the elk until their clients are happy and then cry when they can't make money off them anymore. We need more access during the regular seasons, archery included, not longer shoulder seasons. Thank you for your time!

William Schauman Helena, MT

159. This proposal violates the conditions under which shoulder seasons were sold to resident hunters—as an experiment, with monitoring and further discussion, provisions for increased public access, etc. Like the application of shoulder seasons to DNRC and BLM lands, it will drive elk herds back onto private land, violating a primary premise of the whole program. It's yet another giveaway to outfitters. Gianforte's retooled FWP commission, his FWP director, and legislators are representing interests, but they aren't the interests of resident hunters. FWP and the legislature are incurring hunter anger, and it will show at the midterm elections.

Jock Conyngham Evaro, MT

160. I think that shoulder seasons on public land are a bad idea. The elk are stressed enough after the general hunting season. If you want to reduce numbers you must improve private land opportunities that are not overgrazed block management. I suggest making corner crossings legal to open up land already public.

Hermes Lynn Helena, MT

161. I think we should be looking at the weather season instead of trying to create more problems than we already have. With the snow falling later in the season means less elk taken during the actual season.

Andrew Dobbs Butte, MT

162. No shoulder season at all my opinion

Kevin Ansell Stevensville, MT

163. Elk shoulder season on private is excessive as it is... add public? No. Absolutely no. I love cow elk meat over most of my freezer filled game though stop! Think of our future generations opportunities - not simply the current impulsively to extend our seasons with manipulated elk hunt options in excess! No to public cow elk "shoulder season"! Just stop already!

Charles Whitefish, MT

164. If you are trying to get the elk numbers lower, the shoulder season is the only way due to the majority of private is leased out to guides that only kill bulls and during the shoulder season with the mild winters the elk move to high ground or on forest service where you can watch 300 to

400 head eat but can't hunt them. Also I believe the North side of the crazy mountains should open up for motorized vehicles during the season. Thanks

Eric Voldseth Billings, MT

165. I completely oppose this proposal

Jordan Nelson Townsend, MT

166. Please consider adding additional public land hunting opportunities during shoulder season for units that are over population objectives. Private land access for this season is very difficult to find even on block management properties. If the goal is to reduce elk numbers by killing more cows, give hunters the opportunity to accomplish that goal.

Brody Henderson Belgrade, MT

167. I believe it would be in the best interest of herd management for FWP to allow the the shoulder elk season to also include public lands. My experience, in district 411, is private landowners only want 1-2 people hunting which limits the ability to reduce any noticeable herd size. Maybe it's not a one size fits all solution, but some areas could benefit from a change in policy.

Scott Wandler Missoula, MT

168. Shoulder hunts should only occur on private property that allows some form of public access during archery/rifle seasons. There is not an elk population problem, there is an access problem. If you have private property and allow some verifiable access then you qualify for a shoulder hunt. If you outfit & allow no other access or allow no hunting access at all then you do not qualify for shoulder hunts. Not one square foot of public ground in MT is over populated with elk. It is a private property issue. Life is all about choices. If you choose to allow minimal or no elk hunting then you choose to house & feed them

Shane Missoula, MT

169. By all means, I encourage FWP to extend the elk shoulder season permanently in section 262 where my farm is located. My land is open to licensed hunters from Montana yet the elk herds seem to become larger with each passing season. Each farm should be granted five depredation permits per year for elk joined to a FWP list of licensed hunters for that year who can be contacted and allowed to keep one half of the meat they get and required to donate the other half to local food banks and processed for them at the hunter's expense.

PHILIP TUMMARELLO Stevensville, MT

170. I believe the shoulder hunt should be for private land only with over populated areas, a six month season is way out of line cows will be well into pregnancy so we are taking two elk not just one. If you can't get a elk in general season try again next year. Just leave the shoulder hunts to private land. The hunting pressure will move the elk to national forest to a certain extent if the private land owners stay with the program. The elk will go to a least resistance area. Thank You Darrell Anderson

Darrell Anderson Billings, MT

171. I wholeheartedly oppose a any expansion of Elk Shoulder Season. Global warming and expanding human settlement are already taking their toll on all wild animal populations. Increased hunting seasons will add another stressor.

Janet Maier Hamilton, MT

172. I strongly oppose adding public land to elk shoulder seasons. Additionally, the influence of private interest groups and their "tolerance" for elk on setting the elk herd objectives is a slap in the face to outdoorsman, conservationists, and scientists who dedicate their lives to responsibly managing and improving this public resource held in trust for them by the state. Please determine if you are going to follow the law on how to count elk populations, and disregard private land elk from the herd size when determining whether that unit is "over objective" or not. Then once objectives are properly determined, there are plenty of other management tools aside from "shoot them all, all year long." To summarize- sportsmen & women across the state (as well as nonresidents) are disappointed with the current system, and expanding shoulder seasons to include public lands will only exacerbate this problem. Regards, Robert Kayser

Robert Kayser Billings, MT

173. Please do not open shoulder season elk hunting on public land!

Richard H Shockley Gallatin Gateway, MT

174. I am AGAINST the proposed extension of the elk shoulder season, enough is enough, this was SUPPOSED to be a temporary season, NOT an ongoing expanded war on our public elk for the financial benefit of a few

John C DiPrizio Martinsdale, MT

175. I Tristin Glovan am 100 percent against the shoulder seasons for elk b in the state of Montana. I think they should be stopped.

Tristin Glovan Anaconda, MT

176. Yet again, MFWP - while I am proud of the service I provided to the resources and their users and grateful for the experience - makes me embarrassed to admit that I had a 30+ year career the department. Go ahead and send Montana "back to the brink" and lets lose the moniker of "Last Best Place". It seems this is what the current direction is, the current administration wants, and what the MT populace voted for. These shoulder seasons were a bad idea that only continue to get worse. Thus, I will add my name to the list of objectors to this "proposal". And watch with baited breath.....

Tim Weiss Bozeman, MT

177. I think it should be done with special drawing. Targeted more at getting youth involved and helping the elderly and opening easier opportunities for them on national forest. While remaining the usual late season as is for most able body hunters. Doing this for one to two years then switch to allowing anyone to have this opportunity to hunt national forests.

Dustin Marry Silesia, MT

178. Against my better judgement, as I know that extensions of shoulder seasons into large portions of public lands are already a foregone conclusion... I recommend that shoulder seasons NOT be extended or expanded into public lands. One of the selling points for shoulder seasons to start with was to keep elk off of private land and push them back onto public. While a vast majority of Montana Resident and Non Resident hunters did not support shoulder seasons from the start of the program, there was limited merit to them to control elk on private. Elk on public land are not over-populated in Montana, they belong on public land where hunters during general seasons can have access to them. Public lands also need to be a place where elk can escape the 11 weeks of constant pressure applied to them during general seasons. Now, they will get pounded on for another couple months, just what they need. The elk situation in Montana has become so bad on public lands, I refuse to purchase my Montana Native elk tag there. Even though I grew up hunting Montana and held elk tags for over 30 years, I refuse to participate in Montana FWP's elk extermination program. Elk are the enemy in Montana, treated by the Legislature and FWP as if they're nothing better than a noxious weed. I would really like to hunt elk again in Montana someday, a day when the MTFWP again found value in elk...I don't anticipate that day will come anytime soon. Perhaps not in my lifetime. It comes as no surprise to me or many other hunters that this proposal to kill off elk on public lands during shoulder season is the next "logical" step by the MTFWP to continue its war on elk. I would bet my comments here are ignored, just as my comments were ignored during the initial proposals of shoulder seasons. The MTFWP is not interested in doing what's best for the very wildlife they are required to administer, no reason to believe the Sporting public is considered either. Again, I oppose expansions of shoulder seasons into public lands, where elk belong. However, good luck in your next installment of the "elk wars"... Buzz Hettick Laramie, Wyoming

Buzz Hettick Laramie, WY

179. To whom it may concern, I think extending the shoulder season is a really bad idea for several reasons which I'm about to list. First, as it currently sits as season, the elk are hunted 6 months out of the year by humans. They are already hunted 12 months out of the year by wolves, mountain lions, and coyotes. We are putting too much stress on these animals. Second, from when I started hunting 19 years ago the elk population has dropped dramatically in areas I have harvested elk. I can't even find an elk where we used to hunt. I am not a bad elk hunter harvesting 17 elk out of 18 seasons. By doing the shoulder season we are taking out cows that are pregnant all the time. I think you should get rid of the shoulder season entirely and go back to the drawing system when I was a kid. You could only shoot one elk and you had to put in for either cow or bull not both. So guys that have never wanted to shoot a cow can now put in for one and get a chance and vice versus. So the draw odds have greatly decreased as well. I speak for everyone in my family that would love to see the general tag being able to be used for a cow. Make the hunters have to draw to harvest a cow and getting rid of the shoulder season would help our elk population for sure. Give the land owners a certain number of tags to give to whoever they want to harvest cows and then once they are out they are out. I would really hate to see our elk getting more pressure. I just had a baby boy and I am worried with the way things are going here with out of state hunters and the elk numbers dropping the hunting he might experience will not be the best. Thank you for your time, Anthony

Anthony Helena, MT

180. Why not open up public lands for shoulder seasons? The elk are already concentrated on private lands. Give those who don't have access or money to buy access to those lands a chance on on areas they can get to? Private landowners get all the breaks here. You'll start loosing hunters if people don't have opportunities.

Jim Vralsted Saint Regis, MT

181. There should absolutely not be any shoulder seasons on public land!!!

Daniel Martin Columbus, MT

182. I'm opposed to having a shoulder season prior to the opening of archery or the general rifle season. Also extending the shoulder season past Jan 1 seems a bit excessive. Shoulder season should only be permitted on private lands. No shoulder season hunting on public lands! Thank you

Steven Wharton Billings, MT

183. I am opposed to the continued use of shoulder seasons

Jared Ryan Helena, MT

184. I'm for the extension,

Steven Robinson Cascade, MT

185. Opening the shoulder season on public ground is only going to compound the problem of elk staying on private property.

Paul Donohoe Nye, MT

186. I feel that extending the dates of shoulder seasons could be useful in bringing elk numbers down to objective. However, I oppose opening up more public lands for these hunts. Landowners would like to see elk numbers reduced. But hunting elk on public lands will only push elk down onto private lands. Wintering elk on public lands are good for everyone, landowners and non-landowners alike. Allowing shoulder hunts on public land will only increase elk-related damages to private land. This proposal will likely not reduce elk numbers and will definitely not reduce elk conflict on private lands.

Max Mattioli Helena, MT

187. I would like to comment on a shoulder season in district 332. I am 74 years old and have hunted 332 since high school. There are no more elk there today than in 1960's. A couple of ranchers are having early season hunts that are criminal. They winter all there cattle in dillon and bale no hay. They have 6 block management signs that they receive fish and game dollars for hunter crossing their land to the national forest. yet the past few year they have early season sholder hunts on their land . It is crimmal and should be stipped as there is 0 elk damage to their land.

Bill Hill Anaconda, MT

188. I feel we have killed all the elk in HD262 that's necessary to fill the Departments obligation to the farming community, these shoulder seasons we're meant to be short term three year trials I know we've extended that to be a yearly hunting season in hunting district 262 . Yes I know thank you for your comment.

Steve wilson Victor, MT

189. Quit treating "OUR" elk like vermin!! Show some balls and start managing our elk herd to benefit the elk and not padding FWP greedy ass pockets. Get those lazy ass bio's out in the field to some actual work, instead of sitting at a desk thinking they can manage a valuable resource from a desk. 1st step would be to start growing some food for the elk on the WMA's, instead of sitting on your asses watching.

John Great Falls, MT

190. I totally support FWPs' efforts to expand the hunting districts offering a late shoulder season.

Timothy Engleson EUREKA, MT

191. I am totally supportive of extending the Late Elk Shoulder Season to February 15. I was very fortunate to be able to participate in the Late Season Hunt in HD 314 in 2003 and it was a tremendous opportunity, but at that time it was only allowed for a 4 day period in early January. I strongly support the proposed extension AND the inclusion of HD 314 on both private and public land.

Robert Merchant Polson, MT

192. I oppose the elk shoulder seasons because if you want reduced elk you shouldn't kill wolves which will do the job for you.

Jessica Hill Livingston , MT

193. The primary problem facing elk hunters in the northern Sapphire Range in R2 is prohibition of access to MPG Ranch, and the additional sections MPG purchased in Miller Creek, cutting off access to public land that elk use extensively. This is where real problem solving need be applied by FWP.

George Gaines Missoula, MT

194. I Don't agree with lengthening shoulder seasons for elk.

Bridgar Hill Livingston , MT

195. Love the shoulder season but having different start dates in area 4 and 5 only allows for the elk to move out of hunters reach. The same with not hunting f/s the elk only move up and out of hunts reach defeating the plan to reduce populations

Rick Mccollom Martinsdale , MT

196. I strongly support enhancements to Montana's shoulder seasons. These seasons are a great management tool and help reduce impacts to private lands from elk while at the same time, using hunters to manage this species.

Keith Fisk PIERRE, SD

197. Please add 314 to the 2021 elk shoulder season

Jim Handl Livingston, MT

198. No

Doug Bailey East Helena, MT

199. my elk B license refund was returned to me. I had already paid the \$280. If your goal is to reduce elk in certain management units - why dont you use the non residents to harvest extra elk? Can you not move the management unit and contact a non resident and give them a oppurtunity?

mark dolan hudson, WI

200. I am strongly against this type of management of our wildlife. We are sportsmen and conservationists and early and late season are not ethical. We need to work with landowners to get public hunters on private lawn where elk are pushed. Landowners are making money leasing to the wealthy few and then complaining in the winter that there are too many elk. In the late season cow elk are carrying fetuses and should be left alone during that time period. Early season will hurt both archery and rifle seasons. We should not give up our ethics and our season to manage our wildlife because a few want to profit form it. Wildlife is a public trust. The shoulder seasons are a disgrace to Montana. If my family needs food I will pick up road kill before I participate in the shoulder season.

Jackson Farr, MT

201. I disagree totally with extended seasons. The only areas that are over objective is where elk spend all or majority of time on private. Deincentivizing the private landowners that limit access to sell trophy hunts can be accomplished by changing regulations to antlerless only. The game on public land is decimated and farms and ranches who are negatively affected by the large private land herds that refuge on the pay to hunt land are also not being treated fairly.

Garth Foster Helena, MT

202. I am writing to support extension of 2021 Late Elk Shoulder Season. I request that HD 314 be added to the 2021 Late Elk Shoulder Season, both north and south of Big Creek. This area continues to see over objective numbers of elk and by having a shoulder season would allow hunters another tool for the harvest and management of elk in HD 314.

Matteo Abbruzzese Emigrant, MT

203. I agree with the extension of the shoulder hunt thru Feb. 15. A major problem facing hunters is the amount of posted land by both generational Montanans and new arrivals. New arrivals are. Yuk g up large tracts of land and immediately posting them to hunting. Elk are smart and they

quickly figure out where these “safe havens” are and will often stay there as long as there is food or travel out at night to feed leaving no opportunity for hunters. This also poses a bangs disease problem where they harbor for extended times. Something must be done to open up these areas.

William Higgs Livingston , MT

204. No shoulder seasons. The elk are hunted too long and pregnant. It's a hunting access problem created by greedy land owners profiting off public wildlife. If the district is over populated eliminate the bull tags, cow only season.

Rich Bradley Billings, MT

205. In 2020 Paradise Valley Ranch initiated a revolutionary hunting program by offering free fully-guided one-day elk hunts to the public with the goal to help better control the overpopulated elk herds on the ranch and provide much needed access to Montana hunters. During the 2020 general season hunters harvested 115 elk on PVR. By providing public access on our private ranch, PVR was awarded a damage hunt through FWP. The damage hunt allowed hunters to harvest an additional 25 elk. Still, I am confident we could have harvested more elk if the neighboring ranches were also hunting elk. Because PVR was the only ranch creating hunting pressure in the area, the wolves and snow storms were the only factors pushing the elk back onto PVR during the damage hunts. I understand other ranches are being devastated by the large numbers of elk in Paradise Valley but are hesitated or simply unable to provide a hunting program similar to PVR's, and don't qualify for damage hunts. Still, if a 2021 shoulder season was implemented in HD 314 the continued uniting pressure on private ranches would allow for an solid increase in the elk harvest.

Terance Eichhorn Emigrant, MT

206. I think shoulder seasons should end . Period.

Randy Setter Anaconda , MT

207. I think its an awesome program that helps feed families across Montana! Please continue with this amazing program!

Robert wigton Clancy, MT

208. Please include District 314 in the proposed Late Elk Shoulder Season for this fall and winter 2021-22. Owning land in this district, and participating in the BMA for the past 20 years, and having huge elk damage to my hay ground at 529 Trail Creek Road, numbers range all the way to 500 elk per night at times during these periods, normally from April 15- June 1 and then again from Aug 10 - Oct 20th is putting a huge financial strain on my ability to earn a living in agriculture. Elk numbers in 314 are twice the objective numbers and are on a steep curve upwards if we do not harvest more elk. This year especially, since it is so dry, 1.2" of moisture May 1- June 30, we will see the elk damage even greater on irrigated hay and grain ground not to mention the degradation of the range ground also. I believe that the shoulder season will help increase harvest of cow elk in my area by opening up more access to hunt after the general season is over on my neighbors huntable ground.. I have used depredation hunts and kill

permits to try and disperse these elk to no avail. Please initiate a Shoulder elk season for District 314 this fall and winter.

Robert Anderson Livingston, MT

209. I am against any shoulder season. I fear that between that and the wolves we are putting our elk in western montana into a deficit that we may not be able to pull out of.

clifford egbert clinton, MT

210. Where I live we need the shoulder season, it has worked great in the past and we need to keep it as a management tool.

Bob Rowland Ovando, MT

211. I dislike it. How many pregnant cows are being killed?

patrick mccarthy Winston, MT

212. I oppose extension of the shoulder seasons. The MT FWP continued war on elk is embarrassing and we should stop treating elk like vermin. They are already hunted half the year and the land owners who willingly harbor the excess elk aren't going to participate in further shooting them. Shoulder seasons kill the elk available to the public and further degrade the hunting experience in MT. If MT FWP is must use objectives from the Elk Management Plan (EMP), they should follow the EMP in regards to actual population numbers and only count elk available to the public, not those harbored on private lands when looking at the populations.

Brody Monticello, MN

213. I have never liked or participated in shoulder seasons. There is something wrong with waiting until full winter then shooting pregnant cows, mostly on private land, in my opinion.

Jim Crichton Helena, MT

214. Shoulder seasons are merely a bandaid to address elk populations harboring on private land that doesn't allow access during the general season. There need to be reforms to Block Management to improve access and elk distribution, and population objectives should be based on carrying capacity rather than just landowner tolerance.

David Helena, MT

215. FWP has already done this process. Landowners and sportsman have previously commented and compromises were met on the ground. Season length isn't the problem, access to where the elk are is the problem. Elk primarily inaccessible to the public should not even be counted in the outdated population objectives. I am opposed to hunting elk 6 months

Fred Jakubowski Townsend, MT

216. Please do away with the Elk Shoulder seasons all together! I do not support the Elk shoulder Seasons in principal, and therefore, do not support extending them. Why does the state of MT hate elk so much, that they feel the need to declare war on them.

David L French Belgrade, MT

217. I feel like extending the shoulder season in units that end earlier could cause huge amounts of stress to cows as they are approaching a later time frame within their pregnancies. It could push animals who are already in a state of stress from surviving winter. I do not see this as a good move.

Melissa Hess BOZEMAN, MT

218. I am not in favor of shoulder seasons-elk are being hunted to many days! I am a lifetime hunter but this goes to far. The regular season is fine, but extending the season puts to much strain on the species.

Harold Gibbs Townsend, MT

219. Continue to expand and extend shoulder seasons. If regions continue above acceptable populations than there is no reason hunts should be confined to private property.

William Anderson Butte, MT

220. Not a big fan of the shoulder seasons. Let's put more effort into allowing hunting on private lands during the season. Pushing elk off these private lands will make them more available on public. It's the large properties that are offering safe haven during season that is making these elk numbers be above goal. As a land owner, if I don't allow hunting and complain that there are too many elk eating my crops I, that's on me.

Francis Reishus Helena, MT

221. I wish to eliminate all shoulder seasons

Steven Norred Bigfork, MT

222. Support

Kristopher George Great Falls, MT

223. Please consider reducing the amount of time the Elk Shoulder Season runs. If landowners need elk killed there is a huge window to accomplish that already. The shoulder seasons allow landowners to commercialize the general season and our publicly owned animals, and then after they've harvested the bulls, utilize the shoulder season to harvest cows that should be being harvested during general season. This allows some landowners to carefully keep pressure low on their lands during general season so the bulls stay on them for their commercial gain.

Phil Matteson Cascade, MT

224. I personally know ranch families that are impacted severely by the growing elk population in areas of Montana. Not only would extending the season in areas over objective help in reducing numbers but also allow people who normally do not have the chance to hunt private ground the opportunity to do so!

David Bradley Glasgow, MT

225. I would like to see this happen

Rod McAllister Livingston, MT

226. Please end the Pre-archery season shoulder hunts. These hunts are completely altering Elk behavior prior to archery season. It's killing the Archery season and messing up the Rut hunt. It's also completely irresponsible given temperatures in August. Montana used to have the best archery season around however thanks to the Pre-season shoulder hunt many of us are considering giving up archery hunting altogether.

Kaveh Ruhi Lakeside, MT

227. Extending these seasons further than January 1 is unnecessary. It's already unnerving rolling open a cow to find calf fetuses. I hunt in 390 and have land to hunt there but there is also ample public land that holds elk this time of year where the public could harvest cows without this tag being restricted to private land. Also BMAs in this region could benefit from staying open through the shoulder season.

Jared Weaver EAST HELENA, MT

228. I feel all shoulder seasons should be canceled and you should review how many elk you have actually allowed to be slaughtered! I am a hunter and I like the sport of hunting however with these shoulder seasons running into February for every cow elk shot you are allowing two to be killed as they are pregnant! You have devastated the herds in area 210,211,212 and 214 with these seasons. I have witnessed many herd shooting slaughters related to these seasons. Maybe you should look at how Alaska manages the moose populations which is very similar to how you manage mountain lions.

Steven Peters Phillipsburg, MT

229. Sir, need to keep the shoulder seasons. Please spread this on state and BLM lands due to the fact it's hard to get on private land!

Franklin w Billings, MT

230. This extension would be helpful for managing hearts in ag area.

James George Trego, MT

231. I have hunted in Montana with my brother and friends for over 15 years off and on. I have enjoyed bringing my son and this year bring my grandson. Montana needs to reduce and simplify the hunting process for out of state hunters. Paying almost a \$1000 dollars plus cost of a trip is making it hard for some people to come to the state and the state is losing revenue gain from travelers

James Riley Columbia, SC

232. As a hunter I do not think there needs to be any more shoulder season extensions. The elk are harder to hunt because they are hunted for so long during the year. Having more extended

shoulder seasons will just push the elk onto private land even more which will result in even less harvest for the average hunter.

Heather Great Falls, MT

233. Living in an elk shoulder season area and frequently scouting several ranches in units 590 & 530 I think extending the cow elk only season to Feb 15 is a great way to increase harvest. Some days I see several herds 30-100 in each herd and then a few days later won't see any elk only to have them return next time (2-10 days later). The only issue that remains is the confusion created with the 005 and 595 cow tags. One tag such as the 005 cow tag that covered most over-objective 500 series units in 2018-19 allowed hunters to jump from unit 530 to 590 or vice versa on any given day to try and harvest a cow elk. The current confusion between the 005 tag and the 595 tag as to ending dates and which units each is valid in makes it difficult to harvest cows. Please consider going back to the 005 tag as it was valid for in the 2018-19 seasons and eliminate the 595 tag altogether. If needed, just increase the number of 005 tags. Just my .02 Thank you

Greg Sielinsky Roundup, MT

234. It would be greatly appreciated on extending all B tags to the later date. This would help reduce confusion on which B tag should be applied for in the spring and allow for further managing of elk numbers in these areas! Thanks for all of your hard work! Joe Olson

Joseph Olson Billings, MT

235. Why do we need to have shoulder seasons? If you can't get something during the regular season, then too bad. All this does is cause more confusion to everyone else. Why don't you prosecute poachers and work on the illegal hunting than opening up more time allowed to hunt. Stop treating the state like a business and only worry about money.

Jack Black Kalispell, MT

236. I oppose the extension of the seasons set forth in this proposal. As an avid sportsman, I oppose this attempt to solve population objective problems through extended seasons. We other options available. I would personally like to see the state move to cow only or limited bull permits managed at the unit scale. Allowing the biologists to direct harvest through sex specific tag allocation will provide measurable results towards elk population size and health. Thank you for the opportunity to comment, Hunter Stier

Hunter Stier Belgrade, MT

237. I oppose continuing elk shoulder seasons. We need effective means for helping ranchers who have too many elk on their property. Shoulder seasons have proved ineffective in this regard. Moreover, it seems a bit wrong to be pursuing elk for such lengthy periods and to be hunting pregnant cows.

Jonathan King Clancy, MT

238. Please, please do not further stress our valuable elk herds during these critical winter months. Montana winters can be enough to deal with, adding more hunting pressure to already

pressured herds is not the solution. We are supposed to be managing herds, not sculpting and eradicating them. The problem with these districts is that private land owners complain about elk numbers, yet will not let anyone harvest elk on their land without charging more money than most of us can afford. The solution is to ask that any land owner concerned with elk over-population participate in TYPE 1 BMA's. The pressure that these hunters bring will quickly relieve the elk pressure that the landowners are concerned (rightly so) about.

Keith Davis Columbus, MT

239. Here we are approving more shoulder seasons before the data are in for their effectiveness. I see these seasons as gifts to large land owners who do not allow public hunting. They simply want the public to come in and kill cows after the land owner has sold the bulls and now complains about too many elk on the property. I absolutely do not approve of the hunts until we have some data and side board.

Richard Douglass Butte, Montana, MT

240. Shoulder seasons are a terrible idea! They are bad for elk, hunting's reputation and hunters. It is not hunting! I am a life-long hunter and will never participate in one of these travesties. This is a public resource, not the property of big landowners and guides.

Jack McCormick BUTTE, MT, MT

241. **From: Alan Steele**

To: FWP Commission

Subject: [EXTERNAL]

Date: Thursday, July 15, 2021 7:46:51 PM

Do what the shoulder seasons where ment for quit fucking montana hunters

242. **From: Beth Madden**

To: FWP Commission

Subject: [EXTERNAL] Comments to FWP Commission on proposed hunting and trapping regulations

Date: Thursday, July 15, 2021 2:00:04 PM

To the Montana Fish and Wildlife Commission:

Thank you for the opportunity to comment on proposed hunting regulations.

I am a professional wildlife biologist and worked for 35 years in Montana (retired USFWS). I have many concerns with some of the proposals that have been handed down through bills from the legislature.

Shoulder Seasons:

I am very concerned to see Montana increasingly using shoulder seasons to try and manage elk numbers, rather than the general season. This is not a good idea or policy, in part because the timing of these shoulder season hunts isn't ethical (we should not be chasing elk in deep snow and cold winter conditions).

And importantly, these shoulder seasons make land owners less likely to let folks on during the general season. Shoulder seasons mean fewer elk on public lands, more leasing of private lands, and will turn our "public" elk into profit for land owners instead.

Landowners can sell trophy bull hunts for archery and rifle season, then get hunters in for winter cow elk hunts to address the over population. Please stick to Montana

FWP's original contract with hunters, and manage our elk accordingly. Our five week general hunting season is one of the best in the country - please keep it that way.

Wolf Hunting Seasons:

The legislature passed many extreme bills to expand wolf hunting. As a wildlife professional, I was shocked and dismayed at their lack of understanding of wildlife management. I ask that the commission please take a measured approach to maintain fair chase in wolf hunting and keep state management of the predator species in Montana. We are just asking for trouble if we adopt these most radical proposals and we will be shooting ourselves in the foot: we will end up with wolves being protected under the ESA again if we don't show some moderation here.

The argument provided during the legislative session that wolves have severely impacted deer and elk populations is baseless. The science does not bear that out, and I ask the commission to follow the scientific information provided by our wildlife managers in setting these regulations.

I am opposed to the use of snares in general, and am very concerned with the non-target impacts we will no doubt see. Snares are indiscriminate, killing anything that may accidentally trigger them. Their proposed use is not based upon good science and they are also quite cruel - not to mention they are NOT necessary for us to have a healthy wolf harvest. I urge the Commission to restrict their use as much as possible. And please - if implemented, do set check times of every 24 hours to minimize harm to non-targets.

HB. 225 extends the trapping season by a full month by adding two weeks before and to the end of the existing season. I ask the Commission to decline the extension and also to set regulations that traps be checked every 24 hours through the season. Unfortunately, this legislation was unnecessary and unscientific.

Proposals to institute night hunting on private land, using bait to hunt wolves and allowing each hunter and trapper to kill an unlimited number of wolves are all unnecessary, as well as unethical. I urge the Commission not to enact any of these measures. Wolves are an important part of Montana's landscape and ecosystems and we are already managing their harvest appropriately.

I ask the Commission to respect our long tradition of using science-based management through our excellent FWP staff and programs, and temper the extreme legislation passed this year with some common sense.

Thank you for your work on our behalf, and on behalf of Montana's wild ecosystems and natural resources.

Sincerely,

Elizabeth Madden

408 Overbrook Drive

Bozeman, MT 59715

406-224-1012

bethmadden64@gmail.com

243. **From:** John Richie
To: FWP Commission
Subject: [EXTERNAL] Elk Shoulder season
Date: Thursday, July 15, 2021 4:11:17 PM

Hello

My name is John Richie and I have been a Montana resident most of my life. I was born and raised here and love the states wildlife and outdoors. I do not agree with the shoulder season being ran the way it has been since implemented. Where is the Data? Is it working? Or is just lining peoples pockets? If it is to continue it needs to be run properly and data needs to be made available! No one should be making money off public wildlife for maintaining our wildlife. Thank you

244. **From:** Randy Setter
To: FWP Commission
Subject: [EXTERNAL] Elk shoulder seasons . Totally unacceptable. Fwp is catering to rich landowners. Hunting elk for six months out of the year is unethical. Total b.s . I am a lifelong sportsman. I used to stand by fwp and their decisions not anymore. Fwp work...
Date: Thursday, July 15, 2021 2:09:21 PM

Sent from Yahoo Mail for iPhone [overview.mail.yahoo.com]

245. **From:** rochelle gravance
To: FWP Commission
Subject: [EXTERNAL] Elk Shoulder Seasons
Date: Thursday, July 15, 2021 4:52:22 PM

Fish and Wildlife Commission,

We, as conservationist, are facing many challenging decisions.

We are bound by the ethics of fair chase and guided by the pillars of the North American Model of Wildlife Conservation.

Today in Montana and elsewhere, these agreements to uphold fair chase, equal opportunity and ethical science-centric conservation are being challenged by emotions and politics. Neither of these are foundations to make wise, long-term decisions for the purpose of managing our wildlife and wild places.

Let us remember the ethics of fair chase which apply to all species, not just the favored when it comes to wolf management.

Let us be governed by our conscience when it comes to science-based, common-sense laws for hunting elk so that our decisions don't turn equal right to hunt to pay to play opportunities.

And lastly, let's remember where our support comes from when considering our judgments and decisions. The non-hunting public supports fair-chase, sustenance hunting that is carried out consciously and without gluttony or malice toward our quarry.

It could be construed that Montanans are gluttonous when it comes to our elk which is why we have malice toward any competition like that from the wolf.

If we are to enjoy the tradition of hunting for decades to come, we need the non-hunting public's support because we are choosing ethics over emotions and politics.

For all these reasons, I stand by our original agreement.

Shoulder seasons aren't meant to replace the harvest during Montana's archery

and rifle seasons. Hunters support fair chase and ethical hunting. Chasing elk in deep snows and bitter cold when they're just trying to survive is not supported by hunters, or the general public.

We need to see the data on whether these hunts are opening up more hunting access in the archery and rifle seasons, when we need the most elk harvest to effectively manage them, including by getting elk back onto public lands.

This was never the deal that FWP made with the hunters of Montana, and it's wrong to extend these hunts another month after elk have already been hunted for five months.

Shoulder seasons mean fewer elk on public lands, more leasing of private lands and de facto game farming of our public elk for private interests to profit off of it.

Let's stick to the original agreement of 2015 and provide the data so that we can continue to make ethical, fair chase decisions moving forward.

Thank you for our time and consideration.

Respectfully,

Rochelle Gravance

MMH 2020

246. **From: ROBERT SIMS**

To: FWP Commission

Subject: [EXTERNAL] Shoulder Season

Date: Thursday, July 15, 2021 1:54:30 PM

Here's my take on the shoulder seasons. I've been hunting elk in Montana for more than 40 years. I spend the rifle season hunting in hunting district 293 which is south of Lincoln MT. This is what I have noticed since the advent of the shoulder season which 293 is not part of yet. The number of resident hunters has declined while the number of out of state hunters has stayed about the same or increase slightly. Hunters that I use to see routinely during the season have switched to hunting the shoulder season, which as they say, it is a lot easier than climbing mountains.

I've asked the why and to a man it is the same. First, they have a relative/friend with a ranch near White Sulfur Springs, or any town Montana that allows the shoulder season. Second, only they are allowed to hunt plus a few of their friends and they wait for the call, ie the elk are in the lower pasture. Third they are able to use motorized vehicles depending on the weather. Oh, they still hunt for bulls, but not in the mountains. They have switched to the Missouri Breaks where lots of big bulls live and it is not so hard to get around especially with all the down trees where I hunt.

As for me I say keep having the shoulder season's which I will never hunt. I enjoy my hunting experience with less computation on public lands plus no ass kissing. Robert Sims, 711 Fox Drive, Great Falls, MT 59404 4067278232

So

247. **From:** [Matt Schuyler](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] Shoulder season
Date: Thursday, July 15, 2021 1:18:34 PM

Thankyou for taking a moment to read this. I am seeing/hearing of a proposal to extend shoulder season and keep them going. I was at the original meeting years ago now where they were proposed. We were told these were not permanent and that data would drive weather they continued or not. Now many years later there is still no accounting for these seasons! You don't even know how many elk are being harvested. We basically have a full assault on our elk herd for 6 months out of the year including pregnant cows. This is complete mismanagement and not in the elk or public interest. You have failed to hold your end of the bargain up. The elk continue to harbor on Private land and the situation is being abused. The shoulder seasons DO NOT WORK. Please reconsider and try something else. The shoulder seasons in the long run encourage landowners to harbor elk. They can sell trophy bull hunts for six weeks of archery hunting and five weeks of rifle, then get hunters in for winter cow elk hunts to address the over population. I'm guessing this keeps them from whining to you and makes your job easier but unfortunately that is not a method of scientific management. This needs to end before its too late. Thankyou.

248. **From:** [larry christensen](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] shoulder season
Date: Thursday, July 15, 2021 3:40:05 PM

It is well past time to end the shoulder season. The landowners are using this in the wrong way and stopping to many people from hunting on their land in the regular season. This was not the intention

in the first place it was to replace damage hunts. So my solution is end the shoulder and start back with damage hunts and stop the greedy land owners. If they do not allow public hunting during regular season then there should be no damage hunt or reparation paid to them.

Thank you

Larry Christensen

Sent from [Mail \[go.microsoft.com\]](mailto:go.microsoft.com) for Windows 10

249. **From:** [Lane Kosena](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] Shoulder seasons
Date: Thursday, July 15, 2021 4:50:06 PM

I think it is complete and utter bullshit these are still going on. Elk are now hunted from august to February because of your shoulder seasons. All you knob heads do is abuse our resources and screw things up. For instance beaver creek, just leave shit alone the river was thriving and now will die because you had to go tamper with everything. Stop the shoulder seasons and make the landowners let people in and if they won't tell them to kick rocks.

Sent from my iPhone

250. From: [Steve Stieler](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] Shoulder seasons are being abused by FWP
Date: Thursday, July 15, 2021 1:57:51 PM

Dear FWP Commission,

As a resident of Broadwater County and an annual hunter of HD 390/391, I'm concerned at the lack of public access into the Southern Bigbelts and the objectives of FWP with shoulder seasons in the Belts. Why can't we have the ability to harvest more than one elk during the general archery/rifle seasons on public land to meet the demand of over objectives in the Belts? I understand the ongoing saga of elk on private land, perhaps less private land and more public land is the ideal outcome. I've always asked the question of why some people get to own land on public land (NF or BLM land). The commercialization of our ungulates in this state for hunting is growing faster now that the new governor has been put in place and I'm very concerned with the current direction of FWP and why no one is listening to the hunters that provide the financial ability for FWP to exist. You need to start listening to the hunters of this great state. These are some of the issues I and we as residents are facing:

Shoulder seasons aren't meant to replace the harvest during Montana's archery and rifle seasons. Hunters support fair chase and ethical hunting. Chasing elk in deep snows and bitter cold when they're just trying to survive is not supported by hunters, or the general public.

We need to see the data on whether these hunts are opening up more hunting access in the archery and rifle seasons, when we need the most elk harvest to effectively manage them, including by getting elk back onto public lands.

This was never the deal that FWP made with the hunters of Montana, and it's wrong to extend these hunts another month after elk have already been hunted for five months.

Shoulder seasons mean fewer elk on public lands, more leasing of private lands and de facto game farming of our public elk for private interests to profit off of it.

Thank you for taking the time to read my comments and concerns.

Sincerely,
Steve Stieler
Townsend, MT

251. From: [PAMELA KLOOTE](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] shoulder seasons
Date: Thursday, July 15, 2021 3:15:27 PM

these seasons were not suppose to be permanent , they have driven elk off public lands ending the bow/rifle season for Montana hunters. They have also created an artificial hunt for private land owners to charge excessive amounts of money to out of state non residents to hunt on their closed to public, hunting land. Montana is now selling our game to the highest bidder and throwing the resident hunters under the bus. These hunting districts have expanded over some of the best public hunting in the state and should immediately be stopped, the late hunt for cow elk on private lands is a joke and destroys and distorts the North American Model, please stop shoulder seasons completely!

John and Pamela Kloote
po box 1113
Bonner, MT. 59823

252. **From:** Bear"s Paw Bows
To: FWP Commission
Subject: [EXTERNAL] shoulder seasons
Date: Thursday, July 15, 2021 1:24:51 PM

Shoulder seasons don't work and never will. I am opposed to expanding shoulder seasons. When they were established there were rules and goals that needed to be met. Stick by those rules and do not expand any shoulder seasons.

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This email has been checked for viruses by Avast antivirus software.

[https://urldefense.com/v3/__https://www.avast.com/antivirus__;!!GaaboA!-p3H3iwDPj6PNSjKgW0DFDfJfSpaJMNzI00QRVksIEFTgW8Gqgmwh6ajEekXA8M\\$](https://urldefense.com/v3/__https://www.avast.com/antivirus__;!!GaaboA!-p3H3iwDPj6PNSjKgW0DFDfJfSpaJMNzI00QRVksIEFTgW8Gqgmwh6ajEekXA8M$)

253. **From:** Mike Wilkinson
To: FWP Commission
Subject: [EXTERNAL] shoulder seasons
Date: Thursday, July 15, 2021 6:30:36 PM

Please do away with shoulder seasons. I believe these extended seasons put too much pressure on the elk populations. There are other ways to reduce the elk populations without these extended seasons. Thank you, Mike Wilkinson. 406 832-3191

254. **From:** *jan bertelsen -james <jujyfrt@eurekadsl.net>*
Sent: *Wednesday, June 16, 2021 11:20 AM*
To: *FWP Commission <FWComm@mt.gov>*
Subject: *[EXTERNAL] June 24 Meeting*

I can not be on the Zoom meeting so wanted to make comment. MWF has had a long history of a successful elk hunting program. I don't want to see the new shoulder season replace the five-week general hunting season, which is the best in the nation. In addition, the new wolf hunting measures enacted by the 2021 Legislature are over the top!!!!!!!!!!!!!!!!!!!!!! MWF helped write the 2011 wolf delisting rider and supports ethical wolf hunting. Please implement measures that work to maintain fair chase in wolf hunting and keep state management of the predator species. PLEASE. Thank you. Jan Bertelsen-James

255. **From:** PAM CHRIS <pcscranton@msn.com>
Sent: Sunday, July 25, 2021 1:36 PM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Proposed extended shoulder seasons

I am an avid hunter. I hunt almost exclusively on public lands. I appreciate the science based decisions FWP has made in the past regarding the management of our elk. Unfortunately, the wildlife board appointed by Governor Gianforte is now based more upon emphasis on special private groups particularly outfitters and trappers. Science and scientists especially wildlife biologists have been

removed from the board decision making process. Elk in Montana are a public resource. Every citizen in Montana should have an equal opportunity to hunt. Hunting regulations should be based upon science with a goal of sustainable elk populations and balanced habitats. Regulations should not be written to encourage and abet private property owners and guides. All decisions should be made based upon the best scientific evidence. Regulations during the regular season should be amended if a population is over the preferred target.

Winter is a time when elk are trying to survive. Many of the cows are carrying calves which is another energy drain. Opening up public land during December until mid February puts more pressure on the elk when they can least afford it. Many of these elk will move to private lands when pressured in winter. This will increase damage on private lands and will also incentivize private property owners who want to sell the right to hunt on their land to out of state hunters.

Extending shoulder seasons is a bad idea and is not in the best interest of public elk or the private citizens who hunt them. When a population is over objective special hunts can be organized on a needs basis. Extended shoulder seasons should not become the new norm.

Chris Scranton, 4235 Burro Lane, Stevensville, MT 59870 541-475-4439

256. **From:** Benjamin Haugan <wss47oso@gmail.com>
Sent: Thursday, July 8, 2021 7:59 AM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Shoulder Season

Dear FWP,

I don't imagine that you all would even be humane or progressive enough, but given temps, grass status, you all are absolutely out of your mind to let people chase Elk this coming August.

In addition, I am in dialogue with PETA in regard to the fact that you are chasing pregnant elk in February.

I know this comment means nothing to you all as long as you get your MONEY.

So so so so sad. So so so sad

Oh, you who is reading this, I am a hunter and have been in Montana all my life. You all are destroying it all for MONEY

Benjamin Haugan

406 799 4155

PS I know I will not hear back from you, but it is so ridiculous, in humane, and sad that you let people chase elk in August.

Sent from my iPhone

257.

On Jul 21, 2021 12:14, jim crichton <jameswrichton@yahoo.com> wrote:

Dear Mr Worsech,

Here is my comment on shoulder seasons. the address in the IR did not work.

Most people like elk, but a few large landowners have more say than the many citizens. I have yet to meet the non-large landowner who thinks that any game animal should be hunted for half the year.

It is easy to understand the landowner/livestock producer's point as there is always something that makes it hard to have a successful calf crop, but the presence of the public wildlife is only one factor and usually a minor one. They should have some say when it comes to managing wildlife on their property, but very little when it comes to managing public wildlife on public ground. The "Objective numbers" are not objective numbers that are determined by wildlife biologists; they are landowner preference numbers that are the landowners goal (objective).

I object to shoulder seasons. Elk should be hunted uniformly and according to laws, but I object to the constant slicing and dicing of the rules in each legislature. The process makes the rules complicated and disadvantages the majority to favor the few.

Sincerely,
Jim Crichton, Helena

258. **From: Keni Reese <keni@mtbeef.org>**
Sent: Friday, July 30, 2021 9:05 AM
To: FWP Wildlife <fwpwld@mt.gov>
Cc: Raylee Honeycutt <raylee@mtbeef.org>
Subject: [EXTERNAL] MSGA Elk Late Shoulder Season Extension Comments

Hello,

I am submitting comments regarding the Late Shoulder Season Extension on behalf of Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC), and the Montana Association of State Grazing Districts (MASGD).

Please let me know if you have any questions.

Thank you,

Keni Reese

Keni Reese | Director of Marketing & Communications

MONTANA STOCKGROWERS ASSOCIATION

o 406-442-3420 | c 940-453-2646 | www.mtbeef.org |   



July 22, 2021

Montana Fish and Wildlife Commission
Wildlife Division
Box 200701
Helena, MT 59620-0701

Re: Proposed Extension of Late Elk Should Season

Montana Fish & Wildlife Commission:

On behalf of the Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC), and the Montana Association of State Grazing Districts (MASGD), we appreciate this opportunity to provide comments regarding the proposed extension of late elk shoulder season. Our organizations represent producers who manage livestock on private, state, and federal lands in Montana and have a significant and long-standing interest in elk management, due to their substantial impacts on ranching families. The increasing elk populations have had a great impact to producers.

Since 1884, we have been dedicated to finding proactive solutions for Montana ranching communities and Montana's diverse wildlife and will continue to work to do so. As a general statement, our organizations support the implementation of management tools like shoulder seasons to address over objective levels of elk and problematic elk distributions.

We support the proposed extension of late elk shoulder seasons for the proposed hunting districts that remain above objective where late should seasons end before February 15, 2022. We continue to emphasize the importance of landowner input and flexibility to manage elk hunting on their property and reduce game damage.

MSGA, MPLC, and MASGD appreciates the Fish and Wildlife Commission for its continued work to look at proactive solutions and to address the increasing population of elk with a systematic approach to bring population down to objective levels.

Sincerely,

A handwritten signature in black ink, appearing to read "Raylee A. Honeycutt". The signature is fluid and cursive.

Raylee A. Honeycutt
Director of Natural Resources | Montana Stockgrowers Association
Executive Staff | Montana Public Lands Council
Executive Staff | Montana Association of State Grazing Districts