

**MONTANA FISH, WILDLIFE & PARKS**  
**PUBLIC COMMENT FOR SHOULDER SEASONS ON PUBLIC LAND**

1. First off I love the opportunity to hunt elk late into the year here in Montana as I'm sure most people do who oppose this season expansion. I'm opposed to the shoulder season hunts being allowed on NF land because it seems like a very backwards way of achieving a otherwise sound population goal. Hunting elk late in the season on the NF will inevitably push them back out to the ag fields that we are trying to help out by reaching the population goal. Therefore defeating the purpose of the hunt and taking us in the wrong direction. Thank you for listening  
Carter Snow

***Carter Snow Bozeman, MT***

2. Private land owners with crop deprivation should not receive assistance in the form of reducing the size of the elk herd without first opening up their land to public hunting through Block Management. If they want beards reduced, they need to let hunters on their land during established hunting seasons. Having shoulder seasons on public land only push elk further onto private and stresses out the heard during their toughest time to survive.

***Blake Williams Townsend, MT***

3. July 30, 2021 Montana Fish and Wildlife Commission PO Box 200701 Helena, MT 59620-0701 fwpwld@mt.gov Re: Elk Shoulder Seasons. Dear Montana Fish and Wildlife Commission: Thank you for the opportunity to comment on the proposed changes to Montana's elk seasons. Hellgate Hunters & Anglers is a local conservation organization representing more than 400 sportsmen and women in Western Montana. Our mission is to conserve Montana's wildlife, wild places, and fair-chase hunting and fishing heritage. As you are likely aware, we have ardently opposed the continued use of shoulder seasons in many hunting districts in Region 2. Sportsmen across the state agree that shoulder seasons have deviated from their original intent: a temporary stopgap to address over-objective elk herds affecting private property. The idea that shoulder seasons could be used on public land is fundamentally offensive to Montana hunters, who only agreed to support this tool because it would push elk onto public land. The HHA board and our members have spent countless hours participating in CAC meetings, talking with commissioners, and meeting with Region 2 FWP staff for over two years on this complicated issue of using shoulder seasons as a management tool. We recognize the difficulty in managing elk herds on a district by district basis in conjunction with decreased access for public hunters to pursue elk on private land. Because of this, HHA did not originally oppose shoulder seasons when they were proposed in 2015. However, at that time, the shoulder seasons were supposed to sunset after three years with a substantive evaluation to determine their efficacy. Despite hunters' concerns about the ethics surrounding hunting elk for six months, it is now apparent that shoulder seasons will likely be utilized as a management tool by FWP in perpetuity. HHA supports Montana ranchers, and we sympathize with their problems relating to our elk herds. The hunt roster and shoulder seasons do alleviate crop damage, and, when used correctly, do not overly impact our hunting opportunity. Indeed, in some cases they have met their objective of pushing elk back on to public land. The proposal to allow shoulder season harvests in January and February, for public land elk that are likely pregnant, food-deprived and facing predation from wolves and lions, is a terrible idea that will adversely affect public land hunting

opportunities for Montana hunters. I urge the Commission to oppose this misguided proposal and instead require the department to continue limiting shoulder seasons to private lands in units that are well above objective. Thank you for the opportunity to comment on this process. Walker Conyngham President Hellgate Hunters & Anglers

***Walker Conyngham Missoula, MT***

4. Director Worsech, Please do not add to the elk shoulder seasons on public land- this will both hurt the elk populations on public and add to those on private. The elk will winter on the private land in higher numbers than they do now even with a reduced population as we'll be teaching them that it's safer to be there. This will in the long run reduce public land hunting opportunities as well- hunting them at the wrong time, in the wrong way. Thankyou

***Nicholas Markarian Bozeman, MT***

5. To whom it concerns, I disagree with the elk shoulder seasons in general and, especially, do not support allowing the shoulder seasons to be extended to public lands. If elk numbers in over objective units needs to be reduced, depredation tags should be issued more liberally for private lands only where the depredation is occurring. Every year I sign up for the hunt roster and only once have I been contacted. It was in the middle of August, when it with 90 plus degree temperatures and I would have to use my general tag to hunt which would have likely ended my elk season much sooner than I wanted and risked losing the elk meat I and my family eat every year. If I had been offered the opportunity later in the year and with a depredation type tag issued, I would have definitely taken it up. The point is that opening up the should seasons to public land is not going to solve the over objective elk population problem, its only going to exacerbate it. The solution to the problem needs to be more targeted by issuing depredation B tags on private lands where depredation is occurring and the owners need to actually allow the hunters access (a key point that seems to be often missing). And, require mandatory reporting on depredation tags so you can accurately track the results. Then consider issuing tags to those who were successful (or at least hunted) in place of those who were not. Also, introducing FWP programs, similar to the Master Hunter program, to help connect responsible, ethical hunters to land owners would also alleviate some of the issues. Sincerely, Matt Fregerio

***Matt Fregerio Missoula, MT***

6. Allowing to extend shoulder season hunting onto public lands flies in the face of the intent of the shoulder season, which was designed to manage elk numbers and encourage elk to move onto public lands by providing limited hunter access to wintering elk by private landowners. Expanding this concept to public lands is not, therefore, a true intent of the shoulder season concept. Additionally, allowing the hunting of elk on public lands during their most vulnerable seasons (early calf season, and into mid-winter when pregnant cows are struggling to survive) displays a lack of attention to the concepts of Fair Chase, and will certainly create a backlash of anti hunting sentiment in some growing circles of our state. Yes, elk numbers may be over target in some hunting units, but expanding the take of elk on public lands early late under the guise of the Shoulder Season concept is pure rubbish. Be creative, think out of the box bearing in mind the true nature of Fair Chase and the ethical taking of our elk.

***John B Kirkendall Missoula, MT***

7. Please do not extend or add any shoulder seasons to any public lands in the the above mentioned districts or any other districts. Please consider what is best for the elk populations. This proposal is not science-based and is not in the best interest of elk. Please consider the long term affects this proposal will have on the elk populations and the ability for the public to hunt elk on public lands. This proposal will not help hunters or elk. Please listen to the public and do not pass this proposal.

***Nina Hance Bozeman , MT***

8. I certainly respect the idea of providing more hunting opportunities for those who are unable to utilize private land. While we all know elk could care less about boundaries I do hope FWP is prepared to either revisit or address the program if elk leave public land and seek refuge on the private land, especially if those lands privatize hunting elk. If this program just further frustrates land owners I fear this may increase a divide between hunting groups. Thank you for your consideration.

***Nicho Hash Clancy, MT***

9. The Rocky Mountain Elk Foundation has consistently supported effective elk management strategies in units that are over the population objective, this has included support for shoulder hunts on private lands. In 2016 RMEF submitted comments that opposed shoulder hunts on most public lands, specifically, large blocks of USFS lands. We maintain our opposition to this proposal for the 2021 elk hunting season. Blake Henning Chief Conservation Officer RMEF

***Blake Henning Missoula, MT***

10. Elk shoulder season is already too long. It was originally slated for 3 years as a trial and it isn't working. Elk already harbor on private land. They know exactly where to go to stay away from hunters. Extending the shoulder season onto public lands is outrageous and simply a bad idea. It will only keep elk closer to private and further from public land. Also, elk should have a break from the ever increasing high numbers of hunters. What happened to science based statistics and good practice management out of FWP?

***Scott Mylnechuk Missoula , MT***

11. Please do not allow winter hunting of elk on public land. Thank you.

***Tom Healy Wisdom , MT***

12. Absolutely not. This will inevitably push elk into more private land further removing public opportunities. This state needs to stop assisting the special interests of large private land owners. If they truly want more elk off private land and to assist with management objectives, the state should work with them to allow more public access. We are not Texas, so please stop assisting large ranches in even more capitalization and less opportunities for the common person. Do not allow this.

***James Laird Stevensville , MT***

13. I think extending elk shoulder season onto USFS lands is a bad decision. Shoulder season elk hunts are to reduce numbers where they have become a problem. Both hunters and landowners are doing their part to solve the 2015 elk population problems through shoulder hunts. If expanded to public lands the whole point of reducing elk numbers and pressure on private land will be obsolete. We can not pin point the problem areas if hunting is allowed during those times on public lands. Plus the elk are wintering and hunting public lands during this time will put more pressure on the elk to move somewhere else and the problem will just move.

**Casey Goff Stevensville, MT**

14. Please do not push the elk onto more ranches and limit public hunting more than it already is. Hunting cows carrying calves is not ethical.

**Robb Hollenbeck Missoula, MT**

15. My name is Eric Huleatt and I have lived and hunted in Montana for 16 years. Over those 16 years I have witnessed the transition of elk from public to private lands as private land access has decreased and public land pressure has increased. I oppose the 2021 public land shoulder season proposal as it is written. It seems to me that hunting elk during the winter months will not only lower public land population numbers due to harvest, but also put added stress on cows carrying calves through the winter, and lastly it will ultimately result in more elk moving to private lands where hunting access is limited. I believe the purpose of shoulder seasons on private land was initially was to lower elk number on private land through harvest and hunter pressure forcing the elk back to public land. I believe the current proposal will have the opposite effect on the elk, pushing them onto private land and lowering the population numbers on public land where the majority of hunters spend their time. Thank you for your time.

**Eric Huleatt Stevensville, MT**

16. Do not provide extra shoulder season hunts on public land. The purpose of the shoulder season is to assist landowners with problem elk. We should not be harvesting more elk on public lands during sensitive seasons.

**Jon Muir Missoula, MT**

17. Shoulder seasons should not be allowed if they only benefit people that charge you to hunt.

**Tevin Galata, MT**

18. Dear FWP Commissioners and Director Worsech, I respectfully ask that you do not approve the proposal to extend elk shoulder seasons onto public lands. If the goal is to reduce overall elk numbers, this proposal is not the solution. Expanding the shoulder seasons to public lands will just increase hunting pressure on public lands and drive the elk to seek refuge on private lands. This will only exacerbate the imbalance of elk distribution between public and private lands. I ask that you not approve extended elk shoulder seasons on public lands and instead look for alternative approaches that are based on science and have the support of all the stakeholders, including private landowners, hunters and FWP. Thank you, Michael Fashoway

**Michael Fashoway Helena, MT**

19. Simply put ...NO! expanding shoulder seasons in any hunting district is a really really bad (and political) idea. Two Thumbs down.

***Glenn Ferren St Regis, MT***

20. I am opposed to the proposal to extend the elk shoulder seasons on to public lands in hunting districts 262, 290, 298, 314, 390, 391, 393, 411, 417, 502, 510, 511, 520, 530, 540, 560, 575, 580, and 590. When elk shoulder seasons were initially approved, the intent was to find a temporary solution on private land that was monitored and analyzed. Elk shoulder seasons had two goals: 1) to reduce herd numbers and 2) drive elk off private lands onto public lands where the tolerance is much higher than on private land. Including public lands in the elk shoulder season in these districts will negatively impact the hunting experience of all Montana hunters by reinforcing that the only safe place for elk is private land, making them largely inaccessible to anyone unwilling or unable to pay a landowner for access. Over 50,000 archery stamps were sold last season. Continued harboring and pressuring elk to private land reduces access and opportunity for all hunters across the state. How much revenue is the state willing to lose from hunters who will take their dollars to other states where finding elk to hunt is not unreasonable? This proposal is lazy and is the next step to privatizing our shared, public trust elk herd. Instead of increasing the pressure on public land elk during a time of year where they are under immense pressure just to survive, the FWP Commission should revise the Elk Management Plan with all Montana stakeholders in mind. The Commission should be finding ways to drive elk from private lands, solving harboring issues, and updating outdated objectives that serve a select few instead of benefitting all that stakeholders invested in the health of our elk herd. Thank you for your time, D.J. Zor

***D.J. Zor Kalispell, MT***

21. I am in favor of extending shoulder seasons and including public lands, for Montana residents, if these measures will help reach elk target numbers

***Tom Kraus Whitefish, MT***

22. These seasons are a bad idea for various reasons. The elk are now under more pressure than ever before, and they need to be left alone this time of the year. The number of landowners with an actual elk problem that is not self-induced is much smaller than what the outcry is from landowner groups. The vast majority of these same landowners that perpetually whine about elk have created the "problem" with their actions during the general hunting seasons. The elk need to be hunted and harvested during the general season, and more co-operation between sportsman and the landowners is the effective solution. Caving in to the landowners 1 sided suggestions is NOT the answer. Allowing the public ground to be hunted would simply result in the elk being driven into privately owned safety zones, and would actually be self defeating in the long run. Montana has the longest general elk seasons in the West, and there is ample time to keep the elk numbers within the management objectives. If the landowners are serious about helping out with the overall elk harvest, they need to start encouraging sportsman to harvest the elk during our extremely long general seasons. Not during the harsh winter months that these animals have to endure... Shoulder seasons are a bad idea!

**Brian Munis Philipsburg, MT**

23. You have completely bungled the management of the elk populations. We have completely killed off the entire elk population that migrated off of private land. The remaining population only know completely different migration patterns that do not bring them onto publicly accessible hunting lands and your idiotic plan is to extend the season? What good does that do the elk hole up where no one hunts them and hunters get frustrated and do stupid things on lands where they are allowed to hunt. Wake up.

**Dallas Diehl Townsend, MT**

24. I am opposed to shoulder seasons on public lands

**Joseph M Mangiamele Silver Star, MT**

25. I am writing to offer comments on the 2021 Elk Shoulder Season proposal extending the shoulder season date to Feb. 15 and also include public lands in addition to private lands. During the almost 30 years that I was with MFW&P, I fulfilled roles in a wide area of responsibilities; from Landowner-Sportsman Relations Coordinator (overseeing both Game Damage and Block Management), Helena Area Coordinator, overseeing fish, wildlife & parks activities in the northern portion of Region 3 to Deputy Chief of Law Enforcement. During that time, I was confronted with a number of wildlife management issues that were difficult and often, controversial. However, throughout those times, I, along with staff, worked hard to address problems, generally on a case-by-case basis, with consideration of our responsibility to the Resource as well as to private landowners and the general public. This proposal does none of those. I have two primary objections to this proposal. First, when Shoulder Seasons were first proposed, they were not well accepted by the Conservation Community, or the public at large. However, grudgingly, the idea was ultimately gone along with, but on a trial basis, and only on the condition that they would be carefully monitored and an evaluation of the success and propriety of such seasons in each district would be presented by the department. That, from my understanding, never happened. It therefore disturbs me as to why a strategy such as Shoulder Seasons would not only be continued but expanded without the necessary evaluation and data. Throughout my career at FW & P, I could always rely on sound, accurate data and information to embark on efforts to resolve population or landowner conflict issues. For this proposal, there are very little, if any- and certainly not enough to use such a broad-brush season type. I certainly understand the complications of elk management and that each situation can be driven by a wide range of natural, environmental and social issues. The old A-7 permits, damage hunts, and other means were what we used to deal with these kinds of situations. And, our efforts were always to directed towards encouraging elk to utilize public lands to the greatest extent possible, focusing management tools on private lands suffering legitimate issues. I can count on one hand the incidents where late or damage hunts extended to public land when I was responsible for those kinds of decisions during my time at FWP. I unequivocally object to the wholesale extension of these seasons to public land. In sum, I believe this entire proposal is ill-advised, not data-driven and appears to be little more than a throw-up-your-hands-up-in-the-air-and-walk-away strategy of management. It's a quick and dirty, unmeasurable, broad-brush approach that, if continued, will not serve to address the issues it portends to solve, trivializes

and in some cases- supports the commercialization of - Montana's public elk resource. The public lands feature goes entirely contrary to management efforts and values we have embraced for over 100 years. As such, I believe the agency and the Commission needs to go back to the drawing board and look at the whole set of issues anew and in the interim, abandon this proposal. Thanks for the opportunity to comment. Michael Korn 167 Saddle Mountain Rd. Clancy, MT 59634

***Michael Korn Clancy, MT***

26. This proposal to hunt elk on public lands during the shoulder seasons goes directly against what we were told the purpose of these shoulder seasons were way back in 2015. If we are trying to drive elk off of private lands, then hunting the few elk that winter on public lands is absolutely the wrong direction! This will only further push elk onto inaccessible private lands. If private land owners need help removing elk from their properties we need to bolster the programs that are in place to provide reasonable access to these elk, the block management program. Do not allow this proposal to move forward.

***Mike Mershon Billings, MT***

27. I strongly disagree with the further expansion of shoulder seasons to include public lands. Shoulder seasons have been misguided from the start. Initially meant to be experimental, and to alleviate damage to a handful of landowners and then be reviewed for effectiveness. This isn't what has happened. They have rapidly expanded to many districts, including districts where there is not an ecological over population of elk. Killing elk in February on public lands, will only further the problems felt by landowners, whom will be left to deal with more elk being pushed into their properties. Instead of expanding shoulder season, please work with the advisory committee on a modernization of the outdated EMP. This new plan should reflect the values of most Montanans and most hunters, which is the desire for the scientific management of wildlife, including elk. Carrying capacity, range condition, population distribution should be the primary focus of elk management, with social issues such as landowner tolerance, being valued, but not placed on a pedestal. It should be easy to make the right decision on this and I look forward to you doing so. Thank you.

***Riley Pearson Philipsburg, MT***

28. This plan is no good for public or private landowners and will only hurt Montana's great elk herds

***Matthew Purcell Ennis, MT***

29. NO PUBLIC LAND DURING SHOULDER SEASONS PERIOD. Landowners need to be more willing to allow access for cows during shoulder season (and general) to push elk back on public lands -- not the other way around.

***Stephanie Prater Lewistown, MT***

30. The Traditional Bowhunters of Montana (TBM) is an organization of nearly 200 members dedicated to preserving and advancing traditional bowhunting values in Montana. TBM is opposed to the proposal to extend the elk shoulder seasons on to public lands in hunting districts 262, 290, 298, 314, 390, 391, 393, 411, 417, 502, 510, 511, 520, 530, 540, 560, 575, 580,

and 590. When elk shoulder seasons were initially approved, the intent was to find a temporary solution on private land that was monitored and analyzed. Elk shoulder seasons had two goals: 1) to reduce herd numbers and 2) drive elk off private lands onto public lands where the tolerance is much higher than on private land. Including public lands in the elk shoulder season in these districts will negatively impact the hunting experience of all Montana hunters by reinforcing that the only safe place for elk is private land, making them largely inaccessible to anyone unwilling or unable to pay a landowner for access. Over 50,000 archery stamps were sold last season. Continued harboring and pressuring elk to private land reduces access and opportunity for all hunters across the state. How much revenue is the state willing to lose from hunters who will take their dollars to other states where finding elk to hunt is not unreasonable? This proposal is lazy and is the next step to privatizing our shared, public trust elk herd. Instead of increasing the pressure on public land elk during a time of year where they are under immense pressure just to survive, the FWP Commission should revise the Elk Management Plan with all Montana stakeholders in mind. The Commission should be finding ways to drive elk from private lands, solving harboring issues, and updating outdated objectives that serve a select few instead of benefitting all that stakeholders invested in the health of our elk herd.

***Dane Rider Lewistown, MT***

- 31.** This does not apply to my hunting district this proposal is wrong.. Elk should not be hunted in January and February when they are 4 - 5 months along in gestational months. If the elk are as big a problem as ranchers say they are then let hunters hunt their private lands during hunting season, or maybe have a two-week season in late August when they normally start showing up for youth hunters, disabled veterans, hunters with medical handicaps. It is hard to feel sorry for private land owners who want the elk on their property during hunting season so they have access to the big bulls and in the Spring so they can gather the sheds. And I say this with my husband's family having ranched in Granite County for a hundred years who let hunters hunt the ranch. FWP I hope you will do what is right for our wildlife, and ranchers I hope you will too.

***Tammy Munis Philipsburg , MT***

- 32.** I oppose shoulder seasons on public lands, hunting elk deep into the winter is not only going to pressure the animals back onto private lands but is going to put even more stress on the population when the are at their weakest. The elk season is very long compared to most states and at some point the herd needs a break, even if they are above management numbers.

***James Harmonay Livingston , MT***

- 33.** Fish, Wildlife, and Parks committee: I am against the expansion of the shoulder season in both length and to public lands. The shoulder season should only be used to “push” the elk off private lands and back to public. This is a long enough season already. I fear that this will further push elk into private lands, and also close off more private lands because the “public” land is now available to hunt on. The cow elk have also been carrying a calf or 2 for up to 5 months by the time mid February rolls around. Thank you for your consideration Kyle McIntyre

***Kyle McIntyre Butte, MT***



34. This proposal needs to be killed. We already hunt too much of the year and this will push more elk from public land to private land. Increasing conflict on inaccessible private land. This is not based in any science and the only people who want less elk are landowners. They were extrapolated from the landscape by those who settled this frontier and now that sporting community has brought them back through conservation it is time for landowners to adapt. Just like every other industry and on the plant landowners need to adapt and killing more elk is not the solution. Our elk herds deserve a break.

***Mike Schaub Bozeman , MT***

35. Please reconsider this proposal. I moved to Montana 6 years ago to study wildlife biology at THE best wildlife bio school in the country, The U of M! We all know this proposal does not help elk. It's not a critter first proposal. Too many ideas these days are on commercializing hunting and trying to maximize tags being filled. The goal is conservation.

***Taylor Manaco Missoula, MT***

36. FWP, Please stop trying to kill all of the elk in Montana. It's tragic that you have implemented these shoulder seasons in so many districts. The WORST thing you could do would extend the opportunity to public lands. Public land hunting for elk over the course of 6 months is shameful. Not only will this-destroy our elk herds it's goes against conservation/sportsmanship ethic. We need to reimplement "damage hunts" to help ranchers control problem elk. We are going to look back on shoulder seasons in ten years and see how poorly your department has managed our wildlife. Wildlife is suppose to be managed for the PEOPLE not the select few (ranchers).

***Taylor Livingston , MT***

37. I am strongly opposed to continuing or expanding elk shoulder seasons in Montana. There has been no evidence that these seasons are reducing conflict with private landowners. These shoulder seasons have failed to address the problem of elk distribution between public and private lands. There isn't any data on how these hunts are affecting hunting on public lands either. In the units I hunt I have seen a decrease in the abundance of elk on public lands during the archery and general seasons that coincided with the establishment of the shoulder seasons. The proposal to allow shoulder season hunting on public lands will only exacerbate the problem of elk harboring on private lands, reduce elk on public lands, and continue Montana down this ill-conceived elk management path.

***Troy Smith Missoula, MT***

38. I believe that extending the shoulder seasons for elk including Forest Service lands is the wrong way to go in managing the state's elk herds. Elk are intelligent animals and will move onto private lands that do not allow hunting. This will lead to worsen the problem that is trying to be fixed. FWP would be better served by working to gain better Hunter access to private lands where elk currently inhabit and improve Hunter access to land locked public lands.

***Mark Brown Belgrade , MT***

39. I do not support the expansion of the shoulder season as proposed. It seems like an ill fated attempt to appease some private land owners / Ag producers at the detriment of our public elk

herds and most likely will result in those animals congregating more on private land which is the exact opposite of the intent of the program. The money and resources being put into the shoulder season should be refocused on promoting public access to private lands during the general season. This would move the elk at a time when there would be the highest likelihood of harvest and reduce congregating of the herds on private land.

***Matt Shimanek Missoula, MT***

40. I strongly disagree with this policy. Have we not learned our lesson from shooting public land elk that summered in the Gallatin Range and wintered in the Madison? Shooting public land elk does nothing helpful. In most instances if removes elk that are leaving private lands and does not have any impact on the elk trained to stay on private lands. Prior FWP employees admit the negative consequences of shooting public land elk in the Madison Valley and stopped those efforts once the data showed the problem. Now, FWP is back to the same failed policy, but going at it with even more vigor. The public land elk and the public land hunters are taking the hit by these failed shoulder season policies. In many instances these are "neighbor problems" where a high-elk tolerance landowner creates a sanctuary for elk to the detriment of his neighbor who is trying to make a living off the land. This is not a problem that can be solved with shoulder seasons. It is time FWP starts looking for solutions that work, rather than solutions that check the box of "we're trying."

***Randy Newberg Bozeman, MT***

41. Please DO NOT adopt this proposal. Elk should NOT be hunted, during a shoulder season, on public lands. This doesn't address the actual problem of elk dispersal from private lands and will only exacerbate the lack of public land elk. I'm a fifth generation Montanan and I have two boys that would love to hunt elk on public land. Please DO NOT continue to erode public land hunting opportunities in our state. This would do nothing to address the perceived elk "problem" but only serves to exacerbate the ACCESS PROBLEM. Thank you for your consideration

***Casey Jensen Great Falls, MT***

42. I am opposed to the proposal to open public lands to harvest during elk shoulder seasons. The entire set of proposals concerning shoulder seasons is fact free, no data has been presented to explain current conditions or why public lands should be opened to harvest. There is no information as to why HD 314 needs a shoulder season, including an extended season instead of existing B tags and Damage Hunts. One of the primary guidelines in creation of shoulder seasons was to concentrate hunting on private lands to educate the elk to return to public lands. This proposal would do just the opposite since many hunters will gravitate to public land where access is easier to gain. That will increasingly drive elk to those private lands where hunting is limited, including private lands that guide during shoulder seasons. Guiding during shoulder seasons just exacerbates one of the problems that created excess elk numbers to begin with. The problem with excess elk is created on private lands and should be solved on private lands.

***Jim Vashro KALISPELL, MT***

43. I am completely opposed to any shoulder season hunts on forest service lands! You will permanently run elk off! The intent was to reduce conflict on private. How will hunting public land help hunters. Dumb idea. Shoulder seasons simply are screwing up elk hunting.

***Dave Shimek Shepherd, MT***

44. There's no need for additional shoulder seasons, especially on public land. If private landowners are complaining about elk they should let more people hunt during the regular season. I own quite a bit of land that have elk on it and they do eat the food and you either are okay with it or you let people hunt it to reduce the elk populations. There is no need to put so much pressure on pregnant elk during the late season. People need to learn to hunt harder and the landowners that have elk on their land that are complaining need to let people hunt during the regular season. Please do not do an extended shoulder season on public land and it would be better if you get rid of the shoulder season and its entirety.

***James J Conner Townsend, MT***

45. I don't think the answer to your "problem" is hunting the state's most iconic game animal for 6 months. The Elk Management Plan is outdated and needs to be re-written! Stop trying to manage elk based on a 15+ year old plan. Everyone knows the flaws of managing to these absurd objectives by now. I am all about opportunity, but there are numerous other ways to increase harvest without hunting these elk that long. It makes ZERO sense that I'm "stressing elk" by hiking and looking for sheds in late February or early March, but am "managing" these same animals two weeks earlier by carrying a rifle around!? I'm a bit confused about the question too. Are you seriously considering a shoulder season on National Forest Lands or is it just state and BLM (not National Forest)? If you allow shoulder seasons in National Forest lands FWP will lose what little credibility it has left with a large amount of the hunting public, in my humble opinion.

***Arthur Stephens Townsend, MT***

46. End hunting in 390 by January 15th.

***Terry Plummer Toston, MT***

47. In this year of drought and fire, why harass the wildlife beyond the normal hunting season. I am a big game hunter and do not support with the proposed extended shoulder season.

***Virginia Knerr Sun River, MT***

48. I am commenting on Hunting district 411. Shoulder seasons do not work in this area due to the the large private ranches that do not allow access. If the shoulder season begins in August it ruins archery hunting and further lowers the harvest pushing the elk back to the private lands. I had a cow tag for 411 and inquired numerous places for access during rifle season and was turned away. Eliminating the shoulder season in 411 only makes sense as it gives archery hunters the opportunity to harvest elk without driving them out of the country.

***Teresa Davidson Ulm, MT***

49. I have watched the elk population during hunting season in 390 and 391 the last few years decline. I was born and raised here and know a lot of people. There are people who struggle to find an elk during the season. I don't think the shoulder season is helping. The elk are just going to places where they can't be hunted during the regular season or the shoulder season. I would ask that you don't extend the shoulder season. Thank you

***Nick Rauser Townsend, MT***

50. In my experience, shoulder seasons/extended seasons only train the elk to stay in their safe zones. I totally disagree with hunting elk after Jan. 1. Winter is the toughest time of year for these animals and hunting them until February 15 is disrespectful to the species. FWP releases statements about winter being a sensitive time for elk and FWP asks antler hunters to respect the elk in March and April after allowing hunting until February 15. I find this extremely hypocritical. I would be very curious to see research into calf crops compared between zones with shoulder seasons and zones without. I suspect that the calf crop in zones with shoulder seasons into February would be less due to the stress of being hunted into the 5th, potentially 6th month of pregnancy. I've personally seen a picture of a fetus cut out of a cow harvested in February and it was very developed. This is not a responsible form of elk management. Take shoulder seasons off the table and pressure land owners to help manage elk populations during the regular season. It's obvious that certain ranchers promote shoulder seasons because they want to make their money during regular season with Outfitting/guiding. Then they allow cows/calves to be harvested during shoulder seasons to manage the population and push the elk off of their property. FWP needs to stop allowing these ranchers to push their agenda which benefits the rancher the most. All citizens of Montana should have an equal seat at the table that is elk management. I am a licensed guide with the state of Montana and I guide elk hunts during rifle season. Thank you for allowing public comment on this issue.

***Jesse Moldenhauer Townsend, MT***

51. I would like to continue to only see shoulder seasons on private and state lands. It seems that allowing shoulder season hunting on federal lands too would further isolate elk populations to private lands making it harder to meet management objectives.

***Adam Charles Klein Helena, MT***

52. It makes sense to include public land as the private land hunters will only push elk onto public land making them inaccessible. In my opinion, if elk are over objective in any unit, by allowing hunting everywhere elk are accessible seems to be logical. In unit 590 elk are predominantly on private property only because there is very little public land or BMA's in the unit. I work with an outfitter in unit 530 & 590 and last fall alone we killed quite a few cow elk even though it was difficult to do so with 005 and 595 tags only valid in one but not the other district. One tag should cover all of the Bull Mountains as in the 2019 season and earlier. We'd kill more cows during the shoulder season if we had enough NCHU's to cover hunters but working in limited entry units makes it not cost effective to purchase NCHU's for cow hunts. We even take several locals at no cost to them to shoot cows. Would love to discuss options and we're all ears to suggestions! Any help fwp?? Feel free to call at your convenience. 406-671-4751 Greg Sielinsky

***Greg Sielinsky Roundup, MT***

53. July 29th, 2021 Montana Fish, Wildlife & Parks Commissioners: Lesley Robinson, Brian Cebull, KC Walsh, Pat Byorth and Pat Tabor Director: Hank Worsech 1420 East Sixth Avenue Helena, MT 59620 Dear FWP Commissioners and Director Worsech: As an avid elk hunter and Montana resident, I am very concerned about FWP's proposal to extend the Elk Shoulder Seasons (ESS) into January and February and onto public lands in the listed hunting districts. There has not been sufficient evidence provided on how this would benefit elk herds in Montana and I see it as only causing conflict as more elk are pressured onto private lands late in the winter. Please do not expand elk shoulder seasons in the 19 hunting districts. ESS were adopted in 2015 with the intent to reduce elk numbers and meet management objectives. It was to be implemented on private lands with the goal of redistributing elk to public lands, and to be done for three years. Now, however, in the program's sixth year, FWP is proposing to expand ESS onto public lands. Clearly, something is not working -- and/or the original intent of ESS has changed. Should the current ill-fated proposal be adopted, elk will die for the wrong reason, in the wrong location and during a time when they should not be hunted at all. In the interest of meeting the outdated goals set by select and narrow interests, we will be decimating our public land elk herds over the course of a six-month hunting season. Elk are quick to learn, and we will be hunting and killing elk that stay on public lands in winter, only to train the surviving elk to find refuge on inaccessible private lands. We will perpetuate the very problem we set out in 2015 to solve. To me, this makes little sense. We cannot continue to do the same thing over and over and expect different results. We urge the Commission to look for alternative approaches such as the collaborative effort by the Devil's Kitchen Working Group -- a shared effort among landowners, hunters, agencies and anyone interested to address local elk issues through science-based and consensus-driven solutions. We were absolutely delighted to see Lt. Governor Kristen Juras attend the latest meeting as an active participant. This forward-thinking engagement -- as opposed to rubber-stamping FWP's proposals -- is what we expect from our decision-makers. Sincerely, Simon A. Buzzard

***Simon Buzzard Missoula, MT***

54. I do not believe including public land for elk shoulder season should be conducted. Shoulder season hunts are utilized to minimize the conflict of private land crop damage and elk populations. Moving the hunts to public land will only push more elk onto private land, making the problem even bigger and not solving it. Elk seasons are already starting from September and running through late November. Between drought years, hard winters, and continuous pressure from hunting with shoulder seasons, elk populations will suffer from hardships and stress. Many public land areas have vehicle restrictions in the winter to minimize disturbing wintering wildlife. Incentivizing hunters to be on public land during critical winter months will only lead to further wildlife conflicts

***Erik Schnaderbeck Bozeman, MT***

55. Maybe you are finally realizing that the shoulder season hunting does not work as it should because when you get too many hunters on one piece of property that does have a shoulder season hunt, the elk go back across the property line to another piece that's not hunt-able. That property could be private and owned by an out of state millionaire or public like state or

federal. The elk comes back every night to feed on hunt-able land but leaving at first light to be safe. You can't control the millionaire but you can allow hunting on state and federal lands. Why does it take so many years for you to figure it out? Although 291 is not on your list for comment it is the example I would list as it is happening on all hunt-able land where an out of stater buys up property you hunt for years and they shut you out and elk find refuge on he's land and you can't get to the elk. This is something that needs to be addressed. Thanks again for letting us comment.

***James Thramer Kalispell, MT***

56. Including public land in the proposed shoulder seasons will not fix the problem and will only further push elk from public land to private; decreasing public land elk herds and putting more strain on landowners. The best course would be to incentivize private landowners to allow the public to hunt the shoulder seasons on their property.

***Tyler Pelo Clancy, MT***

57. In my opinion, this will just force more elk to take refuge on private and further perpetuate our problem of all of the elk on private land.

***Ryan Fetherston Helena, MT***

58. As an avid elk hunter in units 390 and 391, allowing shoulder season hunts on the public lands will force more elk onto private land, further perpetuating the problem. This is not the correct solution and will be devastating to those of us who's only opportunity is to hunt public land.

***Adam Fetherston Helena, MT***

59. Allowing hunting on public lands for elk 6 months of any given year is far too much stress on our herds. Over hunting is not the solution to overpopulation. What we are left with is an overstressed, over educated group of elk that is even more difficult to harvest. The biggest problem I see in areas I hunt are increasing wolf and grizzly populations have forced herds into mega groups of 200+ animals that seek refuge on unhuntable public land as soon as the first rifle shots start ringing. The big issue is this unhuntable private land. In no other state are there hunting opportunities for specific big game animals for half the year. Between 6 weeks of archery, 5 weeks of rifle, and soon to be and additional 10 days of muzzleloader, there is more than sufficient time to harvest an elk.

***Matt Helena, MT***

60. I plan to hunt the elk shoulder season this hunting season in Montana, and although the thought of having more land accessible for me to fill my tag seems nice, it is a terrible idea. Public land elk have been pushed enough during the long season and hunting them during this time will only push them onto private. This will then create less opportunity going forward for everyone as all people will need access to private land to hunt elk. When done properly shoulder seasons should lessen the burden on farmers and ranchers due to elk, and push elk into public land to winter. I do not support this FWP proposal.

***Patrick Tucker Williston, ND***

**61.** This was a temporary thing to try and fix a problem. It is not working so why would you do something that makes it even worse than the problem you started with? Opening elk hunting on public land during a time when elk are settling in for the long haul is crazy. Why? Work the problem.....try something new don't keep doing the same on a larger scale hoping for a different outcome. Reach out to people in the field, take suggestions. I'm pretty sure there is more than one smart person in Montana who can come up with a better plan than this. Please try harder.....

***Casey Foster Darby, MT***

**62.** These shoulder seasons are an absolute disaster and total abuse of these great animals. The biggest problem these animals face is the absolute crazy amounts of pressure from people all year long which drives these animals to private. One thought that is never talked about is eliminating driving access to every bit of country around and creating walk in hunting opportunities where these animals can feel somewhat safe and not worry about some giant asshole on a huge side by side flying up a hill to chase them. Me as a avid outdoorsman can tell you from first hand experience that people have become way to lazy and lost any kind of respect they used to have for these animals these machines go places that are unreal. In return we end up with less animals on public property and less hunting opportunities.

***Jake Petersen Butte, MT***

**63.** The shoulder season is designed to provide relief for private land owners from elk damage to their land and property. Allowing elk harvest on public land during the shoulder season would be counter productive in protecting the private land owner and also would provide no refuge at a critical point in the year for herd survival.

***Robert Olson Billings, MT***

**64.** Allowing shoulder season hunting on public land does little to nothing to address elk overpopulation on private lands, and may in fact drive elk to private lands. If shoulder seasons are to remain, they must be private land only

***Patrick Sievert Belgrade, MT***

**65.** I can't stress enough how much I am opposed to this so called "elk management" idea. Elk in Montana are currently hunted for up to six months out of the year. As a sole public land hunter, I have seen fewer and fewer elk on public lands in Montana and more and more elk on private lands, most of which where the landowners do not seem to allow hunting. Elk on public lands are NOT the problem. This horrendous management decision will only continue to push what little elk are on public lands to private lands. Please seek other management options. Targeting public land elk for 6 months a year is not a sound management idea. Thank you.

***Jon Von Eschen Great Falls, MT***

**66.** Shoulder seasons are extremely detrimental to our elk herd health. 6 weeks of rifle season used to be good enough to control the population, now it's not? If more land became unlocked, the 6 week rifle season would be plenty enough. 6 months is ludicrous and borderline animal cruelty.

***Tavis Renner Baker, MT***

67. I strongly oppose the elk shoulder seasons, particularly on public lands. Public lands should not be included in shoulder season hunts. If landowners actually have an elk problem on their land, they should allow hunting during the actual regular season. If they have a problem outside of the regular season, damage control hunts on their particular land should be used only to the extent of keeping the elk off their land.

***Dillon Martini Plains, MT***

68. As a public land hunter I am opposed to the proposed public land shoulder seasons. These actions will inevitably reconfigure elk herds back into private land where they are causing crop damage and in turn keep elk out of reach for public land hunters like me. Thank you

***Noah Davis Missoula, MT***

69. This is misguided and destined to fail. Our elk are not properly proportioned on public and private land. If private land owners truly wanted elk off their property as there are "too many" they would enlist their property in our BLOCK management program. Whether that be a type one or type two property and they could limit the amount and who hunts on the property. These shoulder seasons will only show that we have a distribution problem, not a population issue. Once again, this is a misguided piece of legislation that should be dismissed immediately.

***Garrett Titus Bozeman, MT***

70. No to all shoulder season extensions. This over quota problem is totally caused by outfitters and landowners. People do not pay big dollars to hunt cows, thus outfitters cannot survive by selling cow hunts, bull elk do NOT produce very many calves to increase the herds. I had a cow tag and wished to shoot a cow on guided property, that guide wanted \$1,000 to shoot a cow. That's insane and I told him so, I bought 1/2 a beef instead....that's your problem folks, some greedy, money hungry outfitters. I was willing to camp in my pop-up, sleep, eat and hunt on my own??? too simple for you Commoners to put 2 and 2 together to solve this problem!! Those people hording and elk move after the season is a deer and elk problem, I agree, just do damage hunts open to either sex kills and animals will move on. MGO will fight this to no end, that's your problem. I'm a small landowner and feed plenty of wildlife, so you're not talking to someone that hasn't had much hay consumed buy whitetail, or pissed on and it, ruining it for sale or feed. One idea is you have to buy a cow tag and take a cow/calf before shooting a bull, many food outlets needs meat. Thanks for considering my thoughts, you have a tough job addressing this, DON'T alienate your MT hunter!

***Ed Bukoskey Rosebud, MT***

71. Please do not include public lands - doing so would not make sense. Elk are hunted very enthusiastically on public lands during the general rifle and archery seasons, which are among the longest in the country. If the objective of shoulder seasons is to reduce elk numbers on private ag land that aren't available to hunters during the regular season, why target the ones that ARE in a location that hunters are able to access during the season? It's time to differentiate between populations on public and private lands - they are often quite distinct, and having an overall number above objective does not necessarily indicate that there are too many elk on public land. Killing every single elk on public land would not do anything at all to the huge



numbers of elk that are harbored on private land and seldom if ever cross onto public. It's a horrible idea. If elk on private land need to be thinned out, thin out those elk, not different elk in different places. Driving elk from public lands to private will only make a bad situation worse. Let's revisit the EMP and address the root issue!

***Charles Westerman Bozeman, MT***

72. Members of the Commission, & Director Worsech, I am certain that expanded shoulder seasons in some of the mentioned districts, will expand opportunity, fill freezers, and lessen the burden on agricultural producers. I cannot however tell you which districts fit this mold. I can tell you in certainty that 411, 511, & 530 (The Snowies Complex) which I am vastly familiar with, will suffer greatly from continued and expanded shoulder seasons. A few elk will be killed, but the majority of the accessible elk will quickly move to private reserves, excluding Montana Sportsmen from accessing them in our traditional seasons. The original intent of these seasons was to move elk from private land to public land and increase the harvest. The opposite has happened through the last 5 years. Please do not consider adding USFS lands to shoulder seasons in HD 411, 511, & 530. In fact, please remove shoulder seasons from these districts, and consider improving and utilizing damage hunts for problematic elk herds in a more specific, and effective matter. Folks, our current elk management plan is so out of date it isn't even funny. Please stop tasking our biologists with working towards something that cannot be accomplished. Thank you for your time, Doug Krings Lewistown

***Doug Krings Lewistown, MT***

73. I sympathize with the landowners and participate in the shoulder seasons, but I am against expanding them to National Forests. We need to make National Forests a refuge for elk, not a hostile place compared to private land. The lack of sanctuary on National Forest is already bad enough with season long cow hunting.

***B. Rob Gregoire Bozeman, MT***

74. I Oppose the extension of Elk Shoulder Seasons. Hunting Elk for 7 months out of the year is just un ethical. Aug thru Feb!! When do you expect them to recuperate from the stress of 7 months of Hunting Season and Winter Weather.Conditions?? Plus the constient disruption its doing to other species like deer, antelope, ect. that are also disrupted by this extended public pressure. Elk Cows are 5 months pregnant and it should really be considered if this ethical hunting. I Opose allowing these shoulder seasons on Public land. Public land gets hammered already during the regular hunting season. Lets give it a break!! A lot of public land is Elk Winter Range. Lets not push them off this crittical land for survival and push them back on private lands which is where the problem is your are trying to solve. I think the real solution is to provide private landowners financial incentives to open there lands during the regular hunting seasons Oct-Nov in a controlled manner. Allowing specific numbers of antlerless elk tags to be available.based on each local landowners situation with elk problems and Micro Manage that situation instead of a unit wide approach. Then do the same approach on a shorter shoulder season say Dec-Jan.Only. This of course witi take funding and presonnel to accomplish. Maybe an additional charge on a general license called a Elk Reduction Fee.

***Doug Frazier Missoula, MT***

75. Absolutely NOT! Why does FWP insist on killing every elk in the state!!! The quotas for elk in a given district are a JOKE! Just the latest example of MTFWP's "War on Elk"

**David L French Belgrade, MT**

76. I oppose any/all shoulder seasons on all public land. I was part of the original 85% of the public that originally opposed the initial shoulder season plan, which leads me to believe that it doesn't really matter what comments are made by the public.

**Kurt Rued Bozeman, MT**

77. Dear Montana Fish, Wildlife & Parks Representatives, I strongly encourage you NOT to include public lands in elk shoulder season hunts. By further pressuring elk later in the season they will continue to harbor on and impact private lands. Shoulder seasons were meant to help relieve the pressure elk were putting on private lands. Allowing these hunts on public lands would be doing exactly the opposite thing this special season was intended to do. No one will argue we have too many elk on public lands so why craft a shoulder season that just pushed them onto private lands where they get in trouble? Thank you sincerely, Hannah Nikonow

**Hannah Nikonow Missoula, MT**

78. If the intent of the shoulder season is to increase elk harvest in these hunting districts, why would we exclude public lands from the hunt areas? I understand the desire to "pressure" the elk off of private land by confining hunting only to private land, but does how does that relate to increasing elk harvest? If the shoulder season remains a "private land" hunt only, then we need to find a way to increase access to private lands where the elk like to be. One question I have had (and I do not know all of the issues involved), is whether or not land owners who lease public lands should be hosting a minimum number of hunters during the shoulder season. Would it work to make hosting elk hunters a "condition" of leasing public lands? I am sure there are many issues related to this question, but I would hope that FWP and other policy makers are willing to explore all options.

**Alan Walthall Bozeman, MT**

79. Although shoulder season hunting has helped some land owners. It was not originally designed to be used on public land. Also, we are in need of an update to our original elk plan before incorporating these other districts. Like the brakes the upper rattlesnake and the belts this is more of an elk distribution issue than a population issue. Let's update our Elk plan and keep the shoulder seasons on private ground where they were intended. Thank you and thanks to FWP for all your hard work!

**David Keim Kalispell, MT**

80. I am opposed to the shoulder seasons. The only thing allowing shoulder season elk hunting on public land will do is push more elk onto the private and exacerbate the elk on private land issues.

**Lucas Conlon Three Forks, MT**

81. Do not extend the shoulder seasons, or expand them to public lands. Invest in the Block Management Program and use public access to reduce the elk on private lands. As a public land hunter, I don't want elk messed with on public land during the harshest months of the year. Please reconsider this rule change.

***Keegan Shea Missoula, MT***

82. When shoulder seasons were created, they were to be conducted on a three-year trial basis, after which their effectiveness would be evaluated. Hunters and conservation groups reluctantly supported the shoulder seasons on the conditions that they were to be held on private land only and were not going to be permanent. Here we are 6 years later, talking about extending the seasons, without seeing any evidence that they are working as intended. Even worse, now we are considering extending them to National Forest lands! It is extremely sad and disappointing that is even being considered. We should be targeting elk only on private land where they are causing issues. District-wide hunting of elk is not effective and targets some of the wrong elk. Also, shoulder seasons were created because of over objective elk populations. Those objectives were created 16 years ago and were based largely on the balance between public elk and private livestock operations. A lot has changed in 16 years, especially land ownership. Much of the private land has been bought up for recreational purposes, and obviously tolerance of elk is much higher for these landowners than the traditional ranching operations. Luckily, the new Elk Management Plan is currently being written and should reflect some of these changes. There should be no rush to continue with shoulder seasons until the new Elk Management Plan is finalized. If shoulder seasons are to continue this year, they should NEVER be on National Forest Land. If we are going to hold shoulder season hunts on FS land we might as well just declare a war on elk.

***Jess Wagner Lewistown, MT***

83. NO. Public land should not be included in the elk shoulder hurts. This will only push the elk back onto non accessible private land. The recent practice of DNRC and BLM of locking the public out of the public land in HD 325 and many other districts in Southwest Mt has exasperated the problem. I am opposed to including public lands in the shoulder hunts

***Les Taylor Butte, MT***

84. I don't think elk shoulder seasons should be extended to any of these areas or onto National Forest lands. Elk management needs to be revamped and data driven. Also, all wildlife deserve a break from their hunting seasons.

***Emily Sedgwick HELENA, MT***

85. 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***

86. Do not include public lands in shoulder seasons.

***Greg Houska Missoula, MT***

87. I very much oppose this shoulder season extension in 19 districts. We do not need shoulder seasons on public lands. We want more elk to stay on public land. Shoulder seasons are not working as intended and have made elk harboring on private land a very real problem. It is cruel to chase these elk for such long seasons into the later months. We need to see data if these shoulder seasons have actually opened up public access during archery and rifle season. Elk need to be pushed on to public lands, not wiped out on private land. There is limited access onto certain private lands which harbor elk and create problems for neighboring private land. Limited access means objectives are not met and elk are not being pushed onto public land. Many hunters have continued to voice their opposition to these shoulder seasons and they really need to be listened to.

***Nuridia Missoula, MT***

88. No additional shoulder seasons are needed

***Chester Watson Missoula, MT***

89. This proposal is absolutely disgusting. If land owners that allow the public to hunt their land during the regular season are still having trouble with elk in the later months then by all means there should be damage hunts or extended shoulder season extended to those land owners. But if a land owner does not allow the public to hunt elk and only allows paid or guided trophy hunting then they should have to deal with the consequences on their own. Having a shoulder hunt on public land makes absolute no sense any way. All that will accomplish is pushing more elk onto private land where hunting is not allowed.

***Joel Worth Butte, MT***

90. Dear Commissioners: Isn't it odd that all those in the legislature that whine about wolves killing all the elk and then craft bills to exterminate wolves then abruptly turn around and offer endless elk hunt shoulder seasons because apparently there are too many elk. Sounds to me like there are plenty of elk to support co-existing with wolves. Thank you.

***Michael Stoerger Livingston, MT***

91. These seasons need to END. FWP needs to honor the original discussions. You have ZERO information or tallies on these hunts and apparently they aren't working to lower the density. You lied to us. I was at the meeting years ago and was told it was a trial and there would be information after a few years to see if it worked. You have not tracked this at all and its not working. Why are we even talking about something that has failed completely and been a total lie. Get over it, find a different way. Private land owners cannot continue to manage our wildlife. Hunting has only gotten worse since this garbage started. There are so many other ways to get the population down. Most areas that you are trying to slaughter did not have these issues 15 years ago. WHY???. HMMMMMMMM.....starts with a W and ends with OLVES. This cannot go on.

***Matt Schuyler Bozeman , MT***

92. Please do not expand these shoulder season hunts. What we need is to update the population objectives across the state to determine how much our tolerance for elk has changed. We want more elk not less, feel the room, very few people want less elk in Montana, most of the people supporting the expansion just want a greater chance to hunt elk, the trouble is these hunts might give them that, for a couple years but the net is less elk and less opportunities for most supporting these shoulder seasons. We want more elk!

***Kaine Zetterberg Valier, MT***

93. 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***

94. Pushing elk off public lands, and on to private lands which cannot be accessed seems to go against the original intent of the shoulder seasons. This move would make the public lands in these districts overrun with hunters, putting additional pressure on private lands hay fields, which cannot be accessed by almost everyone. Bad idea.

***Justin Dalby Livingston, MT***

95. Stop all elk shoulder seasons!

***Ryan Wayne Smith Bozeman, MT***

96. Allowing public land harvest will only push elk off public land to private land sanctuaries causing more conflicts for ranchers. Vote no

***Samuel Mckeeth Ulm, MT***

97. Please do not proceed with the proposed expansion of Elk Shoulder Season(s) into additional Hunting Districts and the extension of any such seasons until Feb. 15th. Any wholesale expansion of Shoulder Seasons onto public lands is blatantly contrary to the scope of FWP's original management proposal, and likely counterproductive to the goal of localized reductions of elk on private property. Therefore, please oppose inclusion of public lands for any Shoulder Seasons. Also, do 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 expansions. Thank you.

***Alden Beard Elliston, MT***

98. Absolutely not Private land only Not enough access to private land because leased or outfitted take away grazing permits on public and state lands their would be a lot less elk on private

***Don Eva Townsend, MT***

99. I support what FWP supports for extending or creating elk shoulder seasons. FWP has enough information to help keep our elk herds in check and to help with hunter harvest when elk are becoming a problem in certain areas. I won't hunt a shoulder season but I do understand why we have to have them.

***Dorian Boling Libby, MT***

100. I am adamantly opposed to this proposal, and because of the warped logic and social intolerance over science-based management nature of this proposal, I am categorically opposed to it in every proposed district. Why are we considering this six years after what was supposed to be a 3-year shoulder season proposal? Why can't FWP handle this with our normal liberal season-setting/regulation process? This is not science-based management, and it does not address the issue that there are not too many elk; there is an elk distribution problem. I realize FWP is in a very difficult situation, and I respect the agency tremendously, but this is really disappointing. Please scrap this ill-conceived proposal that will only result in more elk piling onto private land and creating more crop depredation problems and ultimately leading to less elk on public land and less opportunity for public sportsmen and women. Shoulder seasons are highly unpopular and clearly are not solving the issue they were intended to, and I urge you to scrap shoulder seasons as a whole. We can do better, and our wildlife and the people of Montana deserve more thoughtful, creative ideas than this. Thank you.

***David Nolt Livingston, MT***

101. No to public land shoulder seasons!! Quit handing our big game management over to the landed gentry and cattlemen. If adequate public hunting access was granted to private land there would never be haystack or crop damage from elk. These landowners want to have their cake and eat it too.

***Drew Stuart Three Forks, MT***

102. Specifically for the ARCHERY ONLY HD290- NO SHOULDER SEASON OR GUN HUNTING!!! Stop catering to whiny landowners who 10 years ago were fine with the same elk and deer numbers. In 290, this is an issue of the ability to use a rifle and not elk or deer numbers. Thanks

***Kevin Robinson Missoula, MT***

103. I am not in favor of any elk shoulder seasons

***Diann Baier Kalispell, MT***

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

***Paul Martin Kalispell, MT***

105. No shoulder seasons on Public land. They need some place to go hide when being hunted for 6 months. I would hope all shoulder seasons would end soon as they were only supposed to last a few years

***Kevin Larson Lewistown, MT***

106. Please just auction off all hunting tags so that out of state trophy hunters like Greg "Daniel Boone" Gianforte and all you corrupt money men can personally profit. Residents should have to wait in line and pay top dollar. I used to hunt for food, but that isn't important to all your out of state hunters.

***eric missoula, MT***

107. No public land in shoulder hunts until better access to elk sheltering on private land is granted in these units. We'll kill more of the wrong elk.

***Jeff Bangs Inverness, MT***

108. no to public lands, keep it on private only.

***Paul Henze Deer Lodge, MT***

109. Against any shoulder season cow hunts on PUBLIC LAND. This does nothing to address the real reason these HD's are over the objectives. The real reason is harboring of the elk during the hunting seasons. If you allow public land hunting of these elk, in a few short years there will be minimal elk to hunt on public lands. PLEASE DO NOT ALLOW PUBLIC LAND SHOULDER SEASONS! Thank you.

***Seth Wheeler Great Falls, MT***

110. I do not believe extending shoulder seasons to public lands will in anyway provide benefits to the landowners who are seeing over objective herds on their property. Shoulder seasons on the

public land will likely push public land elk back on to private grounds, furthering the issue at hand while diminishing our public resource. I would ask and encourage MTFWP look for solutions other than additional hunts or longer seasons to bring our elk to a publicly acceptable population level.

***Jacob Ahmann Bozeman, MT***

111. The 2015 Elk Shoulder Seasons adopted by the commission explained the following: "The intent is to expand the opportunity to address elk numbers and distribution problems that have not been effectively addressed with this or other season structures. It is not the intent to create an opportunity to continue shoulder seasons in districts where lack of reasonable public harvest opportunities during the general season is the primary cause of elk numbers exceeding population objectives." This proposal seems to go against the stated intent of the shoulder seasons. While I sympathize with private landowners who are experiencing crop and fence damage, I fail to see how targeting elk on public lands during the winter (where we want them to be) will help. A proposal to open shoulder seasons on public lands will not only fail to improve the situation we find ourselves in but will make it worse. This is not the result of an overpopulation of elk; this is a result of a skewed distribution of elk, an unwillingness for certain private landowners to allow public hunting (especially during the regular season, and especially for bulls), and an outdated elk management plan with outdated elk management objectives. A lot has changed in the last 15 years - access, land ownership, distribution, etc. It's time that we take a closer look at objectives, target problem elk on private lands only, and require that in order for a private landowner to complain about elk numbers that they first be willing to use the existing equitable tools in the toolbox to address the issue (ie hunt roster damage hunts, block management, etc). There's no shortage of public hunters wanting to harvest cow elk, even in January and February. And supposedly there's no shortage of problem elk on private lands during those times. Let's work on connecting those dots rather than making the problems even worse and pushing more elk onto private lands to escape six months of public land hunting pressure. Finally, please do not forget that we're talking about a publicly owned resource here. Thank you.

***Kevin Farron Missoula, MT***

112. Allowing elk to be hunted on public land for 7 months out of the year is not going to help the private land elk issues we are facing in this state. Shoulder seasons have helped with land owner relations and the reduction of elk herds where landowners are willing to provide access. Increasing pressure on public lands will ultimately drive more elk to private, where MTFWP will continue to be the goat. Please amend this or vote no.

***RYAN M CALLAGHAN Bozeman, MT***

113. Stop opening shoulder seasons on public land!! We should only use shoulder hunts to control private herds. Stop taking elk out of the public and transferring our herds to the rich private ranches. Hank is driven by rich ranchers and is the WRONG person to lead the FWP.

***Eric Ennis, MT***



114. I am against expanding the elk shoulder seasons. Including public land in the elk shoulder hunt will have a huge negative effect on hunting opportunity. This will only lead to pushing elk into the private lands. I have personally experienced less opportunity due to this on BLM and State lands in district 411. If a private landowner will not allow hunting to help control population, then the elk numbers residing on that private land should be excluded from the management numbers.

***Cory Hess Billings, MT***

115. I am vehemently opposed to including public (Forest Service specifically) lands in ANY elk shoulder seasons. This proposal is brainless. Montana's elk have already been pressured onto mostly inaccessible private lands. Thus the over objective HDs necessitating these ineffective shoulder seasons. Putting additional hunting pressure on these public land elk clear into February will only exacerbate the accessibility of harvestable elk to the commoners. And that is all this issue is - one of access. FWP's time would be much better spent working with landowners on effective access agreements rather than opening the season on antlerless elk for seven months. The shoulder seasons have already proven to be a failure. It is an access issue, and opening MT public lands to shoulder season hunting pressure will just push elk onto inaccessible private lands year round. One question: Why wasn't the proposal to open FS lands to shoulder season hunting addressed in the cover sheet provided?

***Dave Yerk Choteau, MT***

116. I oppose expanding shoulder seasons to public land. I've spent a great deal of time in hunting units 520 and 510. Can anyone honestly say they've seen any number of elk on public land in the Beartooths or Pryors? And although 580 has decent numbers of elk, the public land habitat could clearly support far more. The ranchers are already killing our elk on their land, but we should not allow our elk to be slaughtered on our public land. It would be great if we could value these critters as the amazing resource they are. This war on elk in Montana has gone on long enough, I will no longer be killing any cows and will be enthusiastically voting against those who legislate for it. Thank you, Paul Johnson

***Paul Johnson Billings, MT***

117. The current proposal does not solve the problem of elk management on private agricultural or ranch lands. Creating a shoulder season on public lands, will not only reduce the quality and quantity of public land hunting, but it will also move elk populations back onto private lands. Please do not support an elk shoulder season on public lands.

***Ryan Burkert Helena, MT***

118. Helena Hunters and Anglers Association is vehemently opposed to including any public lands in the proposal to extend shoulder season hunts to February 15 in the subject 19 Montana Hunting Districts. We have voiced our general opposition to the extended shoulder season hunts since their inception in 2015, but reluctantly accepted the current performance based approach and evaluation criteria. This proposal, and the associated proposal to extend the hunts to February 15, have not been based on a thorough and public review of the monitoring data in relation to the established criteria. This needs to happen immediately. Then the public should be engaged

in a broad discussion of available alternatives. There is no quick fix to over-objective elk populations on (frequently outfitted) private lands with limited general season public access. It is time to end shoulder seasons and start looking at other tools. Thank you, Gary Ingman Vice-president Helena Hunters and Anglers Association Helena, MT

***Gary Ingman Helena, MT***

119. I am a land owner in 411 that hosts the majority of the elk on the west end of the Big Snowy mts. I also allow hunting. By allowing hunting in the shoulder season on public land you will encourage the elk to seek private land . This has been the root cause of all our elk management problems i.e. sanctuary lands and especially paid/hunting for dollars. back in the 1960, 70, 80s before paid hunting the pressure on private lands forced the elk to seek solitude in the more remote areas of public ground, but now with the start of hunting seasons the majority of elk go down to private where there is little pressure. To harvest more elk you need to address the rampant paid hunting problem which created the over population in the first place. I also was told that landowner elk tags have been available for sometime. I understand there is a 5000 acre requirement for these tags. What about me, I only have 1400 acres but as I have said we have the majority of elk on the west end of 411 thru the hunting seasons and winter. Darwin Reynolds 3 smokes ranch 899-8293

***Darwin h reynolds Buffalo, MT***

120. With the addition of a muzzleloader season already adding days to an already long season allowing shoulder seasons on public land where they will be hunted for another two months is going to eliminate elk entirely on public land. They will start to reside all year on private property where landowners are able to control harvest and make a cash crop out of Montana's wildlife. Please don't do this

***Dennis Deaton Helena, MT***

121. There should be several more areas add to this list and access should be increased if possible

***William Holcomb Libby, MT***

122. I think it would be beneficial to open them because of the late snow fall and the movement of elk.

***Andrew Dobbs Butte, MT***

123. Absolutely no shoulder season hunting should occur on public ground. There is not a square foot of public ground in MT that is over populated with elk. It is a private property issue caused by minimal hunting due to allowing no hunting, minimal hunting or hunting via an outfitter. In all of those cases I do not believe any additional public funds nor fwp funds should be spent to help those landowners mitigate their self induced elk problem.

***Shane Missoula, MT***

124. Wild animal populations do not need any more stressors. Expanding human population and global warming are already endangering them.

***Janet Maier Hamilton, MT***

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

**Paul Donohoe Nye , MT**

126. Please extend shoulder seasons to public lands and in length. I spend as many days hunting public grounds as possible with a full time job and legal elk is tough prey in our crowded woods. Having an opportunity to harvest shoulder season elk is usually the only way im going to fill my freezer which didnt happen last year due to landowner scheduling conflicts. I feed my family with this meat and I need more opportunities to get it done.

**Luke Lamphier Belgrade , MT**

127. I strongly support including PUBLIC land in all districts!

**Robert Merchant Polson, MT**

**128. From: Alan Steele <[alansteelejr@gmail.com](mailto:alansteelejr@gmail.com)>**

**Sent: Sunday, July 18, 2021 9:20 AM**

**To: FWP Wildlife <[fwpwld@mt.gov](mailto:fwpwld@mt.gov)>**

**Subject: [EXTERNAL]**

No expanding shoulder season to forest service would destroy archery season leave it alone and give a extra cow tag for general season

**129. From: Gloria & Charles Horejsi <[lakemissoula@gmail.com](mailto:lakemissoula@gmail.com)>**

**Sent: Monday, July 26, 2021 3:18 PM**

**To: FWP General <[fwpgen@mt.gov](mailto:fwpgen@mt.gov)>**

**Subject: [EXTERNAL] Elk shoulder season on public lands**

As a life long hunter I stand against any attempt to have shoulder seasons for elk hunting on public lands. Shoulder seasons was a tool intended to control elk populations on private lands, not public lands.

Charles Horejsi  
3028 Queen Street  
Missoula, MT 59801

**130. From: Alan Steele <[alansteelejr@gmail.com](mailto:alansteelejr@gmail.com)>**

**Sent: Sunday, July 18, 2021 9:18 AM**

**To: FWP Wildlife <[fwpwld@mt.gov](mailto:fwpwld@mt.gov)>**

**Subject: [EXTERNAL]**

No!!!! The shoulder season should not be expanded to forest service would ruin archery season. Give a cow tag for the general season!

**131. From: Rostad, Dan - NRCS-CD, Big Timber, MT <Dan.Rostad@mt.nacdnet.net>**  
**Sent: Wednesday, July 21, 2021 12:21 PM**  
**To: FWP Wildlife <fwpwld@mt.gov>; FWP Commission <FWComm@mt.gov>; Worsech, Hank <Hank.Worsech@mt.gov>**  
**Subject: [EXTERNAL] Comment letter**

Please see the attached letter.

Dan Rostad

- Boulder River Watershed Association
- Sweet Grass County Conservation District
- Yellowstone River Conservation District Council
- Missouri River Recovery Implementation Committee

Post Office Box 749

Big Timber, Montana 59011

Email: [dan.rostad@mt.nacdnet.net](mailto:dan.rostad@mt.nacdnet.net)

Phone: 406-932-5160, Extension 106

# Sweet Grass Wildlife Working Group



Wednesday, July 21, 2021

Montana Department of Fish, Wildlife & Parks

- Montana Fish and Wildlife Commission
- Hank Worsech, Director
- Quentin Kujala, Chief of Staff

The Sweet Grass Wildlife Working Group is made up of sportsmen, landowners and big game outfitters representing Hunting Districts 560, 570, and 580 in Region 5. Work group members work closely with FWP's Region 5 wildlife biologist Justin Paugh and agree to seek consensus in the development of recommendations for big game hunting regulations in our region.

Regarding current Commission regulation proposals:

- The group supports the Commission proposal to run late shoulder seasons until February 15. The current Commission proposal does not address early shoulder seasons.
- The group supports the early shoulder season (Aug 15-Sept1) in districts 560-570-580. The early shoulder season is a valuable tool for landowners to help deal with game damage in alfalfa and crop fields. It also provides a unique and enhanced hunter opportunity.
- The group supports allowing the late shoulder season to be valid on public & private lands in districts 570 & 580, but not valid on National Forest lands in district 560.

Regarding the upcoming 2022 biennial season setting process:

- The group recommends eliminating the either sex elk permits in districts 570 & 580 and recommends implementing a general license, either sex, elk season.
- The group supports having a single Region 5 Elk B license valid during the general season and shoulder season, replacing the multiple elk B licenses currently available in Region 5. This would simplify the process and eliminate landowner and hunter confusion that currently exist.

Submitted for your consideration by Dan Rostad, Working Group Representative

**Post Office Box 749 - Big Timber, Montana 59011**

**132. From: Charles Denowh <cdenowh@gmail.com>**  
**Sent: Tuesday, July 27, 2021 6:51 AM**  
**To: FWP Wildlife <fwpwld@mt.gov>**  
**Subject: [EXTERNAL] Comment on 2021 Elk Sholder Season**

Please find attached our comment for the current proposal on elk shoulder seasons.

--

Chuck Denowh

406.239.5952



July 27, 2021

RE: Elk Shoulder Seasons

To the Commission:

We support the Commission's Elk Shoulder Season proposal in its entirety, including extending shoulder seasons to February 15, expanding shoulder season public land, and implementing a shoulder season in HD 314 on both private and public land.

The inclusion of public land in shoulder season hunts is of particular importance. If you don't open everything up to the shoulder season, all you're doing is moving elk around. The goal of a shoulder season should be to reduce populations—that can only be done if all lands are eligible to be hunted.

We encourage the Commission to expand their proposal to implement shoulder seasons in every hunting district where elk populations exceed objective levels.

The Commission is required by law to manage elk populations to objective levels. Furthermore, the Commission is required by law to use liberalized harvests, among other tools, to ensure that elk populations remain at or below sustainable populations. See:

**87-1-323. Viable elk, deer, and antelope populations based on habitat acreage -- reduction of populations as necessary.** (1) Based on the habitat acreage that is determined pursuant to **87-1-322**, the commission shall determine the appropriate elk, deer, and antelope numbers that can be viably sustained. The department shall consider the specific concerns of private landowners when determining sustainable numbers pursuant to this section.

(2) Once the sustainable population numbers are determined as provided in subsection (1), the department shall implement, through existing wildlife management programs, necessary actions with the objective that the population of elk, deer, and antelope remains at or below the sustainable population. The programs may include but are not limited to:

- (a) liberalized harvests;
- (b) game damage hunts;
- (c) landowner permits; or

- (d) animal relocation.
- (3) The department shall:
  - (a) manage with the objective that populations of elk, deer, and antelope are at or below the sustainable population number by January 1, 2009; and
  - (b) evaluate the elk, deer, and antelope populations on an annual basis and provide that information to the public.

Prior Commissions have failed to meet these statutory requirements, resulting in an elk population that is now nearly two times the statewide objective level. In many areas of the state, the elk population is more than 4x the objective level. This trend must stop.

Elk over-populations compound the challenges faced by our agriculture community. Drought conditions persist throughout the state. Hay is scarce and expensive. Crop yields are down. Many ranchers are being forced to reduce their cow herds.

Elk competing for forage and eating hay is a fact of life in Montana, but it's a bitter pill to swallow when game manager refuse to hold up their end of the bargain by keeping elk at objective.

Sincerely,

CHARLES DENOWH  
Policy Director



**COMMENT REGARDING 2021 ELK SHOULDER SEASON MODIFICATIONS**

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



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
MONTANA

July 22nd, 2021

Montana Fish, Wildlife & Parks

Commissioners: Lesley Robinson, Brian Cebull, KC Walsh, Pat Byorth and Pat Tabor

Director: Hank Worsech

1420 East Sixth Avenue

Helena, MT 59620

Dear FWP Commissioners and Director Worsech:

The Montana Chapter of Backcountry Hunters & Anglers is a non-profit conservation organization representing 3,000 dues-paying Montana-resident hunters and anglers. We love to hunt elk.

We are deeply concerned about FWP's latest proposal to extend the Elk Shoulder Seasons (ESS) into January and February and onto public lands. This strikes us as a misguided move destined to backfire.

ESS were adopted in 2015 with the intent to reduce elk numbers and meet management objectives. It was to be implemented on private lands with the goal of redistributing elk to public lands, and to be done for three years. Now, however, in the program's sixth year, FWP is proposing to expand ESS onto public lands. Clearly, something is not working -- and/or the original intent of ESS has changed.

Should the current ill-fated proposal be adopted, elk will die for the wrong reason, in the wrong location and during a time when we'd argue that they should not be hunted at all. In the interest of meeting the outdated goals set by select and narrow interests, we will be decimating our public land elk herds over the course of a six-month hunting season. Elk are quick to learn, and we will be hunting and killing elk that stay on public lands in winter, only to train the surviving elk to find refuge on inaccessible private lands. We will perpetuate the very problem we set out in 2015 to solve. To us, this makes little sense.

We cannot continue to do the same thing over and over and expect different results. We urge the Commission to look for alternative approaches such as the collaborative effort by the Devil's Kitchen Working Group -- a shared effort among landowners, hunters, agencies and anyone interested to address local elk issues through science-based and consensus-driven solutions. We were absolutely delighted to see Lt. Governor Kristen Juras attend the latest meeting as an active participant. This forward-thinking engagement -- as opposed to rubber-stamping FWP's proposals -- is what we expect from our decision-makers.

Sincerely,

John B. Sullivan III, Board Chairman  
Montana Chapter of Backcountry Hunters & Anglers



[WWW.BACKCOUNTRYHUNTERS.ORG/MONTANA\\_BHA](http://WWW.BACKCOUNTRYHUNTERS.ORG/MONTANA_BHA)  
[MONTANA@BACKCOUNTRYHUNTERS.ORG](mailto:MONTANA@BACKCOUNTRYHUNTERS.ORG)

135.

I am writing in hopes that you consider revising your elk shoulder season plan to NOT allow the harvest of elk on public land during the shoulder season. I understand you are trying to get elk numbers to objective, but these are not the problem elk, and this will only make matters worse as you push more and more elk on to private land where they will find safety and security.

I would ask that you abandon the shoulder season completely, but I know that will not happen. As a lifelong Montana resident, elk hunter, and son-in-law to a large landowner in central Montana that thrives with elk, I will tell you that what you are doing is not working. If landowners are not willing to provide access to the public during the general season, then they should have no right to receive assistance from FWP and complain about numbers.

There is absolutely no reason elk should be hunted for six months of the year. Elk are one of Montana's greatest resources and the direction you are headed with their management is extremely concerning for future generations. No matter what you do, you will never have elk numbers at objective in districts where large landowners (many being out of state landowners) harbor elk all season and personally profit from those elk while FWP wages war on all other elk on public land and the few ranches that might provide access.

Please develop a new plan that provides assistance to those landowners that provide public access during the general season and give the darn public land elk a break. All you are doing with your proposed plan is training them to head to the private where they then cause problems.

Matt Komac 406-439-6200

136.

The Sweet Grass Wildlife Working Group is made up of sportsmen, landowners and big game outfitters representing Hunting Districts 560, 570, and 580 in Region 5. Work group members work closely with FWP's Region 5 wildlife biologist Justin Paugh and agree to seek consensus in the development of recommendations for big game hunting regulations in our region.

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- The group supports the early shoulder season (Aug 15-Sept1) in districts 560-570-580. The early shoulder season is a valuable tool for landowners to help deal with game damage in alfalfa and crop fields. It also provides a unique and enhanced hunter opportunity.

- The group supports allowing the late shoulder season to be valid on public & private lands in districts 570 & 580, but not valid on National Forest lands in district 560.

Regarding the upcoming 2022 biennial season setting process:

- The group recommends eliminating the either sex elk permits in districts 570 & 580 and recommends implementing a general license, either sex, elk season.
- The group supports having a single Region 5 Elk B license valid during the general season and shoulder season, replacing the multiple elk B licenses currently available in Region 5. This would simplify the process and eliminate landowner and hunter confusion that currently exist.

Dan Rostad     [dan.rostad@mt.nacdnet.net](mailto:dan.rostad@mt.nacdnet.net)

137.

I am writing to Object to extension or expansion of Shoulder Season hunts.

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. Please do not support extension or expansion of shoulder seasons at this time.

Eric Scranton     [eric\\_scranton@hotmail.com](mailto:eric_scranton@hotmail.com)

138.

Please protect our public lands. I'm not an out of state billionaire, I am a native Montanan who treasures our beautiful State. I spend hours upon hours in our public lands hiking, swimming, fishing, bird watching and gazing at the stars. My family have a long tradition of hunting wild game in an honorable and ethical fashion. Many meals growing up included elk, deer, and

antelope. Extending shoulder season is the wrong practice for Montana, especially for 'large' land private landowners that will get the special privilege of extending their reach into our forests and public lands. Keep Montana a place to be proud of!

Buzz Ferriter [pferriterbuzz@outlook.com](mailto:pferriterbuzz@outlook.com)

139.

My family has ethically hunted in Montana for generations. We rely on wild game for feeding our families. We believe strongly in fair chase and taking care of the the wildlife resource that we are blessed with. We feel that it is the responsibility of all Montanans to protect our rich hunting heritage and care for the animals and the place we all call home. The idea of now allowing animals to be chased, stalked and hunted from August to February in one type of season or another- Is repugnant and should never be allowed. A generation ago hunting season was 5 weeks long. It afforded the animals respite and a higher chance of survival through tough Montana winters. Chasing and killing pregnant elk in the middle of winter will not bode well for the long term survival of the species. With increasing development pressure, loss of habitat and more people recreating in their forest homes, they are under tremendous stress. These recent proposed changes to extend shoulder seasons are clearly meant to benefit private landowners and the wealthy. They do not protect wildlife or respect the rules of fair chase. They commercialize wildlife which is exactly the opposite of long held Montana values. I have gone on a shoulder season hunt and it turned my stomach. On the ranches I was on it was not set up to be ethical or respectful of this incredible Montana iconic and loved animal. Never again. These seasons are too long and do not afford animals trying to survive, a peaceful life that we all love to witness and appreciate. We implore this Commission to protect the wildlife you are entrusted with managing. They are a PUBLIC resource- for everyone, not just those looking for a trophy who are willing to pay top dollar. That is NOT the Montana way.

Nona Chambers, Stephen Wiltzen, Harris Wiltzen [njc2222@aol.com](mailto:njc2222@aol.com)

140.

I see no reason to add public lands to shoulder seasons. Thank you for the opportunity to comment.

Matt Arno [marnowood@gmail.com](mailto:marnowood@gmail.com)

141.

As a lifelong Montana sportsman I am strongly opposed to the proposal to extend shoulder seasons to 19 additional hunting districts along with extending the season to national forest lands through February 15. This proposal is extremely bad public policy, damaging to the principle of fair chase and wildlife stewardship.

When shoulder seasons were established six years ago FWP promised that they would be temporary. Please honor that commitment.

Bill Cunningham      [billpoll@3rivers.net](mailto:billpoll@3rivers.net)

142.

I am writing you to ask that you reject extending shoulder seasons in 19 districts and extending them onto National Forest lands through Feb. 15. Breaking the agreement of a 6 month hunt six years ago, it pledged that they were temporary to bring elk numbers down on private lands. It's wrong, it's not working and you are doing harm.

I am asking you to stop breaking the agreement made with Montana hunters and reject these extended shoulder seasons.

The only thing a man has is his word, please keep yours.

Kim Hover      [khover@aol.com](mailto:khover@aol.com)

143.

As a sportsman I understand this proposal flies in the face of the original intent of shoulder seasons.. I attended the Commission Meeting in Helena when the decision was made to adopt shoulder seasons. That proposal was fiercely debated. The commitment was made at that meeting by the Commission and FWP Dept that such seasons would occur only on private lands, be cow only, and that these seasons would be monitored to assure that at least 50% of the harvest would occur during the archery and regular general seasons.

Now, without any monitoring results the public is subjected to expanding onto National Forest lands until February 15.

As a hunter I am committed to ethical hunting. I would not shoot an elk trapped in mud or hung up in a fence, or otherwise handicapped. But this proposal would allow elk to be pursued in the dead of winter where they have no escape, are potentially belly deep in snowbelly snow, and carrying fetuses. Fetuses will be aborted. Would the ag-oriented Commissioners feel that they treated their livestock ethically by adding the same type of stresses to their pregnant cattle? Where is the sanity in this proposal???

So some elk will escape to private lands where hunting is not allowed or very controlled. So we will have displaced public land elk to private lands.....just the opposite of the original intent of shoulder seasons. Where is the sanity of this proposal???. So we are fostering more elk on private lands and handing most Montana elk hunting to the discretion of the private land owners. Where is the sanity of this proposal???

Most Montana sportsmen will lose big time with this proposal. I ask that this proposal be dismissed and the Commission direct the Department to furnish the public with the elk harvest monitoring data they committed to when shoulder seasons were originally adopted.

Greg Munther [gmunther12@gmail.com](mailto:gmunther12@gmail.com)

144.

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.

Eric J. Bashore [ejbpike@msn.com](mailto:ejbpike@msn.com)

145.

As a lifelong MT hunter, having raised my kids and grandkids to hunt in MT, I must say I am sadly disappointed to hear of the consideration of extending shoulder elk hunting seasons in 19 districts, as well as National Forest lands through February 15th.

I write today to encourage FW&P to STOP BREAKING THE AGREEMENT MADE WITH MONTANA HUNTERS AND REJECT, AGAIN, REJECT, THE EXTENDED SHOULDER ELK HUNTING SEASONS, as proposed by Governor Gianforte.

Wayne Gravitt [phisher1@outlook.com](mailto:phisher1@outlook.com)

146.

Please reject to proposal to extend elk shoulder season until Feb 15 in 19 hunting districts.

Shoulder seasons should only be used in targeted areas and only after data from past seasons has been fully analyzed to determine if they actually work as intended.

Kathy Knudsen [kathyk@cybernet1.com](mailto:kathyk@cybernet1.com)

147.

No to the proposed shoulder seasons.

Eric Hammer [ewhammer55@gmail.com](mailto:ewhammer55@gmail.com)

148.

I have lived in Montana for 30+ years. I do not hunt, but I support hunting for food (not trophy).

First and foremost, I support healthy elk populations. I also support fair chase hunting and am opposed to late-season public land elk hunts I am opposed to Governor Gianforte's elk shoulder season extension.

Elin Hert [elinhert@gmail.com](mailto:elinhert@gmail.com)

149.

I OPPOSE the extending of the elk shoulder seasons in 19 districts thru FEB 15 and creating a new season in HD 314.

Also I OPPOSE extending them onto national forest lands which will cause safety concerns for archers. During the bow

Season. When these seasons were proposed 6 years ago by FWP they were to be on PRIVATE lands ONLY!!! With

Criteria to be met before a shoulder season was to be implemented. These criteria have been thrown away and seasons

Implemented without regard. SCIENCE and TRUSTWORTHYNESS thrown away. Studies and the FACTS show these seasons DO NOT

Work they are just a feel good opportunity for ranchers and legislators.

LES CASTREN [lfcastren@yahoo.com](mailto:lfcastren@yahoo.com)

150.

First, thank you for your time to serve on the Commission. It is truly an awesome responsibility to fairly and reasonably represent the interests of Montanans and its visitors.

I am writing to you in opposition to extending the elk shoulder seasons without justifiable reasons that have evolved from the scientific evidence presented to you. As it stands now, all I've read and listened to is anecdotal support from invested parties, namely outfitters, landowners and the politicians who advocate on their behalf.



Historically, it seems like FWP has bent over backwards, together with hunters and hunting groups, to appease outfitters and land owners and it never seems to be enough.

I can't say enough to echo others who have decried the political management of elk versus the scientific management. Fair chase should be at the heart of your decision making. Submitting elk to a five to six month season under the harshest conditions of December-February is ethically unconscionable.

It is hard for me to imagine that any commissioner in faithful service to the public he/she serves could give the proposed extended season any further consideration.

Please oppose all efforts and influence to change the shoulder seasons without valid evidence that doing so would effectively and humanely manage this country's magnificent elk herd.

Jerry Hoover [jerry.r.hoover@gmail.com](mailto:jerry.r.hoover@gmail.com)

151.

I am writing you to voice my concern about extending the shoulder seasons to include public lands specifically Forest Service land. This will decimate our elk herds and push more elk onto private lands that do not allow access. Please stick to the original plan that was approved six years ago. I am asking you not to expand this hunt to public lands.

Mike Bliele [mbleile85@hotmail.com](mailto:mbleile85@hotmail.com)

152.

I am a resident of the 411 /530 elk districts and am opposed to any extension of the shoulder season. It is my opinion that extending the season would not contribute to the increase in harvest. The elk reside on a very protected, very large portion of the district and often the owners are with holding hunting opportunities based on their personal whims or nth notion that hey did not get enough tags fo personal use. Also in the past they have used the final week of the shoulder season to push elk into the neighbors so we have had elk as far down as Emory and the top of the sure enough divide. Dealing with the over objective elk populations in these districts would not be resolved by extending the shoulder season or the allowing the shoulder season to extend on to public land. The public land in these districts is really un accessible after December and most years there are no elk staying on that public land.

Really the over population is caused by land owners commercializing the trophy bull hunting.

Dick Raths [dick.nancy.raths@gmail.com](mailto:dick.nancy.raths@gmail.com)

153.

PLEASE. No more shoulder seasons. Give the elk a chance. The five, six week general season is enough already.

Elk should not have to spend half the year looking over their shoulder to avoid getting shot.

Thanks for your consideration.

Richard DeGroot [degrootrj@hotmail.com](mailto:degrootrj@hotmail.com)

154.

I just wanted to express my distaste for the extension and expansion of shoulder seasons that is being discussed. Please don't do it.

William Shoutis [wshoutis@hotmail.com](mailto:wshoutis@hotmail.com)

155.

**From:** [Pieske, Shawna](#) on behalf of [FWP Commission](#)  
**To:** [Brian Cebull \(FWPDistrict5@gmail.com\)](#); [KC Walsh](#); [Lesley Robinson](#); [Pat Byorth \(fwpdistrict2@gmail.com\)](#); [Pat Tabor - Swan Mountain Outfitters \(FWPDistrict1@gmail.com\)](#)  
**Cc:** [FWP Wildlife](#)  
**Subject:** FW: Public Hunts and policies!  
**Date:** Friday, August 6, 2021 1:17:05 PM

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**From:** Michelle Herman <guyherman59912@hotmail.com>  
**Sent:** Friday, August 6, 2021 12:57 PM  
**To:** FWP Commission <FWComm@mt.gov>  
**Subject:** [EXTERNAL] Public Hunts and policies!

To Whom it May Concern,

Please stop selling out Montanans and our beautiful Montana! Your policies are for greed and not the people! I'm a hunter along with my husband and we are both born and raised in The Big Sky over many many many generations! Our ancestors lived and respected the land! They believed in fair chase! Do what is right and balance out your polices!!! Stop the bias and greed! It is sinful!! We don't even hunt right now because of what you have sold out to tourists and people with nothing but greed in their eyes! The way they treat our animals, land and resources is a shame!!! Look out for our public wildlife, public hunters and Real Montana's fair chase hunting traditions first, and reject these late season public land elk hunts! Stop selling our precious land, wildlife, water, trees, parks to the highest bidders! Be respectful of Mother Earth and all life! It doesn't belong to you to sell! Remember where you come from and you shall return to someday!

Michelle and Guy Herman  
Columbia Falls, Montana