

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

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

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

Replace antlerless permits with B Licenses.

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

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

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

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

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

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

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

N/A

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

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

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

**Hunting Districts:** 213,215

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

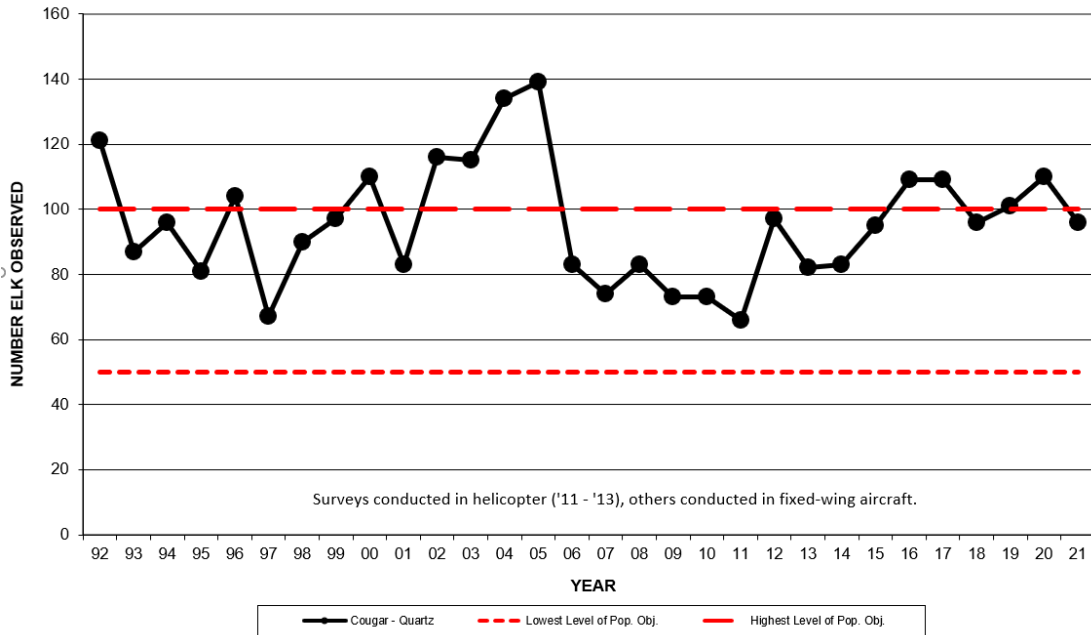
Success will be measured if the elk population declines and stays below population objective. The area is flown and counted annually in the spring.

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

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

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

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



**Figure 1.**

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

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

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

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

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

**Hunting Districts: 201**

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

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

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

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

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

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

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

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

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

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

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

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

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

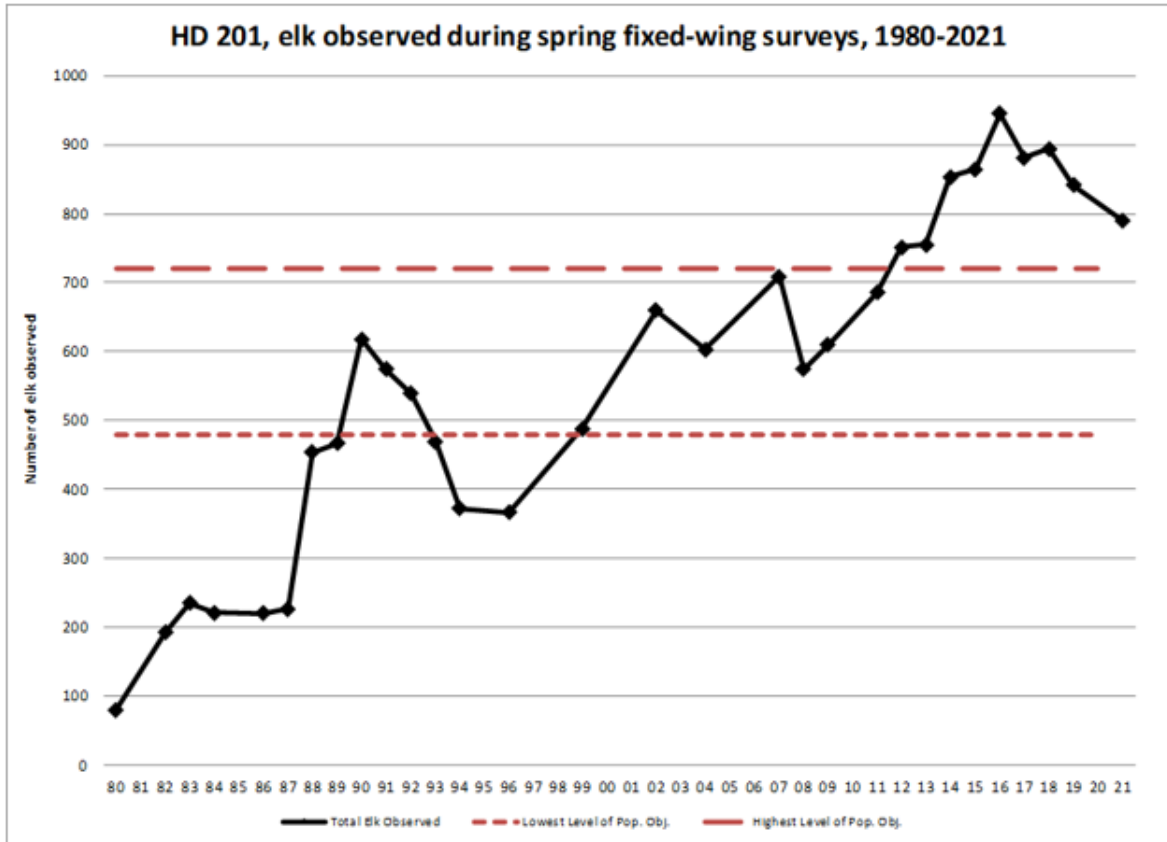
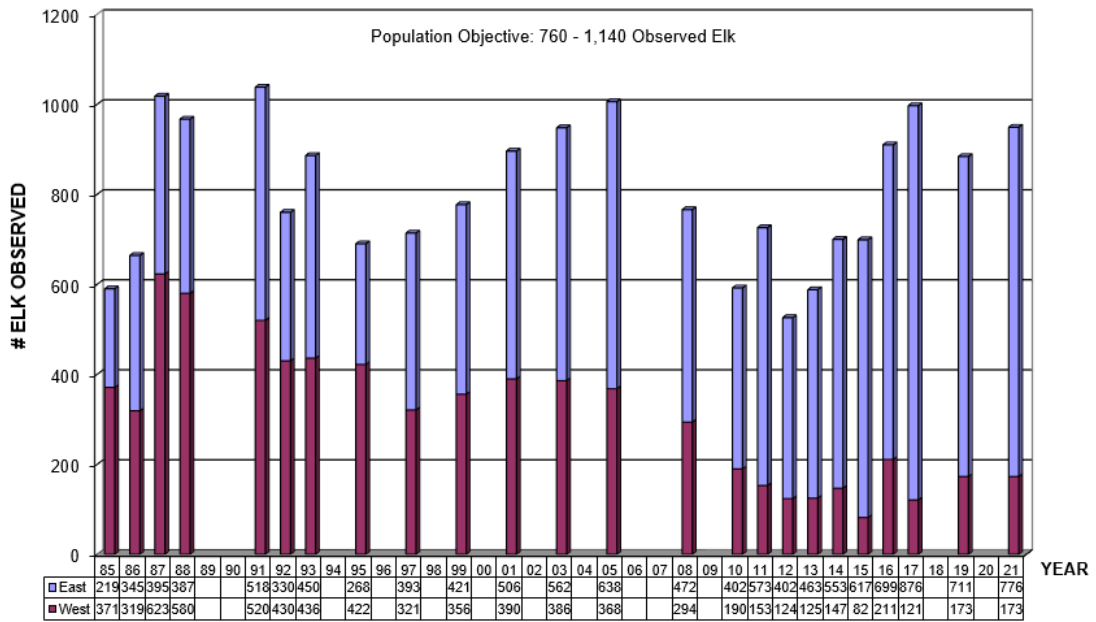


Figure 1.

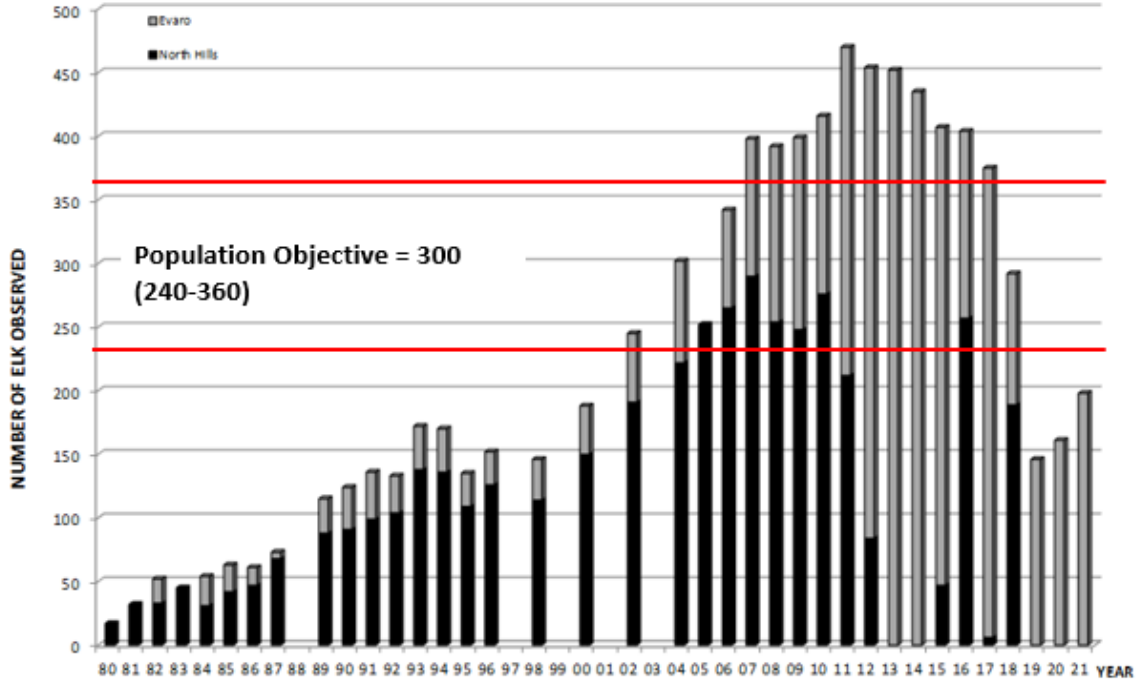
**Elk Trend Surveys, HD 203, 1985 - 2021\***  
**E. of Petty Creek (Formerly 203-80) & W. of Petty Creek (Formerly 203-81)**



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

**Figure 2.**

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



**Figure 3.**

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

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

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

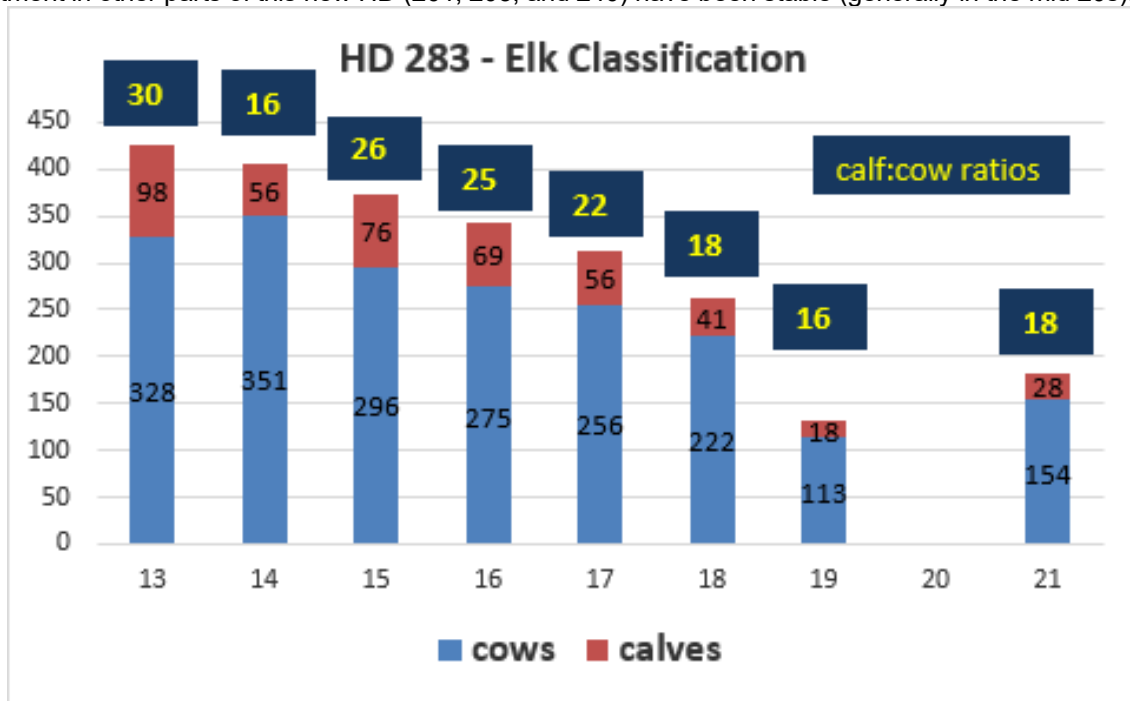


Figure 1.

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

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

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

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



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

**Hunting Districts:** 260

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

Remove Bitterroot/Missoula portions of HD 260.

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

N/A

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

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

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

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

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

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

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

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

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

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

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

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

N/A

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

**Hunting Districts:** 200

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

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

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

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

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

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

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

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

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

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

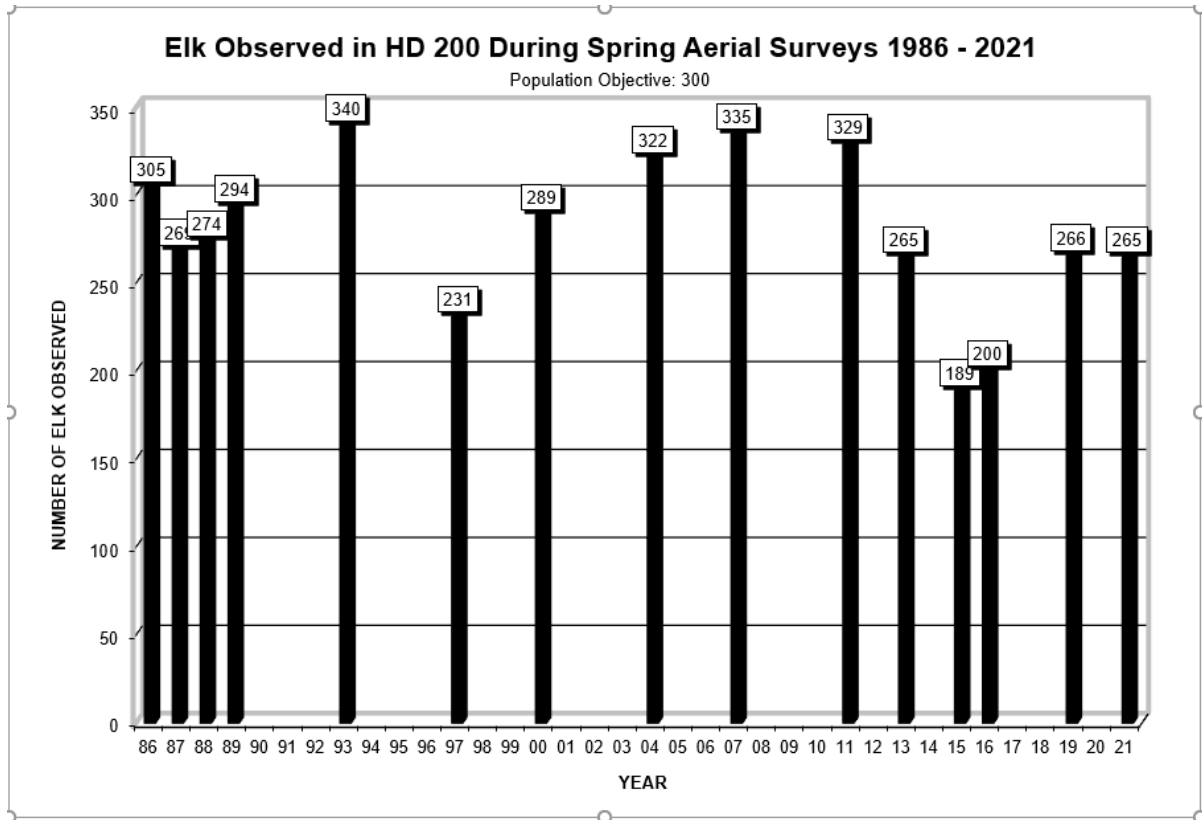


Figure 1.

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

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

**Figure 2.**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Remove all antlerless permits from Region 2 hunting districts.

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

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

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

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

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

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

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

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

This is a statewide regulations change.

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

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

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

**Hunting Districts: 214**

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

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

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

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

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

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

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

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

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

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

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

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

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

**Hunting Districts: 270**

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

**Hunting Districts:** 261

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

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

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

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

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

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

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

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

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

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

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

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

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

## HD 240 boundary change

### Hunting Districts: 240

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

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

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

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

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

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

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

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

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

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

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

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



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

**Hunting Districts:** 204

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

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

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

2. Allow General License antlerless opportunity during rifle season.

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

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

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

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

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

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

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

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

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

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

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

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

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