

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

Hunting Districts: 393

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: portion 293, 343

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

Proposed Changes:

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

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

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

Prior History:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

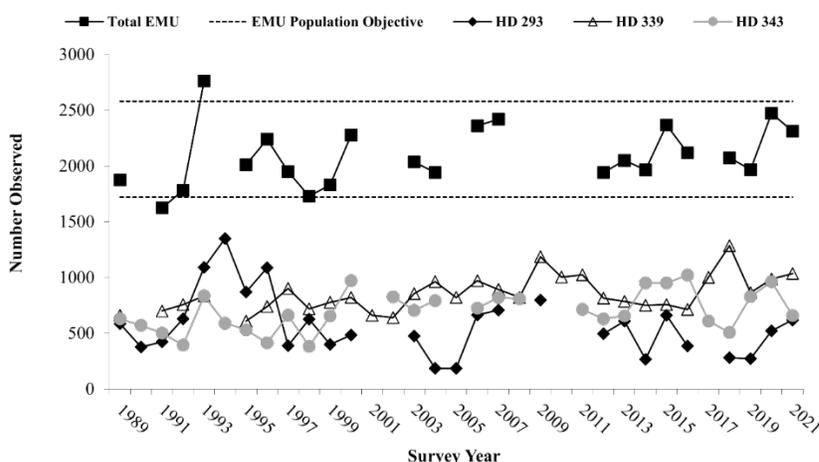


Figure 1: Plot of the total number of elk observed during winter surveys and the EMU population objective (2150 + or - 20%) for Granite Butte EMU hunting districts 293, 339, and 343, Powell and Lewis and Clark Counties, Montana, 1989-2021.

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

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

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

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

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

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

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

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

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

Sept/Oct public comment included:

General

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

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

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

1 Opposed to boundaries based on private property.

New Boundary

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

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

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

293/339/343 Elk

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

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

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

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

293/339/343 MD

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

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

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

Hunting Districts: 380

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

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

HD 380

Current (2021 - dates)

General Elk License.

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

Elk Permit. Drawing only. Apply by March 15.

380-20: 135 permits.

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

Elk B License. Drawing only. Apply by June 1

380-00: 150 B Licenses.

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

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

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

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

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

Proposed (2022 – dates)

General Elk License.

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

Elk Permit. Drawing only. Apply by March 15.

380-20: 135 permits.

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

Elk B License. Drawing only. Apply by June 1

380-00: 250 B Licenses.

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

New HD 380 legal description:

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



Figure 1: New HD 380 D/E Boundary.

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

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

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

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

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

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

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

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

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

ELK AERIAL TREND COUNT SUMMARY FORM

HUNTING DISTRICT: **380**

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

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

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

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

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

Figure 1: HD 380 elk survey summary.

HD 380 Elk Harvest Information (2004 - 2020)

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

('04-'20)

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

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

Figure 2: HD 380 elk harvest summary.

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

('02-'20)

380-00 - License valid entire district

380-01 License valid south portion

380-02 License valid north portion

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

* License type eliminated

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

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

Figure 3: HD 380 antlerless elk harvest summary.

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

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

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

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

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

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

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

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

Proposed Change:

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

Prior History:

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

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

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

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

Regulations simplification.

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

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

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

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

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

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

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

Sept/Oct comment included:

General

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

318/335 Elk

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

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

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

293/339/343 Elk

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

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

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

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

MONTANA FISH, WILDLIFE & PARKS
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION
Elk 2022
R3_Elk_Structure_WC WMA Youth Regulation

Hunting Districts: 322

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

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

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

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

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

Hunting Districts: 313, 317

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 350,370

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

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

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

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

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

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

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

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

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

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

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

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

Combine Deer/Elk Hunting Districts 320 and 333

Hunting Districts: 320 and 333

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

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

Proposed regulations:

General License: Brow-tine bull or antlerless elk;

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

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

Statewide regulations simplification.

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

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

Hunting Districts: HD 301

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: HD 310

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 321, 334

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: HD 311

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 313

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: HD 331

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

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

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

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

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

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

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

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

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

Elk

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

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

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

Mule Deer

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

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

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

Average Since 1986: 59 Bucks; Standard deviation 29.9

25%below avg = 44

25%above avg = 73

Average Since 2012: 41 Bucks; Standard deviation 11.7

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

Elk Population Survey Data in HD 331

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

Figure 1: Elk Population Survey Data in HD 331.

Elk Population Survey Data in HD 332

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

Figure 2: Elk Population Survey Data in HD 332.

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 340

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 360 and 362

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: 390

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

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

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

New HD 390 legal description :

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

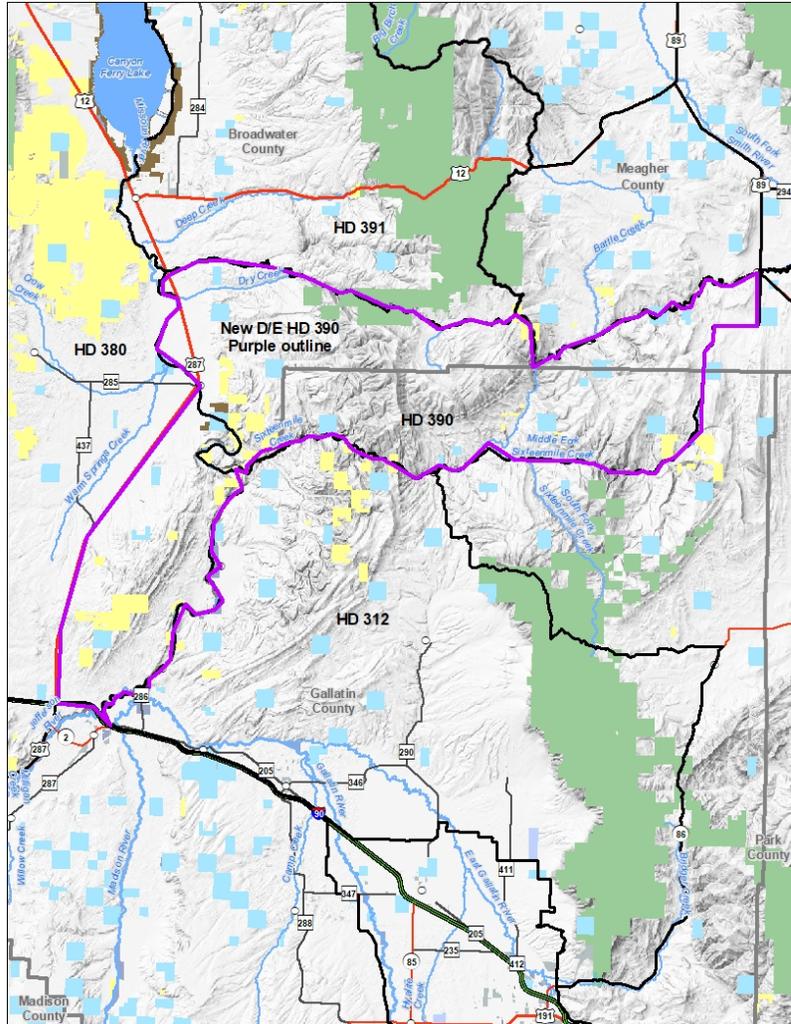


Figure 1: New HD 390 D/E boundary.

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

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

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

Success is implied regarding regulation simplification. One objective is to reduce LPTs which this change does. The proposal also works to standardize season starting and ending dates across at least most of the Bridger EMU (HDs 312, 390, 393).

Annual aerial elk surveys of HD 390 will be used to monitor the status of the elk population to determine if the population objectives of the proposed change are being met, i.e. decreasing elk numbers. Harvest success will be monitored via the Department's annual telephone harvest survey.

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

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

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

ELK AERIAL TREND COUNT SUMMARY FORM

HUNTING DISTR 390

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

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

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

Figure 1: HD 390 elk survey summary.

HD 390 Elk Harvest Summary 2004-2020:

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

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

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

**Number harvested in HD 390 only

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

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

Figure 2: HD 390 elk harvest summary.

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

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

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

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

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

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

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

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

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

Hunting Districts: 391

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

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

HD 391 Elk Harvest Summary 2002-2020:

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

('02-'15)

[^] - B-licenses valid until Feb 15.

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

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

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

Figure 1: HD 391 elk harvest summary.

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

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

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

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

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

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

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

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

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

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

Figure 1: HD 391 elk survey summary.

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

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

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

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

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

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

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

Hunting Districts: 392

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

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

HD 392 Elk Harvest Summary 2002-2020:

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

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

Figure 1: HD 392 elk harvest information.

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

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

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

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

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

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

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

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

Figure 1: HD 392 elk survey summary.

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

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

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

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

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

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

Hunting Districts: HD 329

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Hunting Districts: HD 300

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

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

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

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

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

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

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

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

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

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

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

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

Accurate data and the flexibility to manage hunting pressure specific to HD 303 will be important because of the intense, and increasing, hunting pressure and relative ease of access. Estimated hunter numbers/mile² of public land is 1.5X to 2X that of the adjacent district to the north (HD 302), which is also considered a high pressure area.

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

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

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

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

Hunting Districts: 319 and 341

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

Combine HDs 319 and 341 for Deer, Elk, and Mountain Lion. Elk, WTD, MD and Lion structure will remain as it is currently in HD 319. B License quotas for MD and Elk, along with Mountain Lion quotas will be adjusted next year during the regular quota setting schedules for these species.

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

Combine 2 HDs with shared populations of deer, elk and lions and similar management.

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

This action will prove successful, or at least not detrimental, to species population management if harvest remains well distributed across both current HD's.

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

Elk in both HD 319 and 341 are within objective and have been for the past 8 years. MD trend in both HDs are stable to decreasing. Mountain lion trends appear stable.

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

Both HDs receive a large amount of hunting pressure primarily from being in close proximity to the communities of Butte and Anaconda. In addition, nonresident hunter numbers have increased in both districts in the past few years.

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

This proposal has been vetted far and wide across the state via the FWP website, R3 open house, with local rod and gun clubs, and with R3 staff as well as wildlife staff in adjacent R2.

MONTANA FISH, WILDLIFE & PARKS
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION
Elk 2022
Remove HD 314 Portion

Hunting Districts: 314

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

Elk harvest structures in HD 314 have varied in response to the diverging population trends north versus south. From 2004-2007, either-sex harvest was allowed with a General License. Brow-tined bull or antlerless harvest was allowed on a General License from 2008-2010; additionally, up to 1000 B Licenses were available. As the population was reduced within objective (Figure 2, Figure 3), antlerless opportunity was reduced: in 2011 the B License quota was reduced to 200. During the season setting process for 2012-2013, the season structure was changed from liberal to standard, allowing only brow-tined bull harvest on the General License and 400 B Licenses were issued. As elk numbers grew in northern 314 but declined south of Big Creek, a structural change was made in 2014 to split HD 314 into 2 portions divided by Big Creek. From 2014-2017, brow-tined bull or antlerless harvest was allowed with a General License north of Big Creek, while only brow-tined bull harvest was allowed south of Big Creek on the General License. Twenty-five antlerless B Licenses were valid throughout the district and youth hunters were allowed to use a General License to harvest antlerless elk south of Big Creek. To address continued population growth north of Big Creek, 500 antlerless B Licenses valid north of Big Creek were added for 2018-2020. In 2020, the youth opportunity was changed to either-sex as part of a region-wide effort to simplify regulations related to youth opportunity. For the 2021 season, the number of B Licenses available north of Big Creek was 1000 to address continued over-objective elk numbers in northern 314.

This proposal will eliminate the division of HD 314 into north and south portions. Instead, the B License will be valid throughout the district and the General License will be valid throughout the district for brow-tined bull or antlerless harvest. The either-sex youth opportunity with a General License will remain unchanged.

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

The objective is to remove hunting district portions.

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

Success in removing the portions is implied. Success in whether this is actually viewed as a positive simplification will be difficult to measure.

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

There is no biological justification for eliminating the portion. It is proposed solely meet the direction to simplify regulations by eliminating portions. Elk numbers in the northern subunits defined in the 2005 Elk Plan are above objective and warrant liberalized antlerless harvest. Subunits immediately south of Big Creek are near objective; farther south elk numbers are substantially below objective, liberalized antlerless harvest is not warranted based on the subunit objectives in the 2005 Elk Plan.

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

Limited hunter access to private lands and the relative remoteness of public lands will likely keep antlerless harvest in the southern end of HD 314 to a low level.

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

Due to the accelerated timeline for this season setting process, outreach and comment has been somewhat limited. The proposed change has been shared multiple times via the area biologist's (Michael Yarnall) email listserve, discussed at the Region 3 Regulation Simplification Open House (13 October 21), and between the area biologist and a handful of local landowners and sportsmen. Thus far, most of the public comment has been in opposition to the removal of this portion and some sportsmen are concerned that this portion will be removed, while a portion on the other side of Paradise Valley in HD 313 will be maintained.

MONTANA FISH, WILDLIFE & PARKS
HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION
Elk 2022
HD 314 - Change Shoulder Season

Hunting Districts: 314

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

In August 2021, the Fish and Wildlife Commission added a shoulder season to HD 314 from the end of general season through 15 Feb 2022. There was substantial confusion among landowners and sportsmen regarding the timing of the season (i.e. was an *early shoulder season in place during August*), what licenses could be used during this season, and what landownership would be included. For the 2021 season, only the 314-00 Elk B License is valid on private lands north of Big Creek.

This proposal is to expand the ability for hunters to use their General License during the shoulder season, and add an early season component. Note that a separate proposal, as part of the regulation simplification effort removed north and south portions of HD 314; these shoulder season changes will apply to the entire HD.

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

The objective of this change is to provide additional tools to increase antlerless elk harvest and help manage the population to objective in HD 314. Additionally, this change is intended to address game damage complaints in the northern end of HD 314.

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

Annual elk population surveys and harvest estimates will provide information on how effective these changes are for increasing antlerless harvest. Additionally, the number of game damage complaints related to elk in HD 314 will provide another measure of success.

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

Elk numbers in HD 314 have been above objective in recent years. However, this has been driven primarily by elk numbers north of Big Creek: north of Big Creek elk numbers have been over objective for most years since 2002 (except for a period within objective from 2010-2012), while elk numbers south of Big Creek have generally been below objective since 2011. This year, elk numbers were within objective south of Big Creek due to increased numbers of elk between Point of Rocks and Rock Creek; numbers were above but near objective between Big Creek and Point of Rocks and substantially below objective south of Rock Creek. This year's total count for HD 314 (3975) was a 7-percent increase from the 2019 count of 3716 (Figure 2). This year's total count was 15 percent higher than the 10-year average (3446) and 16 percent higher than the long-term average of counts since 1990 (3421, SE = 109.5). North of Big Creek, elk numbers were 9 percent lower than in 2019 and 29 percent higher than the long-term average of counts since 1990 (2156, SE = 128.8). South of Big Creek, elk numbers were 86 percent higher than in 2019 but remain 6 percent lower than the long-term average of counts since 1990 (1264, SE = 84.2). The increased number of elk south of Big Creek this year was driven primarily by a sharp increase in the number of elk wintering between Point of Rocks and Rock Creek.

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

The ability of hunters to access concentrations of elk in areas that have previously provided refuge to elk will strongly impact whether this change effectively increases elk harvest.

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

Due to the accelerated timeline for this season setting process, outreach and comment has been limited. In previous conversations related to potential shoulder seasons in HD 314, some landowners have expressed support for expanded shoulder season opportunity and some sportsmen have expressed opposition. Additional comments are expected during the next comment period.