

### **Briefs for Hunting Districts that are Over Objective and Have Limited Either-Sex Permits**

In response to questions regarding the use of limited either-sex (ES) permits for elk in hunting districts (HDs) that are above population objective, the Department assembled a brief for each HD where these circumstances apply. In the past, the Department attempted to be responsive to matching limited permit numbers with levels of existing opportunities, which resulted in either-sex permit quota increases when possible. In 2021, there were 30 HDs that met the above circumstances. As part of the 2021 biennial season setting process, the Department is proposing to remove limited ES elk permits in six of the 30 HDs where these circumstances exist and is also proposing to increase ES permit quota (from 300-400) for three of the current HDs in question.

The Department has limited ES permits for multiple different reasons, which vary across HDs and through time. Some of the current reasons why limited ES permits are used in Montana include: to protect bull elk in areas with low security or in those areas where bull elk are highly accessible and vulnerable to harvest; to provide equitable allocation of the elk resource by designating opportunities via random draw lottery; to limit hunter crowding; to meet the demand for older age class bulls; to address landowner tolerance of hunter density; and to maintain agreements made with existing local working groups. If limited ES elk permits were removed, the primary expected population response would be a significant decrease in the bull segment of the population, with this being more pronounced on public lands.

Lastly, the Department is attempting to decrease populations that are over population objective. All HDs that currently have limited ES permits and are over population objective have liberal antlerless harvest opportunities. Harvesting antlerless elk has the largest effect on population growth, and the Department will continue to manage antlerless opportunities liberally to decrease elk populations in these areas.

See below for summary information on the use of limited ES elk permits in individual HDs that are over population objective.

## HD 410:

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the bull:cow ratio (from 2020 elk survey) was 50:100.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 410 is characterized by relatively open country – scattered timbered breaks interspersed by large expanses of sagebrush prairie. The Missouri Breaks Elk Management Unit (EMU), particularly HD 410, is known for its high numbers of bulls and “large, trophy bull elk” by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands.

Overall, the hunting opportunities in HD 410 are very good, considering the relatively high amounts of legally accessible public lands and Block Management Areas (BMAs). However, despite this, some private lands in HD 410 are trending towards leasing/outfitting or severely limiting hunting opportunity for elk, and elk will congregate on these properties during the hunting season. The current LE permit system maintains the equitable allocation of this resource, by designating hunting opportunity for bulls in this HD via random draw. At current LE permit levels, most hunters already complain that HD 410 is too crowded during the archery season, and/or there are too many ES rifle permits offered. Drawing statistics for landowner preference average 53% and 74% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the “House Bill 454” program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year, regardless of permit quota.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest (especially on public lands) because given habitat conditions they are more visible and easier to find. The current ES rifle permit quota represents 50% of the estimated 6-point bulls that exist in the HD, which are what most hunters wish to pursue. Archery harvest alone has averaged 107 6-point bulls/year for the last decade. Approximately 65% of the HD's observed 6-point bulls were harvested in 2020. Given the amount of lands open to elk hunting and lack of security cover, increasing the number of permits further, or turning either archery and/or rifle season into general ES will likely eliminate or greatly reduce the number of bulls, particularly 6-point bulls, on huntable public lands and BMAs. Proponents of increasing the number of ES permits claim doing so will help reduce elk numbers of objective, however harvesting cow elk, not bull elk, is the only effective way to manage elk populations.

Much public input has been gathered over the years concerning archery and rifle hunting in this HD; a sweeping change to season-structure or increased permits beyond what are already available will likely elicit extensive public pushback.

## **HD 411:**

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** The 2005 Elk Management Plan speaks to providing hunter opportunity for harvesting older bulls as a management goal.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited-entry (LE) permits are required to prevent overharvest of bull elk because they lack large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. Where elk reside in the Snowies during hunting season are typically foothill-type habitats with smaller patches of timber, or open prairie/agricultural lands. Social support exists for providing hunter opportunity to harvest older bulls, and LE permits prevent the overharvest of such, especially on huntable areas (legally accessible public lands containing elk). The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 70% and 76% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member, or full-time employee in a district a free, ES elk permit each year. A general license opportunity for either-sex (ES) elk has existed in the Snowies via a spike-only bull regulation (in addition to antlerless elk) since 2014. Average annual spike bull harvest has increased 4-fold since. The 411-20 ES elk permit is proposed to increase from 300 to 400 for the 2022 season. Finally, a hunter can legally harvest 3 elk in the HD with proper licenses.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest (especially on public lands) because given habitat conditions they are more visible and easier to find. Harvest data indicates that increasing permits without any significant increase in public hunting access stagnates hunter success; relatively few additional bull elk are harvested compared to numbers of permits available or hunters on the ground.

Specific to the Snowy Mountains, HDs 411 and 535 contain a total of 2,524,342 acres. Of that acreage, 457,513 acres are considered elk fall/winter range (18%). However, those acreages overlapped by legally accessible public lands or Block Management Areas (BMAs) amount to just 64,229 acres or 2.5% of the HDs, and over half of that primarily represents archery/early season hunting. Thus, only 2.5% of the entire Snowy Mountain HDs provide guaranteed public elk hunting opportunity, and not usually during the rifle/shoulder seasons when elk hunting for "management" occurs. Further liberalizing/generalizing the ES seasons for elk in this area will substantially increase crowding issues on public lands/BMAs that are already maxed out in regard to hunting pressure. Despite an already very liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are well over-objective due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. With an increase in archery permits valid in the Snowies via 900-20, more lands were leased/outfitted, and this trend would continue with extensive liberalization of rifle permits. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

## **HD 412:**

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** The 2005 Elk Management Plan speaks to providing hunter opportunity for harvesting older bulls as a management goal.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited-entry (LE) permits are required to prevent overharvest of bull elk because they lack large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. Where elk reside in the Judiths and Moccasins during hunting season are typically foothill-type habitats with smaller patches of timber, or open prairie/agricultural lands. Social support exists for providing hunter opportunity to harvest older bulls, and LE permits prevent the overharvest of such, especially on huntable areas (legally accessible public lands containing elk). The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 64% and 80% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member, or full-time employee in a district a free, ES elk permit each year. A general license opportunity for either-sex (ES) elk already exists via a spike-only bull regulation (in addition to antlerless elk).

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Liberalizing either-sex elk permits in these habitats would leave elk, particularly bulls, more vulnerable to harvest on public lands because given habitat conditions they are more visible and easier to find. Harvest data indicates that increasing permits without any significant increase in public hunting access stagnates hunter success; relatively few additional bull elk are harvested compared to numbers of permits available. After the permit increase in 2020 from 85 to 120 permits, success rates for bull elk were at an all-time low after 20 years. Forty-nine bulls were harvested on the ES permit in 2019 (with a quota of 85) compared to just 54 in 2020 (with a quota of 120). The current quota represents 34% of the available bulls in the district and over 50% of the 6-point bulls, which the majority of people who put in for this LE, ES permit wish to hunt. Hunting district 412 contains a total of 420,807 acres. Of that acreage, 153,862 acres are considered elk range (including summer ranges not occupied by elk during the hunting season; 37%). However, those acreages overlapped by legally accessible public lands or Block Management Areas (BMAs) amount to just 28,123 acres. Thus, only 6.6% of the entire HD 412 provides guaranteed public elk hunting opportunity, and not usually during the rifle/shoulder seasons when elk hunting for "management" occurs.

Further liberalizing/generalizing the ES seasons for elk in this area will substantially increase crowding issues on public lands/BMAs that are already maxed out in regard to hunting pressure. Despite an already very liberal license structure for antlerless elk, harvest is insufficient to meet management objectives. This is not a season-type or quota issue; it is an access issue. With an increase in archery permits valid in HD 412 via 900-20, more lands were leased/outfitted (not likely to be reversed), and this trend would continue with extensive liberalization of rifle permits. At current permit levels, local FWP staff are inundated with calls from hunters having difficulties gaining access on private lands and unable to find elk on legally accessible public lands.

## HD 417:

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the current bull:cow ratio in HD 417 (from the March 2021 elk survey) is 34:100, right at objective.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 417 is characterized by relatively open country – scattered timbered breaks interspersed by sagebrush prairie and farmground. The Missouri Breaks Elk Management Unit (EMU) as a whole is known for its high numbers of bulls and "large, trophy bull elk" by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands, which has already been shown cannot be done with an additional permit quota increase (or by extension, general season) here.

A few large ranches in HD 417 lease/outfit or severely limit hunting opportunity for all elk. Implementing the shoulder season in 2020 possibly decreased the number of antlerless elk harvested during the general season. The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Drawing statistics for landowner preference already average 70% and 44% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the "House Bill 454" program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Due to high bull numbers in HD 417, the Fish & Wildlife Commission increased the 417-20 ES permit quota from 100 to 225 for the 2020 and 2021 hunting seasons. Prior to this increase, in 2019, harvest success was 62% and the majority of harvest (64%) occurred on private lands that allowed limited public elk hunting. These private lands were already "at capacity," and with no further increase in private land access, the 125 additional hunters in 2020 and 2021 were limited to legally accessible public lands and the three BMAs in HD 417 containing elk. Since the permit increase, fewer bull elk have been harvested on private lands, and significantly more hunter pressure is occurring on already-limited public lands. All permit holders from 2020 and 2021 were surveyed and most (77% and 87%) have stated they could only get access on public lands (which were overcrowded), they were not in favor of the increase, they did not have a pleasurable experience, they feel like they wasted years' worth of bonus points, and would not be applying to hunt HD 417 again.

Despite an already very liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are well over-objective due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. A hunter can legally harvest 3 elk in the HD with proper licenses. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

## HD 426:

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** The 2005 Elk Management Plan speaks to maintaining at least 30 bulls:100 cows and the bull:cow ratio (from 2020 elk survey) is 125:100, however we observed only 157 total bulls.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited-entry (LE) permits are required to prevent overharvest of bull elk due to lack of large expanses of security cover (dense timber/mountain ranges) typical of western MT and most 'general' season areas. HD 426 is characterized by relatively open country – scattered timbered breaks interspersed by large expanses of sagebrush prairie and farmground. The Missouri Breaks Elk Management Unit (EMU) as a whole is known for its high numbers of bulls and “large, trophy bull elk” by design due to decades of cooperative management. Social support exists for maintaining this opportunity on huntable lands.

Several landowners in HD 426 lease/outfit or severely limit hunting opportunity for all elk; landowners that allow for hunting access have stated being “at capacity” for public hunting access. Landowners, some of whom allow bull hunting opportunity, have expressed that the current number of LE permits, 60, is already too high given the limited public opportunities to harvest elk in this district and have spoken against an additional increase. The current LE permit system maintains what little equitable allocation of this public resource remains, by designating hunting opportunity for bulls in these districts via random draw. Most pressure for increasing the number of permits in this HD originates from landowners who would like to be able to hunt their own property. Drawing statistics for landowner preference already average 41% and 38% for the rifle permit (resident and non-resident, respectively) and 100% for the archery permit. Furthermore, changes to the “House Bill 454” program all but guarantee *any* landowner, immediate family member or full-time employee a free, ES elk permit each year, regardless of permit quota.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Despite an already liberal license structure for antlerless elk (the most effective tool for managing elk populations), elk populations are over an already relatively-low objective (75 total elk) due to a lack of free public hunting where the largest concentrations of elk exist. This is not a season-type or quota issue; it is an access issue. The current permit quota already represents 38% of the total bulls available to harvest and 73% of the 6-point bulls that members of the public and landowners alike hope to harvest with this permit.

At current permit levels, local FWP staff are inundated with calls from hunters having difficulties gaining access on private lands and unable to find elk on legally accessible public lands. Older age class bulls will always exist on inaccessible private lands, however increasing the opportunity to harvest bull elk district-wide with no concomitant increase in public hunting opportunity where the majority of elk reside (private land), will do no more than exacerbate the extirpation of elk on publicly-accessible lands during hunting season.

## **HD 445:**

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** Yes. The 2005 Elk Management Plan calls for:

- Maintaining total elk numbers within habitat capabilities and at a level acceptable to landowners and sportsmen.
- Producing older age class bulls, while maintaining a diverse age structure. In HD 445, provide a bull harvest comprised of at least 75% BTB, while maintaining a diverse age structure. In HD 455 (Beartooth Wildlife Management Area), provide a bull harvest comprised of at least 60% BTBs, while maintaining a diverse age structure.
- Maintaining the number of elk observed during post-season aerial surveys in the EMU within 20% of 2,200 elk (1,760-2,640). Wintering population objectives by area are: 1,500 elk on the Beartooth WMA (HD 455) and 700 elk in HD 445.

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

The Devil's Kitchen EMU consists of two adjoining Hunting Districts, HD 445 and HD 455. HD 455 is entirely public land mostly the Beartooth Wildlife Management Area and portion of the Gates of the Mountains Wilderness. HD 445 contains nearly 90% private lands with some interspersed BLM, DNRC, and FWP (Whitetail Prairie portion of Beartooth WMA) lands. In the 1980's and early 1990's the elk population in the EMU was managed with either sex general license and antlerless permits. In 1990, the Devil's Kitchen Working Group was created to assess elk management/issues in the area. The group established five goals: 1) Increase harvest to manage the elk numbers 2) Secure public access to hunt elk, including bulls. 3) Reduce the burden on landowners for managing hunters 4) Improve age diversity among bull elk. 5) Maintain existing outfitting operations on private land. A large emphasis has been to redistribute elk onto the Beartooth WMA during winter and improve overall harvest opportunity. In 1995, the Devil's Kitchen group endorsed the bull elk hunting season structure which remains in place (6-week general archery, 2 weeks general rifle followed by 3 weeks permit-only rifle). In 1994 limited entry permits were implemented in the Beartooth WMA (HD 455) as well. In all but four years since 2008, archery hunting has been on limited permit in HD 455. Both bull harvest objectives are annually met or exceeded.

Over the last 20 years, the elk population in the Devil's Kitchen EMU has grown to a record high of 4,363 elk observed in 2016. Presently, numbers remain above objective but lower than recorded highs. Winter 2020/21 surveys revealed 3,460 elk (467 BTB, 295 Spikes). Liberal antlerless seasons were implemented over the last 20 years to increase harvest to include general elk license, B licenses and shoulder seasons (since 2015). An elk hunter with proper licenses can harvest up to 3 elk in the EMU.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

The Devil's Kitchen Working Group and area sportspeople continue to support the elk hunting regulations in the EMU, including the liberal shoulder seasons. Check station hunter comments indicate satisfaction with existing elk hunting opportunities on the Beartooth WMA. Removing permits or liberalizing bull harvest opportunities may shift winter elk distribution and affect relationships amongst the DK working group, landowners, sportspeople and outfitters. Consistent public and landowner comments are to maintain limited entry rifle and archery permits in HD 455 and to maintain current season structure in HD 445.

## **HD 447:**

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** Yes. The 2005 Elk Management Plan calls for:

- Maintaining total elk numbers within habitat capabilities and at a level acceptable to landowners and hunters.
- Producing older age class bulls while maintaining a diverse age structure. The population objective was to provide a bull harvest comprised of at least 75% brow-tined bulls (BTBs).
- Maintaining the number of elk observed during post-season aerial surveys in the EMU within 20% of 550 elk (440 – 660). A revision to the EMU plan was made in 2007. The change increased the objective to within 20% of 700 total elk (560 – 840).

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Bull elk hunting with a rifle has been limited entry since the 1980's. Archery hunting bull elk has been limited permit since 2008. Bull harvest objectives were implemented in the 1992 elk plan to manage for older age class bulls. The objective was to maintain annual bull harvest comprised of 60% BTBs, of which 20% should be 6-point or better. In the 2005 elk plan, this language changed, "to produce older age class bulls while maintaining a diverse age structure, and a harvest of at least 75% BTBs". Approximately 79% of the elk habitat is under private ownership; the remaining habitat is on public land, primarily the centrally located USFS (21%).

Winter 2020/21 surveys revealed 1,563 elk (310 BTB, 122 Spikes). Over the last 20 years, the elk population in the Highwoods has grown and expanded range to a high of 1,828 in 2016. Presently, numbers remain above objective but stabilized and declined from highs due to liberalized antlerless seasons and increased either sex permits. Either sex rifle permits have remained very stable over the last 20 years, increasing to current allocation of 100 permits in 2017, following increasing bull numbers. On average, 85 bulls are harvested annually from both the archery and rifle seasons. Since 2004, the average 6-pt-or-better bull harvested has been 74.8%, very close to harvest objectives for the EMU.

Antlerless opportunities in HD 447 have been liberalized over the years to increase harvest. Year 2006 was the first-year antlerless harvest was allowed during the rifle season on a general license (without a permit), restricted to youth hunters only. These opportunities expanded to B licenses, general elk license antlerless and shoulder seasons off USFS lands (implemented in 2018). An elk hunter with proper licenses can harvest up to 3 elk in the EMU.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

Bull elk in this EMU are highly susceptible to overharvest if weather conditions prevail. Most elk leave USFS lands to lower elevation privately owned foothills where security is very low. At present times, hunter overcrowding on the USFS, particularly during the archery season, remains a concern. Public access to private land for permit holders remains difficult. Given that the USFS is centrally located amongst most of the elk habitat, removal of either the archery or rifle permits would likely further increase hunting pressure on the National Forest and push elk out onto private lands. Consistent comment indicates permit-only opportunities in the Highwoods has largely been the preference of both landowners and the general public.

**HD 411 and proposed HD 535 (currently HDs 511 & 530):**

**Does 2005 Elk Management Plan call for managing for older age class bulls, or is there a bull:cow ratio objective for this HD?** Yes, the 2005 Elk Management Plan, on page 350, states as a Management Goal to “provide hunter opportunity for harvesting older bulls.”

**We are limiting bull harvest in this HD, what are the reasons for doing so (biological, social, equitable allocation, access, crowding)?**

Limited entry permits are a proven tool to manage for older age class bulls which is the management goal from the 2005 Elk Management Plan. To increase bull harvest but maintain older age class bulls the General Elk License regulation changed in 2014 to include Spike Bull and Antlerless Elk. Average spike bull harvest from 2014-2020 was 32 spikes compared to the average of 8 spikes harvested 1999-2013. In 2020 fifty-three spike bulls were harvested. Elk hunting on publicly accessible public and private lands is extremely limited in these districts. The limited free public opportunities are overcrowded for the archery and rifle seasons. The overcrowded public opportunities usually keep the elk on inaccessible private land for most of the season. The either-sex permits allow for some equitable distribution of elk hunting opportunity across the landscape so that wealth isn't the only factor determining access to elk hunting in these districts.

**What would the consequences be if you removed the ES permit or liberalized bull harvest (biological, social, equitable allocation, access, crowding)?**

The 411-20 Either-sex elk permit is proposed to increase from 300 to 400 permits. The last increase from 200 to 300 Either-sex permits was in 2018. Several hunters and landowners made complaints about the increase in permit numbers causing increased hunting pressure on public hunting opportunities and the increase in hunters requesting access. Some landowners have voiced support for keeping the either-sex permits to maintain the quality of bulls in these districts. Hunting district 580 is a common example used by landowners and sportsmen to describe a hunting district with either-sex general elk license regulation with a lot of bulls but not that many really big bulls. Amenity landowners are already purchasing property in these hunting districts for the elk hunting opportunity which has contributed to the increased land prices. If these hunting districts are no longer managed with an either-sex permit more amenity landowners will purchase land in these districts because of the high bull quality that would be available for a few years. What little free public hunting opportunities exist will further decrease to only those opportunities on publicly accessible public land. These public lands will be so overcrowded very few elk will be present during hunting seasons. The equitable allocation of elk hunting will be lost to the general public. Only those hunters who can afford to pay thousands of dollars for the opportunity to harvest a bull elk will have access to this public resource in these districts.