

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HDs 411/412 archery/shoulder seasons/quotas**

**Hunting Districts:** 411, 412

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

For the upcoming 2022/2023 hunting seasons:

- Remove HDs 411 and 412 from the 900-20 archery only elk permit.
- Create a new, 411-21 either-sex archery only elk permit, valid in HDs 411 and 412, with a quota of 800 (quota range 600 to 1100).
- Specific to HD 411:
  - Increase the quota on the 411-20 elk permit from 300 to 400.
  - Increase the quota on the 411-00 Elk B License from 800 to 1200.
  - Reintroduce an early shoulder season (August 15 – the day before the start of archery season) for antlerless elk on the general, 411-00 B, and 004-00 B elk licenses valid on private land only.
  - Extend the late shoulder season on the general, 411-00 B, and 004-00 B elk licenses to February 15. The general and 004-00 Elk B Licenses will not be valid on National Forest lands for this time period. The 411-00 Elk B License would be.
  - Remove any district “split” in HD 411 at Red Hill Road—manage the entirety of HD 411 as one unit.
  - Changes proposed for General Elk License, 411-20 elk permit, 411-00 Elk B License, and 004-00 Elk B License (which parallels 005-00) are consistent with proposed changes in HDs 511/530, or new HD 535.
- Specific to HD 412:
  - Eliminate “dead week” shoulder season on general and 004-00 Elk B Licenses.

Language in the 2022 Montana Hunting regulations for Elk in HDs 417 and 426 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 411 – Snowy Mountains</b>						
<b>Elk</b>						
General Elk License	Spike Bull or Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 27	
	Antlerless Elk	-	-	-	Aug 15-Sep 02 Nov 28-Feb 15	Private land only. Not valid on National Forest lands.
Elk Permit: 411-20	Either-sex Elk	April 1	<del>300</del> 400	Sep 03-Oct 16	Oct 22-Nov 27	Only valid in HDs 411, 511, and <del>530</del> and 535.
Elk Permit: 411-21	Either-sex Elk	April 1	800	Sep 03-Oct 16	-	ArchEquip only. Only valid in HDs 411 and 412.
<del>Elk Permit: 900-20</del>	<del>Either-sex Elk</del>	<del>April 1</del>	<del>4,000</del>	<del>Sep 03-Oct 16</del>	-	<del>First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.</del>
Elk B License: 411-00	Antlerless Elk	June 1	800 1,200	Sep 03-Oct 16	Oct 22-Nov 27 Aug 15-Sep 02	Valid in HDs 411, 511, and 530, and 535. Valid in HDs 411 and 535. Private land only.
				-	Nov 28-Feb 15	Valid in HDs 411, 511, and <del>530</del> and 535. 411-00 license holders may also use an unused General Elk License to harvest antlerless elk. 411-00 and General Elk License not valid on National Forest lands after general season.
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16 -	Oct 22-Feb 15 Jan 15 Aug 15-Sep 02	Not valid on National Forest lands, RWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except 410 and 455 as listed under each HD. Only valid on private land. Valid in all Region 4 HDs except 410 and 455 as listed under each HD.

Figure 1: Proposed HD 411 2022 Regulations.

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 412 – Judith and Moccasin Mountains</b>						
<b>Elk</b>						
General Elk License	Spike Bull or Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 27	
	Antlerless Elk	-	-	-	Aug 15-Sep 02 Oct 18-Oct 22 Nov 28-Feb 15	Only valid on private land
Elk Permit: 412-20	Either-sex Elk	April 1	120	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 411-21	Either-sex Elk	April 1	800	Sep 03-Oct 16	-	ArchEquip only. Only valid in HDs 411 and 412.
Elk Permit: 900-20	Either-sex Elk	April 1	4,000	Sep 03-Oct 16	-	First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16	Oct 22-Feb 15	Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.
				-	Aug 15-Sep 02 <del>Oct 18-Oct 22</del>	Only valid on private land. Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.

Figure 2: Proposed HD 412 2022 Regulations.

**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 overarching objectives of this proposed change are to have consistency across the entire Snowy EMU (with one exception), improve local archery hunting opportunity, and assist landowners in managing elk on their properties to reduce game damage. The biggest proposed change herein is the removal of the 900-20 archery elk permit, and in an additional step since public scoping, the separation of archery hunting between HDs 411 and 511/530 (i.e., 535). The main drivers behind these changes are improving the drawing odds for area

landowners and sportsmen to be able to “hunt their backyard,” while ebbing the increasing number of archery hunters in the Snowy Mountains, i.e., maximize opportunity while reducing pressure.

**Archery:** Removing HDs 411 and 412 from the 900-20 bundle will lower the size of the pool of applicants competing to hunt multiple HDs. A new archery permit, with a quota set above the level of existing hunter pressure, should ensure that individuals desiring to hunt HDs 411 and/or 412 will have the opportunity to draw a permit (Table 1). Coupled with a possible statewide change in which hunters who draw a permit can only hunt the district for which that permit is valid, draw odds and hunter participation should improve.

Due to other proposed changes in Region 5, we recommend separating archery hunting between HD 411 (north side of the Big Snowies) and HDs 511/530 (proposed HD 535, southern Big Snowies and Little Snowies). Ideally, the Snowy mountain range would be managed with all LPTs as one unit, however Region 5 is proposing their archery elk permits to be bundled into a singular permit, similar to the 900-20. Public comment gathered prior to and during the scoping process indicates that sportsmen hunting HD 411 wanted to see this district out of the 900-20 bundle and by default, anything like it. Management issues with elk along the Musselshell River/Highway 12 deem it difficult for Region 5 to split their new HD 535, which includes the southern Snowies, from the Bull Mountains. The Snowies are one mountain range and will continue to be managed together for shoulder seasons and the general rifle season for the sake of managing elk populations towards objectives. However, maintaining archery opportunity for locals and landowners that hunt HD 411 while minimizing potential crowding issues on limited publicly-accessible lands dictates the department bundle HDs 411 and 412 together in a separate, smaller permit.

**411-20 Permit Increase:** Bull numbers across the Snowy Mountains have been increasing, but the Elk Management Plan (EMP) speaks to managing for older age class bulls. Maintaining limited-entry archery permits in addition to a modest increase in either-sex rifle permits ensures older bulls are protected but provides additional means to harvest and manage this increasing bull population.

**Shoulder seasons:** Making shoulder seasons consistent across the entire Snowy Elk Management Unit, where possible, greatly simplifies the regulations and improves opportunities for antlerless elk harvest in these districts, which are over objective. All antlerless license/permit types (LPTs) across the entire EMU will have an early shoulder season beginning August 15 (valid only on private land), and archery only season, a break for dead week, and a late shoulder season extending to February 15. Except for the 411-00 LPT, all late shoulder seasons will not be valid on National Forest lands.

**411-00 Quota Increase:** Particular to the increase in the 411-00 quota, landowners in the Snowy Mountain complex have varying levels and tolerances for elk on their properties. Given the status of the Snowy elk population relative to objective, increasing the license quota will further provide area landowners the tool they need to manage elk on their properties. This license will likely not sell out before the end of the late shoulder season, so it provides opportunity for landowners and sportsmen to utilize it no matter the season timing.

**Eliminate the Red Hill Rd/Hwy 238 district split in HD 411:** Elk are over their sub-objectives on both the east and west ends of HD 411, with legitimate impacts to landowners on both “sides” of the boundary. This is one population of elk and needs to be managed as such. Large, singular parcels of private land do not exist on the west end of the Snowies like they do to the east, and landowner tolerance for large concentrations of elk is lower in western HD 411/511. Thus, these landowners need the same tools to manage elk on their properties afforded to landowners east of Red Hill Road.

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

The components of this proposal lend several metrics for measuring success. Related to elk archery, an improvement in drawing odds and hunter participation, with a reduction in comments/complaints about too much pressure will be one indication of success. Increased antlerless harvest across the shoulder and general seasons among all valid licenses will be another. Finally, increased bull harvest via an increase in the rifle permit quota will be a third measure. Game damage complaints may decrease, and if antlerless and total harvest were to exceed recruitment, overall elk populations numbers may decline towards 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).**

In February 2021, area biologists observed 8755 total elk across the Big and Little Snowy Mountains (2257 bulls, 4502 calves, 1884 calves, 112 unclassified antlerless). Overall, elk in the Snowies are 1067% over the objective of 800 total elk. Additionally, in HDs 511/west 411 (i.e., west of “Red Hill Road”), biologists observed 1061 elk (372 bulls, 478 cows, 211 calves). Elk on the west end of the Snowies are 165% over the sub-objective of 400 elk. In HD 412, the area biologist observed 779 total elk in February 2021 (355 bulls, 283 cows, 141 calves). The survey objective for HD 412 is to observe 300 elk post-season, thus elk are 159% above objective. The EMP for the Snowy EMU also speaks to managing for “older age class bulls.”

Table 1 shows elk harvest by sex/season since 2013, including the 2016-2020 shoulder seasons, for HDs 411, 412, 511/530, and the Snowy Mountains (411, 511, and 530 combined). Across all districts and years, archery/general harvest has exceeded shoulder season harvest, one of the criteria set for their continuation. Other shoulder season criteria state cow harvest and total harvest must exceed annual recruitment. For the Snowies, these criteria have not been met, but for HD 412, these criteria have been met (Table 2).

Year	HD(s)	Shoulder Season Harvest			Archery/General Season Harvest			Total Harvest		
		Cow	Bull	Total	Cow	Bull	Total	Cow	Bull	Total
2013	411	-	-	-	155	150	315	155	150	315
	412	-	-	-	108	53	170	108	53	170
	511/530	-	-	-	33	51	84	33	51	84
	Snowies	-	-	-	188	201	405	188	201	405
2014	411	-	-	-	145	125	295	145	125	295
	412	-	-	-	132	79	228	132	79	228
	511/530	-	-	-	35	72	129	35	72	129
	Snowies	-	-	-	199	197	424	199	197	424
2015	411	-	-	-	147	166	313	147	166	313
	412	-	-	-	137	52	207	137	52	207
	511/530	-	-	-	48	47	98	48	47	98
	Snowies	-	-	-	195	213	434	195	213	434
2016	411	111	0	131	195	154	364	306	154	495
	412	51	0	51	57	64	127	108	64	178
	511/530	65	0	67	40	107	150	105	107	217
	Snowies	176	0	198	235	261	514	411	261	712
2017	411	120	0	126	280	205	502	400	205	628
	412	41	2	52	107	61	173	148	162	225
	511/530	38	4	45	88	80	177	126	84	222
	Snowies	158	4	171	368	285	679	526	289	850
2018	411	177	3	180	173	188	379	350	191	559
	412	66	0	66	62	72	140	127	72	206
	511/530	81	3	94	96	81	186	177	84	280
	Snowies	258	6	274	269	269	565	527	275	839
2019	411	241	0	250	166	187	365	407	187	615
	412	44	0	44	71	83	160	116	83	208
	511/530	104	0	113	86	62	153	190	62	266
	Snowies	345	0	363	252	249	518	597	249	881
2020	411	109	0	113	228	344	586	337	344	699
	412	12	3	15	67	93	132	79	96	175
	511/530	15	6	27	107	82	189	122	88	216
	Snowies	124	6	140	335	426	775	459	432	915

**Figure 1:** Table 1. Elk Harvest by sex and season in the Snowy EMU, 2013-2020.

Year	HDs	Recruitment (required harvest)			Criteria Met?		
		Cow	Bull	Total	Archery/general harvest > SS harvest	Recruitment Harvested	
						Cows	Total
2016	Snowies*	468	379	847	Yes	No	No
	412	86	57	143	Yes	Yes	Yes
2017	Snowies	912	608	1520	Yes	No	No
	412	31	21	52	Yes	Yes	Yes
2018	Snowies*	1295	863	2158	Yes	No	No
	412	80	54	134	Yes	Yes	Yes
2019	Snowies	1273	848	2121	Yes	No	No
	412	36	24	60	Yes	Yes	Yes
2020	Snowies*	1375	917	2292	Yes	No	No
	412	79	53	132	No for cows	Yes	Yes
2021	Snowies	1286	857	2143	Yes	No	No
	412	100	67	167	Yes	Yes	Yes

\*Incomplete survey years; the east end of HD 411 is flown only on odd years. In the absence of such data, current calf counts for HDs 411 (west), 511, and 530, plus the previous year's calf count for 411 (east) are used to estimate recruitment.

**Figure 2:** Table 2. Elk recruitment estimates and shoulder season criteria for the Snowy Mountains and HD 412, 2016-2020.

**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 elk in both HDs 411 and 412 reside on private lands year-round. When elk are on public lands (mainly USFS in the Snowies and BLM in the Judiths/Moccasins) it is primarily during summer months or early fall. With vegetation senescence, hunting pressure, and winter snows, these elk migrate out of the mountains into the surrounding foothills—primarily agricultural lands bisected by creek drainages and timbered ridges.

Elk numbers in the Snowy Mountains have been increasing exponentially since the mid-2000s, mostly related to population expansion and growth on the east end. Conversely, up until ~2016, elk on the west ends of HDs 411 have remained relatively steady at ~subobjective elk since 1991. Since 2016, this localized elk subpopulation has grown to over twice objective. Despite this recent growth, habitat limitations (winter snow on the north slope, marginal availability of water and succulent forage) is the primary limiting factor for these elk. While habitat quality seems to be excellent on the north slope of the Big Snowy Mountains, elk fail to use this area for much of the year, and save an occasional observation (15-75 elk), most of the elk summer and winter on the far west side. This “west end” group of elk has caused numerous game damage complaints from area landowners. Additionally, during severe winter weather, these elk congregate and move into the flats west of the mountain, sometimes crossing the highway. During hunting season, better access, high visibility, and a general either-sex regulation leave them vulnerable to “elk shootouts.” There is no shoulder season in HD 418 where this occurs, but outside of the general season, the large congregation of elk results in numerous game damage complaints and necessary management hunts. The larger the herd, the more likely they are to cross; thus, it is imperative to keep these elk at or near objective levels.

It is no surprise that elk have fared much better on the east ends of HDs 411 and in (former) HD 530. Large swaths of land in both districts have been effectively closed to hunting for almost the last two decades (there is limited hunting pressure but this has little to no effect on the elk population). These lands also contain abundant food sources, few predators, and elk productivity is high under these circumstances. Shoulder seasons, which began in the 2016 hunting season, have increased the average number of antlerless elk harvested the last few years, but harvest of antlerless elk is still insufficient towards meeting management objectives.

Based on hunter effort data, an average 700 hunters who drew the 900-20 archery permit chose to hunt either HDs 411 or 412 (Table 3). The 900-20 averaged 78% draw odds overall (landowner, resident, non-resident), and 90% draw odds for residents. Hunter effort data from Table 3 indicates that at least for residents, draw odds should be close to or meet 100% if the same people that choose to hunt these districts year to year apply for the 411-21 permit.

Multiple iterations of elk shoulder seasons currently exist across the Snowy Mountains and HD 412. This proposal greatly simplifies shoulder season structure by keeping season dates consistent across all LPTs and districts. The

assorted Elk B Licenses also have similar season structures (i.e., General License structure is the same for 411, 412, and 535, 004-00/005-00 season structures are the same, etc.).

# Permits offered	HD	# Elk Archery Hunters				
		2015	2016	2018	2020	Average
3700-4000 <sup>1</sup>	411	421	467	564	732	546
	412	154	125	171	165	154
	<b>411/412</b>	<b>575</b>	<b>592</b>	<b>735</b>	<b>897</b>	<b>700</b>
	511	41	52	59	81	58
	530	146	180	238	228	198
	<b>Snowies only</b>	<b>762</b>	<b>824</b>	<b>1032</b>	<b>1206</b>	<b>956</b>

<sup>1</sup> Valid in 21 total HDs, including HDs 411, 412, 511, and 530.

**Figure 1:** Table 3. Elk Archery Hunter Participation, 2015-2020.

**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).**

Earlier in this process, in order to simplify regulations by reducing the number of HDs and LPTs, one potential proposal brought forward for public scoping was to eliminate HD 412, combining it with HDs 419, 417, and 426. Elk move between the Moccasins in HD 412 into the Judith River breaks of HD 426, as well as between the Judith Mountains of HD 412 into Armells Creek of HD 417. Some, but very little movement of elk occurs between the Snowies (HD 411) and Judiths. Additionally Region 5 combined several of their HDs and changed their archery regulations, with the Bull Mountains and southern Snowy Mountains keeping their limited archery permits while the remainder of the region moved to general, either-sex archery opportunity. The region proposed two separate permits, one for the Snowies (to include HD 411) and one for the Bull Mountains. After public scoping Region 5 made the determination to alter this proposal and include all limited-entry archery into one permit, which no longer tied with Region 4 objectives. Preliminary phone calls with local sportsmen in the Lewistown-area suggest that sportsmen prefer to keep the entire Snowy Mountain range together for archery, however, not if 411 would simply be rolled into a region-wide archery permit for Region 5. Their next preference was to keep 411 and 412 together, bundled into a smaller permit. In responding to these early public comments, it was thus necessary to remove HD 411 from proposed HD 535 as well as maintain HD 412 as an HD, managed for archery opportunity with HD 411.

For HD 411, there have been mixed comments related to archery and rifle permit numbers. Archers want to be able to draw a permit every year, but many sportsmen agree that the limited-entry nature of the permit structure should be maintained. Some landowners also agree, and some landowners/outfitters would prefer a general archery season. For landowners whose priority it is to draw an archery permit every year to hunt their lands, this is possible under landowner preference and would remain so with the current changes. For archery hunting, an average 11 resident and 11 non-resident landowners applied for the 900-20 across all 21 districts this permit was valid. With a landowner preference quota of 485, draw odds under landowner preference were always 100%, and again, this is not likely to decrease under this proposed change.

In addition to landowner preference, changes to the “454 Agreement” structure allows almost any landowner to apply for and receive an elk permit valid on their property. Thus, for archery and rifle permits, almost any landowner in either HD should now be able to receive an either-sex elk permit. For landowners along the Region 4/Region 5 boundary, if they are concerned about having to choose between archery hunting either district, they can still either apply for landowner preference for the rifle permit (411-20) and enjoy 60-100% draw odds, or apply for a rifle permit under the auspices of the 454 program and hunt both regions 4 and 5 during the archery and rifle seasons.

Regarding the HD 411 district split at Red Hill Road, much effort went into removing this “sub-boundary” during the 2020/2021 season-setting process. It was not in the 2020 or 2021 regulations, but misconceptions about the status of the herd and regulation language resulted in 2020 shoulder season changes to bring this split back into the fold. During the public scoping, landowners on the west end specifically addressed this, and emphasized wanting equal opportunity to managing elk on their properties as landowners east of Red Hill Road. Furthermore, despite some sportsmen concerns about the west-end elk segment being more vulnerable to overharvest and under-objective, this herd has been increasing in number each year and has been over objective since 2016.

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

**Hunting Districts:** 441, Portion of 441

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

FWP proposes to change elk regulations in HD 441 for the Archery Season from Either-sex Elk to Brow-tined Bull or Antlerless Elk, and from Antlered Bull Elk to Brow-tined Elk in the Bob Marshall Wilderness Portion of HD 441. This hunting district has had a variety of season types since 1984, when either-sex elk hunting was allowed the first two weeks of the general hunting season, with antlered bulls for the remainder of the season. An antlered bull-only season was initiated in 1985. In 1986, bull harvest was allowed only in the National Forest portion of the hunting district with either-sex permits (10) valid in the entire area. This season type was continued until 1990, when antlered bulls were legal only in the Bob Marshall Wilderness portion of the HD with limited either-sex permits outside of the Bob Marshall Wilderness. These season structure for antlered elk has continued until 2021 with various number of either-sex permits valid outside the Bob Marshall Wilderness.

**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.**

Regulation Simplification by align season types in adjoining HDs where biologically possible. The objective of this proposal is providing consistency for Region 4 elk HDs where elk harvest opportunity exists on a General Elk License that are adjacent to elk HDs in Region 1 or adjoining other elk HDs in Region 4 with a Brow-tined or Antlerless elk regulation.

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

Regulations Simplification effort. The success of this proposal will be determined by acceptance from the FW Commission and public.

**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 2005 Montana Elk Management Plan describes the population objectives and season types for HD 441. For HD 441, the population management objective is +/- 20% of 500 (400 -600) observed elk. The Standard Regulation package call for maintaining antlered bull on a General License in the Wilderness Portion of HD 441 if the antlered bull to cow ratio is at least 15. The Elk Plan does not outline a Liberal Regulation package for antlered elk. The Restrictive Regulation package calls for limited permits for the entire HD if the antlered bull to cow ratio falls below 15. Recent surveys indicate the population is within objective (See HD 441 Chart) and the bull to cow ratio exceeds the threshold for the Standard Regulation package See (HD 441 Table).

**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 proposed change is based solely on the Regulation Simplification process.

**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 draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Only one comment was received. The comment was opposed to Brow-tined Bull/Antlerless regulations anywhere in the state.

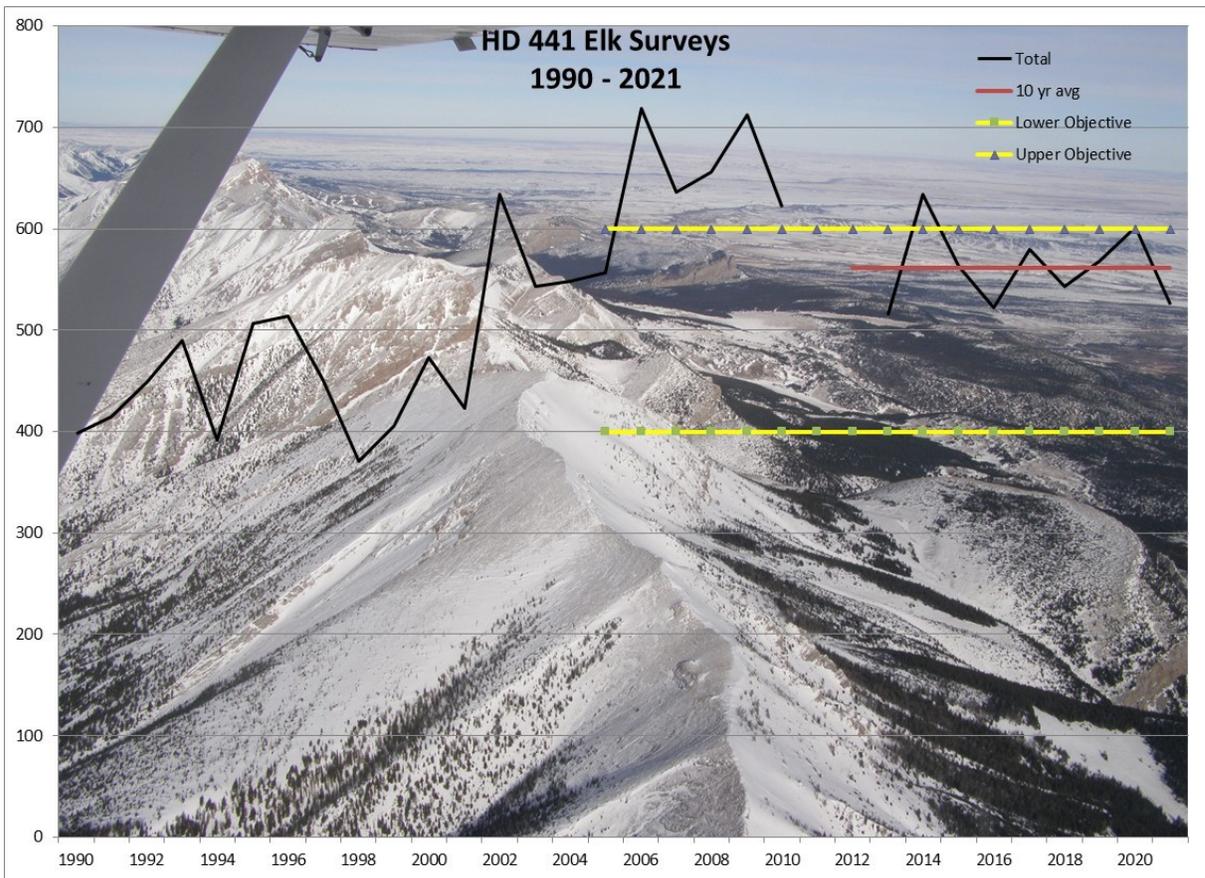


Figure 1: 2021 HD 441 Chart.

Maximum Elk Counts and Production Ratios, HD 441										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Suney Type
2/26/1990	398	28	7	21	258	90	20	35	11	G-P
1/3/1991	415	46	13	33			369			FW-C
3/12/1992	449						449			H-C
4/1/1993	490	61					429			FW-P
3/24/1994	392	71	42	29	60	16	245	27	80	FW-C
1/5/1995	507	38	35	3	33	13	423	39		H-C
2/16/1996	514	71	24	47	245	116	82	47	29	G-P
4/11/1997	451	41					410			FW-C
4/7/1998	371						371			H-C
4/3/1999	405	21	3	18	297	86	0	29	7	G-P
3/2/2000	473	82	67	15	37	13	341			H-C
3/20/2001	423	21		21	324	78		24	6	G-P
2/25/2002	634	46	40	6	36	5	547	14		FW-P
3/17/2003	543	39	18	21			504			H-C
2/11/2004	548	25	8	17	264	81	178	31		G-P
4/11/2005	557				66	11	480			H-C
2/25/2006	719	96	57	39	439	142	42	32	22	FW-C
3/15/2007	636	59	36	23	264	85	272	32		H-C
4/8/2008	656	145	107	38	390	121		31	37	H-C*
1/26/2009	712	**45	10	35	509	158	0	31		FW-P
3/15-16/2010	621	127	127							
2011										
2012										
3/26/2013	515						515			H-C
2/25/2014	634	63	46	17	196	67	313	34	32	FW-C
2/16/2015	563	58	19	39	371	134		36	16	FW-C
1/1/2016	522		30	42	222	113	112	52	32	FW-C
2/2/2017	580	88	69	19			492			FW-C
3/21/2018	543						543			RW-C
1/17/2019	568	86	62	24	388	94		22	24	FW-C
2/18/2020	602	109					493			FW-C
1/21/2021	525	61	28	33	331	133		40	18	FW-C

Figure 2: 2021 HD 441 Table.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 420 Es to BTB/A-**

**Hunting Districts:** 420

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

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk regulation. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

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

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**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 is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released for initial public comment. The few comments to date have been a mix of both support and opposition.

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

**Hunting Districts:** 403

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

FWP proposes to remove HD 403 from LPT 401-20 and change from Antlerless Elk to Either-sex Elk for both the Archery and General Season.

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

Regulation Simplification - The objective of this proposal is removing 2 LPTs from HD 403.

**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 determined by acceptance from the FW Commission and public.

**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 2005 Montana Elk Management Plan describes the management objectives for HD 403. HD 403 is in the Golden Triangle EMU. Because more than 90% of the EMU is devoted to agricultural production, the management goal is to prevent permanent occupancy by elk because of landowner intolerance and to avoid certain game damage to agricultural crops. No population monitoring for elk occurs in this EMU.

**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 proposed change is based solely on the Regulation Simplification process.

**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).**

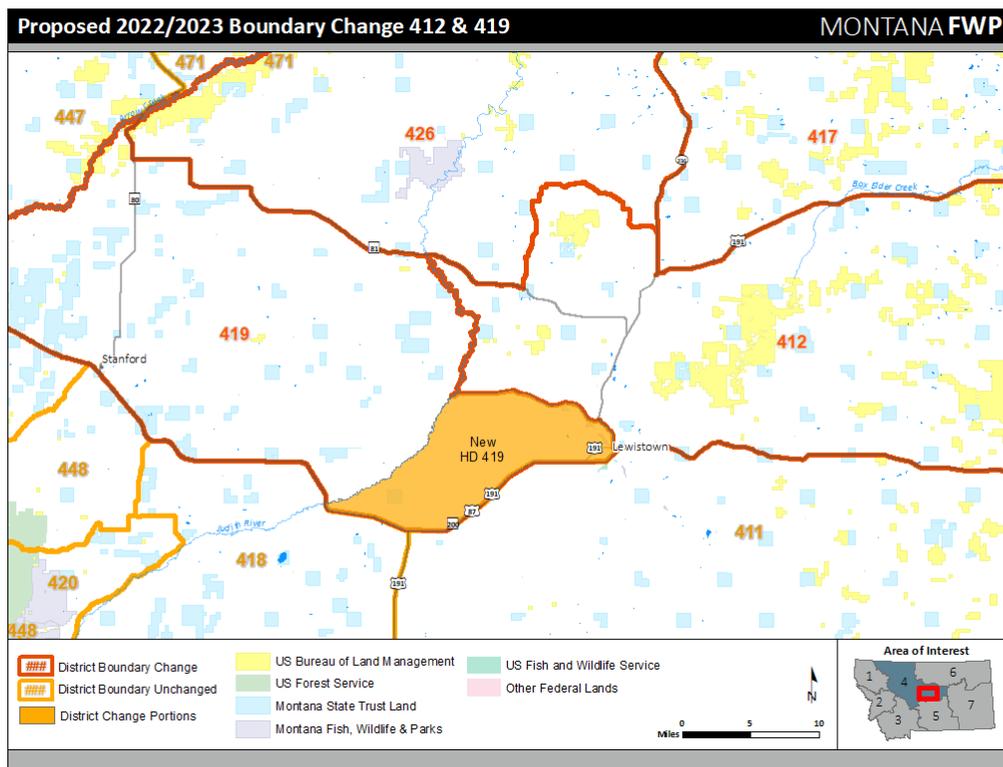
The draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Three comments were received. All were in support of the proposed change.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 412/419 Boundary Change Deer/Elk/Lion**

Hunting Districts: 412, 419

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

Change the boundary between HDs 412 and 419 such that the portion of HD 412 south of Hanover Road to Highway 200 would be absorbed by HD 419.



**Figure 1:** Map of proposed boundary change between HDs 412 and 419.

**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.**

With expanding elk populations across central Montana, moving the portion of HD 412 south of Hanover Road, primarily farmground, into HD 419 will reflect the similarities in habitat types between that area and HD 419.

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

There are no real metrics of success associated with this proposal. It is more of a “housekeeping” proposal.

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

N/A

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

N/A

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

Wildlife and enforcement staff discussed this proposal and agree that it makes sense to move these boundary lines. Additionally, a version of this proposal was presented for public scoping and received positive feedback.

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

**Hunting Districts:** 401

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

FWP proposes to remove HD 401 from LPT 900-20 and change the Archery Season from Antlerless Elk to Either-sex Elk.

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

Guidance from the 2021 Regulation Simplification directs the department to eliminate and/or combine LPTs so there are fewer types where biologically possible. The department is proposing to eliminate the archery LPT 900-20 which allows successful applicants to hunt either-sex elk in several HDs including HD 401. Previously, archery hunters could only pursue antlerless elk on General License in HD 401. With the proposed elimination of LPT 900-20, the objective of this proposal is to allow either-sex elk hunting in HD 401 on a General License during the archery season only. This proposal would remove 1 LPT from HD 401. All other LPTs in HD 401 would remain unchanged. HD 401 was included in LPT 900-20 by the FW Commission in 2013.

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

Regulations Simplification. The success of this proposal will be determined by acceptance from the FW Commission and public.

**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 2005 Montana Elk Management Plan describes the management objectives for HD 401. The population management objective for HD 401 is +/- 20% of 350 observed elk (280 – 420). The management objective for antlered elk is maintaining an antlered bull to cow ratio of at least 15 bulls per 100 cows. The Liberal and Standard regulation packages call for maintaining a six-week either-sex archery season while the Restrictive Regulation package requires limited archery permits for both antlered and antlerless elk. The most recent complete population survey (1/29/2020) in HD 401 had 511 observed elk indicating the population is above objective (See HD 401 Chart). That same year, the bull to cow ratio was 18 bulls per 100 cows, exceeding the Standard Regulation package of 15 bulls per 100 cows (See HD 401 Table). The most recent survey (1/16/2021) was only a partial survey.

**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 proposed change is based primarily on the Regulation Simplification process to eliminate LPTs, in this case LPT 900-20.

**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 draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Most comments were in favor of the proposal. Some comments were received about potential increased archery hunting pressure. However, the LPT 900-20 success

rate was over 85% for residents in 2021 and 95-100% previously indicating this limited permit did not limit residents. On average, approximately 93 elk archery hunters hunt HD 401 per year. Some landowners have expressed an interest in archery hunting elk on their own land without having to sacrifice the opportunity to apply for limited permits in other districts.

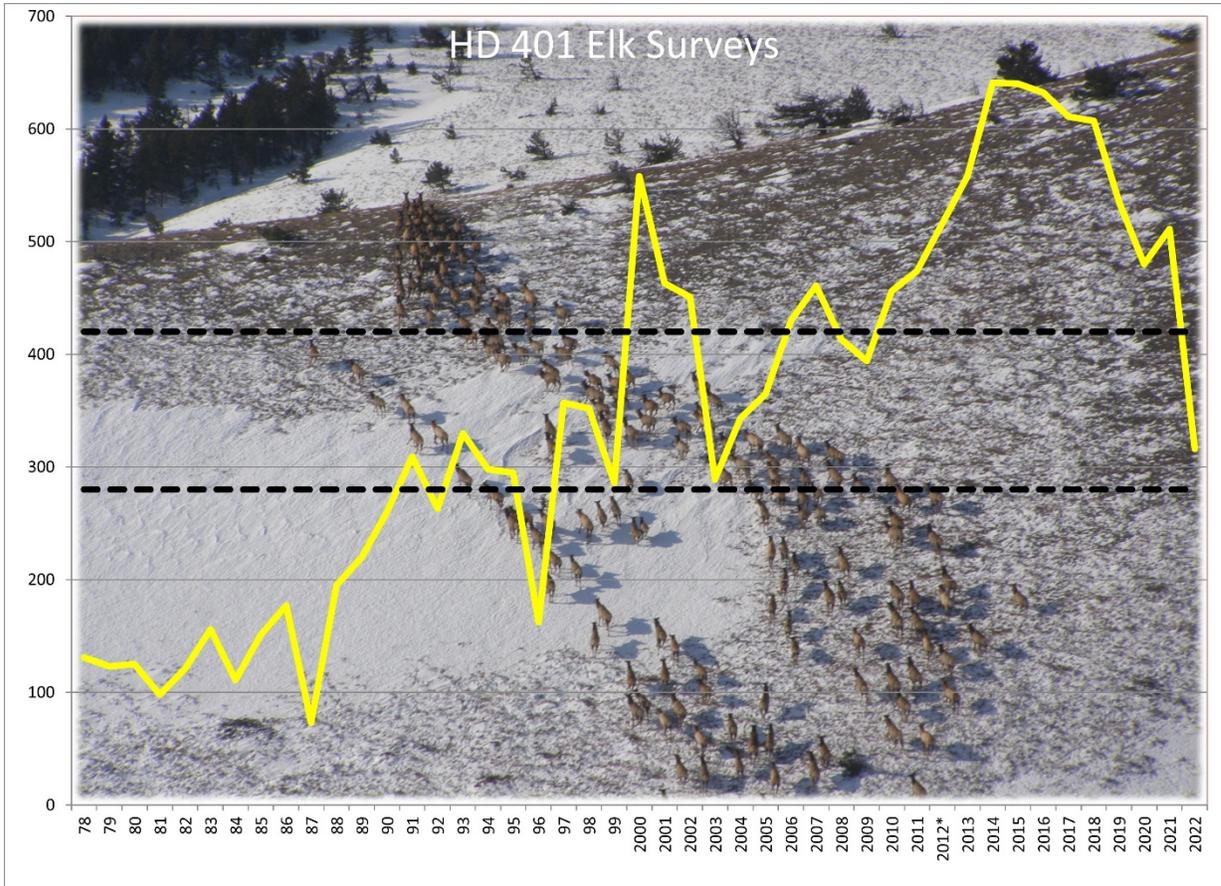


Figure 1: 2021 HD 401 Chart.

Maximum Winter Elk Counts and Production Ratios, HD 401										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Survey Type
11/21/1978	131	14			83	34	0	41	17	FW-C
4/2/1979	123						123			FW-C
1/29/1980	125	11	4	7	78	36	0	46	14	FW-C
1/14/1981	98	7	6	1	70	21	0	30	10	FW-C
3/26/1982	121	5	1	4	92	24	0	26	5	FW-C
1/15/1983	156	22	12	10	56	22	57	39	39	RW-C
5/1/1984	111	10			82	19	0	23	12	RW-C
1/7/1985	151	23	1	7	38	10	80	26		RW-C
3/3,3/13/86	177	16	6	10	74	29	58	39	22	RW-P, G-P
2/27,3/12/87	73	16	6	10	42	15	0	36	38	G-P, G-P
6/21,7/7/88	195	11	2	3	124	60	6			G-P, G-P
4/13,4/21/89	220	7	0	7	98	35	80	36	7	FW-P, G-P
2/27/1990	260	34	8	26	58	20	148	34		FW-C
3/13/1991	309						309			FW-C
3/9/1992	263	16	5	11			247			FW-C
1/18/1993	330						330			FW-C
4/27/1994	298	29					269			FW-C
3/7/1995	295	31	13	18			264			FW-C
1/12/1996	162	23	23	0	2		137			RW-C
1/14/1997	357	30	28	2	2		325			RW-C
3/24,4/2/98	352	55	14	41	174	110	13	63	32	G-P, G-P
3/24/1999	286	35	2	33	152	99	0	65	23	G-P
1/12/2000	558	8	8				550			RW-C
4/19/2001	463	13					450			FW-P
4/26/2001	147	6			92	49		53		G-P
4/30/2001	168	8			107	53		49		G-P
1/27/2002	426						426			RW-C
3/21/2002	451						451			FW-C
7/25/2002	332						332			FW-C
1/6/2003	289	14	13	1			275			RW-C
2/3/2004	343						343			FW-P
2/26/2005	365	27					338			FW-P
1/19/2006	430	51	15	13	114	38	227	33		RW-C
1/13, 2/24/07	461	33	21	12	128	48	252	38		RW/FW-C
1/16/2008	413	50		50	258	100	5	39		FW-C
2/17/2009	394	49	4	45	263	82	0	31		FW -C
2/3/2010	456	27	0	27	309	113	7	37		FW -C
1/11/2011	474	54	7	47	299	112	9	37	18	FW-C
1/22/2013	558	77			374	107	0	29	21	RW-C
1/23/2014	641	70	9	61	397	174		44	18	FW-C
12/4/2014	640						640			FW-C
12/23/2015	632	14					618			FW-C
1/10/2016	611	63			373	175		47	17	FW-C
1/3/2017	570	18	18				552			FW-C
1/11/2017	607	88	10	78	349	170		49	25	RW-C
12/31/2017	530							37	20	FW-C
1/21/2018	535									RW-C
12/26/2018	470									FW-C
1/14/2019	480									RW-C
1/29/2020	511	51	19	32	281	119	60	42	18	RW-C
1/16/2021	316						316			RW-P

FW= fixed wing, G= ground, RW= Rotary Wing, P= partial survey, C= complete survey

Figure 2: 2021 HD 401 Table.

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

**Hunting Districts:** 455

**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 create hunting district-specific either-sex archery-only elk permits in HD 455. Presently HD 455 is a part of the 900-20 archery elk permit bundle. Should the 900-20 archery elk permit bundle dissolve, these new archery-only elk permits would replace that opportunity. The 900-20 archery elk permit was implemented on the BTWMA in 2020 with public support. Prior to that either-sex elk archery hunting was an opportunity on the General 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 the proposed change is to continue to provide satisfactory levels of elk archery hunting opportunities in HD 455, and improve upon those opportunities when possible. Should the 900-20 permit bundle be removed, local biologists would make available 100 archery-only, either-sex elk permits valid only in HD 455 and establish a quota range of 50-150 permits. At this introductory level, the numbers of permits are expected to completely replace the opportunity presently provided. Going forward, annual adjustments to the number of permits available could be made through collaboration with local FWP biologists, landowners, and Devil's Kitchen and Beartooth WMA elk hunters to fine tune harvest.

**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 the proposal could be measured by comparing the number of bulls harvested during the archery season, total number of bulls harvested both during the archery and rifle season, hunter and landowner satisfaction, and the ability manage for older age class bulls as is presently being done in HD 455 and neighboring HD 445.

Since 2015, about 31% of the elk hunters in HD 455 hunted during the archery season (average taken from years 2015, 2016, 2018 and 2020 when effort data is available). This equates to approximately 83 archery hunters on average. Approximately 8 bulls have been harvested annually during the archery season on average (data since 2015) suggesting the bull harvest success rate during the archery season is about 10%; which is similar to other districts within Region 4 (see HD 447). Improving hunter success and satisfaction using an analysis such as this could be done to assess the results of this change.

It should be noted that in 2020 fewer hunters archery-hunted in HD 455 likely because of the sudden switch to the 900-permit bundle and not recognizing the need for a permit. Likely only a little more than half the hunters that usually hunt the Beartooth WMA during the archery season hunted it in 2019 (49 hunters compared to an estimated 104 hunters in 2015, 75 in 2016, and 105 in 2018). It is estimated 90 to 100 people archery hunted the BTWMA to some degree in the years prior to the 900-bundle switch; reports of archery-hunter numbers increasing were becoming more common. Beginning with 100 archery permits in 2022, knowing that not all successful applicants may show up to hunt, should strike a balance between the general opportunity and the 900-permit bundle if the permit bundle is dissolve in Region 4.

Check station harvest data at the BTWMA in 2021 suggests 15 bull elk were harvested during the archery season this year. A 10% success rate on bull elk is expected by archery only permit holders who are able to hunt each year at least initially with this proposed change. Reevaluation of the rifle and archery permit quota ranges will remain ongoing.

**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).**

Since 2016, area biologists have detected between 3460 and 4363 elk during winter surveys each year across both HD 445 and 455 known as the Devil's Kitchen Elk Management Unit, EMU. During 2016 an all-time high of 4363 elk were observed; but since then survey observations have declined. In 2021, 3460 elk were counted during the winter survey but 1915 were counted not too far into neighboring HD 446 (Big Belts EMU. It is likely about half of these elk are normally observed in HD 445/HD 455 but due to weather the elk moved into HD 446 at the time of the survey. Similar to the total count, the brow-tined bull count peaked in 2018 (890 bulls) but this number has since declined. In 2020 the brow-tined bull count was 467 which was unusually low. The bull count in 2019 and 2020 was considered low due to the difficulty observing bulls during the survey period likely due to warmer weather. Because survey observations as well as hunter and landowner feedback suggested bull numbers were low; the *rifle* permit numbers were decreased for the 2021 season (presently 50; quota range 50-75, rifle permits).

Regional FWP staff feel elk numbers are still at all time highs because harvest data suggests not enough antlerless elk are being harvested to drastically reduce population size. Devil's Kitchen elk frequently move between HD 445 and HD 455 (Beartooth WMA) and sometimes into small portions of HD 392, 413, and 446. During winter its not uncommon to observe half of the elk present in the EMU on the Beartooth WMA.

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

HD 455 is entirely public land encompassing the majority of the Beartooth WMA and the north portion of the Gates of the Mountains Wilderness. Either-sex elk permits are required to harvest bull elk during the rifle season. Elk B Licenses are required to harvest antlerless elk without an elk permit. This set of regulations was developed to maximize harvest of cow elk and provide excellent opportunities to harvest older age class bulls. Prior to the current set of regulations and also a recent set of seasonal road closure rules, increasing hunting pressure on the WMA commonly kept elk from using it until after the hunting season. Region 4 feels overcrowding on the WMA can impact elk harvest opportunities during the archery season, just as it has in the past during the rifle season. In 1992, the elk regulations in HD 445 were crafted by the Devil's Kitchen Working group with the goal of improving age diversity among bull elk. Multiple changes to the elk regulations in HD 455 soon followed leading to the ones we have today. Since then, the Beartooth WMA has become a premier elk hunting destination in Montana. Most sportsmen who've had the opportunity to hunt the WMA look forward to coming back.

Being apart of the Devil's Kitchen Elk Management Unit, both HD 445 and 455 are managed for older age class bulls. The WMA serves as a safe wintering area for elk after the rifle season closes and successfully relieves pressure from neighboring private lands.

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

This proposal generated several comments during the scoping period. Almost 75% of the comments supported the change. A few of the comments were tied to another proposed change to include Whitetail Prairie into HD 455 (presently a portion of the Beartooth WMA is in HD 445). The majority of the comments for the change were tied to support for dissolving the 900-20 permit bundle. A comment or two against the change reflected concern over the possibility of difficult draw odds if permits are tied specifically to HD 455. At least one individual felt archery hunting should be made available on the General License with no permit and that past experiences, when that was the case, was satisfactory. It is thought neighboring landowners support the change. The Devil's Kitchen Working Group had no formal comment on this change.

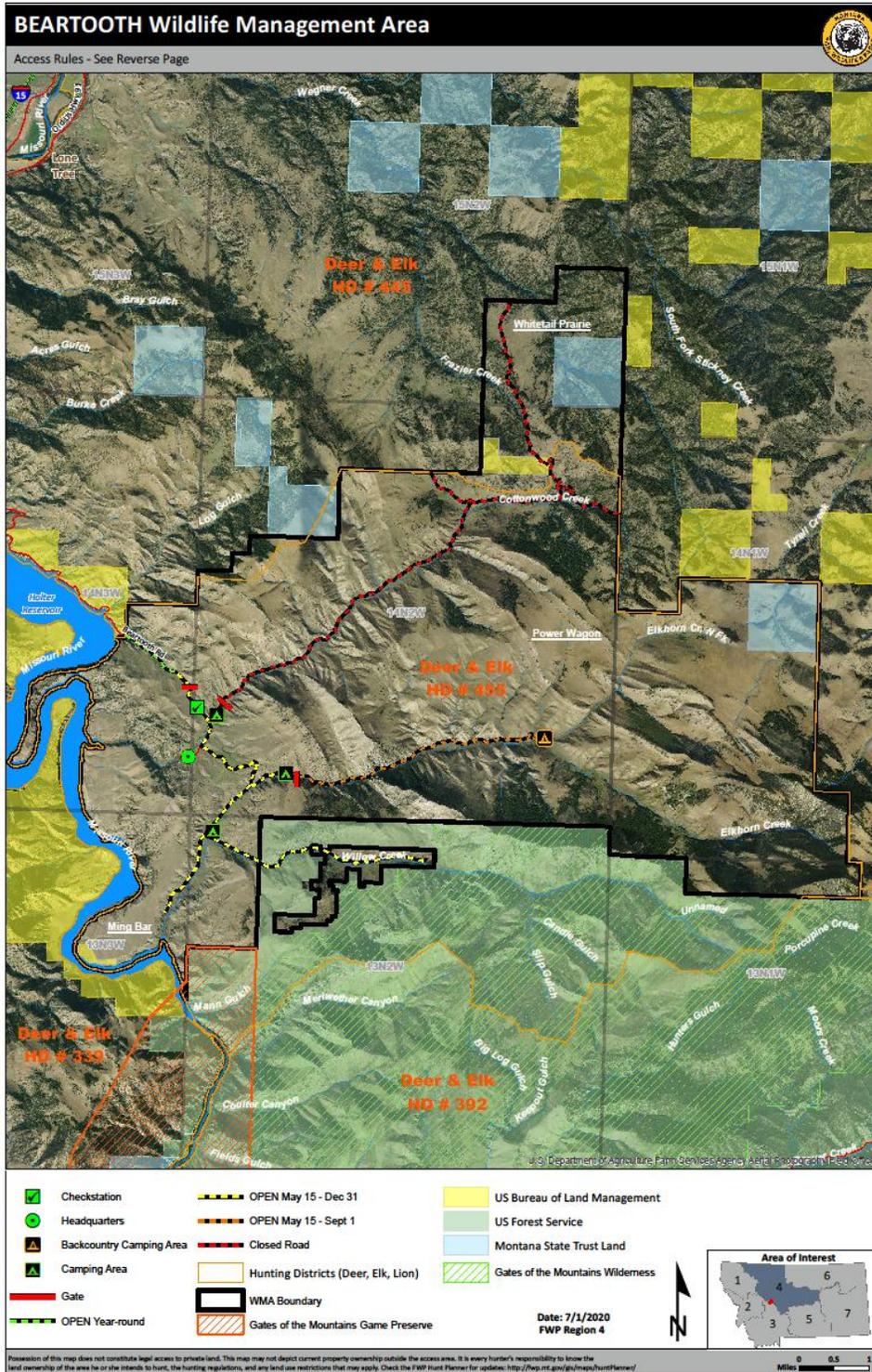


Figure 1: Beartooth Wildlife Management Area.

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

**Hunting Districts: 447**

**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 create hunting district-specific either-sex archery-only elk permits in HD 447. Presently HD 447 is a part of the 900-20 archery elk bundle. Should the 900-20 archery elk bundle dissolve, these new archery-only elk permits would replace that opportunity.

**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 continue to provide satisfactory levels of elk archery hunting opportunities in HD 447, and improve upon those opportunities when possible. Should the 900-20 permit bundle be removed, local biologists would make available 300 archery-only elk permits valid only in HD 447 and establish a quota range of 100-400 permits. At this introductory level, the numbers of permits are expected to completely replace the opportunity presently provided. Going forward annual adjustments to the number of permits available could be made through collaboration with local FWP biologists, local landowners and Highwood Mountains elk hunters to fine tune harvest.

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

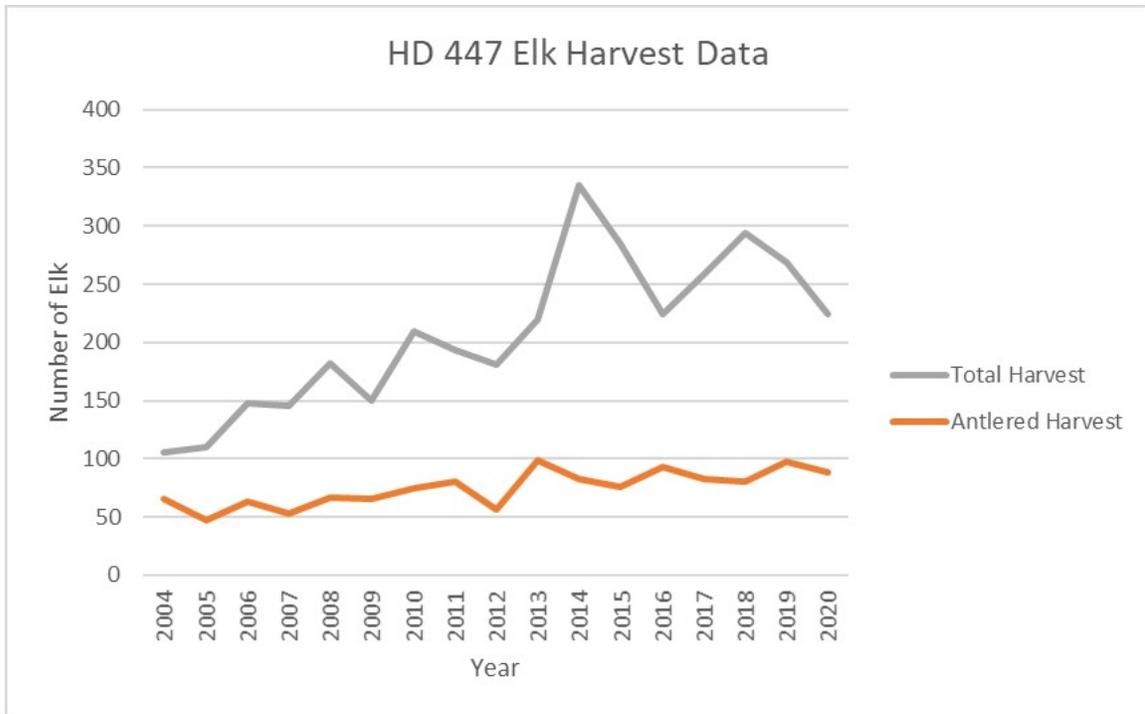
The success of the proposal could be measured by comparing the number of bulls harvested during the archery season, hunter and landowner satisfaction, and the ability to manage for bull age diversity as is presently being done in HD 447.

Since 2015, about 29% of the elk hunters in HD 447, hunted during the archery season (average taken from years 2015, 2016, 2018 and 2020 when effort data is available). This equates to approximately 300 archery hunters on average. Approximately 30 bulls have been harvested during the archery season (since 2015) suggesting the bull harvest success rate during the archery season is about 10%. 13% of the bulls harvested were harvested by non-residents. Improving hunter success and satisfaction using an analysis such as this would be a goal following this change.

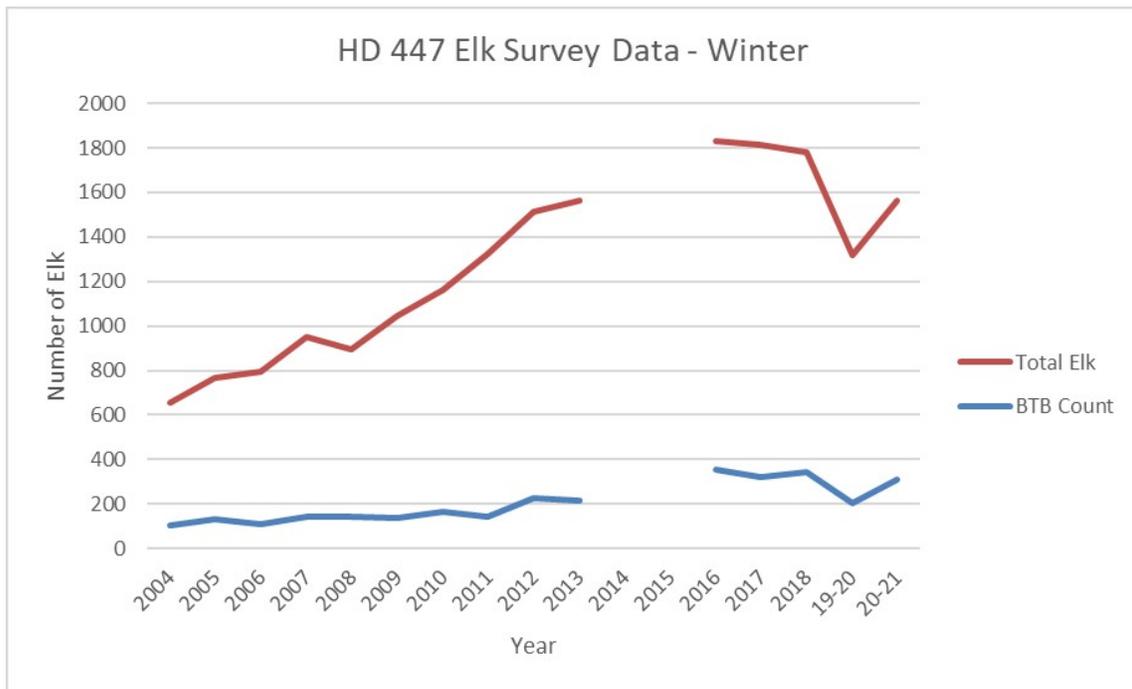
**4. What is the current population's status in relation to the management objectives? (i.e., state management objectives from management plan if applicable; provide current and prior years of population survey, harvest, or other pertinent information).**

Since 2016, area biologists have detected between 1321 and 1828 elk during winter surveys each year. During 2016 an all-time high of 1828 elk were observed; but since then numbers have declined. In 2020, 1563 elk were counted during the winter survey. Similar to the total count, the brow-tined bull count peaked in 2016 (355 bulls) but has declined (e.g. the 2020 count was 310 brow-tined bulls).

While shoulder seasons have seemingly slowed the growth of the elk population, elk numbers are still over twice the objective set in 2005 at 700 elk. HD 447 presently has an early shoulder season beginning August 15th and a late shoulder season ending February 15th.



**Figure 1:** HD 447 Elk Harvest Data.



**Figure 2:** HD 447 Elk Survey Data – Winter.

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

HD 447 is unique in that the Highwood Mountains are an island mountain range with a relatively small/large portion of the mountainous terrain being public land/national forest (approximately 55,000 acres). Much of the best elk habitat occurs on private land surrounding the Forest, albeit good elk hunting opportunities occur on the Forest as well. Nearly all of the elk winter range in HD 447 is privately owned. While a reasonably good number of

farm and ranch operations exist around the Highwoods and a good number of those landowners grant excellent public elk hunting opportunities, in particular for cow elk during the shoulder seasons; some hunters find gaining access to private land difficult, especially when hunting bulls. Some outfitting occurs, some leasing occurs, some properties simply do not allow hunting while others do. The district presently has one Block Management Area and one Conservation Easement that provide elk hunting opportunities. Public hunters are encouraged to explore the National Forest, visit with private landowners, build relationships and ask politely to hunt for elk on private land in HD 447.

**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).**

Given the nature of this year's season setting process, little local outreach has been made to fully collect feedback from landowners and sportsmen. With that being said, surprisingly very little comment was received during this year's scoping comment period. Three individuals commented for the change, four individuals commented against the change.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Combine HDs 416 and 454**

**Hunting Districts:** 416

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

This proposal would combine current Deer/Elk hunting districts 416 and 454 into a single new hunting district 416. Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective of this change is to simplify the hunting regulations by reducing the number of Deer/Elk hunting districts.

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts.

Secondarily, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

**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 the extent to which hunting regulations are simplified.

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Current HDs 416 and 454 have identical Deer/Elk regulations and are physically adjacent. Both historic survey data and population objectives can be combined without hindering future management of the new, expanded, hunting district. Current HD 416 has been over the 2005 Elk Plan objective since the objective was first implemented. Current HD 454 winter elk counts are variable, but observed elk in that hunting district are generally within or slightly above the 2005 Plan objective.

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**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 should not affect opportunity, land use, habitat, or wildlife monitoring.

This change is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts' elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released to the public for initial review. No significant comment has been received to date.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 418 Elk ES to BTB/A-**

**Hunting Districts:** 418

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

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

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

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**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 is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 Elk HD 448 ES to BTB/A-**

**Hunting Districts:** 448

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

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

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

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**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 is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 453 ES to BTB/A-**

**Hunting Districts:** 452

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

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting districts. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

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

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population.

**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 is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 417/426 Boundary Change Deer/Elk/Lion**

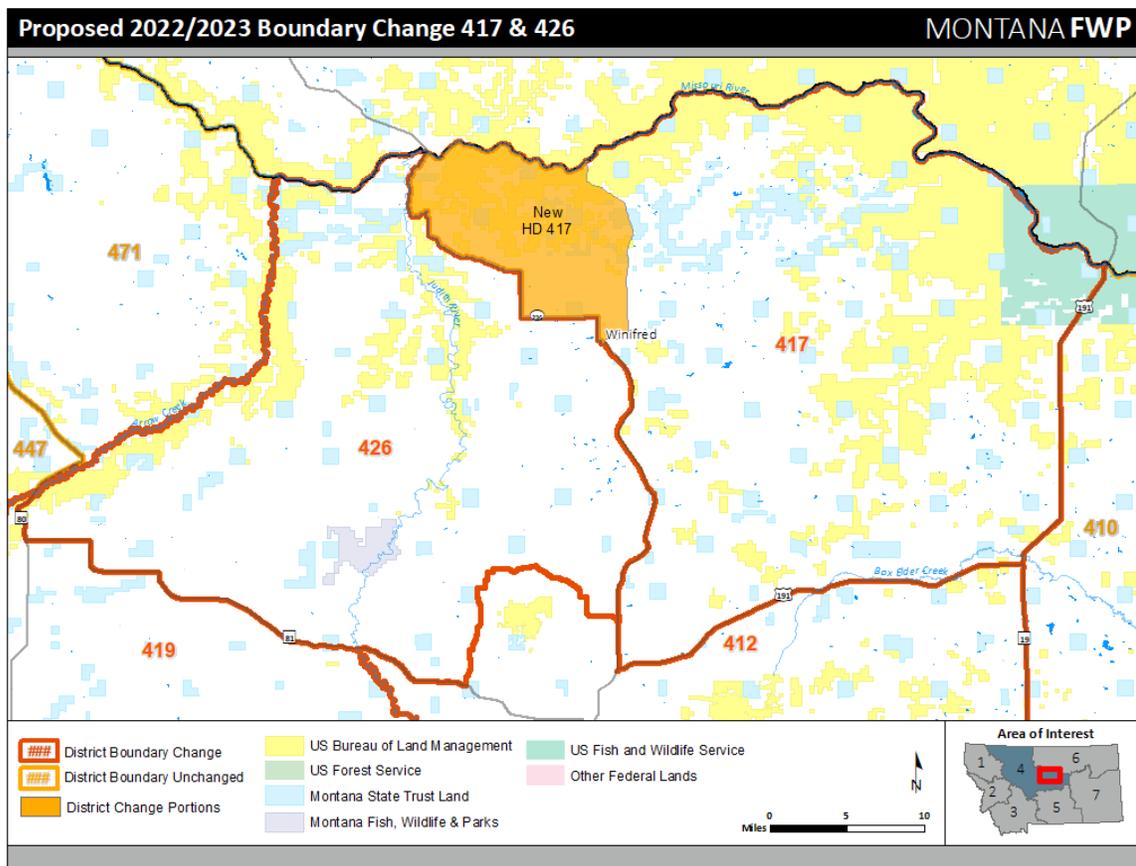
Hunting Districts: 417, 426

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

Change the boundary between HDs 417 and 426 such that the portion of HD 426 north and east of PN Bridge Road to Stafford Ferry would be absorbed by HD 417.

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

The objective of this proposed change is to simplify the legal descriptions of the above HDs by reducing the number of junctions and keeping boundaries to highways, major rivers, and routes. Additionally, the boundary change between HDs 417 and 426 will better reflect elk movements and distribution in the northeastern corner of HD 426/northwestern corner of HD 417.



**Figure 1:** Proposed new boundaries for HDs 417 and 426.

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

There are no real metrics of success associated with this proposal. It is more of a "housekeeping" proposal.

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

N/A

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

N/A

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

Wildlife and enforcement staff discussed this proposal and agree that it makes sense to move these boundary lines. Additionally, a version of this proposal was presented for public scoping and received positive feedback.

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

**Hunting Districts:** 445/455

**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 incorporate the Whitetail Prairie Addition (~2,840 acres) of the Beartooth WMA (35,174 acres total) into HD 455 which also includes the Beartooth WMA. When FWP purchased the property in 2014, the existing HD 445/455 hunting district boundary was described as a fence line around the north end of the Beartooth WMA proper, south of the newly acquired Whitetail Prairie Addition. After the purchase, the old "boundary fence" was removed and a new boundary fence was constructed around the Whitetail Prairie Addition making it reasonable to now consider changing the hunting district boundary so the Beartooth WMA is all one single unit. Prior to the Whitetail Prairie Addition, the HD 455 boundary was the "fenced boundary" of the WMA on the east, north and west ends of the WMA.

HD 445 and HD 455 presently have different deer and elk regulations; meaning across the Beartooth WMA, there are two sets of regulations in place for managing deer and elk. In HD 455, an elk permit is required to harvest a bull elk during both the archery and rifle seasons. Without a permit, a WMA-specific Elk B License is required to harvest an antlerless elk. In HD 455, a hunter may harvest any white-tailed deer on the General License during the archery seasons, but a permit is required harvest a mule deer buck or any white-tailed deer during the rifle season. In HD 445 hunters may harvest any elk on the General Elk License during the archery season. They may also harvest any elk on the General License during *only* the first two weeks of the rifle season. A permit is needed to harvest a bull elk during the last three weeks of the rifle season in HD 445. Antlerless elk harvest is allowed on the General License throughout the season, including early and late shoulder seasons and with a 004 Elk B License, not valid on the WMA. An either-sex, either species deer opportunity exists on the General License presently in HD 445.

The regulations in both hunting districts have been finely tuned over the years to manage for older age class bull elk, maximize antlerless elk harvest across both districts, reduce game damage on private lands, and strike a balance between public and private land access across both hunting districts. Since the purchase of the Whitetail Prairie Addition an increasing number of hunters have begun traveling through HD 455 to take advantage of the different opportunities. The existing regulations complicate the hunting regulations not necessarily *between* HD 445 and 455 but on the Beartooth Wildlife Management Area specifically.

New HD 455 Boundary: Beartooth Wildlife Management Area

*Those portions of Cascade and Lewis and Clark Counties lying within the following-described boundary: Beginning at the mouth of Meriwether Canyon on the east side of the Missouri river, then northeasterly up the Meriwether Canyon-Mann Gulch divide to the Meriwether Canyon-Willow Creek divide, then northeasterly along said divide to Willow Mountain, then southeasterly along Slip Gulch-Meriwether Canyon-Big Log Gulch divide to Bear Prairie, then northeasterly along Candle Gulch-Hunters Gulch divide to Candle Mountain, then easterly along Willow Creek-Hunters Gulch-Moors Creek divide to Moors Mountain, then northeasterly along the Willow Creek-Elkhorn Creek-Porcupine Creek divide to the posted Beartooth Wildlife Management Area boundary, then east along said boundary to the east boundary fence of the Beartooth Wildlife Management Area near Hump Cabin, then north and west along said WMA boundary fence to Holter Lake, then southerly up said lake and the east shore of the Missouri River to the mouth of Meriwether Canyon, the point of beginning.*

Old HD 455 Boundary: Beartooth Wildlife Management Area

*Those portions of Cascade and Lewis and Clark Counties lying within the following-described boundary: Beginning at the mouth of Meriwether Canyon on the east side of the Missouri river, then northeasterly up the Meriwether Canyon-Mann Gulch divide to the Meriwether Canyon-Willow Creek divide, then northeasterly along said divide to Willow Mountain, then southeasterly along Slip Gulch-Meriwether Canyon-Big Log Gulch divide to*

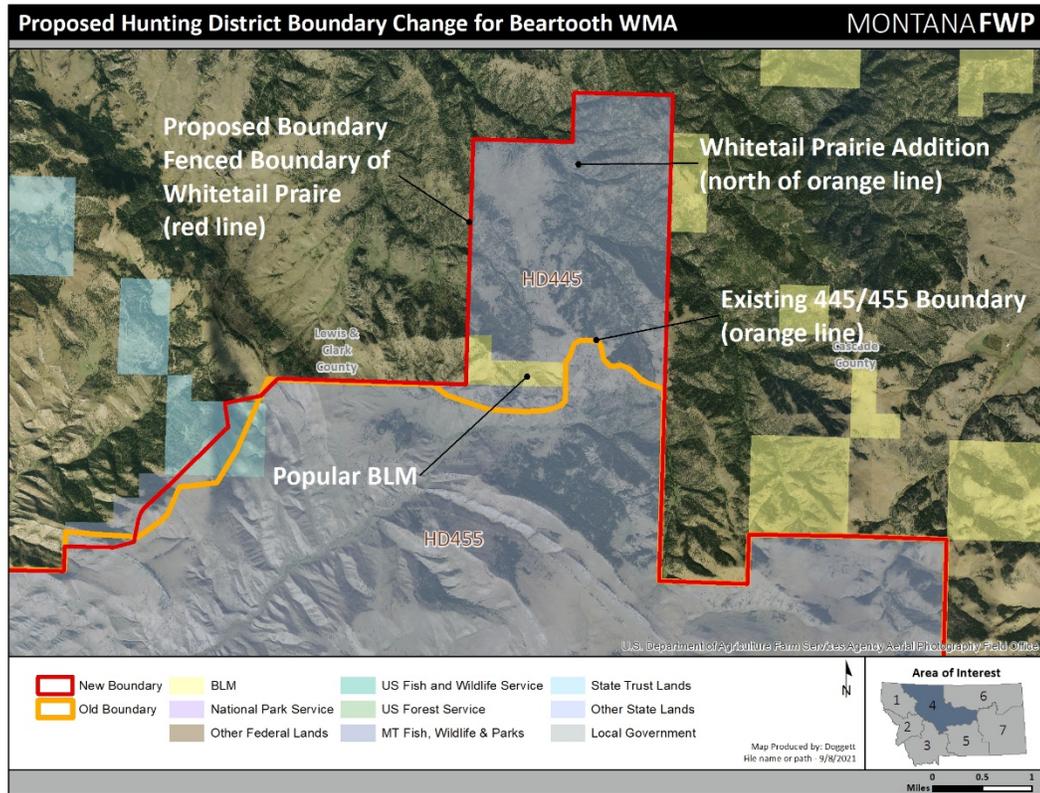
*Bear Prairie, then northeasterly along Candle Gulch-Hunters Gulch divide to Candle Mountain, then easterly along Willow Creek-Hunters Gulch-Moors Creek divide to Moors Mountain, then northeasterly along the Willow Creek-Elkhorn Creek-Porcupine Creek divide to the posted Beartooth Wildlife Management Area boundary, then east along said boundary to the east boundary fence of the Beartooth Wildlife Management Area near Hump Cabin, then north and west along said boundary fence, ~~or posted HD boundary~~, to Holter Lake, then southerly up said lake and the east shore of the Missouri River to the mouth of Meriwether Canyon, the point of beginning.*

New HD 445 Boundary: Hound Creek

*Those portions of Cascade, Lewis and Clark, and Meagher Counties lying within the following-described boundary: Beginning at Ulm, then southeasterly down the south bank of the Missouri River to the mouth of the Smith River, then southerly up the west bank of said river to the mouth of Two Creek, then westerly up said creek to the divide between Trout Creek and Black Canyon/Rock Creek, then westerly along said divide to the Hound Creek-Rock Creek divide then westerly along said divide to the Beaver Creek-Hound Creek divide (Meagher and Lewis and Clark County line), then westerly along said divide to the posted Beartooth WMA boundary fence near Hump Cabin, then north and west along said WMA boundary fence, to Holter Lake, then down said lake and the east bank of the Missouri River to the Missouri River Bridge in Cascade, then west and north through Cascade to the Interstate 15 interchange, then northeasterly along said interstate to Ulm, the point of beginning.*

Old HD 445 Boundary: Hound Creek

*Those portions of Cascade, Lewis and Clark, and Meagher Counties lying within the following-described boundary: Beginning at Ulm, then southeasterly down the south bank of the Missouri River to the mouth of the Smith River, then southerly up the west bank of said river to the mouth of Two Creek, then westerly up said creek to the divide between Trout Creek and Black Canyon/Rock Creek, then westerly along said divide to the Hound Creek-Rock Creek divide then westerly along said divide to the Beaver Creek-Hound Creek divide (Meagher and Lewis and Clark County line), then westerly long said divide to the posted Beartooth WMA boundary fence near Hump Cabin, then north and west along said WMA boundary fence, ~~or posted HD boundary~~, to Holter Lake, then down said lake and the east bank of the Missouri River to the Missouri River Bridge in Cascade, then west and north through Cascade to the Interstate 15 interchange, then northeasterly along said interstate to Ulm, the point of beginning.*



**Figure 1:** Proposed Changes on the Beartooth WMA.

**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 simplify the regulations and the hunting district boundary on the Beartooth WMA.

Regardless of which hunting district the Whitetail Prairie Addition is in, the harvest prescription in HD 455 can be adjusted to manage both hunters and wildlife appropriately; however, management would be easier to understand and change in the future, if the Beartooth WMA was all in one hunting district.

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

If the proposal is accepted, the results would be simplified hunting regulations on the Beartooth Wildlife Management Area (HD 455).

**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 greater Devil's Kitchen elk herd which spans multiple hunting districts, primarily HD's 445 and 455, is well above the objective of 2,200 elk. Total counts since 2016 have ranged from 3,460 to 4,363 elk. During winter and after the hunting season is closed, it's common for about half the elk in the EMU to be on the Beartooth WMA most of the remaining winter. During the hunting season elk use of the WMA is conditional upon weather. Active elk GPS collar data from collared cow elk show many elk make multiple trips across the EMU from the Smith River to the Missouri River annually. A common elk corridor cuts through the Beartooth WMA across Cottonwood Creek, the popular pathway for hunters headed to the Whitetail Prairie Addition.

The Devil's Kitchen Chapter of the Elk Management Plan which includes both HD 445 and HD 455 describes objectives for managing for older age class bull elk. Recently, there has also been a growing emphasis on the harvest of antlerless elk. The opportunities on the Beartooth WMA (HD 455), have been crafted to maximize the harvest of antlerless elk while at the same time acceptably limit the harvest of bull elk. Past management on the WMA has shown that high hunting pressure on the WMA can reduce antlerless elk harvest. Since the elk population is over objective and game damage occurs on neighboring private land, allowing elk to move onto the WMA for harvest is a priority for FWP. For bull elk, allowing HD 455 either-sex permit holders to hunt the Whitetail Prairie Addition, if this proposal is accepted, could spread out hunting pressure over HD 455 while at the same time continue to maximize hunter opportunity, for both bulls and cows.

Deer:

Limited entry deer permits were implemented in 1992 for both mule and white-tailed deer. The small size of the hunting district, competition with elk and white-tailed deer, and habitat availability in the area are factors affecting mule deer management in this hunting district. Permit-only mule deer hunting for the entire general rifle and archery seasons has been driven by the overwhelming presence of elk and numbers of elk hunters in the district. The hunting district does not support large numbers of mule deer, so the opportunity for substantial harvests of older bucks is minimal. The stated objective of 50% of harvested bucks 4 point or greater is normally met on an annual basis. However, the objective  $\geq 20$  bucks:100 does post-season is met less frequently mainly due to lack of consistent post season survey data. Harvest success is generally high, with harvest being split between mule and white-tailed deer.

HD 445 and HD 455 have become well known for the opportunity to harvest an older age class bull elk, mule deer and white-tailed buck. Since public access is so to speak restricted in both districts, hunters are taking advantage of the opportunities in the Whitetail Prairie Addition (primarily elk hunting opportunities). If all of the WMA was within HD 455, FWP could more simply adjust the quotas and regulations when improvements are desired.

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

Elk:

The current proposal is difficult not only for the HD 455 B License holders without a bull permit, who can still technically harvest a bull and a cow on the Beartooth WMA (i.e. hunt bulls in the Whitetail Prairie Addition the first two weeks of the rifle season and cows the rest of the season in HD 455); but also for those hunters who are regularly unsuccessful in drawing either the HD 445 or 455 either-sex rifle permits, (drawing odds are about 5-10% for either-sex elk permits).

While FWP feels HD 445 and HD 455 permit holders appreciate limited access to older age-class bulls, the HD 455 permit holder could experience reduced permit numbers in HD 455 to account for greater harvest in the Whitetail Prairie Addition, if bull harvest continues to increase, making drawing the permit even more difficult.

Many hunters do not understand that in HD 455, the permits and B Licenses were put in place largely to control overcrowding, enhance harvest success of antlerless elk, and manage for older age class bulls. In HD 445, the permits were put in place not only to grow older age class bulls, but also to provide the public an opportunity to draw a permit and hunt bull elk on private lands in a limited fashion. Private landowners presently allow HD 445 elk permit holders an opportunity to harvest a bull elk during the last three weeks of the season.

Although adding the Whitetail Prairie Addition to HD 455 removes an opportunity for a hunter to harvest a bull on the General License where older age class elk exist, leaving things as is would continue to add complexity to an already unique set of regulations.

Deer:

Mule deer numbers are presently below the long-term average and the number of HD 455 permits reflects this status. Presently, HD 455 deer permit holders are restricted to hunting mule deer bucks in HD 455 only. Occasionally, older whitetail bucks are harvested in the Whitetail Prairie Addition.

**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 generated a significant number of comments compared to other proposals in the region. Nearly all comments were directed towards elk hunting on the Beartooth WMA. Comments were mixed, with some in favor of the change and some strongly against the change. Because of the attention it is receiving, Region 4 recommends moving the proposal forward to the commission and possibly another public comment period.

The Devil's Kitchen Working Group which includes a mixture of private landowners, sportsmen and agency personnel has been influential in crafting the elk regulations in both districts over the years, in particularly in HD 445. The group supports keeping the general elk regulation structure the same in HD 445, either-sex elk the first two weeks on the General License and permits for bulls the last three weeks.

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

**Hunting Districts:** 415

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

FWP proposes to change elk regulations in HD 415 from Either-sex Elk to Brow-tined Bull or Antlerless Elk for both the Archery Season and General Season.

HD 415: Elk season in this HD has varied. For some time prior to 1990, the season was 1 week either-sex elk, 4 weeks antlered bull elk. For 1991 and 1993, the season was 2 weeks either-sex elk and 3 weeks antlered bull. The season returned to 1 week either-sex elk and 4 weeks antlered bull until 2014 when the season changed to either-sex elk for the entire season until the present.

**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.**

Guidance from the 2021 Regulation Simplification directs the department to align season types in adjoining HDs where biologically possible. The objective of this proposal is providing consistency for Region 4 elk HDs where elk harvest opportunity exists on a General Elk License that are adjacent to elk HDs in Region 1.

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

Regulations Simplification. The success of this proposal will be determined by acceptance from the FW Commission and public.

**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 2005 Montana Elk Management Plan describes the population objectives and season types for HD 415.

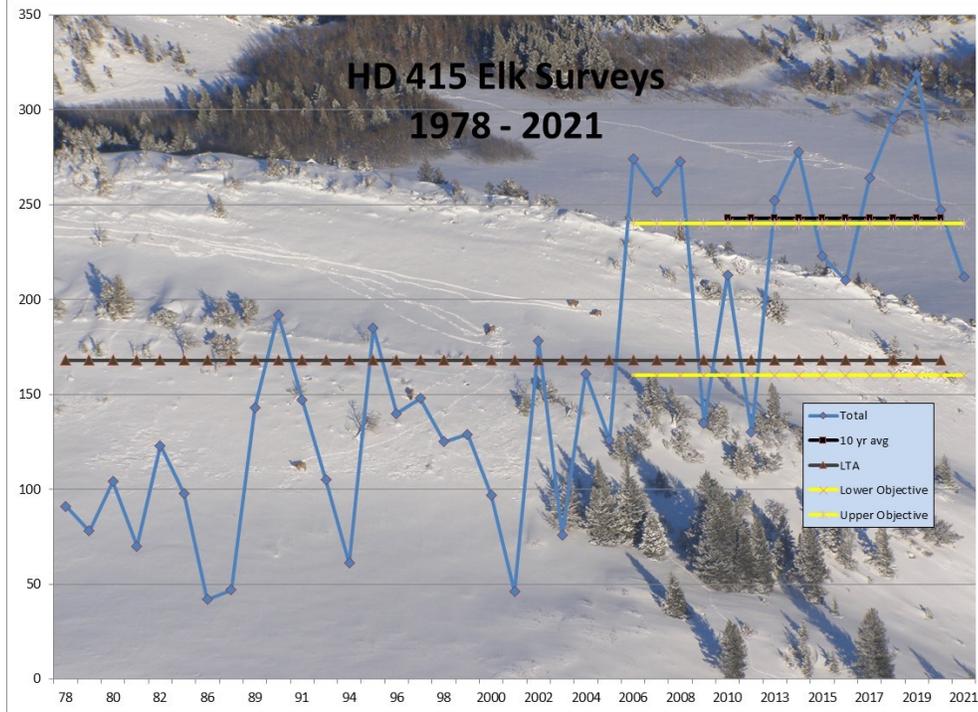
For HD 415, the population management objective is +/- 20% of 200 (160 -240) observed elk. In the most recent survey (2021), the observed number of elk are within objective. Previous surveys indicate the population varied between over and within objective (see HD 415 Chart) but is currently within objective. The Standard Regulation for antlered elk is at least 15 bulls per 100 cows are observed post-season. The most recent survey (2021) indicates 47 bulls per 100 cows (see HD 415 Table).

**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 proposed change is based solely on the Regulation Simplification process.

**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 draft proposal was posted on the FWP website for public review. The proposal was discussed on the Region 4 Regulation Public Zoom meeting on October 5, 2021. Two comments were received. One comment was opposed to hunting antlerless elk in HD 415 and another comment was opposed to Brow-tined Bull/Antlerless regulations anywhere in the state.



**Figure 1: 2021 HD 415 Elk Chart.**

Maximum Winter Elk Counts and Production Ratios, HD 415										
Year	Total	Bulls	BTB	Spk	Cows	Calves	Uncl	Yng/100F	B/100F	Survey Ty
11/20/1978	91	14			35	16	26	46	40	FW-P
4/25/1979	78					18	0			FW-P
12/28/1979	104	7	5	2	40	22	35	55	18	FW-P
3/13/1981	70	3					67			H-P
2/22/1982	123	8	0	8	90	25	0	28	9	FW-P
3/15/1985	98	6	1	5	61	28	3	46	10	G-P
3/5/1986	42				27	10	5	37		H-P
2/9/1987	47				37	6	4	16		FW-P
4/7/1989	143	16	2	14	84	39	4	46	19	G-P
2/26/1990	192	11	5	6	89	22	70	25	12	FW-P
3/14/1991	147	11	5	6	70	35	31	50	16	G-P
4/1/1993	105				24	5	76			FW-P
4/29/1994	61						61			FW-P
3/7/1995	185	22	16	6	1		162			FW-P
3/6/1996	140	10	2	8	68	18	44	26	15	H-P
2/5/1997	148	13			57	20	58	35	23	FW-P
5/8/1998	125	16					109			FW-P
3/17/1999	129	17	9	8	86	26	0	30	20	H-P
3/4/2000	97	10	4	6	72	15	0	21	14	H-P
1/9/2001	46	2		2	35	9		26		H-P
2/25/2002	178	17	15	2	69	19		28	25	FW-P
2/24/2003	76						76			FW-P
3/11/2004	161	5	1	4	126	30		24		H-C
5/13/2005	126						126			FW-P
2/18/2006	274	28	15	13	89	31	126	35	31	FW-C
2/24/2007	257	19	8	11	151	54	3	36	13	FW-C
1/16/2008	77	2		2	21	4	50			FW-C
2/17/2008	273	20	20		12	1				FW-C
1/26/2009	135	31	18	13	76	22	3	34	41	FW-C
2/17/2009	264	13	6	7	121	37	93	30		FW-P
1/6/2010	213	19	11	8	134	42	18	31	14	FW-C
1/31/2011	130	45	42	3	67	18				FW-C
2/10/2011	201	7		7	152	42				FW - Carr
<b>Total 2011</b>	<b>331</b>	<b>52</b>	<b>42</b>	<b>10</b>	<b>219</b>	<b>60</b>		<b>27</b>	<b>24</b>	
2/14/2013	252	10			197	45		23	5	FW-C
2/25/2014	278	19	13	6	204	55		27	9	FW-C
2/16/2015	223	10	3	7	149	64		43	6	FW-C
1/1/2016	210	10	2	8	112	56	32	50	5	FW-C
2/2/2017	264	30	22	8	165	69		42	18	FW-C
4/12/2017	226						226			FW-P
2/15/2018	295						295			FW-C
2/14/2019	319	60	52	8	183	49	27	27	33	FW-C
2/18/2020*	247	43	33	10	163	41	0	25	26	FW-C
2/12/2021*	212	54	45	9	115	43	0	37	47	FW-C

FW= fixed wing, G= ground, H= helicopter, P= partial survey, C= complete survey  
 \* Unable to locate 1 group of cow/calves

Figure 2: 2021 HD 415 Elk Table.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 444 Boundary Change**

**Hunting Districts:** 444 & 422

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

Move east portion of HD 422 boundary to Highway 287. Move west boundary of HD 444 boundary to Hwy 287. Remove HD 444 elk shoulder season language and maintain all existing season deer/elk season types.

For HD 422, the general elk hunting season has been either-sex for at least the last 30 years. Beginning in 1999 and in response to consistent landowner requests for late hunting opportunity on late arriving elk, a fixed and pre-determined late hunt season structure was initiated. Starting at the end of December, twenty antlerless permits were valid each weekend for six weeks (120 total permits) in a portion of the hunting district. This structure was in place until the winter of 2002-2003 when all of 100 (permits were lowered) antlerless permits were made valid throughout the entire hunting district from the day after the general season ends through February 15. Beginning in 2006 the late season structure was eliminated as part of a statewide effort to close late season hunts and make the general season the priority to harvest elk. The 422 specific Elk B Licenses have remained in place, but have been limited to the normal archery/general season hunting period and valid the entire HD. Unlimited over-the-counter R4 B Licenses were made available beginning in 2003. These licenses became limited later on, but ultimately are currently still sold via surplus over the counter. Beginning in 2016/17, special late season (Jan. 1 – Feb. 15) ‘shoulder season’ hunting was established and specific to the regional Elk B License in accordance with the criteria adopted by FW commission in October 2015. Other special or spontaneous game damage hunts have been completed off and on during these same time periods. Beginning in 2018, general and Elk B Licenses were further liberalized to include the entirety of the late shoulder season. For the 2020 and 2021 seasons, shoulder seasons were reduced to focus harvest only in late summer (August 15 to the beginning of archery season) and January 1 – February 15.

For HD 444, the general elk hunting season has also been either-sex for at least the last 30 years. This HD does not normally have significant and/or consistent elk presence, perhaps best described as a transitory presence more than anything. This HD belongs to the Golden Triangle elk management unit (EMU) which has minimal management goals and population objectives due to the very sporadic and minimal nature of elk presence, although this is changing at least specific to HD 444 and further described in this proposal. The only regulation package identified in the elk plan pertains to a six-week either-sex archery season and a five-week either-sex general rifle season on the General Elk License. Unlimited over-the-counter R4 Elk B Licenses were made available beginning in 2003. Beginning in 2018, general and Elk B Licenses were also included in the shoulder season structure to assist in managing harvest as/if elk from HD 422 redistribute themselves during portions of the winter period into portions of HD 444. For the 2020 and 2021 seasons, shoulder seasons were reduced to focus harvest only in late summer (August 15 to the beginning of archery season) and January 1 – February 15.

**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.**

Inclusion of HD 444 served to allow additional harvest opportunity as/if elk do ‘show up’ in immediately adjacent portions of this HD with respect to HD 422. Specifically, this area primarily is speaking to the southwest area of HD 444 just east of the Dearborn River area. Depending on winter weather conditions and hunting pressure, significant elk presence can occur in this area, thereby making them inaccessible to harvest based on current regulations. This change would move elk management in this area into one HD rather than be split between two HDs. Deer management would remain unchanged.

**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 will be measured by simplifying elk management in this broader context. This change would also remove the shoulder season LPTs from existing HD 444 regulations, thereby meeting the needs of the current direction to simplify and reduce regulation language. Ultimately, this will not affect elk management given the consistency in application of regulations as is currently prescribed.

**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 current elk plan for the Birdtail EMU calls for population level observations to be within 20% of 500 elk during post season aerial trend surveys. 2021 dedicated aerial winter surveys gave way to a minimum observation of just under 1,000 elk in this area. Elk populations within this EMU are currently above objective levels and have been for several years, albeit at much lower levels than they were 5-10 years ago.

HD 444 has no set population objectives given the lack of routine elk presence. As previously stated, only in recent years during the winter period are elk becoming more "common" in southwest portions of this HD. Given the significant amount of land in this HD that is devoted to agricultural production and certain damage potential of elk with regard to recreational potential, it is FWP's intent to prevent permanent occupancy of elk 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).**

The vast majority of wintering elk in these four HDs persist primarily on private lands. Some elk will be closely associated with private lands throughout the year (HD 422). Although a number of private properties entertain significant levels of hunting pressure during the general season, certain areas are either closed or mostly closed to hunting. This reality, as it creates relatively secure areas for elk to move into, will continue to limit potential gains any season adjustment stands to generate. Within HD 422, game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

Additionally, despite more recent hard winters (2018 & 2019), impacts on elk have been minimal. Late spring and summer vegetation growing conditions have also been relatively good during this time. Both of the latter factors have allowed for continued fair to good elk recruitment and survival from year to year.

**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).**

Conversations and phone messages have been had or left with some of the landowners pertinent to this proposed change. It is generally felt that this proposed change will be welcomed and provide less confusion and added clarity to regulations specific to this area. Although not specifically addressed in this proposal, maintenance of the shoulder season regulation types in this area may also be met with some resistance, as has been the case since they were initiated. Although general acceptance, for now, of this season type has been maintained. With longer seasons does come added work to some degree (more telephone calls, hunter requests, etc.). Although it is also believed the reduction in shoulder season harvest opportunity that was initiated in 2020 has helped to limit impacts to those landowners and/or hunters that do not prefer these longer seasons.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 410 archery permit/license structure/quota**

Hunting Districts: 410, 417

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

For the upcoming 2022/2023 hunting seasons:

- Remove HD 417 from the 410-21 Elk Permit and 410-01 Elk B License (both Archery Only).
- Create a quota range on the 410-21 Elk Permit, with a minimum of 1000 and maximum of 1900, and lower the quota on the 410-21 Elk Permit from 1900 to 1500.

Language in the 2022 Montana Hunting regulations for Elk in HD 410 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 410 – Missouri River Breaks</b>						
<b>Elk Hunting by Drawing Only</b>						
Elk Permit: 410-20	Either-sex Elk	April 1	150	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 410-21	Either-sex Elk	April 1	1,500 <del>4,900</del>	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 410-00	Antlerless Elk	June 1	100	Sep 03-Oct 16	Oct 22-Nov 27	
Elk B License: 410-01	Antlerless Elk	June 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 410-02	Antlerless Elk	June 1	1000	Sep 03-Oct 16	Oct 22-Feb 15	Only valid south of Crooked Creek (Sacagawea River). Not valid on CIMR Refuge. Successful 410-02 license holders may use General Elk License to harvest 2 <sup>nd</sup> antlerless elk in the same area where the 410-02 is valid for the same duration the 410-02 is valid.

Figure 1.

**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.**

In order to simplify regulations by reducing the number of license-permit types (LPTs), one potential proposal brought forward for public scoping was to eliminate the 410-01 archery-only Elk B License, valid in HDs 410 and 417. Removing or keeping this LPT has no biological consequences; on average 32 antlerless elk/year are harvested in HD 410 on this LPT. Its removal on the other hand would result in a loss of hunting opportunity, particularly for archery hunters, and the public largely opposed this change during scoping. Alternatively, we propose to maintain this LPT, removing HD 417 (where it is redundant with additional general/004-00 license opportunity and therefore underutilized).

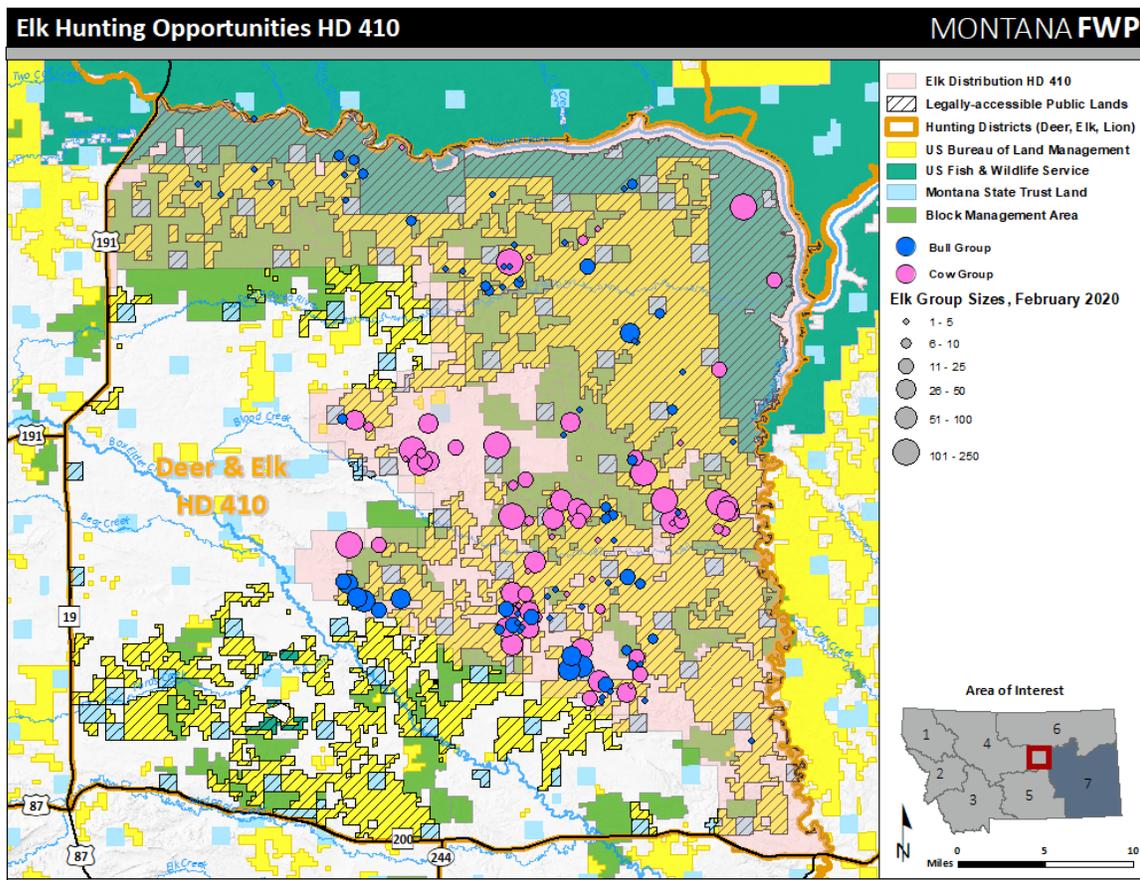
Proposed changes relative to the 410-21 elk permit are in part due to proposed changes occurring in nearby districts, primarily HDs 417 and 426, and to address public comment gathered during the public scoping period speaking to crowding issues in HD 410 during the archery season. Removing HD 417 from the 410-21 archery permit will reduce additional archery season pressure if the proposed archery structure changes involving HDs 417 and 426 occur (combining either-sex archery hunting for these districts into a single permit). While HDs 410, 417, and 426 are all considered part of the Missouri River Breaks Elk Management Unit (EMU), elk distribution and population size relative to objectives, the public-private land interface, access opportunities, and hunter pressure differ among the districts.

Approximately 79% of elk habitat in HD 410 is open to public hunting, whether it is legally accessible public land or currently land enrolled in MFWP’s Block Management Program. Additional private lands in the district also offer free public hunting opportunity. Conversely, in HDs 417 and 426, only 46% and 10% respectively, of the elk habitat are legally accessible public lands or lands enrolled in Block Management (Figures 2 and 3). If given the option, hunters drawing an archery permit valid for all of these HDs may opt for the “better hunting opportunity” HD 410 if they fail to gain access elsewhere, compounding the already-occurring issues with hunter density in this district.

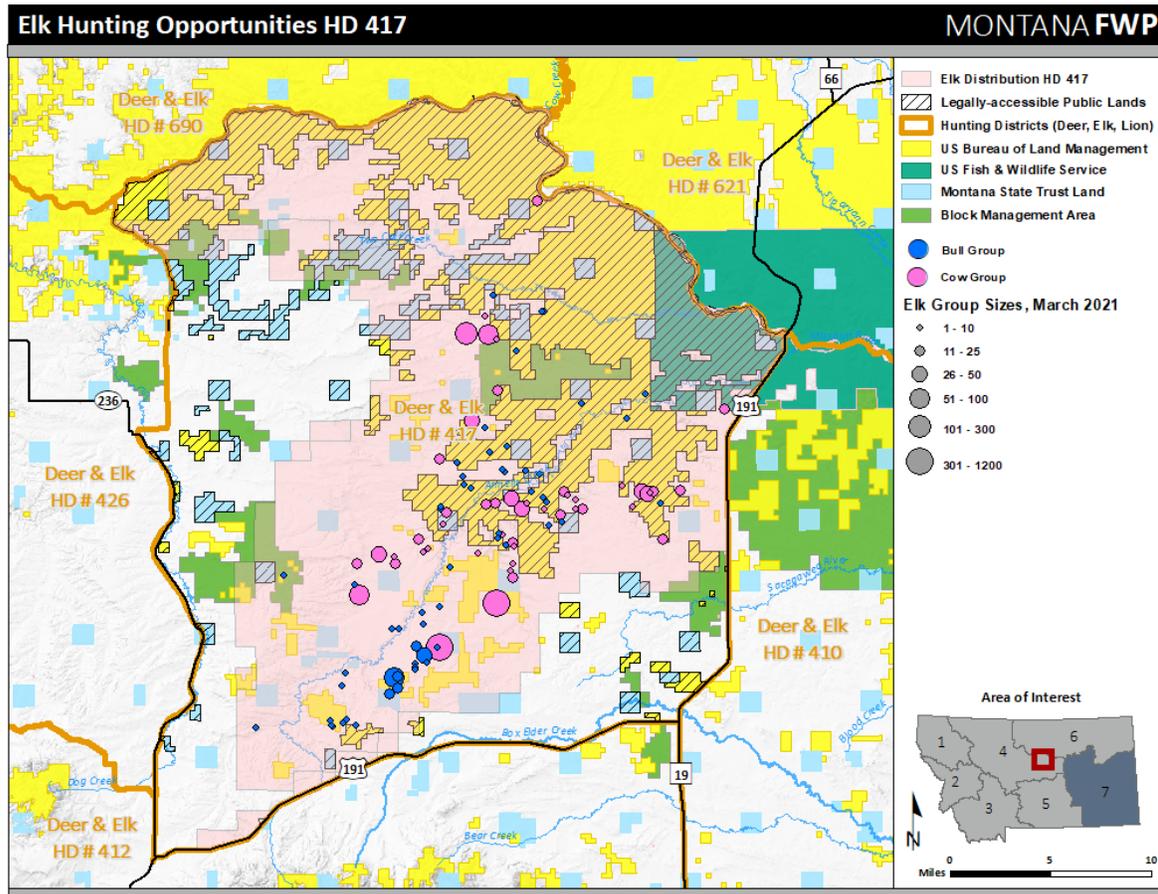
Furthermore, during the 2021 public scoping, a significant number of comments pertaining to HD 410 spoke to crowding issues during the archery season. Some comments spoke directly of a need to reduce the number of archery permits valid in HD 410, *whether or not HD 417 was removed from the 410-21 permit*. Lowering the quota from 1900 to 1500 will respond to these concerns while still providing adequate opportunity for archery hunters, based on the number of archery hunters that draw the permit and opt to hunt HD 410 (Table 1).

Approximately 70% of the 410-21 permit holders hunt elk in HD 410, and if this percentage is maintained, with a reduction in the quota, there would be reduced hunter numbers in the district (i.e., 70-100% of 1500 permits equals 1050 – 1500 total hunters).

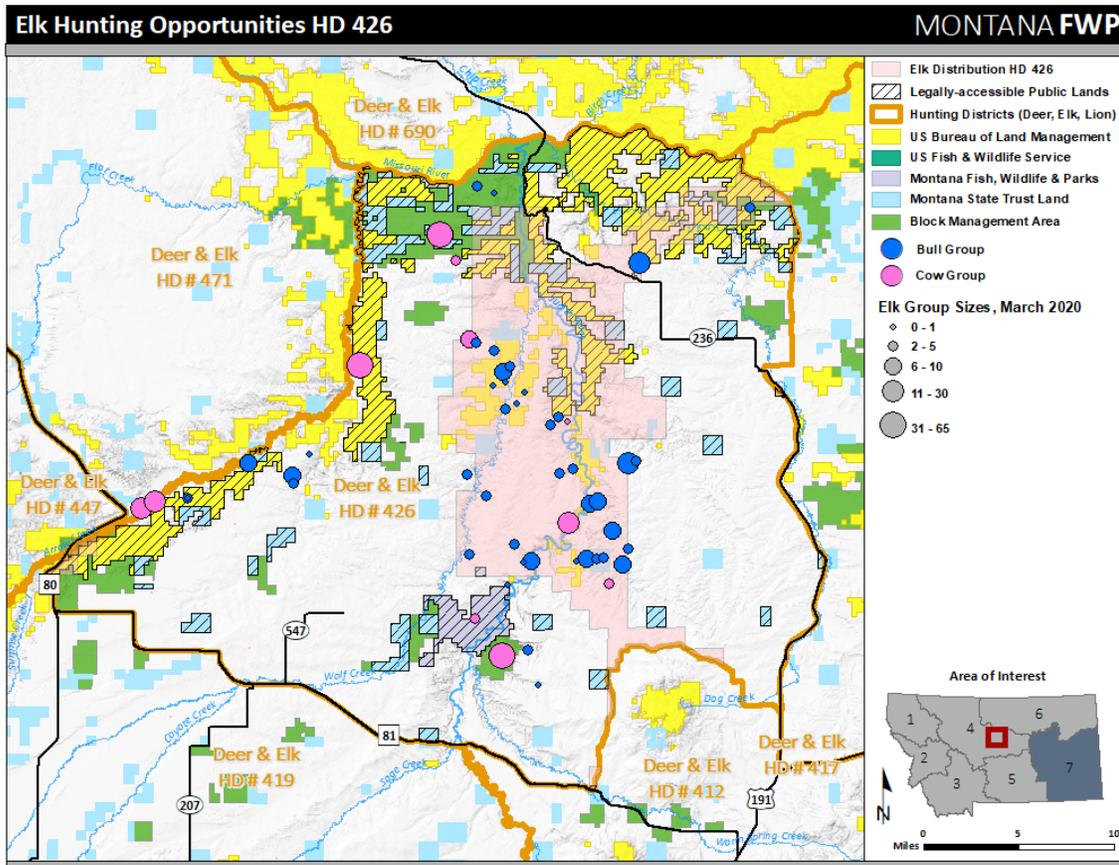
Additionally, with other statewide proposals, including to limit successful permit holders to only hunting elk in the district from which they drew, one can also surmise that those seriously interested in hunting a given district will put in for that permit, thus representing a *possible decrease* in the number of applicants and maintaining fairly high drawing odds for the district despite a reduced quota. In the first year of such changes (combination quota decrease and the statewide proposal), it will be difficult to estimate these actual numbers, however implementing a quota range will allow for future changes, as early as the 2023 season, to account for either continued overcrowding or unacceptably reduced drawing odds.



**Figure 1:** Figure 1. Elk distribution, survey locations, and “hunting opportunity” in HD 410.



**Figure 2:** Figure 2. Elk distribution, survey locations, and “hunting opportunity” in HD 417.



**Figure 3:** Figure 3. Elk distribution, survey locations, and “hunting opportunity” in HD 426.

# Permits offered	HD	# Elk Archery Hunter Numbers					% of permit holders that hunted
		2015	2016	2018	2020	Average	
1900 <sup>1</sup>	410	1278	1282	1318	1343	1305	69%
	417	116	130	125	181	138	7%
3700-4000 <sup>2</sup>	426	80	91	85	76	83	2%
Total		1474	1503	1525	1600	1526	n/a

<sup>1</sup> Valid in HDs 410 and 417

<sup>2</sup> Valid in 21 total HDs, including HDs 412 and 426

**Figure 4:** Table 1. Elk Archery Hunter Participation, 2015-2020.

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

If the Department receives fewer complaints regarding overcrowding during the archery season, hunter harvest surveys reveal that a higher percentage of successful applicants for the 410-21 archery permit hunt HD 410, and the drawing odds for the 410-21 archery permit are maintained or improved, this proposal will be considered a success. The creation of a quota range on this permit will help mitigate failure immediately following the first hunting season under its structure should this proposal not succeed in any of the above criteria.

Overcrowding and pressure can also cause elk to move from accessible lands to inaccessible, “refuge” lands, thereby reducing hunter success. Reduction in crowding and hunting pressure may in turn increase hunter 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 last HD 410 elk survey occurred in February 2020. This survey is flown only on even years, due to the amount of time and cost required to complete it. In 2020, the area biologist observed 3253 total elk (790 bulls, 1583 cows, and 755 calves), with a calf:cow ratio of 48:100 and a bull:cow ratio of 50:100. Hunting district 410's survey objective is 2000-2300 elk, thus elk are 51% above objective.

Archery hunting is generally viewed as an "opportunity," rather than a management tool. Elk numbers in HD 410 are over objective, but not to the same degree as neighboring districts. This proposal will likely not hurt elk management efforts, and addressing crowding issues during archery season may help keep elk distributed on public lands or other areas where they will likely be more vulnerable to harvest into the rifle season, which would further aid in elk management efforts.

In order to reduce hunting pressure on elk that reside in the northern portion of the district, primarily on public land, while addressing elk management issues and game damage complaints in the central/southern portion of the district, primarily on private lands, MFWP made changes to both general season antlerless Elk B Licenses (410-00 and 410-02) during the last season-setting process. The 410-02 Elk B License became valid on all lands south of Crooked Creek (Sacagawea River) with the quota increased to 1000. Additionally, holders of the 410-02 could harvest a second antlerless elk with a General License. The 410-00 license remained valid district-wide, maintaining some opportunity for hunting the public lands north of Crooked Creek (including the Charles M. Russell National Wildlife Refuge; CMR), but with a reduced quota of 100. This change was enacted to maintain hunting opportunity across the district, encourage elk re-distribution to the north, and provide landowners ample opportunity to manage elk on their properties. At the time of this current proposal's development, its second hunting season is underway, but an aerial survey has not yet been completed to gauge possible effects on elk numbers. Anecdotal reports suggest this change is working, and antlerless elk harvest increased 165% from the previous 10-year average. Thus, regardless of this current archery-only proposal, which mainly addresses opportunity, efforts to improve elk management in HD 410 are underway and show early signs of success.

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

Hunting district 410 is relatively unique, considering the amount of accessible public lands that contain elk throughout the hunting season. Despite this, changing land uses and values have resulted in reduced hunting on some private lands, inhibiting MFWP's ability to manage elk to objective. This proposal will likely not *significantly* impact elk archery opportunity; rather it will mainly reflect the removal of HD 417 and those hunters from the 410-21 archery permit and to a small extent respond to numerous hunter complaints about too much archery pressure in the district.

While this year most of Montana experienced severe drought conditions, resulting in lower natural forage availability, some of private properties grow alternative crops that provide additional and highly attractive, nutritious forage for elk that draws them to these areas during the late summer/fall months and likely bolster over-winter survivorship. Winter 2017-18 was one of the harshest on record for the last few decades, yet elk survival and recruitment remained relatively high the following year. The next survey, to be flown in early 2022, will aid the area biologist in recommending changes to any quota numbers (mainly antlerless licenses, and/or permits if necessary) following this upcoming 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).**

The main contacts made regarding this proposal occurred during the public scoping process. This pre-proposal was made available to the general public, including sportsmen and landowners, and received a variety of responses. Most of the feedback spoke to 1) maintaining the 410-01 archery Elk B License, 2) supporting the removal of HD 417 from the 410-21 archery elk permit, and 3) lowering or maintaining (not increasing) the quota to account for the removal of HD 417 from the archery elk permit. Numerous comments mentioned over-crowding and a diminished hunting experience with the high number of archery permits currently available. Some additional

comments, primarily from outfitters and non-resident landowners, preferred more archery permits or unlimited archery permits.

Some sportsmen support this proposal for the reasons mentioned above. Some sportsmen do not support this proposal, as they are concerned about reduced drawing odds. The possible statewide proposal (a hunter may only hunt elk in the district for which they drew a permit) will go a long ways to mediating this latter concern, as a potential consequence of its passing would be fewer people applying for a district they may not intend to hunt.

This proposal does not affect elk management or overall populations, the primary concern we hear about from traditional landowners. However, also from a landowner's perspective another important consideration is their ability to draw a permit to hunt elk on their properties. At 1900 permits, the landowner preference quota is 285, or 15% of the total quota. Any landowner with 640 acres of land in 410 may apply for the 410-21 archery elk permit. Since 2011, an average 13 landowners have applied annually for the 410-21 under landowner preference, thus draw odds for landowners who apply for this permit are, and will likely remain at, 100%. In addition to landowner preference, changes to the "454 Agreement" structure allows almost any landowner to apply for and receive an elk permit valid on their property. Anticipating more of these "454" permits to be issued over the coming years provides another possible justification for reducing the 410-21 quota, to order to keep archery hunter numbers in HD 410 near current levels.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**R4 HD 413 ES to BTB/A-**

**Hunting Districts:** 413

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

Currently Either-sex Elk (including non-brow tined yearling bulls, or “spikes”) are allowed to be harvested with a General License in these hunting districts. This proposal is to change the regulation to Brow-tined Bull or Antlerless Elk.

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

The objective is to simplify the elk hunting regulations by making those in the subject hunting districts (in the Little Belt and Castle Mountains) consistent with regulations in the adjacent hunting districts (including 392, 391, 390, 446, 451, 393, and 315) that currently have a Brow-tined Bull or Antlerless Elk regulation. Regulations requiring that antlered bull elk have a legal brow tine are the most common regulation type in Montana’s General License hunting district. Secondly, more yearling bulls would be recruited as branch antlered bulls, and available for harvest at that age class.

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

Elk hunting regulations will be more consistent across large portions of Regions 1, 2, 3, and 4, where bulls lacking a brow tine are protected from harvest.

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

Elk numbers in the hunting districts subject to this proposal are either within or above 2005 Elk Plan objectives. However, this change is not expected to affect overall elk numbers or trend. Approximately 75 non brow-tined bulls (or “spikes”) are harvested in the hunting districts subject to this proposal each season (10-year average)—this represents 11% of the total bull harvest. FWP expects most of these bulls would have otherwise survived and been available for harvest as brow-tined bulls the following season if they had not been killed as spikes. Brow-tined bull regulations are not expected or intended to significantly increase the proportion of “trophy” (>5 year old) bulls in a population. However, a greater number of more mature branch-antlered bulls are expected in harvest following implementation of regulations restricting spike harvest.

**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 is likely to increase opportunity for hunters to harvest a more mature brow-tined bull and will reduce the inconsistency of these hunting districts’ elk hunting regulations with those in adjacent HDs in Regions 1, 2, 3, and 4. Brow-tined bull regulations have generally been strongly supported following implementation in other areas of the State.

**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 released for initial public comment. The few comments to date have been a mix of both support and opposition.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**Archery permit/shoulder season HDs 417/426**

Hunting Districts: 417, 426

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

For the upcoming 2022/2023 hunting seasons:

- Remove HD 417 from the 410-21 Elk Permit and 410-01 Elk B License (both Archery Only; separate proposal under HD 410).
- Create a new, 417-21 either-sex Elk Permit, Archery Only, valid in HDs 417 and 426, with a quota of 300 (quota range 200 to 500).
- Extend the late shoulder season end date for antlerless elk on General License and 004-00 from January 15 to February 15.
- Remove HD 426 from the 900-20 Elk Permit (separate, state-wide proposal).

Language in the 2022 Montana Hunting regulations for Elk in HDs 417 and 426 should be amended to read (changes highlighted in RED):

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 417 – Amells Creek</b>						
<b>Elk</b>						
General Elk License	Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Feb 15 <del>Jan 15</del>	Only valid south of D-Y Trail to intersection with Knox Ridge Road, and south of Knox Ridge Road thereafter.
Elk Permit: 410-21	Either-sex Elk	April 1	1,500	Sep 03-Oct 16	-	Only valid in HDs 410 and 417.
Elk Permit: 417-20	Either-sex Elk	April 1	225	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 417-21	Either-sex Elk	April 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 417 and 426.
Elk B License: 004-00	Antlerless Elk	April 1 June 1	6,000	Sep 03-Oct 16	Oct 22-Feb 15 <del>Jan 15</del>	Only valid south of D-Y Trail to intersection with Knox Ridge Road, and south of Knox Ridge Road thereafter. Not valid on National Forest-Lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except 410 and 455 as listed under each HD.
Elk B License: 410-01	Antlerless Elk	June 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 410 and 417.
Elk B License: 417-02	Antlerless Elk	June 1	100	Sep 03-Oct 16	Oct 22-Nov 28	

**Figure 1:** Proposed new regulations HD 417.

License or Permit	Opportunity	Apply by Date	Quota	Archery Season Dates	Season Dates	Opportunity-specific Details and/or Restrictions
<b>HD 426 – Winifred</b>						
<b>Elk</b>						
General Elk License	Antlerless Elk	-	-	Sep 03-Oct 16	Oct 22-Nov 28	
Elk Permit: 426-20	Either-sex Elk	April 1	60	Sep 03-Oct 16	Oct 22-Nov 27	
Elk Permit: 417-21	Either-sex Elk	April 1	300	Sep 03-Oct 16	-	ArchEquip Only. Only valid in HDs 417 and 426.
Elk Permit: 900-20	Either-sex Elk	April 1	4,000	Sep 03-Oct 16	-	First and second choice only. ArchEquip only. Valid in multiple HDs as listed under each HD.
Elk B License: 004-00	Antlerless Elk	June 1	6,000	Sep 03-Oct 16	Oct 22-Nov 28	Not valid on National Forest lands, FWP WMAs, or CMR Refuge. Valid in all Region 4 HDs except HDs 410 and 455 as listed under each HD.

**Figure 2:** Proposed new regulations HD 426.

**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.**

In order to simplify regulations by reducing the number of license-permit types (LPTs), one potential proposal brought forward for public scoping was to eliminate the 410-01 archery-only Elk B License, valid in HDs 410 and 417. Removing or keeping this LPT has no biological consequences; on average <1 antlerless elk/year are harvested in HD 417 on this LPT. Its removal on the other hand would result in a loss of hunting opportunity, particularly for archery hunters, and the public largely opposed this change during scoping. Alternatively, we propose to maintain this LPT, removing HD 417 (where it is redundant with additional general/004-00 license opportunity and therefore underutilized).

Potential changes in other HDs and the overall regulations simplification effort have resulted in the elimination of the 900-20 archery elk permit and the need to accommodate archery hunters from HD 426. Given its proximity to HD 417, the fact that HD 426 is also considered part of the “Missouri River Breaks” Elk Management Unit (EMU), and similar elk management issues and distribution across public/private lands in both districts, the most plausible solution is to combine some aspects of elk management (i.e., archery permit) for both HDs. The districts possibly could be combined, however landowners across HD 426 have been adamant against an elk shoulder season, and the mule deer populations differ between districts—combining them into one HD would confound some elk management as well as mule deer management. Additionally, the scale on which elk are over-objective in HD 417 far exceeds HD 426—landowners in HD 426 could be overrun with hunter permission requests, and considering they have been reluctant to raise the number of either-sex permits beyond 60, would likely not support such a proposal. On the other hand, maintaining 417 archery hunting with HD 410, in addition to adding 426, could result in exacerbated overcrowding issues in HD 410 (see HD 410 justification). Thus, in this and a separate document, MFWP regional staff also propose to remove HD 417 from the 410-21 archery elk permit.

Based on hunter effort data, an average 221 hunters who drew either the 410-21 or 900-20 archery permits chose to hunt either HDs 412, 417, or 426 (Table 1). At their separate quota levels, each permit averaged 75% and 78% draw odds respectively overall (landowner, resident, non-resident), and 87% and 90% draw odds respectively for residents. Hunter effort data from Table 1 indicates that at least for residents, draw odds should be close to or meet 100% if the same people that choose to hunt these districts year to year apply for the 417-21 permit.

Currently, an elk shoulder season exists in HD 417, valid in the central/southern portion of the district, to help landowners manage elk game damage issues on their properties but ends on January 15. Extending this date to February 15 will better facilitate antlerless elk harvest while simplifying and making consistent late shoulder season regulations across the area where shoulder seasons occur.

# Permits offered	HD	# Elk Archery Hunter Numbers				
		2015	2016	2018	2020	Average
1900 <sup>1</sup>	410	1278	1282	1318	1343	1305
	417	116	130	125	181	138
3700-4000 <sup>2</sup>	426	80	91	85	76	83
<b>Total 426 and 417</b>		196	221	210	257	221

<sup>1</sup> Valid in HDs 410 and 417

<sup>2</sup> Valid in 21 total HDs, including HD 426

**Figure 1:** Table 1. Elk Archery Hunter Participation, 2015-2020.

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

This proposal represents more of a “housekeeping” effort, the need to account for and maintain archery opportunity following the removal of the 900-20 permit. However, if the Department receives fewer complaints regarding overcrowding during the archery season in HD 410 and the drawing odds for the 417-21 archery permit are maintained at current percentages or improved to 100%, this proposal will be considered a success. The addition of a quota range on this permit will help mitigate failure should this proposal not succeed in any of the above criteria. Additional antlerless elk harvest in HD 417, particularly after January 15, will also indicate success of the extended shoulder season.

**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).**

Hunting district 417 surveys occur during odd years, given the amount of time and cost required to complete them (HD 410 surveys are flown even years). The last survey in HD 417 occurred in March 2021, when the area biologist observed 3442 total elk (652 bulls, 1941 cows, and 849 calves). The observed bull:cow and calf:cow ratios were 34:100 and 44:100, respectively. The survey objective for HD 417 is to observe 350-400 elk and maintain a bull:cow ratio of 30 bulls:100 cows. The last survey indicates elk are 818% over objective in HD 417, and the bull ratio is roughly at objective.

The last, best complete survey of HD 426 occurred in March 2020. In February 2021, we flew HD 426 but extremely windy and warm conditions yielded poor visibility and a suppressed count. In 2020, we observed 367 total elk (157 bulls, 126 cows, 61 calves, 21 unclassified antlerless), with bull:cow and calf:cow ratios of 125:100 and 48:100, respectively. Due to it being predominately agricultural lands, the survey objective for HD 426 is 75 total elk, with a bull:cow ratio of 30 bulls:100 cows. Hunting district 426 is 389% above objective, and the bull:cow ratio is also above 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).**

Both HDs 417 and 426 are characterized by agricultural lands and sagebrush grassland interspersed with breaks/badlands of the major drainages bisecting them (Arrow Creek/Coffee Creek, Wolf Creek, Judith River, Armells Creek) and the Missouri River to the north. The larger river breaks contain conifer stands that provide excellent cover, especially juxtaposed with adjacent agriculture. While much of this timbered/breaks habitat is public land, it is also either land-locked or difficult to access. The majority of both districts are private lands, and over the last decade, elk have expanded in their distribution from timbered drainages into more of the private/agricultural interface.

Due to the area’s topography, elk movement patterns, and variable hunting pressure, elk harvest is insufficient to meet management objectives in both HDs. Several, albeit key landowners restrict hunting access to the public, and elk use these areas as refugia during the archery and general seasons. Even with relatively good public access, hunting conditions and retrieval are challenging in these districts for several reasons.

For HD 417, most elk reside in the southern portion of the district, predominantly private land. These elk get limited hunting pressure on several properties that also contain abundant agricultural forage resources. Later, after the general season, they will move onto more traditional ranches that cannot tolerate these large elk concentrations. The northern portion of the district has majority public land. When general/004-00 licenses were initiated in HD 417, there was suddenly a disproportionate amount of hunting pressure in the northern half of the district. Hunters who previously had to draw a limited license to hunt the Missouri Breaks now had relative free rein in one of the districts, and this pressure, in addition to the relative security and abundance of forage on southern private lands likely exacerbated the redistribution of elk to those areas. Changes to the 2020/2021 season structure have attempted to rectify this by limiting antlerless harvest in the northern portion of the district while still maintaining liberal antlerless opportunity on majority private lands in the southern portion of the district.

Elk in HD 426 primarily reside in the Judith River, Wolf Creek and Arrow Creek breaks and commonly use adjacent private agricultural lands (wheat and hay fields). When these elk travel between drainages or back and forth between the Judith/Moccasin Mountains, they must also cross wheat and hay fields. Both residency and movement activities have caused crop damage and landowner complaints and is the reason for the low population objective in this HD.

Other challenges specific to elk management in HD 426 include:

- An elk's visibility and vigilance on the flat, farmed benches is high, and they can easily move into steep, timbered breaks and become difficult for sportsmen to pursue and retrieve.
- Harvest of crops is usually over by the start of the hunting season, and elk are less visible and "available" on the benches and spend more time in the breaks. Pressure from a large volume of archery hunters also encourages elk to move from certain, huntable areas into steep breaks or private "refuge" lands. This is another reason to maintain "limited entry" archery permits here.
- Permit holders sometimes forgo harvesting a cow or smaller bull in hopes of harvesting a trophy; and many who do so miss their one and only shot opportunity. For people hunting antlerless elk, cows usually congregate in large groups on private "refugia" by the start of the general season.
- The pattern of private lands (numerous smaller properties relative to daily elk movements) in this HD also it difficult for hunters to gain permission on multiple landowners at one time, when elk may be present on an adjacent property to where they have permission.

**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 archery portion of proposal will not affect elk management or overall populations, the primary concern we hear about from traditional landowners. However, also from a landowner's perspective another important consideration is their ability to draw a permit to hunt elk on their properties. At 1900 permits, the landowner preference quota is 285, or 15% of the total quota. Any landowner with 640 acres of land in 417 could have applied for the 410-21 archery elk permit. Since 2011, an average 13 landowners between both HDs 410 and 417 have applied annually for the 410-21 under landowner preference, thus draw odds for landowners who apply for this permit are, and will likely remain at, 100%.

For HD 426 and the 900-20, and average 11 resident and 11 non-resident landowners applied for the 900-20 across all 21 districts this permit was valid. With a landowner preference quota of 485, draw odds under landowner preference were always 100%, and again, this is not likely to decrease under this proposed change.

In addition to landowner preference, changes to the "454 Agreement" structure allows almost any landowner to apply for and receive an elk permit valid on their property. Thus, for archery and rifle permits, almost any landowner in either HD should now be able to receive an either-sex elk permit.

The shoulder season extension of this proposal received broad support from HD 417 landowners during the 2020/2021 season-setting process, and that support has not wavered. Being as the shoulder season affects mainly private and land-locked public lands, it will have minimal impact to area sportsmen.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 450 Season Structure/Boundary Change**

**Hunting Districts:** 450 & 442

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

Remove HD 450-20 either-sex elk permits (by default 900-20 archery licenses go away and becomes a general archery season) and replace with a General Elk License brow-tined bull/antlerless season type. Move west boundary of HD 450 from Bellview/Battle Creek road to National Forest boundary. Five either-sex elk permits have been available in HD 450 for at least the last 20 years. Ten antlerless elk permits were available in HD 450 from 1991 through 2001. Prior to 1991, there was no elk season in HD 450. For the 2002 season, 30 antlerless elk permits were made available. As per a request from several landowners, 80 permits were made available in 2003. In their beginnings, these antlerless permits were also valid in HD 441 to the north. That changed for the 2002 season as the antlerless permits were separated from HD 441 to the north and validated for a portion of HD 442 to the south. In 2004, these permits were once again reduced to 30, intending to better match permit numbers with what appears to be effective harvest access to elk. Additionally, B Licenses were added in 2004 as well. Beginning in the early 2010's, antlerless permits were removed and replaced with a general antlerless elk license regulation for the entire HD with additional harvest available on the Region 4 antlerless B License (004-00).

**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.**

As per FWP direction, a primary objective of this proposed change serves to remove a limited number of permits in an area in which elk numbers, to include bulls, remain well above objective levels. General interest as viewed by hunter permit applications for this limited number of licenses is fair at best (3-year 1st choice applications = 29), with low harvest success according to FWP harvest estimates. As well, elk within HD 450 readily move back and forth between HDs 450 and 442. HD 442 elk are managed as Sun River elk and focuses on elk south of the Sun River and within US Forest Service lands to the west. Adjusting the boundary as proposed between HD 450 and 442 will allow for better focused management ability related to separate elk groups within this area. As is further described below, elk hunting regulations and opportunity will ultimately remain unchanged within the 'new' portion of HD 450 (as proposed) based on current elk hunting regulations. Deer management would also remain unchanged as it is currently prescribed.

**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 will be measured by simplifying elk management in this broader context and allowing added flexibility in elk hunting opportunity for hunters and landowners alike. Elk population levels within this area are well above management objectives so reduced elk numbers in time will also be a successful measure of these changes.

**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 general management goal for this area and as outlined in the current elk management plan, is to maintain some presence of elk for public enjoyment, within landowner tolerance levels, and attempt to provide maximum use of general public hunting to manage elk population level. The current elk plan for the Teton River EMU calls for maintaining 75-100 total elk observed during post-season aerial surveys, to include 25-35 total bulls, of which not less than 15 are brow-tined bulls. Most recent current surveys from winter 2021 aerial surveys produced not less than 557 elk with 113 classified bulls (76 brow-tined bulls, 32 spikes and 6 unclassified bulls). There are two

primary groups of elk within this area, Teton River and Deep Creek area elk. In recent years, Teton River elk (cow/calf/yearling group) typically numbers in the 100-150 range depending on observability. Deep Creek area elk (cow/calf/yearling group) typically number in the 300 to nearly 400 range depending on observability. Scattered groups of bulls are observed within and between these areas.

Both groups of elk have strong ties to private land, subsequently, most hunting/harvest access is dictated by such. Some public lands are accessible where elk can and do get hunted on a regular basis. However, both locations have proved to be difficult to hunt due to either thick riparian habitat (Teton River), generally open grassland habitat (portions of Deep creek area), and/or general access at time depending on elk distribution during the primary fall hunting periods. Estimated annual harvest for HD 450 over the last 5 years is just over 30 elk per year with a rough split between bull and antlerless harvest. Allowing added flexibility in season regulations in this area should aid in improving harvest success, at least in places.

**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).**

Most elk in this area persist primarily on private lands with intermixed state lands (DNRC) throughout the year. As is described in the elk management plan, maintaining an appropriate level of antlerless harvest related to access to private land is important. Developing regulation types, season formats and ongoing communication with private landowners is an ongoing management priority related to public hunting access and subsequent harvest. As previously noted, habitat security related to harvest is variable and provides difficult hunting conditions at times.

As well, these elk have strong ties to more riparian, agriculture and grassland/mountain foothill type habitat, and subsequently overall elk production in this area has been strong, albeit in general, population numbers appear to have peaked based on recent observations (albeit at a high level). Game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

**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).**

General landowner tolerance of elk is low to good depending on the area within this HD. While there's interest in lowering overall numbers, there's also interest in maintaining some level of elk (albeit in more tolerable levels). Ultimately, landowner access will dictate most significant hunter opportunity in this HD. Maintaining flexibility in harvest related to such while allowing more liberal seasons for both hunters and landowners alike, is important and an ongoing balance. During late summer 2021 and based on landowner concerns of elk game damage (cultivated ground along the Teton River), a management hunt was held. While the hunt (by design) and harvest were minimal, it was one step in hopefully the right direction to build onto in the future. Through this effort, some landowner comments were obtained at least specific to this area related to these proposed season changes and no significant opposition was noted. Additional conversation is planned to consider future special hunts and/or 'shoulder season' type management options.

Through the initial 'scoping' phase of the 2021/22 season setting process, several comments were taken in opposition to this change – primarily geared towards the boundary adjustment. However, in reading these comments, individuals had primary concern over lost opportunity to hunt elk within the new portion of HD 450 (formally east portion HD 442) with the assumption this area would also now become limited to the either-sex elk permit system. However, as is described in this proposal, elk regulations and hunting opportunity within the 'new' portion of HD 450 will remain unchanged – hunters will continue to have a general brow-tined bull/antlerless elk season type within this area. It is important to note that the boundary adjustment as proposed will only work as/if the proposed season change in HD 450 (removal of the 5 permits) is similarly adopted.

With that clarification, it is generally felt that these proposed changes will be acceptive and provide less confusion and added clarity to regulations specific to this area, while maintain liberal harvest opportunity. However, there will likely be some concern related to the loss of the limited permits given their long-standing presence in this area. Nonetheless, given strong elk numbers (to include bulls), liberalizing regulations in this area is warranted.

**MONTANA FISH, WILDLIFE & PARKS**  
**HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION**  
**Elk 2022**  
**HD 442 Boundary Change**

**Hunting Districts:** 442/450

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

Move the east boundary of HD 442 (west boundary of HD 450) from the Bellview/Battle Creek/Pishkun Canal Road to the US Forest Service Boundary.

The general elk season in HD 442 has been based upon a quota system since at least 1964. More recently, conservative quotas in the late 1990's and early 2000's reflected the desire to increase observed elk numbers up to the Elk Plan objective of 2,500 animals. Beginning in 2001-02 and each year through the 2014/15 season all objectives have been reached and/or exceeded (Table 2) and quota increases (along with additional Elk B License opportunity) have been proposed and implemented to help check population growth. Beginning in 2016 and based on elk numbers trending in a downward direction, reduced quota levels began to be proposed along with reductions in antlerless harvest opportunity in HD 425 (weekly license quota levels and eventual reduction in number of weeks valid for these licenses). The HD 442-00 antlerless Elk B Licenses were established in 2008 and quota levels have ranged from 50 to 300 over the last 13 years. Antlerless Elk B Licenses (formerly permits) in HD 425 were removed from the Sun River elk quota system (HDs 424 and 442) in 1998 to allow flexibility in setting quotas and to ensure that permits were valid even after conservative harvest quotas had been met. HD 425 elk harvest is factored in related to total elk harvest for this herd when setting HD specific quota levels and/or other B License levels (and vice versa).

**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.**

As per FWP direction, the primary objective of this proposed change serves to manage elk within the HD 442/450 are in a more consistent fashion and based on current management strategies for groups of elk in this area. During the general rifle season, these elk spend time in both HD 442 and 450. Elk harvest within HD 442 has historically been based on a quota system that is tracked via the Augusta check station (general rifle season). However, as/if the HD 442 elk quota is met, antlerless harvest ceases. In 2017, language was added addressing this specific area to allow continued harvest of antlerless elk as/if the HD 442 quota was met, while at the same time, still protecting the management needs the quota serves for Sun River elk. Adjusting the boundary as proposed between HD 450 and 442 will allow for better focused management ability related to separate elk groups within this area and reduce unnecessary language within the regulations. As is further described below, elk hunting regulations and opportunity will ultimately remain unchanged within the 'new' portion of HD 450 (as proposed) based on current elk hunting regulations. Deer management would also remain unchanged as it is currently prescribed.

**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 will be measured by simplifying elk management in this broader context and allowing added flexibility in elk hunting opportunity for hunters and landowners alike. Elk population levels within the HD 450 area are well above management objectives so reduced elk numbers in time will also be a successful measure of these changes.

**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).**

For HD 450, most recent aerial surveys from winter 2021 produced not less than 557 elk with 113 classified bulls (76 brow-tined bulls, 32 spikes and 6 unclassified bulls). There are two primary groups of elk within this area, Teton River and Deep Creek area elk. In recent years, Teton River elk (cow/calf/yearling group) typically numbers in the 100-150 range depending on observability. Deep Creek area elk (cow/calf/yearling group) typically number in the 300 to nearly 400 range depending on observability. Scattered groups of bulls are observed within and between these areas.

Through winter and early spring 2021 observations, overall 'Sun River' elk numbers (HDs 424, 425 and 442) (n = 2,328) are in the bottom range of objective levels of +/- 10% of 2500 elk with continued good bull/cow ratios and fair at best calf/cow ratios.

**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).**

Most elk in this area (HDs 450/442) persist primarily on private lands with intermixed state lands (DNRC) throughout the year. As is described in the elk management plan specific to this area, maintaining an appropriate level of antlerless harvest related to access to private land is important. Developing regulation types, season formats and ongoing communication with private landowners is an ongoing management priority related to public hunting access and subsequent harvest. As previously noted, habitat security related to harvest is variable and provides difficult hunting conditions at times.

As well, these elk have strong ties to more riparian, agriculture and grassland/mountain foothill type habitat, and subsequently overall elk production in this area has been strong, albeit in general, populations numbers appear to have peaked based on recent observations (albeit at a high level). Game damage is most often reported as heavy elk use of private agricultural property during winter (fences and standing residual forage), late spring (fences and green-up) and late summer (fences, alfalfa and grain-ripe).

**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).**

Through the initial 'scoping' phase of the 2021/22 season setting process, several comments were taken in opposition to this proposed boundary adjustment. However, in reading these comments, individuals had primary concern over lost opportunity to hunt elk within the new portion of HD 450 (formally east portion HD 442) with the assumption this area would also now become limited to the either-sex elk permit system. However, as is described in this proposal, elk regulations and hunting opportunity within the 'new' portion of HD 450 will remain unchanged – hunters will continue to have a general brow-tined bull/antlerless elk season type within this area. It is important to note that the boundary adjustment as proposed will only work as/if the proposed season change in HD 450 (removal of the 5 either-sex elk permits and change to a brow-tined bull/antlerless season) is similarly adopted.