

**Comments on Proposed Guidelines for Elk Shoulder Seasons**  
**Bob Ream, 521 Clarke St., Helena, MT 59601**

The proposed guidelines are a good attempt at managing elk populations that are over objective and in places where harboring of elk is occurring on private land or access to public land is limited. However, the guidelines are general and somewhat vague on how these seasons will be carried out. It appears that the harvests would be determined and methods for carrying them out would be entirely at the discretion of regional offices. Although I agree that timing of such seasons, length of season, and number of animals to be harvested should be determined at the regional level, I think some very basic criteria should be determined by FWP and the FW Commission. Otherwise FWP and the Commission may be subject to considerable criticism if there are substantial differences between regions in how such hunts are carried out. Regional biases in how this is accomplished should be minimized.

1. For example, there should be universal agreement through all FWP regions on what percentage of hunters are allowed to be selected by landowners, and how sportsmen and landowner hunters are selected. Considerable thought and discussion should precede such a decision by FWP and the Commission. This has the potential to be an explosive topic.

2. "Fundamental Objectives" listed in the proposal shows "Elk considerations:  
• Manage elk populations to objective as rapidly as possible.  
• Increase harvest of elk, where appropriate."

The proposal goes on to state: "The primary intent of a shoulder season is to help reduce the population in a Hunting District or group of Hunting Districts."

The only way to accomplish that objective is by harvesting antlerless elk. That's a simple biological fact. Bull harvests should only be accomplished through the general season by general season hunters. Again, I would foresee considerable consternation and anguish by general season hunters complaining about a lack of bulls to harvest and blaming it on the shoulder season harvests.

The proposal states "Proposed guidelines also include "fundamental objectives" to describe management success and to ensure transparent agency and public assessment of how overall elk harvest management is progressing."

In order to be entirely transparent and maintain the trust of sportsmen and landowners alike, FWP and the Commission need to make decisions on some very fundamental issues like the two I have pointed out above. I think that will be crucial to the success of this approach. Game damage hunts have come under criticism recently by legislative auditors and we need to learn from that in adding another type of season.

Thank you for consideration of the points I have made in my comments.