



# COLORADO

## Parks and Wildlife

Department of Natural Resources

**To:** The Parks and Wildlife Commission

**From:** Jeff Davis, Director

**Date:** May 31, 2024

**Re: 2025-2029 Big Game Season Structure (BGSS) Alternatives Updates for the June 12, 2024 Parks and Wildlife Commission meeting.**

### **Final Staff Recommendations for Limitation of Over-the-Counter (OTC) licenses**

At its May meeting, the Parks and Wildlife Commission asked staff to bring back a single alternative for each BGSS topic to the June meeting, except for limitation of OTC elk licenses. This memo provides additional information to the Commission on the limitation of OTC licenses topic to help with their final decisions at its June meeting.

#### **Limitation of OTC Rifle Licenses (Bull Elk Only)**

If the Commission only takes one staff recommendation for all BGSS topics, it should be maintaining status quo for OTC bull rifle licenses. Staff strongly recommend making no change to OTC bull rifle licenses for the following reasons:

1. There is a 20-year decreasing trend in OTC bull rifle license sales (Figure 1). In the early 2000s, the number of OTC rifle license sales peaked around 72,000 (59% resident; 41% nonresident). Twenty years later, OTC bull rifle license sales have declined by about 20,000.
2. There is a 20-year decreasing trend in total rifle license sales for elk, which is a combined total of OTC bull and limited license sales (Figure 2). In the early 2000s, total rifle license sales for elk peaked around 210,000 (67% resident; 33% nonresident). In 2023, total rifle license sales for elk have declined to about 126,000, or ~80,000 fewer licenses than in the early 2000s. This decline in license sales is not indicative of a declining elk population. In fact, the overall statewide post-hunt elk population is projected to be at a 20-year high in 2024.
3. Crowding is less of a concern in OTC rifle seasons than it is for OTC archery seasons.
4. There are no biological concerns associated with OTC rifle seasons unless we are trying to rebuild herds following a stochastic event, such as a severe winter mortality event. Breeding occurs before the OTC rifle seasons, and there is a 4-point antler restriction in OTC units to protect younger age-class bulls.
5. CPW has not completed adequate public engagement on limitation of OTC rifle licenses. This would be one of the largest changes in CPW's history of license distribution, making it premature to limit OTC bull rifle without substantially more public involvement. Most of the public engagement efforts and testimony heard during this BGSS process have focused on limitation of OTC archery, and not OTC rifle. CPW

has been discussing limitation of OTC archery for at least 2 season structure processes, and we are still discussing how to limit licenses. This is the first BGSS process where staff or the public have discussed limitation of OTC rifle. In other words, there may be segments of the public who have not yet had a chance to consider how limitation of OTC bull rifle affects them.

6. Change in demand associated with limitation of OTC licenses is unknown. This is especially true for nonresident hunters. CPW expects nonresident demand to decrease when unlimited OTC licenses are no longer available. If we lose 25% of our nonresident rifle hunters following limitation of OTC rifle licenses, CPW will lose over \$10 million in revenue. This is in addition to the revenue CPW will lose from limiting OTC archery licenses. The actual decrease in nonresident demand is unknown; therefore, CPW is not able to project actual loss in revenue.

### Limitation of OTC Archery Licenses

For various reasons, staff initially recommended full limitation of OTC archery licenses. This recommendation was difficult to make considering it was least supported by resident hunters. From March through May, the Commission and staff listened to the public testimony from many hunters who are passionate about having OTC licenses available to them. Hunters shared their perspectives on hunting heritage, how important OTC licenses are to ensure families and friends can hunt together, about recruitment and retention, and many other reasons to maintain OTC archery licenses for residents. The Commission presented new ideas to accommodate resident hunters in new ways, mainly by managing OTC archery licenses for residents only within a phased-approach for limitation of OTC archery licenses.

Since the Commission meeting in March 2024, staff have held numerous internal discussions about all of the feedback received. Staff have come to a new recommendation, which is to limit OTC archery licenses for nonresidents only, and to maintain OTC archery licenses for residents. Unlike rifle, staff believe OTC archery elk licenses should be limited for nonresidents only for the following reasons:

1. There has been an increasing trend in OTC archery license sales (Figure 3) over 20 years. In the early 2000s, the number of OTC archery licenses sales was around 10,000 (~50% resident; ~50% nonresident). From 2014-2019, the number of OTC archery license sales was around 36,000-39,000, with residents getting 58%-51% of the licenses during that period. OTC archery license sales dropped to about 27,000 licenses in 2023 (~47% resident; ~53% nonresident). The limitation of five elk herds during the period 2000-2023 and hunter response to the 2022-2023 severe winter contributed to this drop in OTC license sales.
2. There is a 20-year increasing trend in total archery license sales for elk, which is a combined total of OTC and limited license sales (Figure 4). In 2001, total archery license sales for elk were about 25,000 (53% resident; 47% nonresident). Twenty years later, CPW sold over 20,000 more archery licenses (48% resident; 52% nonresident) than in 2021. Total archery elk license sales have substantially increased during this period, and nonresidents now get a higher proportion of the licenses than residents.

3. Crowding has been a concern during archery season for many years. In 2020, the Commission initiated a phased-approach for limitation of OTC archery licenses. At that time, the Commission allowed archery elk licenses to be limited geographically on a case-by-case basis to meet biological or social management objectives. The Commission did not consider limitation of nonresidents only. Since 2020, resident and nonresident licenses were limited in five different elk herds for biological and social management reasons. CPW has engaged the public on limitation of OTC archery licenses during the last two BGSS processes, which means we have been discussing limitation of archery licenses for over 10 years. The majority of resident hunters prefer to maintain OTC archery elk licenses for residents, and to limit OTC archery elk licenses for nonresidents.
4. Change in demand associated with limitation of OTC licenses is unknown. This is especially true for nonresident hunters. CPW expects nonresident demand to decrease when unlimited OTC licenses are no longer available. We expect to lose nonresident archery hunters following limitation of OTC archery licenses; however, maintaining OTC rifle for both residents and nonresidents (status quo) will likely reduce revenue loss. Many nonresident archery hunters who choose not to apply in the primary draw will still be able to obtain an OTC rifle license as long as we remain status quo for OTC rifle licenses.

In June, the Commission will decide whether to limit resident and nonresident OTC archery hunters, or to limit nonresident OTC archery hunters only. In both alternatives, OTC licenses will be limited for nonresidents. Therefore, CPW strongly recommends the following:

- Do not limit OTC rifle at this time.
- Limit only one method of take at a time. We have already started limiting OTC archery to address biological and social management objectives, so we recommend limiting archery only at this time as part of an incremental-approach.
- Monitor the economic impacts of limitation of nonresident OTC archery licenses. This includes license sales as well as potential impacts to local communities and businesses.
- Monitor potential behavior change in resident and nonresident hunters after limitation of OTC archery. This includes demand and participation in OTC versus the primary draw.
- Monitor perceptions about crowding and experience satisfaction in archery and rifle units. Try to determine what level of hunter participation in a unit will result in improved attitudes toward hunter crowding.
- Evaluate the information collected (changes in economic impacts, demand, participation, crowding and satisfaction) over the course of the next 3 years before beginning the next BGSS process to assess whether adaptive changes are necessary.

Thank you for your time and consideration.

Respectfully,



Jeff Davis

CC: All CPW Staff

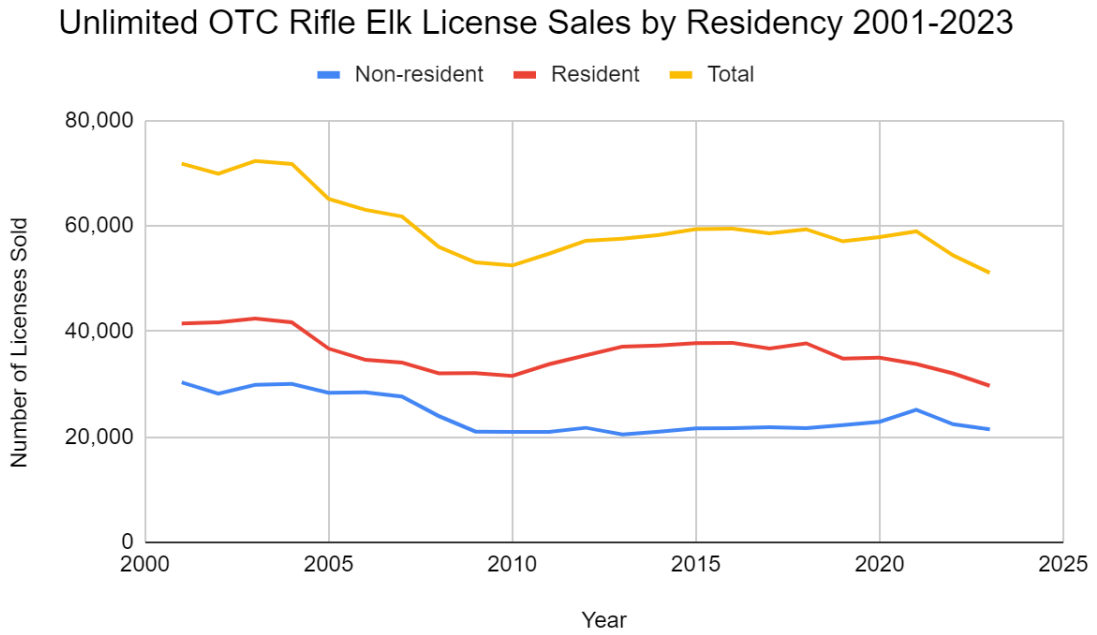


Figure 1. Unlimited over-the-counter license sales by residency from 2001-2023.

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### Total Rifle Elk License Sales by Residency 2001-2023

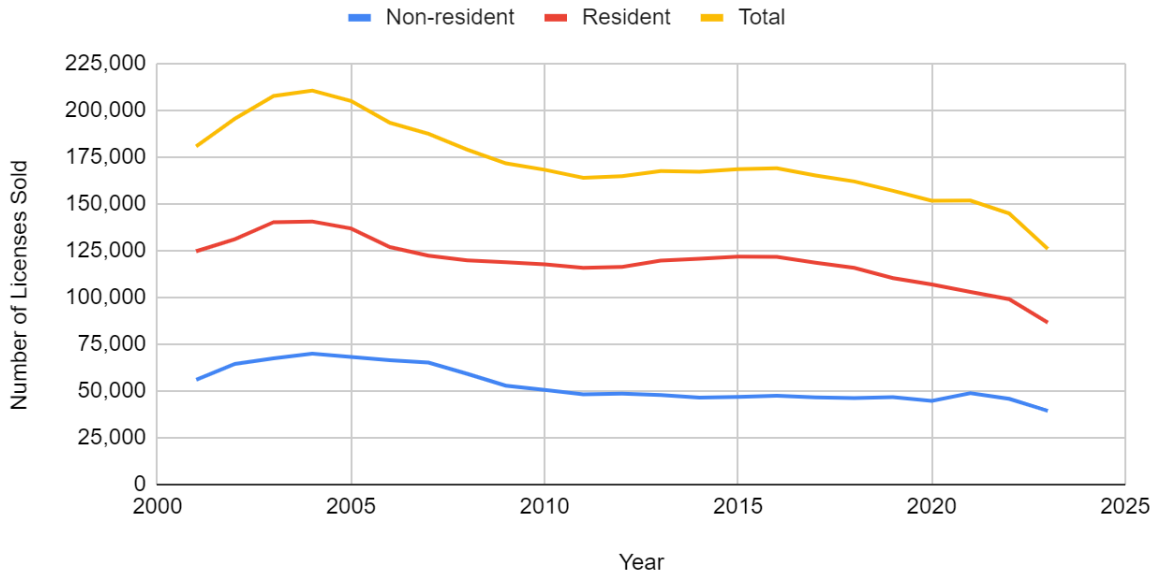


Figure 2. Total rifle elk license sales, including over-the-counter and limited licenses, by residency from 2001-2023.

### Unlimited OTC Archery Elk License Sales by Residency 2001-2023

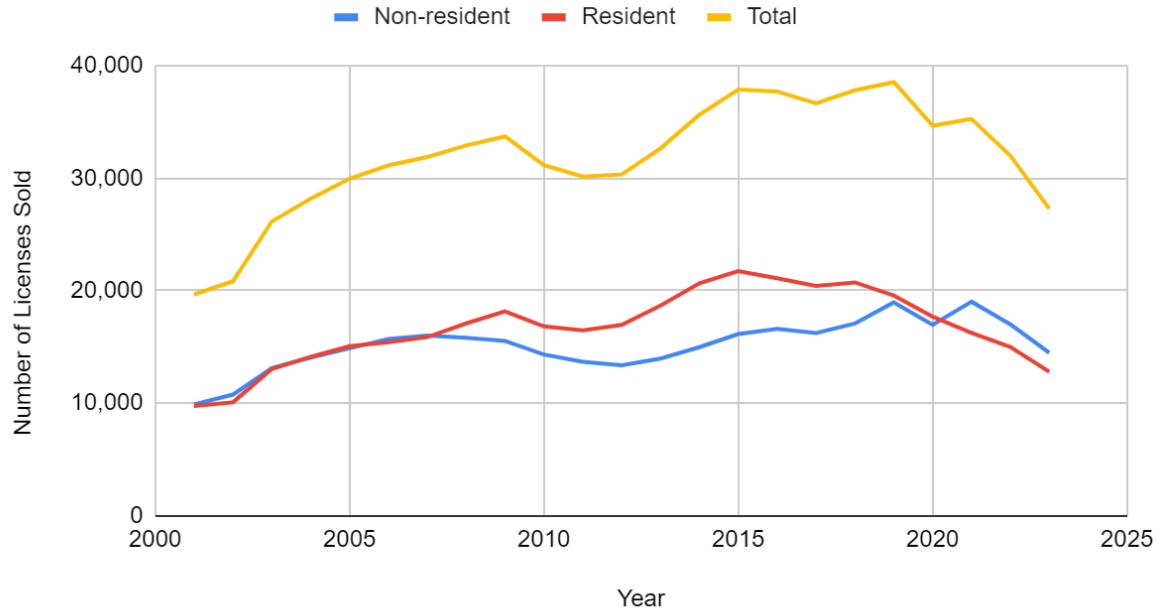


Figure 3. Unlimited over-the-counter (OTC) archery elk license sales by residency from 2001-2023. OTC archery elk licenses were fully limited in 3 elk herds in 2020, 1 elk herd in 2022, and 1 elk herd in 2023, which partly explains the decline in OTC licenses from 2020-2023.

## Total Archery Elk License Sales by Residency 2001-2023

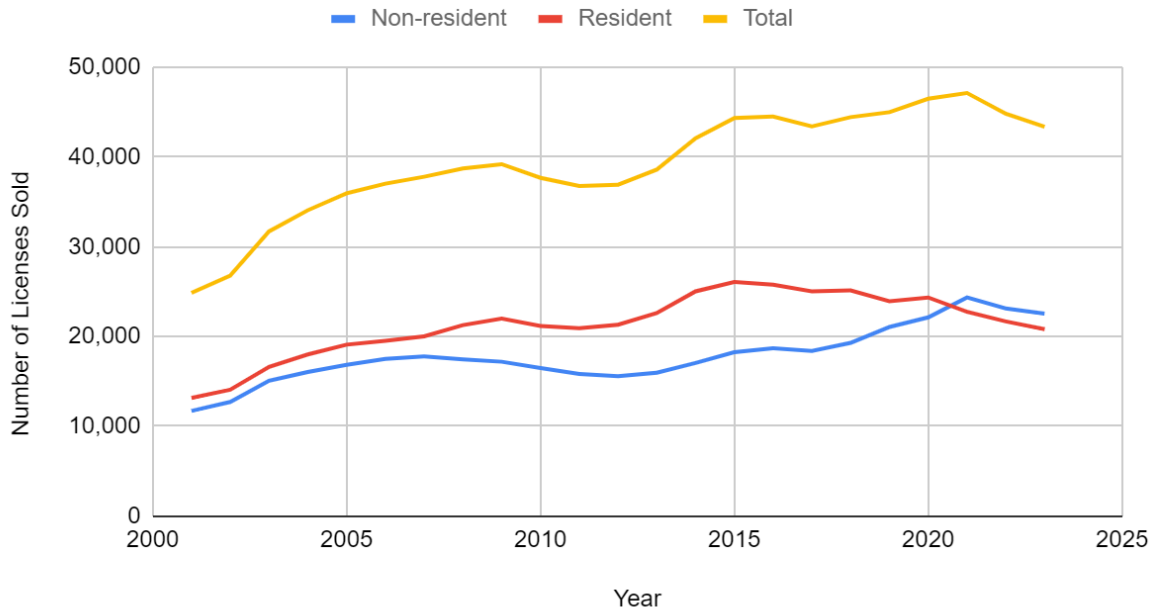


Figure 4. Total archery elk license sales, including over-the-counter and limited licenses, by residency from 2001-2023. OTC archery elk licenses were fully limited in 3 elk herds in 2020, 1 elk herd in 2022, and 1 elk herd in 2023. Most of the OTC licenses were shifted to limited licenses within these 5 elk herds, and are captured in this trend.

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