ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should a first rifle, antlered deer season be established in D-41 (Logan Mountain)?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Data analysis unit (DAU) D-41, Logan Mountain, is located in Mesa and Garfield Counties, near the towns of Rifle, Parachute, DeBeque, and Grand Junction. The DAU consists of approximately 48% private land, including multiple large holdings owned by Oil and Gas companies or ranches, 51% federal public land, and <1% State of Colorado.

Reducing chronic wasting disease (CWD) and achieving sex-ratio objective are two goals of the current herd management plan. D-41 has been at or above sex-ratio objective for the past three years, and CWD has been detected. In 2023, adult male prevalence was 7%, exceeding the management threshold outlined in the Colorado Chronic Wasting Disease Response Plan. In response to this, a 4th season antlered deer license was added to the DAU in 2024, in part to potentially reduce the incidence of CWD through higher buck harvest. Additional licenses have also been added to 2nd and 3rd seasons to meet CWD and sex-ratio objectives.

However, adding additional deer hunters to the landscape has raised concerns about hunter crowding. According to our annual Hunter Attitude Surveys, response to the question: “To what extent did you feel crowded by other hunters while deer hunting in D-41?”, an average of 15.5% of hunters over the last three years reported feeling “Very Crowded,” with the statewide three-year average of 11% of hunter responses. A majority of hunters (61.9%) in those three years felt at least “Slightly Crowded”.

Additionally, adding more deer licenses to the current seasons has created issues for local stakeholders. Given the DAU’s proximity to the city of Grand Junction and Interstate 70, D-41 is a popular destination for big game hunters, particularly during the combined deer and elk seasons (2nd and 3rd seasons). During these seasons, deer are often concentrated in low-elevation, open areas where they are vulnerable to hunters along county roads in the Roan Creek drainage, and the majority of the land is private property without hunting access.

To achieve herd management goals while also addressing issues of hunter crowding and distribution, it is recommended that an additional 1st season buck hunt be established in D-41. The addition of a 1st season would allow CPW to shift a portion of deer licenses currently allocated to 2nd and 3rd seasons to an earlier season, thereby reducing concerns about crowding while maintaining the potential for high buck harvest.

Shifting a portion of the current allocation of deer licenses into a 1st season also addresses issues raised by local stakeholders**.** During the 1st season, it is anticipated that most deer hunters will concentrate their efforts on higher elevation, publicly accessible lands. These areas are not bisected by major county roads, thus reducing issues associated with vehicle traffic.

The potential for a new 1st season deer license to cause crowding and/or reduce success among elk hunters in this area has been considered. When considering the potential for interference caused by deer hunters, it was determined that for the last decade, the number of elk hunters using game management units (GMUs) to hunt elk that are a part of D-41 (GMUs 31 and 32) is small compared to the other GMUs within E-10 (Figure 1). We do not expect a small number of new buck hunters to have an effect on elk hunters in the first rifle season.

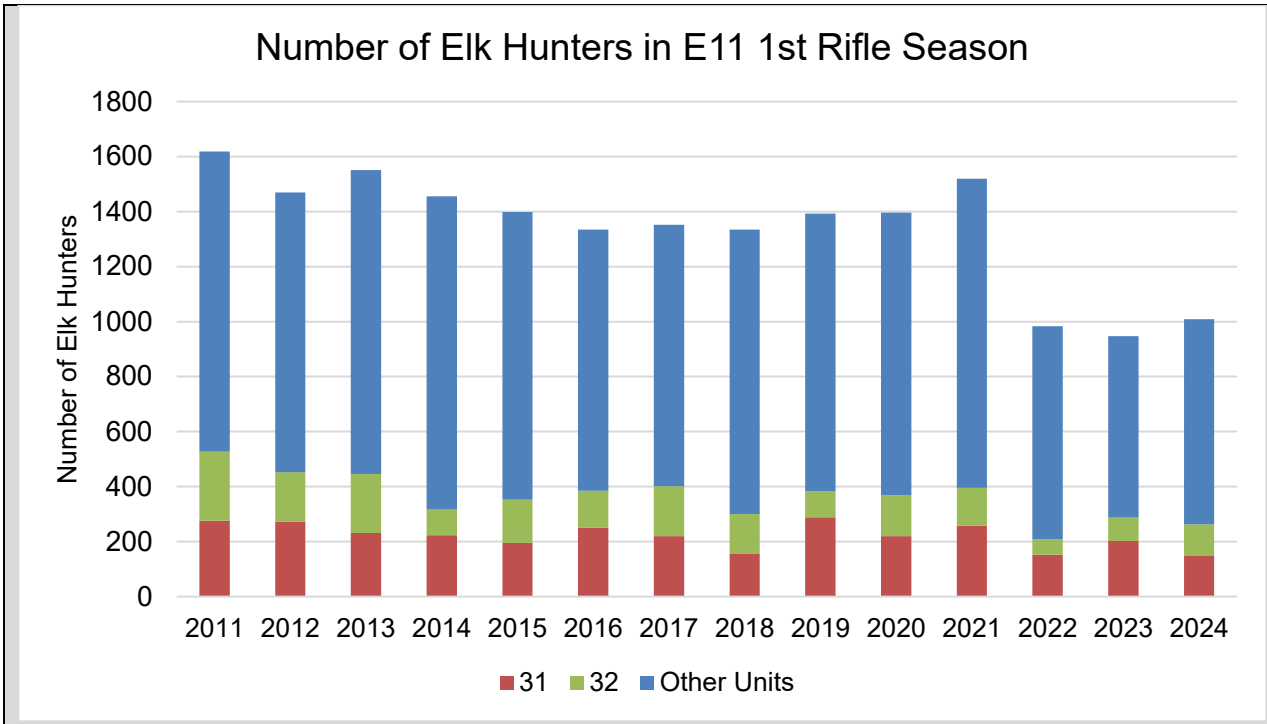


Figure 1. A bar graph showing the number of elk hunters reported using GMUs 31 and 32 during first rifle season versus the other units in the elk DAU E11 from 2011 to 2024.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Informal conversations with local hunters and landowners.

A public survey was conducted and 70.7% of the total 242 responses were in support of the preferred alternative. The few comments received expressed concern over CWD management and whether or not an additional season would help, even if it improved crowding concerns.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Establish one DAU-wide antlered deer hunt code valid during the 1st regular rifle season: DM031O1R (Valid in GMUs 31 and 32)

2. Status quo

Issue Raised by:	Scott Hoyer, DWM - DeBeque; Genevieve Fuller, Terrestrial Wildlife Biologist; Nathan Harral, DMW - Parachute; Travis Bybee, AAWM - Area 7; Kirk Oldham, AWM - Area 7
Author of the issue paper (if different than person raising the issue):	

CC:	Brad Banulis, NW Senior Terrestrial Biologist, Travis Black, NW Regional Supervisor
Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	NW Terrestrial, Area 7
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the season dates for DE052P6R be extended from August 15 to September 30 annually?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Chronic Wasting Disease (CWD) is of increasing concern in the North Fork of the Gunnison River watershed in Area 16. Mandatory testing performed in the fall of 2025 on mule deer for Data Analysis Unit D-51 indicates an increase in prevalence in adult bucks in this DAU from approximately 7% in 2020 to 17% in 2025 (Table 1). D-51 includes game management units (GMUs) 52, 411, and 521, which encompass the southern half of the Grand Mesa between the municipalities of Delta and Paonia. With increasing CWD, managers continue to seek management prescriptions intended to maintain or decrease prevalence. The exurban areas in the southern portion of this DAU, surrounding the towns of Cedaredge, Delta, Hotchkiss, and Paonia, are largely comprised of private lands where concentrations of resident deer occur. Mandatory testing continues to highlight CWD “hot spots” within these exurban areas (Figure 1) where managers have previously focused harvest management through early either-sex licenses and extended antlerless seasons.

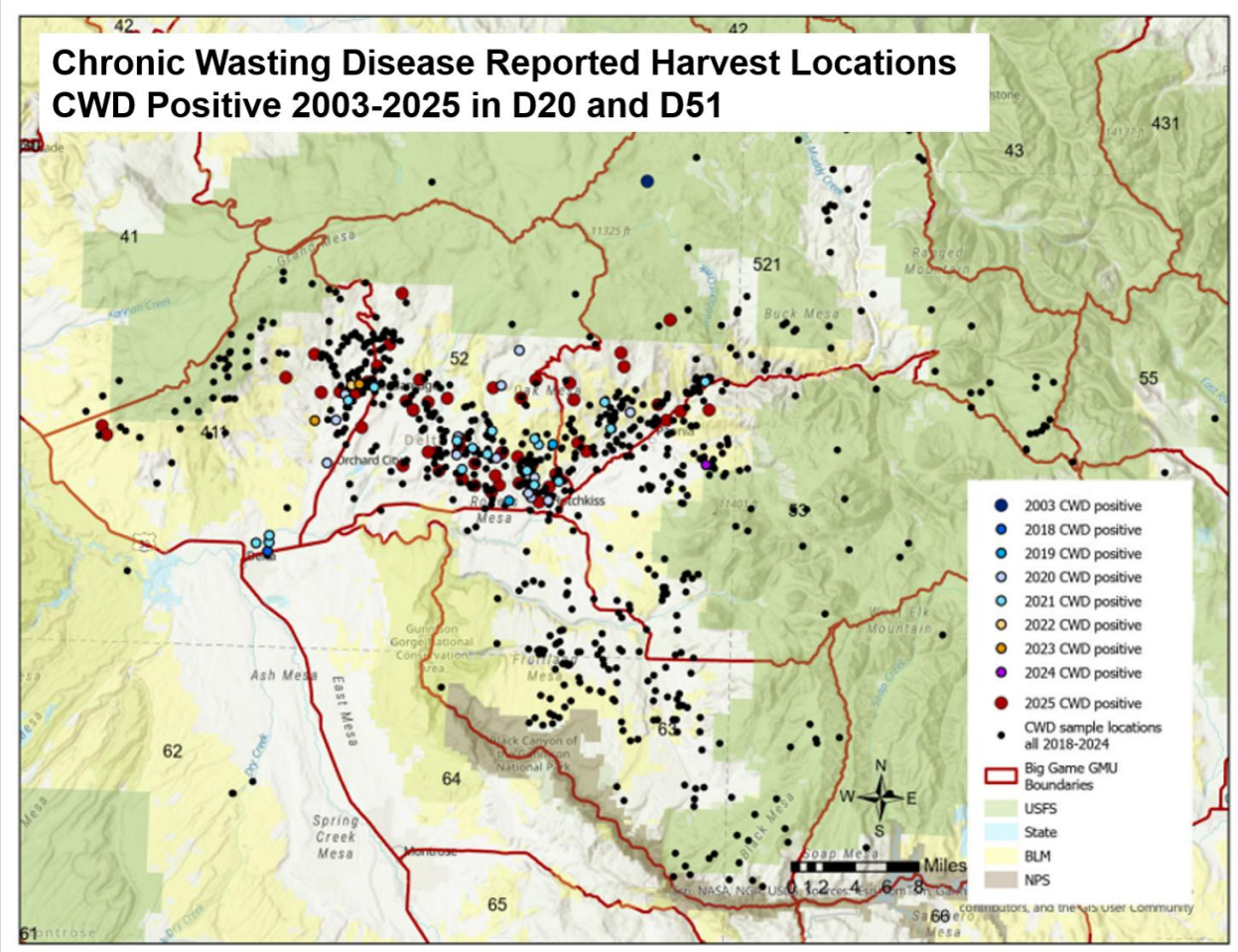


Figure 1: CWD positive hunter harvested mule deer, 2003-2025.

Species	Animal Sex	Age Class	# Tested	CWD Positive	CWD Negative	CWD Prevalence	95% Confidence Interval
Mule Deer	**Female**						
		Adult (2+)	28	2	26	7.1%	0.9% - 23.5%
		Yearling	5	0	5	0.0%	0.0% - 52.2%
	Total		**33**	**2**	**31**	**6.1%**	**0.7% - 20.2%**
	Male						
		Juvenile	2	0	2	0.0%	0.0% - 84.2%
		Adult (2+)	303	50	253	16.5%	12.5% - 21.2%
		Yearling	48	2	46	4.2%	0.5% - 14.3%
	Total		**353**	**52**	**301**	**14.7%**	**11.2% - 18.9%**
Grand Totals			**386**	**54**	**332**	**14.0%**	**10.7% - 17.9%**

Table 1: CWD prevalence rates from the 2025 mandatory testing period for mule deer in DAU D-51. Shown are the number of animals tested, the number of positive and negative results, and the corresponding prevalence rates separated by age class and sex as well as the total estimated prevalence for the DAU.

The existing early-season, private land only either-sex mule deer license in D-51 runs from August 15th to August 25th (DE052P6R). We propose extending the season dates to the end of September to provide more opportunity for hunter harvest of resident deer within CWD hot spots. Additive, focused hunting pressure in this area is intended to reduce overall deer density and potentially reduce localized sex ratios, with both outcomes potentially contributing to stabilized or reduced CWD prevalence. Private landowners will ultimately dictate the level of access and harvest that results from these licenses; however, providing a variety of tools and options for them to consider is one way managers may address increasing CWD concern.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Stakeholders were contacted during the Herd Management Plan process in 2023-2024. Support was given to manage D-51 within the population objective. Data from the 2025 Hunter Attitude Survey showed that hunters in D-51 would prefer to hunt more mature males than to hunt more often. Unfortunately, high CWD prevalence requires CPW to take management action to decrease CWD infection rates. Hunters may be satisfied with extending the season dates to increase their opportunity to encounter larger bucks on private property.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Extend the season dates for hunt code DE052P6R to run from August 15th to September 30th annually.

2. **Status quo:** The season dates for hunt code DE052P6R remain August 15th to August 25th annually.

Issue Raised by:	Area 16 Staff	
Author of the issue paper (if different than person raising the issue):	Alyssa Meier – SW Terrestrial Biologist Brandon Diamond – Area Wildlife Manager Area 16 Evan Phillips	
CC:	Jamin Grigg	
Approved for further consideration by:		**Cory Chick**
Requires new space in the brochure?		**NO**
Are adequate staff and funding resources available to implement?		**YES**
Region, branch, or section leading implementation:		Terrestrial, SW Region
Any additional regions, branches or sections involved in implementation:		**Area 16**
Complies with Big Game Season Structure?		**YES**
Recommended for consent agenda?		**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should hunt codes in mule deer DAU D-29 be made GMU-specific?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Currently, deer licenses issued for deer in DAU D-29 (Mesa Verde Mule Deer Herd) (Figure 1) are valid under the same hunt code in game management units (GMU) 72 and 73. To improve harvest management in response to chronic wasting disease (CWD), CPW proposes creating separate hunt codes to designated licenses specifically for GMU 72 or GMU 73. The current hunt codes (DM072O1A, DM072O1M, DM072O2R, DM072O3R, DM072O4R DM072P2R, DM072P3R, DF072P2R, DF072P3R, and DF072P4R) would be valid only in GMU 72 and ten new hunt codes (DM073O1A, DM073O1M, DM073O2R, DM073O3R, DM07304R, DM073P2R, DM073P3R, DF073P2R, DF073P3R, and DF073P4R) would be created for GMU 73

CWD was first detected in D-29 in 2020 at a 0.02 prevalence rate. Mandatory CWD testing in 2025 revealed a substantial increase to a 0.14 prevalence rate, with many positive samples originating from GMU 72. This is likely due to high CWD prevalence in Utah which borders the west side of GMU 72, and wildlife moves freely to and from. To decrease CWD rates in D-29, deer licenses were increased in 2026. Future management requires the ability to concentrate harvest pressure on GMU 72 relative to GMU 73.

Under this proposal, the current hunt codes would be valid only in GMU 72
DM072O1A
DM072O1M
DM072O2R
DM072O3R
DM072O4R
DM072P2R
DM072P3R
DF072P2R
DF072P3R
DF072P4R

And seven new hunt codes would be created for GMU 73
DM073O1A
DM073O1M
DM073O2R
DM073O3R
DM07304R
DM073P2R
DM073P3R
DF073P2R
DF073P3R
DF073P4R

The D-29 population has been increasing the past 10 years (Figure 2). It is currently within the management objective but is expected to grow above it at the current rate. The observed buck ratios have been above the objective for the most of the past ten years (Figure 3).

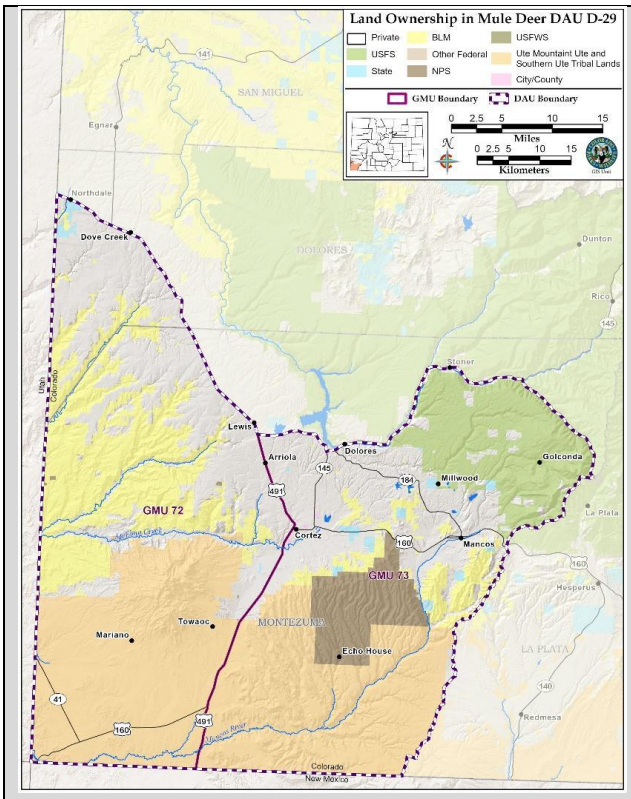


Figure 1: Map of Mule Deer DAU D29 with GMU boundaries and landownership.

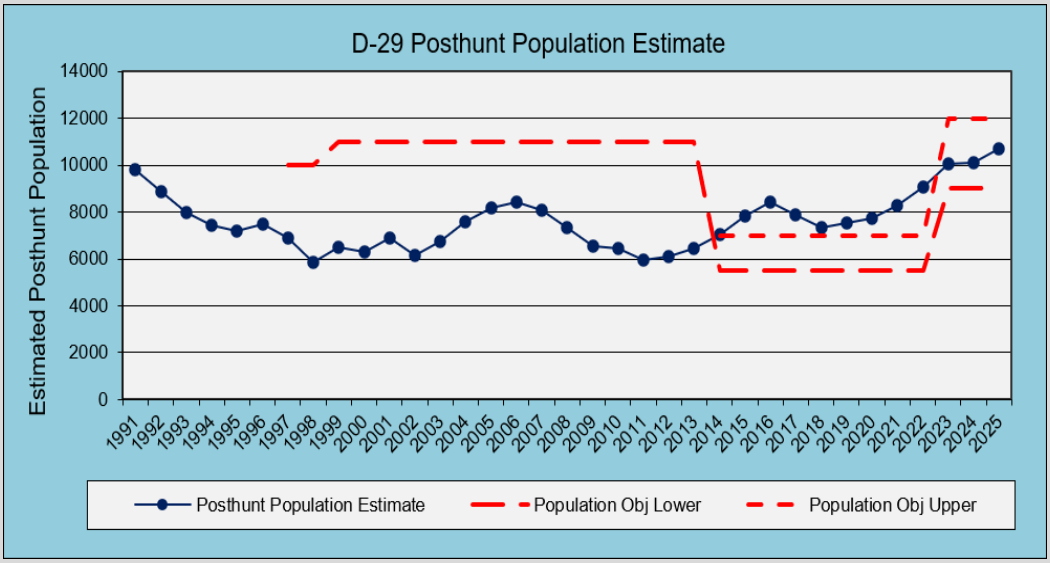


Figure 2. Line Graph for D29 posthunt population estimate, 1991-2025.

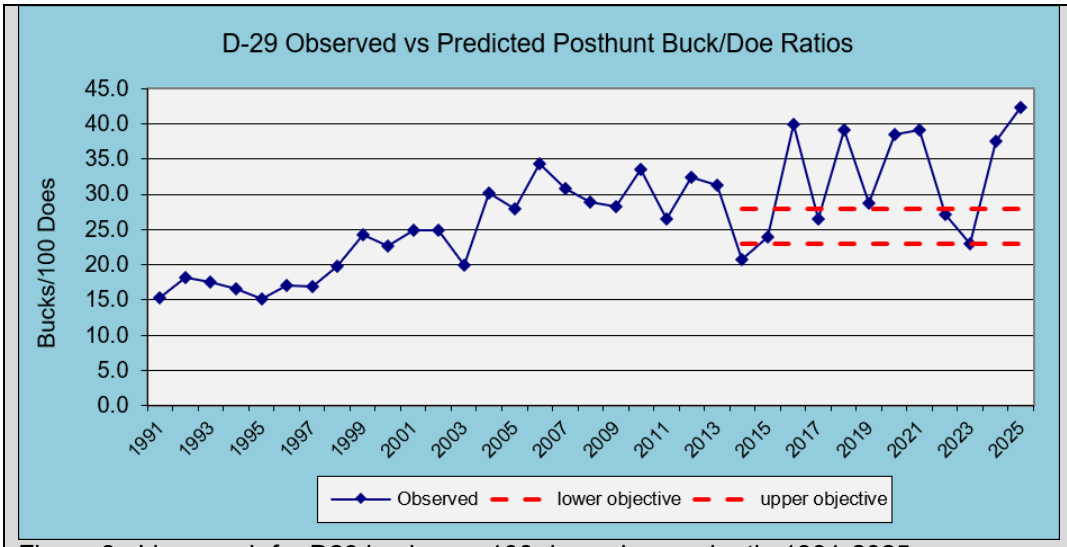


Figure 3. Line graph for D29 bucks per 100 does observed ratio 1991-2025.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Extensive stakeholder engagement occurred during the development of the SW Deer Herd Management Plans, which were adopted by the PWC in March 2024. Further, extensive outreach was conducted during the development of the Colorado Chronic Wasting Disease Response Plan, which was adopted in December 2018.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Create GMU-specific hunt codes for bucks in GMU 72 and GMU 73. New hunt codes that would be created include:

Existing hunt codes would now be valid only in GMU 72:
DM072O1A
DM072O1M
DM072O2R
DM072O3R
DM072O4R
DM072P2R
DM072P3R
DF072P2R
DF072P3R
DF072P4R

New hunt codes would be valid in GMU 73:
DM073O1A
DM073O1M
DM073O2R
DM073O3R
DM073O4R
DM073P2R

DM073P3R
DF073P2R
DF073P3R
DF073P4R

2. Status quo

Issue Raised by:	Andy Brown, Matt Sturdevant, Brandon Dye, Adrian Archuleta, Brad Weinmeister
Author of the issue paper (if different than person raising the issue):	Brad Weinmeister
CC:	Adrian Archuleta, Jamin Grigg

Approved for further consideration by:	**Cory Chick**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**SW Region**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should limited private-land-only antlered deer hunt codes be added to fourth rifle seasons in data analysis units D-23 and D-24?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

DAU D-24, the Groundhog Deer Management Herd, and D-23, the La Sal Deer Management Herd, are located in the southwest region between Gateway and Nucla, Colorado. D-24 consists of game management units (GMUs) 70, 71, and 711 (Figure 1). The majority of this deer population is located in GMU 70, and high concentrations of these deer winter in Dry Creek Basin and surrounding private lands near Redvale. D-23 only consists of GMU 60 (Figure 1). This unit is located on the Colorado-Utah border, where deer and elk herds move extensively between both states depending on snow levels, making management difficult. Additionally, chronic wasting disease (CWD) is increasing in both of these units, driving wildlife managers to look for options to limit the spread of this fatal disease.

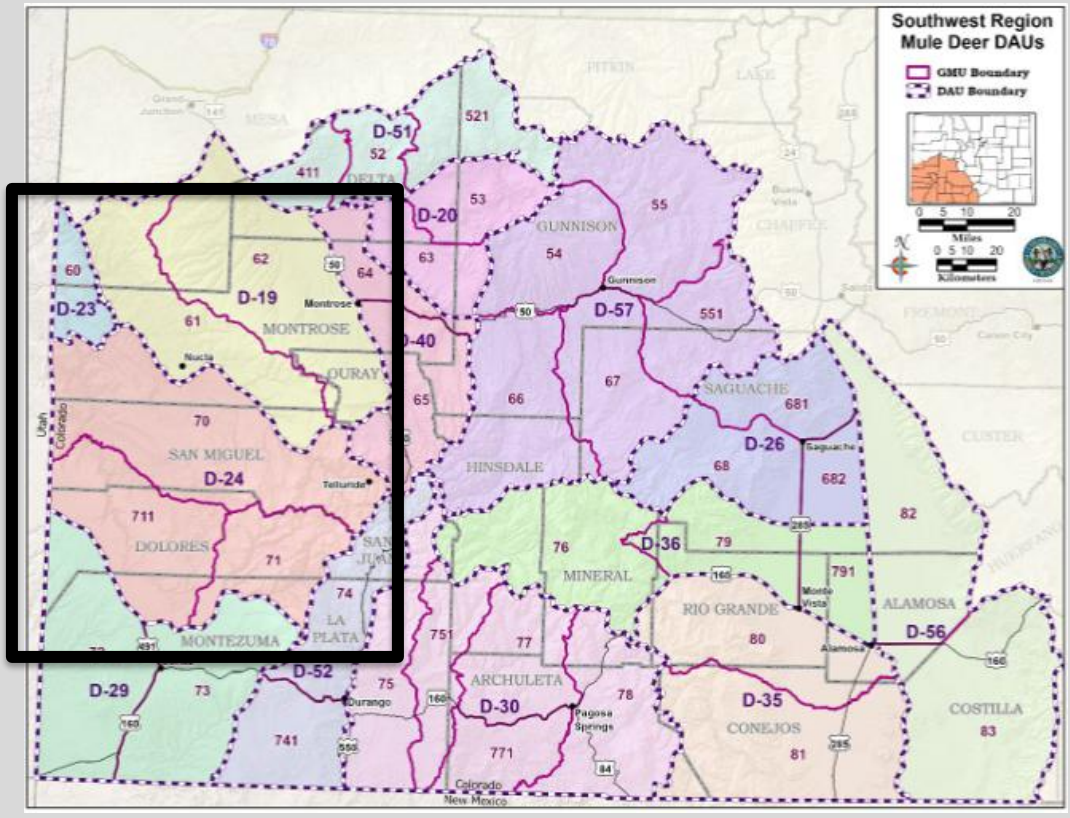


Figure 1. Deer data analysis units (DAUs) in southwest Colorado. D-23 and D-24 are outlined in black and located near Gateway and Nucla.

Currently, D-24 has an objective range of 19,000-23,000 animals, and a buck-to-doe ratio of 23-28 bucks per 100 does. The population estimate is increasing close to the upper population objective with 21,755 deer (Figure 2). The current observed and modeled five-year average buck-to-doe ratio is 26 bucks:100 does, and the 2025 estimate is 29 bucks:100 does (Figure 3). Age ratios have also averaged 62 fawns: 100 does for the last five years, implying strong recruitment. Model estimates indicate the increasing trend will continue. With population estimates and buck ratios reaching the top of their objective ranges and high concentrations of deer wintering in Dry Creek Basin (see Figure 6), CPW needs additional management tools to stay within objective and reduce CWD prevalence and fourth-season private-land-only antlered licenses will help limit concentrations of bucks in hot spots, like Dry Creek Basin.

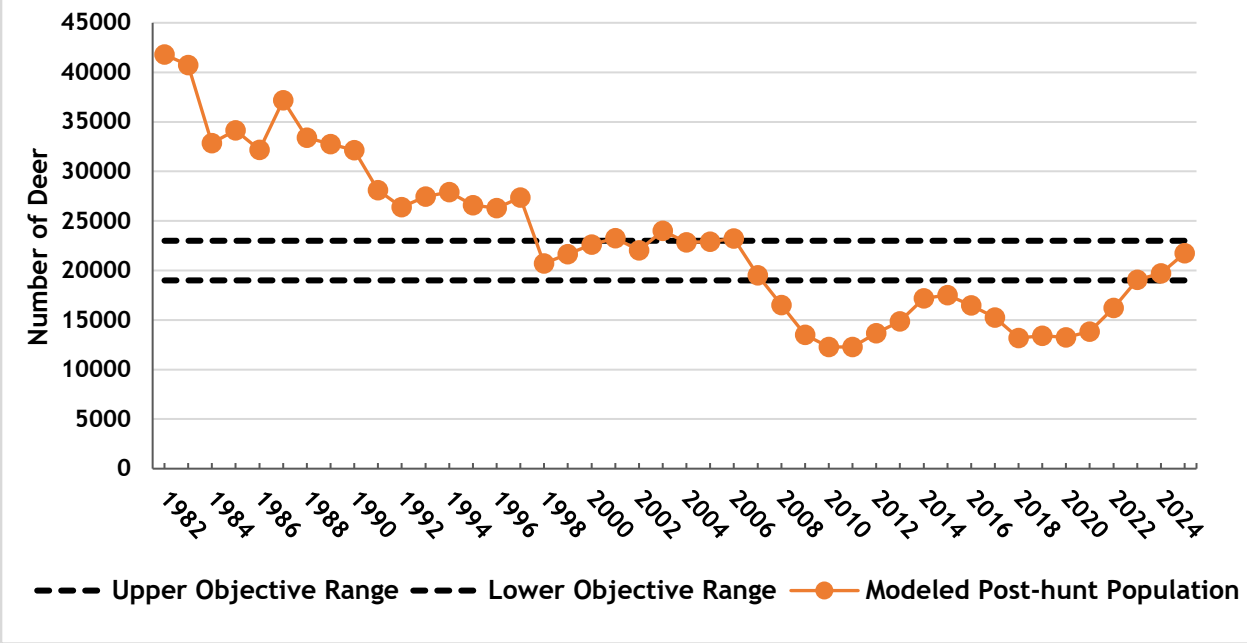


Figure 2. D-24 population estimates from 1982 to 2025.

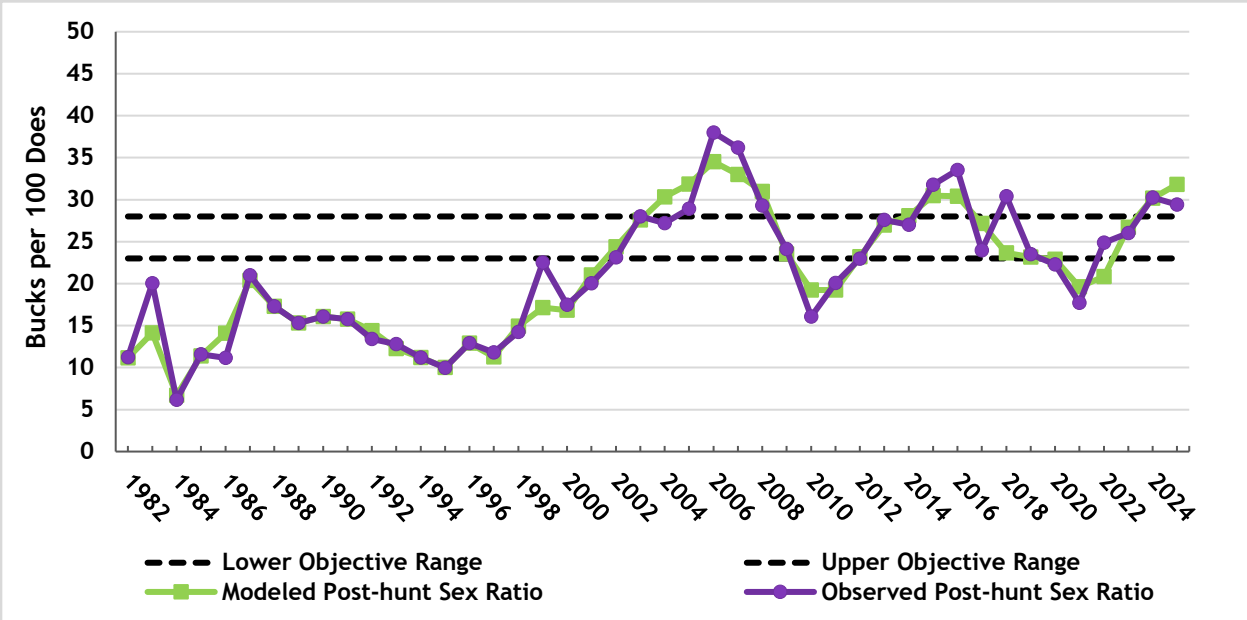


Figure 3. D-24 modeled and observed buck ratios from 1982 to 2025.

D-23 is not classified annually, and frequent movement between Colorado and Utah makes herd management more difficult. The population estimate for D-23 is 2,119, and it is increasing outside the objective range of 1,500-1,800 (Figure 4). The buck-to-doe ratios and age ratios are based on D-19's classification estimates. The observed five-year average age ratio from D-19 is 62 fawns:100 does. The observed buck-to-doe ratio from D-19 was 36:100, with a five-year average of 33:100 (Figure 5). The modeled buck-to-doe ratio for the last five years was 34:100 (Figure 5). These estimates are above the objective range of 20-25 bucks:100 does. Because CWD is increasing in this unit, an increasing population and high buck ratios have led CPW to need additional management options to try to limit prevalence in this herd. CWD concentrations are also high in the bordering Utah unit, creating additional

management challenges as wildlife move across borders. Adding a regular fourth-season private-land antlered hunt code will focus harvest on hot spots in Paradox Valley and Sinbad Valley.

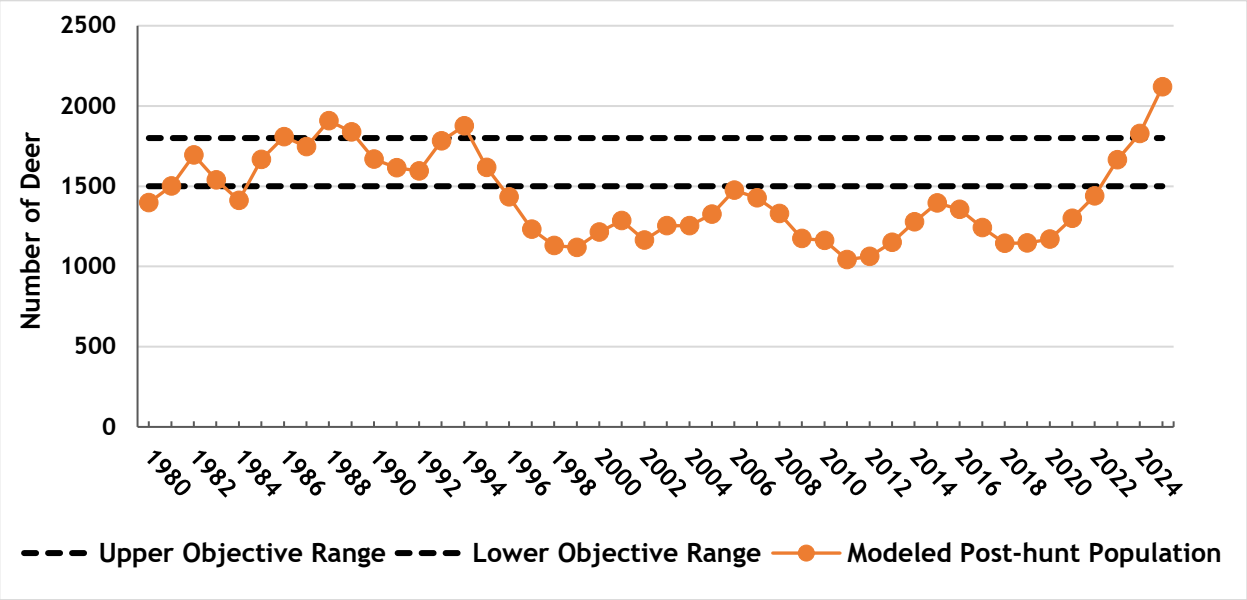


Figure 4. D-23 population estimates from 1980 to 2025.

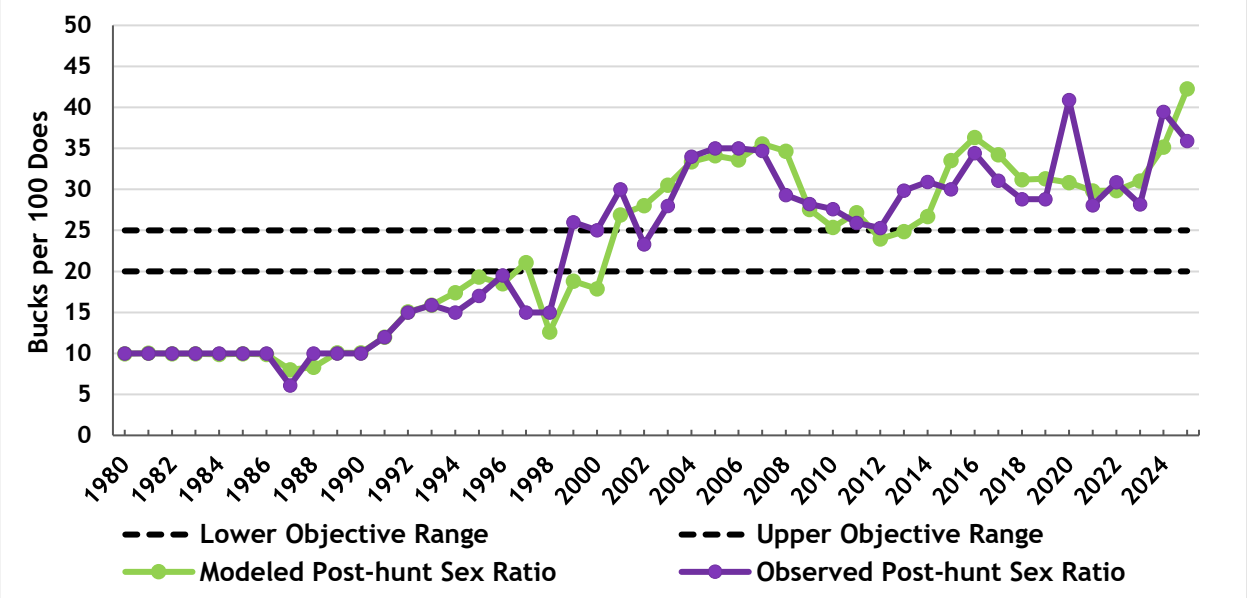


Figure 5. D-23 modeled and observed buck ratios from 1980 to 2025.

As previously mentioned, CWD is increasing in D-23 and D-24; therefore, CPW is seeking to limit prevalence by reducing buck ratios and targeting more mature bucks, in addition to other management tools, as recommended by the Chronic Wasting Disease Response Plan (Figure 6). Both DAUs are on a five-year rotating, mandatory CWD monitoring plan to evaluate changes in CWD prevalence over time, as laid out in the Plan. Prevalence in GMU 70 increased from 2.8% to 6.5%, and prevalence in GMU 60 increased from 21.1% to 32.6% between 2020 and 2025. Very few samples are collected in GMU 60 because populations are small, and as a result, there are not very many licenses; therefore, this herd is managed with the assumption that prevalence is extremely high and that the prevalence estimate is not necessarily accurate due to the small sample size. CPW recommends adding private-land-only fourth rifle season hunt codes so hunters will have more opportunities to harvest deer on agricultural and private

lands where hot spots exist, and more opportunities to harvest mature bucks (which are more likely to carry CWD) when they are most active during the rut at lower elevations and more vulnerable to harvest. These additional hunt codes will also give hunters the opportunity to limit deer concentrations in high-density areas, such as private lands in Dry Creek Basin, Paradox Valley, or Sinbad Valley. These additional hunt codes will be used as tools to help achieve management objectives for these herds and to alleviate the increasing prevalence of CWD.

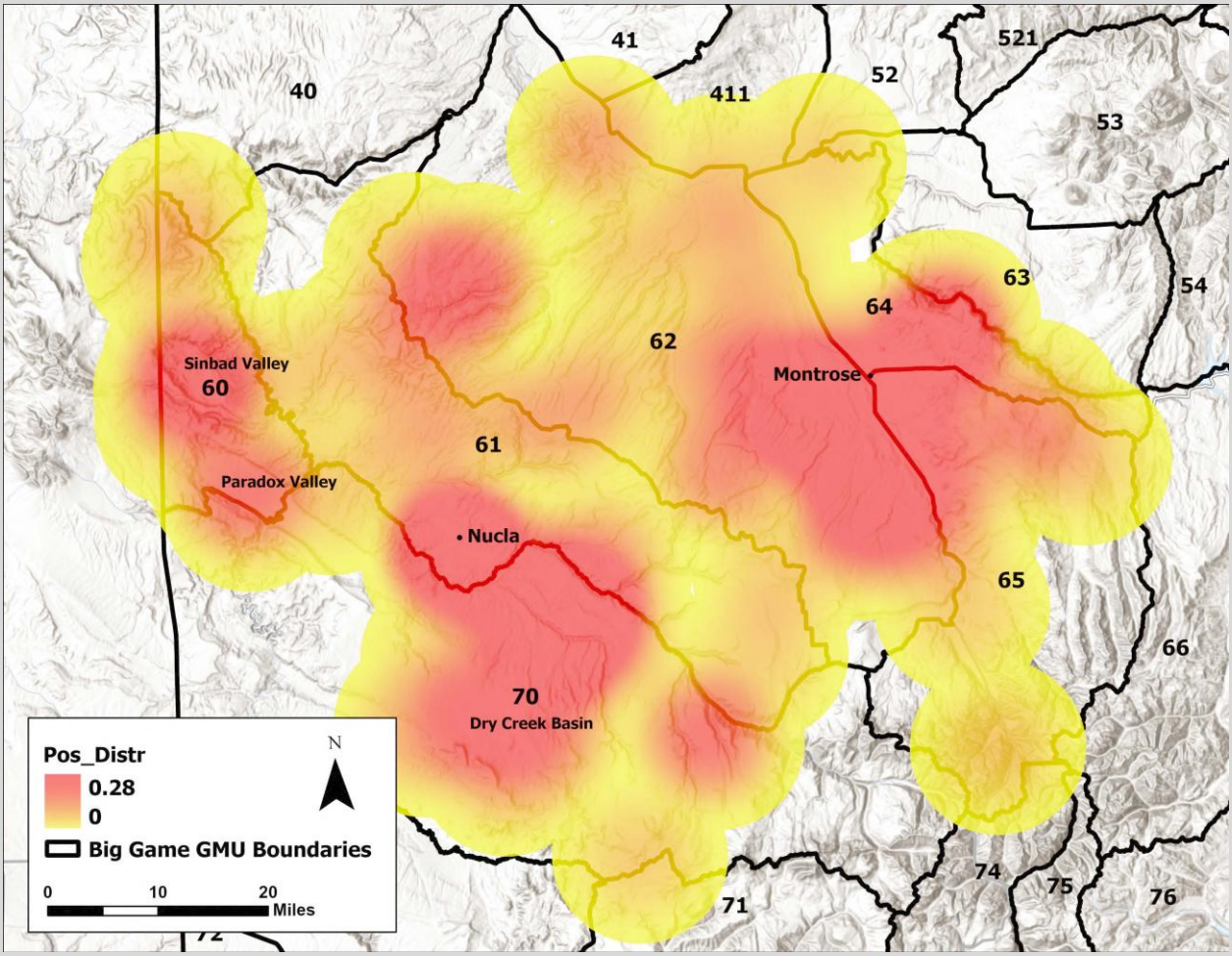


Figure 6. Distribution of suspected positive chronic wasting disease samples from mandatory testing in 2025. Higher densities of positive samples are found in the darker-shaded areas. The black stars show where hot-spots are located near private lands in Paradox Valley and Sinbad Valley in GMU 60, and Dry Creek Basin is located in GMU 70.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

1. Resident and Non-resident Hunters (Comments received during informal interactions and the Big Game Harvest Survey)
2. Outfitters

3. CPW Staff

Stakeholders were contacted during the Herd Management Plan process in 2023-2024. Support was given to manage D-23 and D-24 within the population objective.

Data from the 2025 Hunter Attitude Survey showed that hunters in D-23 and D-24 would prefer to hunt more mature males than to hunt more often. Unfortunately, high CWD prevalence requires CPW to take management action to decrease CWD infection rates. Hunters may be satisfied with the new private-land-only fourth season hunt codes that will increase their opportunity to encounter larger bucks during the rut.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Add PLO rifle hunt codes to D-24 and D-23 concurrent with the established regular fourth season (list A):
DM070P4R (valid in GMU 70)
DM060P4R (valid in GMU 60)

2. Status quo: Continue without adding hunt codes to DAU D-24 or D-23.

Issue Raised by:	Area 18 Staff, Alyssa Kircher
Author of the issue paper (if different than person raising the issue):	
CC:	Jamin Grigg, Rachel Sralla, Matt Ortega, Cory Chick, Brad Weinmeister, Adrian Archuleta
Approved for further consideration by:	Cory Chick, Jamin Grigg
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial Section**
Any additional regions, branches or sections involved in implementation:	**SW Region**
Complies with Big Game Season Structure?	**NO**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should limited private-land-only antlered deer hunt codes be added to select rifle seasons in data analysis unit D-19?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

DAU D-19, the Uncompahgre Deer Management Herd, is in the southwest region near Montrose and Nucla, Colorado. D-19 consists of game management units (GMUs) 61 and 62 (Figure 1). The estimated population size is 13,584, which is near the middle of the herd's objective range of 12,000-15,000 deer and a five-year average modeled and observed buck ratio of 33:100 bucks with an objective range of 30-35 bucks:100 does (Figure 2). The 2025 buck ratio estimate is 36 bucks:100 does. The five-year average fawn: doe ratio is 62 fawns:100 does. One of the greatest management challenges that D-19 faces is that chronic wasting disease (CWD) prevalence has increased steadily since 2017. Prevalence increased from 13.8% in 2022 to 20.4% in 2025 during mandatory testing efforts. Additionally, past testing efforts have shown that the majority of CWD-positive deer are located in agricultural and residential areas near the Uncompahgre Valley and Nucla (Figure 3). Unfortunately, the latest testing efforts indicate that CWD has spread beyond the previous hotspots, underscoring the need for additional management strategies (Figure 3). CPW is seeking to limit the spread of this fatal disease by adding second, third, and fourth season private-land-only antlered hunt codes in GMU 61 and adding a fourth season private-land-only antlered hunt code in GMU 62 to lower buck ratios and focus harvest in areas where concentrations of deer tend to be highest on private lands, as recommended by the Chronic Wasting Disease Response Plan.

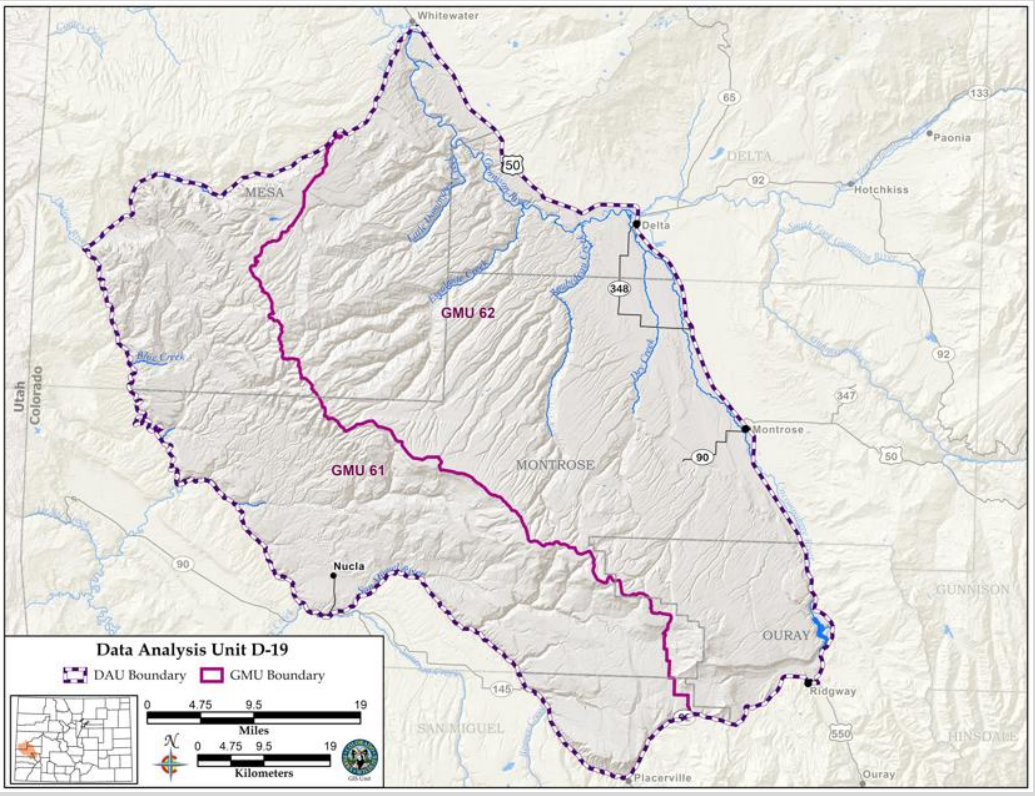


Figure 1. Deer data analysis unit D-19 is located on the Uncompahgre Plateau between Nucla and Montrose in southwest Colorado.

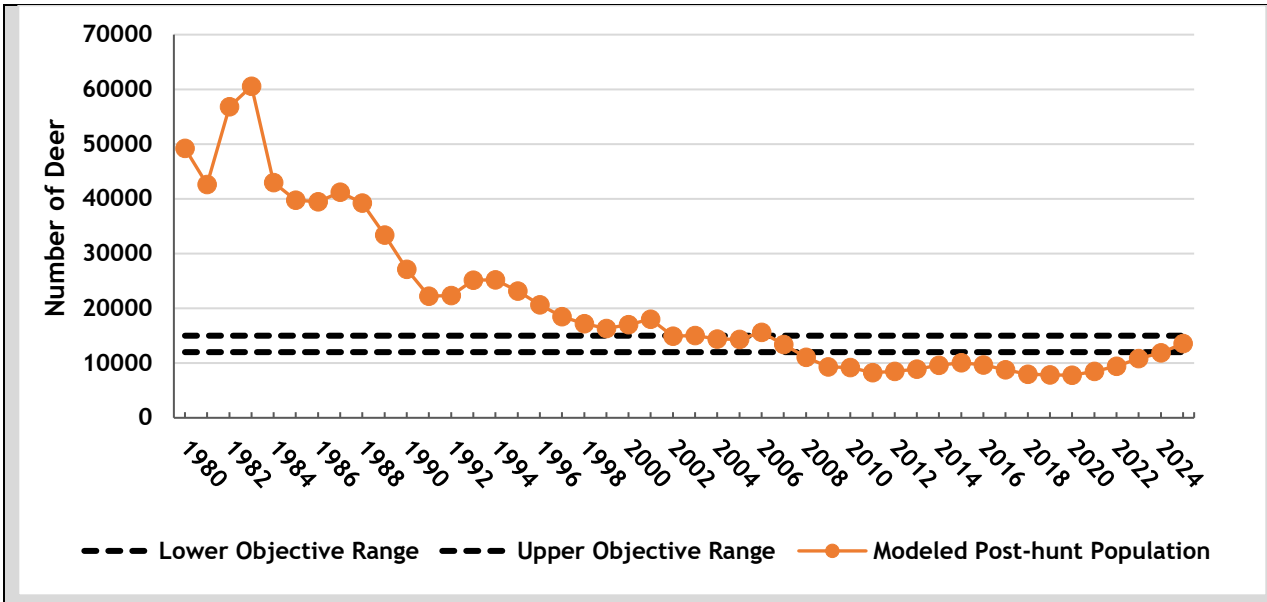


Figure 2. D-19 population estimates from 1980 to 2025.

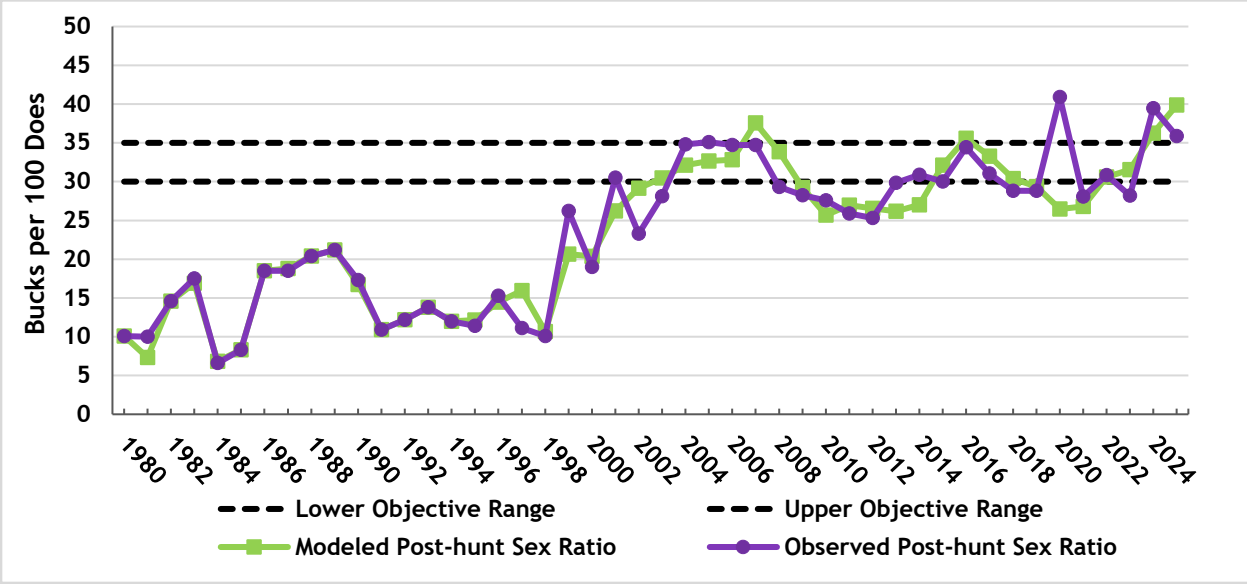


Figure 3. D-19 modeled and observed buck ratios from 1980 to 2025.

Area 18 has used several management strategies listed in the Plan to mitigate CWD concerns in D-19 and neighboring DAUs. These strategies include adding first rifle season hunts and an early season rifle hunt focused on strategic portions of D-19 and D-40 (GMUs 64 and 65). The early-season, either-sex rifle hunt in August focuses harvest on resident deer populations in CWD hot spots within the agricultural and residential areas of the Uncompahgre Valley near Montrose (Figure 4). Over the last five years, this hunt has successfully removed CWD-positive resident deer before lower-prevalence migratory deer move down into the Valley during the winter months. Additionally, 2025 was the first year that hunters were able to take advantage of the new first rifle season deer hunts. These hunts further alleviated hunter crowding and increased CWD-positive deer harvest, but despite these management efforts, CWD prevalence continues to rise; therefore, CPW recommends adding private-land-only second, third, and fourth rifle season hunt codes to GMU 61 and a private-land-only antlered hunt code to fourth season in GMU 62, so hunters will have more opportunities to harvest bucks on agricultural and private lands where hot spots exist and lower buck ratios to slow prevalence throughout the DAU. Unit 61 currently only has unit-wide

licenses for all rifle seasons, but adding private-land-only licenses should help to focus hunting pressure on private land where deer concentrate, especially in agricultural fields and residential areas around Nucla and Montrose. These additional hunt codes will be used as tools to help achieve management objectives for these herds and to alleviate the increasing prevalence of CWD.

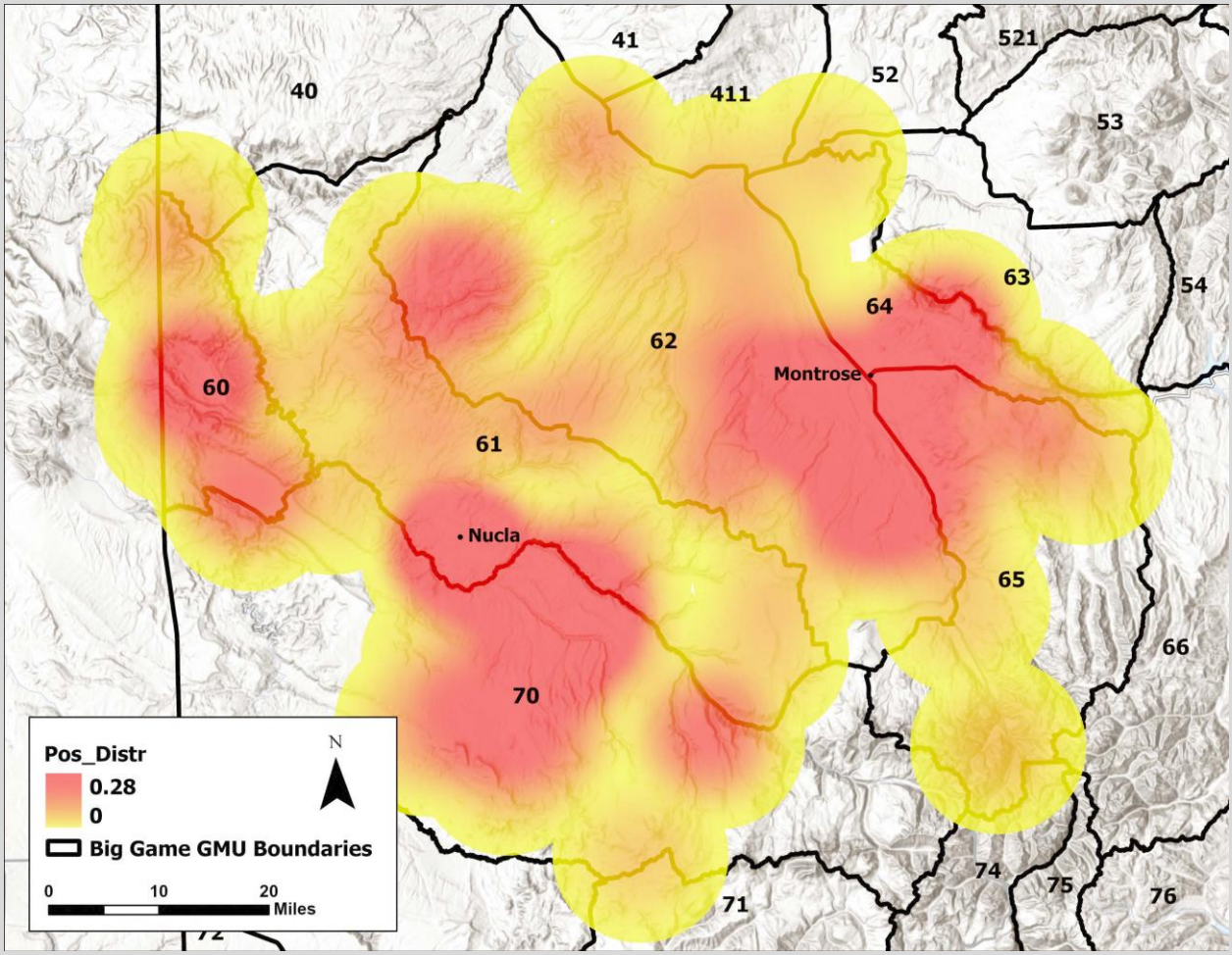


Figure 4. Distribution of suspected positive chronic wasting disease samples from mandatory testing in 2025. Higher densities of positive samples are found in the darker-shaded areas. The towns of Nucla and Montrose are emphasized with stars.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

1. **Resident and Non-resident Hunters (Comments received during informal interactions and the Big Game Harvest Survey)**
2. **Outfitters**
3. **CPW Staff**

Stakeholders were contacted during the Herd Management Plan process in 2023-2024. Support was given to manage D-19 within the population objective. The HMP for this herd also directs CPW to manage for increasing CWD concerns.

Data from the 2025 Hunter Attitude Survey showed that hunters in D-19 would prefer to hunt more mature males than to hunt more often. Unfortunately, high CWD prevalence requires CPW to take management action to decrease CWD infection rates. Hunters may be satisfied with the increased opportunity for more private-land-only rifle season hunt codes.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Add rifle PLO hunt codes to D-19 concurrent with established regular rifle seasons (list A):

DM061P2R (valid in GMU 61)
DM061P3R (valid in GMU 61)
DM061P4R (valid in GMU 61)
DM062P4R (valid in GMU 62)

2. Status quo: Continue without adding hunt codes to D-19.

Issue Raised by:	Area 18 Staff, Alyssa Kircher
Author of the issue paper (if different than person raising the issue):	
CC:	Jamin Grigg, Rachel Sralla, Matt Ortega, Cory Chick
Approved for further consideration by:	Cory Chick, Jamin Grigg
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial Section**
Any additional regions, branches or sections involved in implementation:	**SW Region**
Complies with Big Game Season Structure?	**NO**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the regular rifle antlerless seasons in GMU 461 be closed, while maintaining the antlerless private-land-only season?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

GMU 461 falls within the E39 Mt Evans elk herd in central Colorado. The GMU covers parts of Douglas, Jefferson and Park Counties southwest of the city of Denver at the north end of the Kenosha mountains. The majority of the land within 461 is privately owned, and much of it is divided by mountain communities south of Highway 285.

DAU E39 currently has a population objective range of 2,200 - 2,600 elk and a post-hunt sex ratio objective range of 30 - 40 bulls per 100 cows. Over the past 10 years, modeled population estimates have been at the low end of or below objective and the 2025 modeled population estimate was 2,184. Elk numbers observed during survey flights and ground counts have been consistently low in most areas of 461, and the groups of elk that are there are found in the eastern portion of the GMU where they refuge on county, city and private lands closed to hunting. CPW has noted low numbers of elk and a desire to increase populations in 461 for some time. The float group that contained all four 461 antlerless rifle seasons was lowered to the minimum of 10 licenses after the 2017 season, where it remained until the float groups were eliminated for the 2023 season. With the elimination of float groups in E39, each of the four antlerless rifle hunt codes needed to be set to the minimum of 10 licenses, changing the minimum number of 461 antlerless rifle licenses from 10 to 40 and changing the management goal for the GMU.

Eliminating hunt codes EF461O1R, EF461O2R, EF461O3R, and EF461O4R will allow managers to reduce the number of hunters and harvest in 461 and allow the elk population to grow. GMU 461 either sex archery, antlerless muzzleloader, and private land only antlerless rifle licenses remain available to address large refuging groups and local hunter demand.

STATE LAW REQUIRES CPW TO SOLICIT INPUT FROM STAKEHOLDERS THAT MAY BE AFFECTED POSITIVELY OR NEGATIVELY BY THE PROPOSED RULES. THE FOLLOWING STAKEHOLDERS HAVE BEEN ADVISED OF AND INVITED TO PROVIDE INPUT ON THE REGULATORY CHANGES PROPOSED IN THIS ISSUE PAPER:

***IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.**

These changes align with the goals of the current herd management plan and will help reach the objectives it has set.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Eliminate hunt codes EF461O1R, EF461O2R, EF461O3R, and EF461O4R.

2. Status quo

Issue Raised by:	Area 1 staff

Author of the issue paper (if different than person raising the issue):	Mark Fisher - Area 1 and 2 Game Management Team Biologist
CC:	Scott Murdoch, Matt Martinez, Shannon Schaller, Ben Kraft
Approved for further consideration by:	**Brian Dreher**
Requires new space in the brochure?	**NO**

Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE Region, Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should hunt code(s) be created in GMU 38 to create a subunit to manage the resident elk herd at Rocky Flats National Wildlife Refuge?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Rocky Flats National Wildlife Refuge is a 5,640 acre refuge in GMU 38 of the Clear Creek Elk Herd (DAU E-38), in Jefferson County. The refuge is located northwest of the greater Denver Metro Area. In 2007, the U.S. Fish and Wildlife Service (USFWS) began managing the site for wildlife, habitat, and recreation. The refuge provides suitable habitat for big game species such as mule deer and elk. Over the last 50 years, the habitat has remained fairly unchanged. However, a steadily increasing resident population of elk has shifted the property's primary ungulate occupants from mule deer to elk. The resident elk herd has increased from approximately 200 elk in 2013 to over 500 in 2026. The herd occupies Rocky Flats and adjacent surrounding properties on an annual basis.

The rapid growth and large size of the resident herd have caused a number of management issues on the refuge. In 2022, a dryland pasture condition assessment was conducted by USFWS staff, which determined that the property can sustainably support 200 to 250 elk. Estimates from ground surveys 2021 - 2025 have increased from 350 to 500 animals. The high concentration of elk on the refuge has led to overbrowsing and overgrazing, noxious weed issues, and damage to the small number of trees and shrubs on the property. Additionally, neighboring land managers have experienced increasing property damage from elk tearing down fences, damaging erosion control materials and infrastructure. The refuge is bordered by major roadways on three sides, and increased vehicle collisions pose a serious risk to public safety. Finally, the Rocky Flats subherd is driving the Clear Creek Elk Herd above population and sex ratio objectives set in the E-38 herd management plan.

The USFWS is working with CPW to implement a public hunting program on the refuge to manage the elk herd. Since 2023, USFWS has worked with CPW on annual culling operations to reduce the size of the herd to the desired range of 200-250 elk. From 2023 to 2025, over 200 elk have been lethally removed by USFWS. With support from the Federal Government to increase hunting opportunities on National Wildlife Refuges (NWRs), an elk management plan for Rocky Flats NWR has been submitted by USFWS for federal rule making. This plan was approved in July of 2026. With this approval, CPW recommends administering licenses specific to the Rocky Flats Refuge.

CPW proposes creating limited list C rifle hunt codes specific to Rocky Flats NWR on lands managed by USFWS. The sub-unit created by the new hunt codes will be within the area bounded by CO State Hwy 93 on the west, CO State Hwy 128 on the north, Indiana St. on the east, and CO State Hwy 72 on the south. An annual season running Aug. 15 - Jan. 31 will maximize hunter opportunity.

USFWS's hunt plan will establish property-specific hunting regulations, such as method of take and restricted areas, which can be enforced by both USFWS and CPW law enforcement.

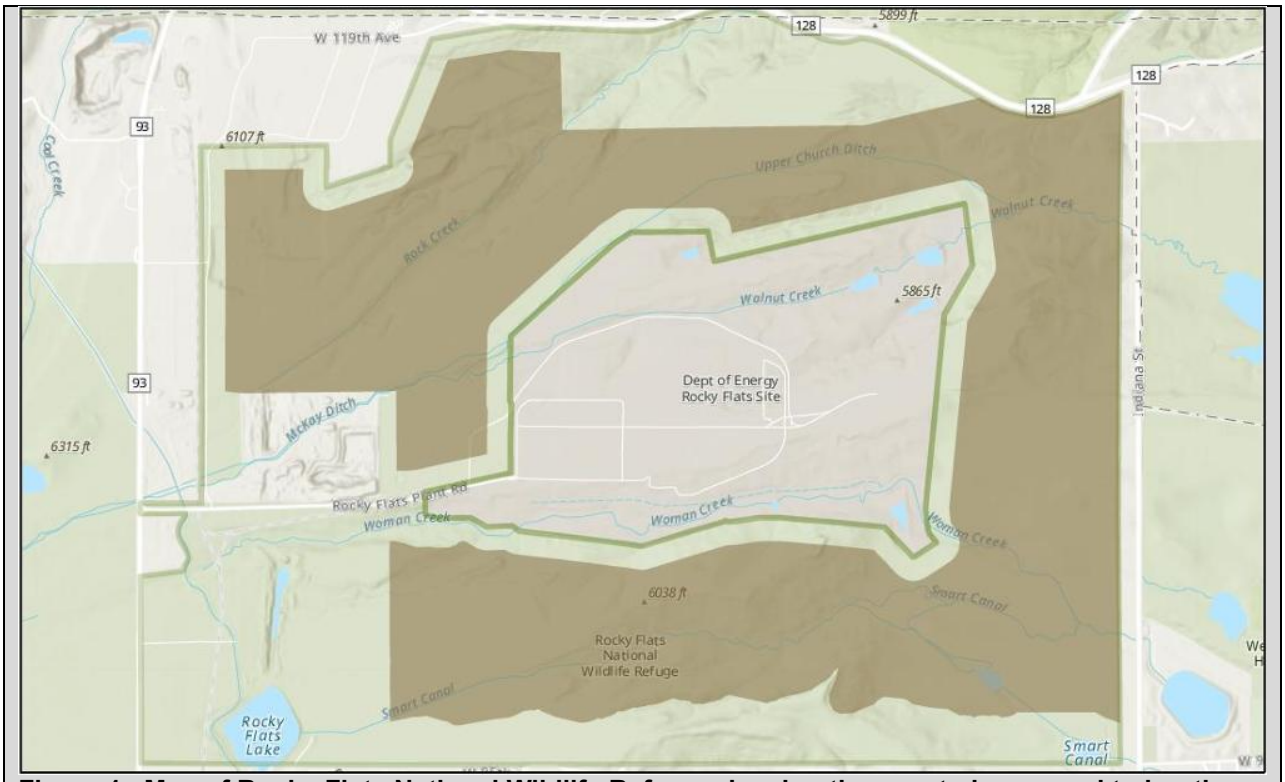


Figure 1. Map of Rocky Flats National Wildlife Refuge, showing the area to be opened to hunting shaded in brown.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Meetings were held with Boulder County Open Space Dept., Jefferson County Open Space Dept., the Cities of Arvada, Broomfield, and Westminster, the US Fish and Wildlife Service, local residents, and the Northern Arapaho, Southern Ute, Cheyenne and Arapahoe, and Jicarilla Apache tribes. Feedback from these meetings was used to develop the USFWS hunt plan and regulations.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Establish hunt codes (EE038S1R & EF038S1R) as list C licenses valid only on the Rocky Flats National Wildlife Refuge from August 15th to January 31st annually.

2. Status quo.

Issue Raised by:	Philip Sorensen (DWM), David Lucas (USFWS)
Author of the issue paper (if different than person raising the issue):	
CC:	Matt Martinez, Shannon Schaller, CPW Area 5, Ben Kraft
Approved for further consideration by:	**Brian Dreher**
Requires new space in the brochure?	**YES**

Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE Region, Area 5, Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

Issue:	**Should private-land-only (PLO) either-sex archery licenses be available over-the-counter?**

Discussion (facts and figures, explanation of issue):

Private lands play a critical role across the state, providing quality habitat for Rocky Mountain elk. Depending on the elevation and location of private lands, those properties provide habitat to meet elk winter and summer range habitat requirements. Furthermore, hunting on private lands is crucial to herd management to help meet population objectives, provide recreational hunting opportunities, and address game damage concerns.

Following approval of the current Big Game Season Structure (BGSS) for 2025-2029, private-land-only archery hunt codes have been added to multiple data analysis units (DAUs) across the northwest region. In an effort to simplify hunt codes, meet private land only hunting demand, meet herd management plan objectives, and address concerns from landowners that straddle DAU boundaries, CPW proposes creating an over-the-counter (OTC) private-land-only (PLO) either-sex archery hunt code.

Hunting on private lands will be self-limited based on elk presence and landowner desire and tolerance for elk population size. Hunting on private lands will not increase hunter crowding on public lands, helping to meet the objectives of staff and resident archery hunters to reduce hunter crowding on public lands during the archery season. This option would benefit private landowners and outfitters who have been affected by the limiting of non-resident archery licenses to specific units, and reduce competition for regular non-resident archery licenses. Maintaining hunting pressure on private lands during archery season may benefit public hunters in areas where elk are redistributed onto public lands. By creating a region-wide OTC PLO either-sex hunt code, it simplifies the number of hunt codes across the region by eliminating 4 limited PLO either-sex archery hunt codes across the NW region.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Staff have heard concerns from landowners and outfitters about their hunters being able to hunt across properties that are split by DAU boundaries. The new non-resident archery licenses are DAU specific, which creates a burden for allocating hunters to certain parts of properties.

Input collected from a survey on Engage CPW, indicated that 57.4% of respondents (n=251) support the proposed regulation change. From the limited comments received (18), supporters argue that establishing region-wide, over-the-counter, private-land-only (PLO) archery elk licenses would relieve administrative and boundary burdens for landowners and outfitters while encouraging elk movement onto adjacent public lands. In contrast, opponents contend that the proposal unfairly favors private landowners and commercial interests, circumvents the preference point draw system, and risks exacerbating overcrowding.

Alternatives (possible outcomes or possible regulations):

1. ***Preferred Alternative*:** Create an over-the-counter PLO either-sex archery license, EE000P1A, valid in GMUs 3, 4, 5, 6, 11, 12, 13, 14, 15, 16, 17, 18, 21, 22, 23, 24, 25, 26, 27, 28, 30, 31, 32, 33, 34, 35, 36, 37, 43, 44, 45, 47, 131, 161, 171, 181, 211, 214, 231, 301, 371,

431, 441, 444, 471 (DAU's E-2, E-3, E-6, E-7, E-8, E-10, E-12, E-13, E-15, and E-16); and eliminate hunt codes: EE003P1A, EE011P1A, EE021P1A, EE028P1A. **2. Status quo**	
Issue Raised by:	Jeromy Huntington, A9 AWM; Elissa Slezak, A9 Biologist; Kris Middledorf, A10 AWM; Mike Swaro, A6 AWM; Brad Banulis, NW Senior Biologist
Author of the issue paper (if different than person raising the issue):	
CC:	Travis Black, NW RM; Garett Watson, DRM; Jacob Brey, DRM; Sherri Huwer, TERP; Andy Holland, Big Game Coordinator; Matt Eckert, GMT DAD

Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**YES**
Does this change comply with BGSS?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NO**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should E-14 muzzleloader hunt codes be standardized with E-14 archery hunt codes?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Data analysis unit (DAU) E-14 includes game management units (GMUs) 41, 42, 421, 52, 411, and 521. In 2023, archery elk licenses were limited in the DAU, resulting in five hunt codes. As intended, this model has allowed CPW to manage both hunter distribution and harvest across the DAU more prescriptively. Current archery hunt codes include:

E-14 ARCHERY:
EE041O1 (valid in 41, 42, 421)
EE041P1A (valid in 41, 42, 421)
EE052O1A (valid in 52, 411)
EE052P1A (valid in 52, 411, 521)
EE521O1A (valid in 521)

In contrast, muzzleloader hunt codes in E-14 have not followed suit following the E-14 archery limitations. Presently, there are three muzzleloader hunt codes:

E-14 MUZZLELOADER:
EM041O1M (valid in 41, 42, 421, 52, 411, 521)
EF041O1M (valid in 41, 42, 421, 52, 411)
EF521O1M (valid in 521)

The issue is whether hunt codes should be standardized during the early seasons to create consistency in management. Although this would create several novel hunt codes, it would eliminate the disparity between archery and muzzleloader and sync the current management framework in E-14. Aligning the archery and muzzleloader hunt codes would also make it easier for hunters to interpret and follow regulations, and allow CPW to better manage hunter distribution across the landscape to achieve management objectives. Standardized hunt codes could include:

Revised E-14 Muzzleloader Hunt Codes:
EM041O1M (GMUs 41, 42, 421)
EF041O1M (GMUs 41, 42, 421)
EMO52O1M (GMUs 52, 411)
EFO52O1M (GMUs 52, 411)
EM521O1M (GMU 521)
EF521O1M (GMU 521)

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

GMU 521 landowners and outfitters have provided input and are supportive of the proposed changes. Muzzleloader elk hunters are generally supportive of standardizing E-14 hunt codes during the early seasons to maintain consistency within this DAU. Input collected through CPW's engagement website indicated 79% of respondents (174/220) support the proposed changes. Area 16 and SW Region CPW staff are also supportive.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Create the following hunt codes for muzzleloader season in E-14: EM041O1M (GMUs 41, 42, 421) EF041O1M (GMUs 41, 42, 421) EMO52O1M (GMUs 52, 411) EFO52O1M (GMUs 52, 411) EM521O1M (GMU 521) EF521O1M (GMU 521) **2. Status quo** EM041O1M (valid in 41, 42, 421, 52, 411, 521) EF041O1M (valid in 41, 42, 421, 52, 411) EF521O1M (valid in 521)	
Issue Raised by:	Brandon Diamond
Author of the issue paper (if different than person raising the issue):	Brandon Diamond – Area Wildlife Manager Area 16
CC:	Kirk Oldham, Rachel Sralla, Jamin Grigg, Brad Banulis
Approved for further consideration by:	**Cory Chick**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**SW/NW Collaboration**
Any additional regions, branches or sections involved in implementation:	**Area 7, NW Region, Terrestrial**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the eastern plains either-sex rifle elk licenses (EE087U5R) be changed from list C to list B?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Currently, the eastern plains are primarily covered by an either-sex, over-the-counter elk license (EE087U5R), valid annually from September 1st through January 31st. This license allows landowners to utilize elk hunting to mitigate game damage to irrigated crops and rangeland. The license is valid on both public and private lands, which helps manage conflicts on private properties adjacent to, or interspersed with, public lands. While these are currently list C licenses and hunters can purchase an unlimited number of them, license sales data indicate that approximately 1% of the average 1,971 hunters purchase more than two licenses per season.

CPW proposes reclassifying these licenses from list C to list B. This change would maintain the ability to address elk conflicts through hunting while limiting individual elk hunters to two licenses.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

CPW staff met with the Executive Director of Grasslands Unlimited (GU) to discuss changing the list status for EE087U5R as an alternative to the regulatory changes proposed in GU's July 2026 citizen petition on Eastern Plains elk management.

CPW Terrestrial Branch and SE/NE Region staff support the recommended status change from list C to list B proposed in this issue paper.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Change the list status of EE087U5R to list B
2. **Status quo:** EE087U5R will remain list C

Issue Raised by:	Area 12 CPW Staff
Author of the issue paper (if different than person raising the issue):	Frank McGee and Julie Stiver
CC:	Shannon Schaller, Matt Eckert, Sherri Huwer, Katie Gray, Andy Holland, Ben Kraft

Approved for further consideration by:	**Frank McGee**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**SE Region**
Any additional regions, branches or sections involved in implementation:	**Terrestrial, NE Region, Branding and Communications**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the archery antlerless hunt code, EF020O1A, in the St. Vrain Elk Herd be closed?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The St. Vrain Elk Herd, data analysis unit (DAU) E-9 includes game management unit (GMU) 20, which is located on the northern Front Range in Boulder and Larimer Counties. In 2003, a special antlerless-specific archery hunt code (EF020O1A) was created to maintain limited antlerless archery hunting in the Estes Valley. Concurrently, a regulation change restricted either-sex archery license holders (EE020O1A; a hunt code with a large quota) from hunting in the Estes Valley. At the time, the St. Vrain Elk Herd (E-9) was above the population objective, and these regulatory changes were made to better distribute archery elk hunting pressure and harvest geographically within GMU 20 and to increase antlerless elk harvest to reduce the population size. Subsequently, the herd has declined below the population objective, the herd's distribution and migration timing have changed, and the Division has learned to determine the optimal number of archery hunters in the Estes Valley to limit archery hunting conflicts. In addition, the private-land-only rifle season length (also valid in the Estes Valley and allowing archery equipment) has been extended to September 1st through January 31st. Therefore, because the hunt code is not needed to achieve herd objectives, mitigate conflicts, or address distribution concerns, CPW proposes closing EF020O1A. Additionally, E-9 currently has 17 hunt codes, and removing this special hunt code will reduce regulation complexity.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

There is Area support to eliminate this hunt code. The hunt code does not help achieve herd management objectives or address elk conflicts.

Prospective antlerless archery elk hunters of the Estes Valley have not been contacted but would be impacted.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. **Preferred Alternative*:** Eliminate special hunt code EF020O1A in game management unit 20.

2. **Status quo**

Issue Raised by:	Ben Kraft
Author of the issue paper (if different than person raising the issue):	Ben Kraft, Jason Duetsch
CC:	Shannon Schaller, Matt Eckert

Approved for further consideration by:	**Shannon Schaller**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE GMT and NE Region**
Any additional regions, branches or sections involved in implementation:	**TERP**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the first late antlerless elk season, EF020L1R, be closed in the St. Vrain Elk Herd to encourage elk use of National Forest Land during the winter?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The St. Vrain Elk Herd, data analysis unit (DAU) E-9 includes game management unit (GMU) 20, which is located on the northern Front Range in Boulder and Larimer Counties. A large proportion of the St. Vrain Elk Herd uses Rocky Mountain National Park (RMNP) and the Estes Valley. Due to differing management strategies among land managers and agencies within the DAU, alternative and creative hunting seasons are needed to achieve herd and harvest objectives and manage conflicts. Beginning in 2003, three late-season antlerless seasons were implemented to harvest elk that occasionally moved outside of RMNP and the Estes Valley during the winter. In 2008, one of those late seasons was closed, followed by a second late-season closure in 2015. EF020L1R is the only remaining late-season antlerless hunt code.

However, the winter distribution of elk that use RMNP and the Estes Valley continues to shift further east, as proportionally more elk spend more time in exurban and residential foothill areas. Large cow/calf groups make very rapid movements from RMNP and the Estes Valley to the foothills, spending less time on National Forest Lands. With the shift in distribution, human-elk conflicts along the foothills have increased. To encourage elk use of National Forest Lands during the winter and early spring, and because the herd is below the population objective, CPW proposes eliminating EF020L1R. Additionally, E-9 currently has 17 hunt codes, and removing this hunt code will reduce regulatory complexity.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

There was internal discussion about reducing hunting opportunity, but this was outweighed by concerns about the current distribution of elk, as most antlerless elk are on private land or open space during the season dates.

Prospective GMU 20 antlerless elk hunters have not been contacted but would be impacted.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Eliminate hunt code EF020L1R to reduce winter hunting pressure on National Forest Land.

2. **Status quo**

Issue Raised by:	Ben Kraft, Area 2
Author of the issue paper (if different than person raising the issue):	Ben Kraft, Jason Duetsch
CC:	Shannon Schaller, Matt Eckert

Approved for further consideration by:	**Shannon Schaller**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE GMT and NE Region**
Any additional regions, branches or sections involved in implementation:	**TERP**
Complies with Big Game Season Structure?	**YES**

Recommended for consent agenda?	NO

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**In E-4, should private-land-only antlerless hunting seasons start dates be moved from September 1st to August 15th?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Data analysis unit (DAU) E-4 is the Red Feather-Poudre Canyon elk herd which consists of game management units (GMUs) 7, 8, 9, 19, and 191 in northern Larimer county, Colorado. There are four private-land-only (PLO) cow elk hunt codes in this DAU consisting of EF007P5R (GMUs 7 and 8), EF009P5R, EF019P5R, and EF191P5R. The season dates for these hunt codes are currently September 1 through January 31 annually. The 2025 post-hunt modeled estimate was 4,522 elk, above the objective of 3600-4200 elk. Over the past three years, game damage claims paid on elk damage to corn and hay in E-4 have increased, incurred by sedentary elk in agriculture fields. This includes $12,480 in 2022, $15,330 in 2023, $28,485 in 2024, and $32,934 in 2025. Damage licenses are regularly issued to agriculture producers receiving damage.

Changing the season dates for the PLO cow hunt codes to begin on August 15th will allow landowners to use hunter harvest to change the distribution of elk causing damage to agriculture in late summer when maturing corn and later cuttings of alfalfa and hay receive significant damage. Any increase in harvest can be sustained because this herd is over objective.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

External publics solicited by DWMs have been landowners, some of whom have been receiving damage and have filed game damage claims. Input from these external publics have been collected informally, and all supported this proposed change to increase the season dates for cow elk hunting on private land.

Input has been gathered internally through meetings and discussions between the terrestrial biologist and Area personnel.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Change the season dates for the PLO cow hunt codes EF007P5R, EF009P5R, EF019P5R, and EF191P5R to begin 16 days earlier, on August 15th instead of on September 1st.

2. **Status quo**

Issue Raised by:	Brandon Muller, Justin Foster, Joe Halseth
Author of the issue paper (if different than person raising the issue):	
CC:	**Area 4, Schaller, Eckert, Kraft**

Approved for further consideration by:	**Schaller**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE Terrestrial**

Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should either-sex elk licenses in muzzleloader, first season and fourth season rifle in DAU E-8 be changed to sex specific licenses?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Either-sex licenses were established in a variety of hunt codes for muzzleloader, first rifle, and fourth rifle seasons in DAU E-8 in 2010 as a means of increasing cow harvest when the DAU was above objective. These either sex licenses and other measures have been successful in increasing cow harvest and reducing the number of elk in E-8. The objective range for E-8 is 3,400-4,400 elk. The 2026 post-hunt population estimate is approximately 3,220 elk and is the second consecutive year below the objective range (Figure 1).

Since 2018, antlerless harvest has comprised between 24% (2023) and 58% (2020) of total either-sex harvest in this DAU, averaging 39%. In 2025, antlerless elk comprised 35% of the either-sex harvest. Among 1st & 4th season either-sex private-land-only licenses, cow harvest has fluctuated year to year, ranging from 0% to 80% (2023) of the ES PLO harvest.

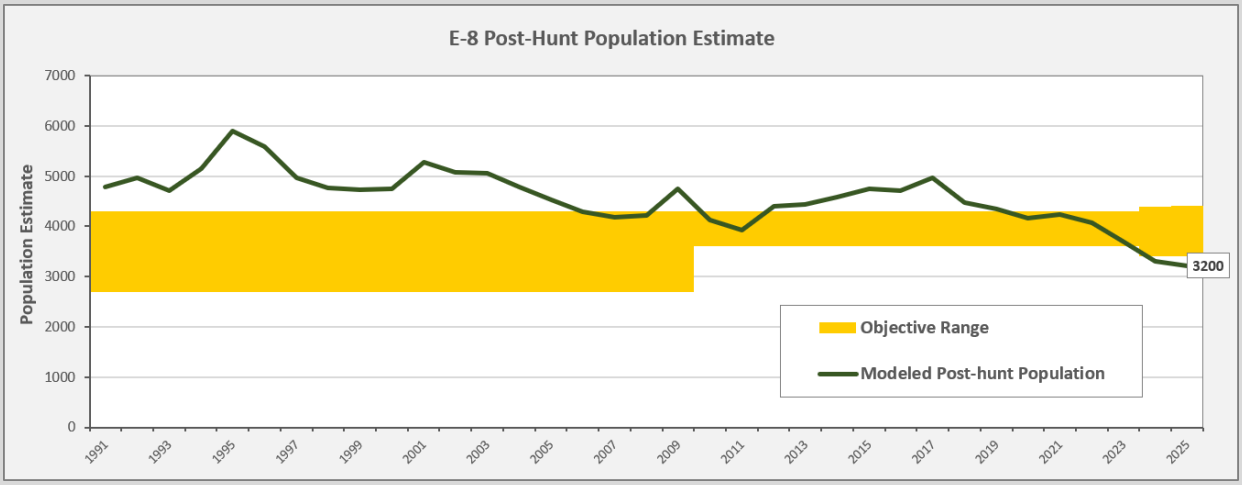


Figure 1. *E-8 post-hunt population and Objective Range Graph, 1991-2025. A yellow shaded bar shows the population objective was approximately 2800 to 4300 elk from 1991-2009, then 3,500 to 4,300 elk from 2010-2023, and 3,400-4,400 elk from 2024 to present. A dark green line shows that the population was above objective from 1991 to around 2005, then within or slightly higher than objective from 2006-2022, and below objective since 2023.*

Separating the either-sex licenses into sex specific hunt codes will provide better ability to regulate cow harvest, while still maintaining license opportunity for bull hunters through sex-specific antlered licenses, as both either-sex and antlerless license allocations for this DAU are currently being reduced due to the decrease in population. In addition, the List B antlerless archery license option will be removed, and the EF018V1A hunt code will be removed.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

During the Herd Management Plan (HMP) revision process, public meetings and an online survey were available to gather public attitudes towards elk management. There was overwhelming concern from sportsman and landowners about the low elk numbers and desire to increase the population. Either sex licenses are not a conducive management tool for increasing hunted populations. During the recent public engagement survey, 81% of respondents (n=244) supported the draft proposed regulation.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Convert Either Sex licenses to sex specific:

   Eliminate the following hunt codes:

   - **EE018O1M**
   - **EE018O1R**
   - **EE018O4R**
   - **EE018P1R**
   - **EE018P4R**
   - **EF018O1A**
   - **EF018V1A**

   And add the following hunt codes:

   - **EM018O1M** (EF018O1M cow hunt code already exists for muzzleloader)
   - **EM018O1R** (EF018O1R cow hunt code already exists for 1st Rifle)
   - **EM018O4R** (EF018O4R & EF181O4 R cow hunt codes already exists for 4th Rifle)
   - **EM018P1R**
   - **EF018P1R**
   - **EM018P4R**
   - **EF018P4R**

Regulation change:
W-2 #205 - Annual Bag Limits and Maximum Numbers of Licenses per Person
2. Elk
b. Two Licenses - A hunter may obtain two elk licenses if at least one of them is
3. an antlerless license, except Ranching for Wildlife license, issued for GMUs 1, 2, 6, 10, 16, 17, 21, 22, 30, 31, 32, 38, 40, 41, 42, 43, 44, 45, 47, 50, 52, 59, 82, 85, 86, 133, 134, 140, 141, 142, 161, 171, 201, 411, 421, 444, 471, 500, 501, 511, 512, 581, 682, 691, 791, 851, 861.

W-2 #255 - Archery Elk Seasons
B. Regular Archery Elk Seasons
Archery Season Dates, Units, Limited or Unlimited Licenses as shown by hunt code
Hunt Code: EF000U1A (antlerless, unlimited, Colorado resident only), Units: 6, 16, 17, 21, 22, 30, 31, 32, 38, 43, 59, 82 (public lands only), 85, 86, 133, 134, 140, 141, 142, 161, 171, 431, 471, 511, 581, 591, 682, 691, 791, 851 except Bosque del Oso SWA, 861

2. Status quo

Issue Raised by:	Elissa Slezak (Wildlife Biologist), Brad Banulis (NW Senior Wildlife Biologist)	
Author of the issue paper (if different than person raising the issue):		
CC:	Jeromy Huntington (A9 AWM), A9 DWMs	
Approved for further consideration by:		**Travis Black**

Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should either-sex elk licenses in muzzleloader, first season and fourth season rifle in DAU E-13 be changed to sex specific licenses?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Either sex licenses were established in a variety of hunt codes for muzzleloader, first rifle, and fourth rifle seasons in DAU E-13 in 2010 as a means of increasing cow harvest when the DAU was above objective. These either sex licenses and other measures have been successful in increasing cow harvest and reducing the number of elk in E-13. The objective range for E-13 is 4,000 - 5,500 elk. The 2026 post-hunt population estimate is approximately 2,700 elk, and the population has been below objective since 2018.

Since 2018, antlerless harvest has comprised between 40% (2022) and 60% (2019) of total regular season (muzzleloader, 1st, & 4th season) either-sex harvest in this DAU, averaging nearly half at 47%. In 2025, antlerless elk comprised 48% of the either-sex harvest. Among 1st & 4th season either-sex private-land-only licenses, cow harvest has comprised an even higher percentage, ranging from 29% (2023) to 100% (2021).

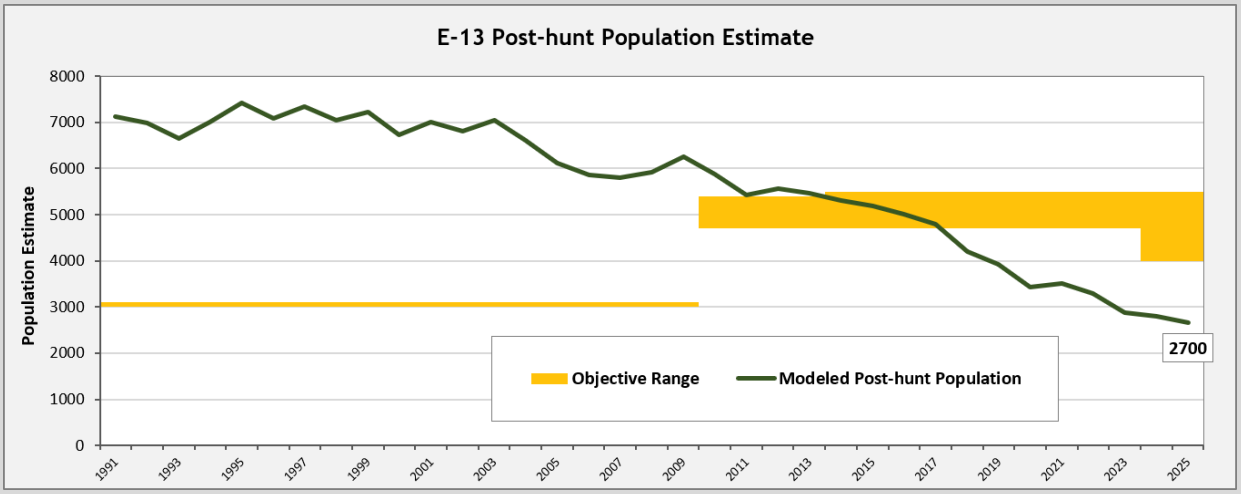


Figure 1. E-3 post-hunt population and Objective Range, 1991-2025. This graph shows a downward trend in the elk population. A dark green line shows the population between 6,000 to 7,000 elk from 1991-2009, and gradually declines to approximately 2,700 by 2025. A gold shaded bar represents the objective range, which was 4,500 to 5,500 elk from 2010 to 2023, then expanded to a range of 4,000 to 5,500 elk starting in 2024. The population has been below the objective range since 2018.

Separating the either-sex licenses into sex-specific hunt codes will provide better ability to regulate cow harvest, while still maintaining license opportunity for bull hunters through sex-specific antlered licenses, as both either-sex and antlerless license allocations for this DAU are currently being reduced due to the decrease in population.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

During the Herd Management Plan (HMP) revision process, public meetings and an online survey were available to gather public attitudes towards elk management. There was overwhelming concern from sportspeople and landowners about the low elk numbers and desire to increase the population. Either-sex licenses are not a conducive management tool for increasing hunted populations. The recent public engagement found that 80% of respondents (n=242) were supportive of the draft proposed regulation.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Convert Either Sex licenses to sex specific:

   Eliminate the following hunt codes:

   - **EE028O1M**
   - **EE028O1R**
   - **EE371O1R**
   - **EE028O4R**
   - **EE371O4R**
   - **EE028P1R**
   - **EE371P1R**
   - **EE028P4R**
   - **EE371P4R**

   And add the following hunt codes:

   - **EM028O1M** (EF028O1M cow hunt code already exists for muzzleloader)
   - **EM028O1R** (EF028O1R cow hunt code already exists for 1st Rifle)
   - **EM371O1R** (EF371O1R cow hunt code already exists for 1st Rifle)
   - **EM028O4R** (EF028O4R cow hunt code already exists for 4th Rifle)
   - **EM371O4R** (EF371O4R cow hunt code already exists for 4th Rifle)
   - **EM028P1R** & **EF028P1R**
   - **EM371P1R** & **EF371P1R**
   - **EM028P4R** & **EF028P4R**
   - **EM371P4R** & **EF371P4R**

2. **Status quo**

Issue Raised by:	Elissa Slezak (Wildlife Biologist), Brad Banulis (NW Senior Wildlife Biologist)
Author of the issue paper (if different than person raising the issue):	
CC:	Jeromy Huntington (A9 AWM), A9 DWMs

Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should antlered hunt codes EM011O1R, EM011O4R, and EM012O4R in DAU E-6 be changed back to either-sex hunt codes EE011O1R, EE011O4R, and EE012O4R?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Either-sex licenses are an effective management tool for increasing antlerless harvest. Either-sex licenses were used to reduce elk populations in the White River elk herd, data analysis unit (DAU) E-6, from 2003-2012. Elk populations in E-6 were significantly over the population objective, and the either-sex licenses were a very effective tool that helped to meet antlerless harvest objectives. From 2003-2012, average antlerless harvest on either-sex licenses was 39% and 46% for the first and fourth rifle seasons, respectively. Knowing estimated antlerless harvest off-take from either-sex licenses will allow managers to more accurately allocate antlerless licenses to achieve desired harvest objectives. For example, managers have learned that antlerless harvest rates of >15% are needed to reduce an elk population. From 2003-2012 the average antlerless harvest rate was over 18% with the management objective of reducing the E-6 herd. From 2013-2022, the average antlerless harvest rate averaged just under 14% with the objective to maintain a stable population within desired objective levels. After the 2022-23 severe winter, antlerless harvest rates dropped to 6% with the objective of growing the herd.

The conservative harvest management approach taken following the severe 2022-23 winter, has proven successful in recovering the E-6 elk herd. In addition, mild winter conditions in 2023-24, followed by a wetter-than-average spring and summer, and even milder winters in 2024-25 and 2025-26 have contributed to accelerating herd recovery. The post-hunt 2025 population estimate of over 42,000 elk indicates the E-6 herd has grown above the long-term population objective range of 32,000-39,000. Drought conditions from record low snowpack during the 2025-26 are now having an impact on range conditions, furthering concerns of having an overabundance of elk.

Given the quick recovery of the White River elk herd, current drought conditions, fire impacts on winter ranges, and potential for another severe winter event, CPW recommends changing the antlered hunt codes for first and fourth rifle seasons back to either-sex hunt codes for the northern portions of E-6. The northern portions of the White River herd are more productive than most elk herds in the state. The proposed change from antlered to either-sex licenses for hunt codes E*011O1R, E*011O4R, and E*012O4R will allow for targeted antlerless harvest while providing the needed flexibility to manage periphery GMUs within the E-6 herd unit with antlered and antlerless licenses.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

This issue paper proposes changing back huntcodes that were in place prior to the severe winter of 2022-23, when received comments at that time recommending these changes when the elk herd recovered. Through the recent public engagement survey, 57% of respondents supported the draft proposed regulation.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Replace existing antlered hunt codes:
   EM011O1R (valid in GMUs 11, 12, 13, 23, 24, 25, 26, 33, 34, 131, 211, 231),
   EM011O4R (valid in GMUs 11, 211),
   and EM012O4R (valid in GMUs 12, 13, 23, 24),

   with either sex hunt codes:
   EE011O1R (valid in GMUs 11, 12, 13, 23, 24, 25, 26, 33, 34, 131, 211, 231),
   EE011O4R (valid in GMUs 11, 211)
   and EE012O4R (valid in GMUs 12, 13, 23, 24).

2. **Status quo:** The EM011O1R, EM011O4R, and EM012O4R licenses remain available.

Issue Raised by:	Terrestrial Biologist Darby Finley, Area 6 Staff
Author of the issue paper (if different than person raising the issue):	Darby Finley
CC:	AWM Mike Swaro, AWM Kris Middledorf, AWM Matt Yamishita, AWM Kirk Oldham, Terr Bio Eric VanNatta, Terr Bio Julie Mao, Terr Bio Genevieve Fuller

Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should general list A antlerless elk licenses be converted back to list B, and should OTC antlerless elk licenses be valid again in DAUs E-2 and E-6?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

General antlerless licenses in DAUs E-2 and E-6 were converted from list B to list A in 2024, following the 2022-23 severe winter, as a management tool to help recover these populations. Additionally, list B OTC antlerless archery licenses were no longer valid in any E-2 and E-6 GMUs, starting in 2025. Prior to the severe winter, the E-2 and E-6 herds were stable, and list B licenses were a beneficial tool in maintaining these two very productive elk herds within long-term objective ranges.

Over the past three years, the E-2 and E-6 elk herds have recovered from the severe winter of 2022-2023, a testament to the high productivity of these herds. The post-hunt 2025 population estimate for E-2 (~17,000) is within the herd objective range of 15,000-18,000, and the estimate for E-6 (~42,500) is above the objective range of 32,000-39,000. In addition, the sex ratios for both herds are within the respective objective ranges of 20-25 bulls/100 cows, E-2 at 23 bulls/100 cows and E-6 at 25 bulls/100 cows E-6.

Switching these licenses back to list B, and making OTC antlerless archery licenses valid on public and private land in the same GMUs that they were in 2024 will allow hunters to obtain an additional antlerless license, resulting in the potential to increase cow harvest without increasing hunter crowding. If these changes are approved, those licenses will provide a list B license to harvest cows on private land in the GMUs where general ES archery licenses are limited, and OTC antlerless archery licenses were only valid on private land in 2024 (4, 5, 12, 23, 24, 33, and 441). Due to the recent change that made OTC archery licenses available only to Colorado residents, CPW proposes adding two new limited nonresident hunt codes that would be the nonresident list B antlerless license option equivalent to the OTC antlerless licenses available to residents in E-2 and E-6. Biologists will adjust the quotas for existing limited nonresident hunt codes within these DAUs to keep total nonresident license numbers in line with the current management strategies. These changes will allow managers to apply the same tools used prior to the severe winter to maintain the E-2 population within the long-term objective range, and restore one of the tools staff can use to bring the E-6 population back into objective range. Past experience has shown that keeping these two prolific elk herds within long-term objective ranges can be challenging. It is important for CPW to have list B antlerless licenses as a management tool to keep these herds from growing beyond population objective ranges. It's also important to note that when license allocations become extremely conservative, list B licenses become self-limiting because there simply are not enough licenses to meet demand.

The issue paper approved in August 2024, proposing to switch general antlerless licenses from list B to list A, stated that "when the elk populations are back at, or above objective, and antlerless licenses are selling as leftovers, CPW proposes converting antlerless licenses back to list B." Both of those criteria were met in 2025 for E-2 and E-6, and CPW has no reason to expect that they will not be met again in 2026 (*see attached tables). General antlerless licenses valid in GMU 14 will remain list A to continue population recovery in the Steamboat area subherd.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Stakeholder input was collected through a survey on Engage CPW. Of the 245 people who responded to this draft proposed regulation, 73% support the change. Most comments provided strongly support returning antlerless elk licenses to List B to expand hunting opportunities and restore previous management standards. However, several stakeholders express caution regarding severe winter weather and hunter crowding, with some specifically opposing the return to over-the-counter archery tags.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Convert all general antlerless hunt codes to list B from list A in DAUs E-2 (GMUs 3, 4, 5, 14, 214, 301, and 441) and E-6 (11, 12, 13, 24, 25, 26, 33, 34, 131, 211, and 231), make OTC antlerless archery licenses valid in GMUs 3, 11, 13, 25, 26, 34, 131, 211, and 231, and add nonresident hunt codes EF003V1A and EF011VIA, with the same season dates as the current nonresident archery hunt codes, to restore list B options for archery.

Regulation change:
W-2 #205 - Annual Bag Limits and Maximum Numbers of Licenses per Person
2. Elk
b. Two Licenses - A hunter may obtain two elk licenses if at least one of them is
3. an antlerless license, except Ranching for Wildlife license, issued for GMUs 1, 2, 3, 4, 5, 6, 10, 11, 12, 13, 16, 17, 18, 21, 22, 23, 24, 25, 26, 30, 31, 32, 33, 34, 38, 40, 41, 42, 43, 44, 45, 47, 50, 52, 59, 82, 85, 86, 131, 133, 134, 140, 141, 142, 161, 171, 181, 201, 211, 214, 231, 301, 411, 421, 441, 444, 471, 500, 501, 511, 512, 581, 682, 691, 791, 851, 861.

W-2 #255 - Archery Elk Seasons
B. Regular Archery Elk Seasons
1. Archery Season Dates, Units, Limited or Unlimited Licenses as shown by hunt code
Hunt Code: EF000U1A (antlerless, unlimited, Colorado resident only), Units: 3, 6, 11, 13, 16, 17, 18, 21, 22, 24, 25, 26, 30, 31, 32, 34, 38, 43, 59, 82 (public lands only), 85, 86, 131, 133, 134, 140, 141, 142, 161, 171, 181, 211, 231, 431, 471, 511, 581, 591, 682, 691, 791, 851 except Bosque del Oso SWA, 861.

Add new hunt code to table on page 124: EF003V1A (antlerless, nonresidents only, Units 3, 301)
Add new hunt code to table on page 124: EF011V1A (antlerless, nonresidents only, Units 11, 13, 131, 211

See the list of hunt codes that would change from list A to list B below.

2. Status quo: General antlerless hunt codes that were changed to list A with the 2024 issue paper will remain list A in DAUs E-2 and E-6, and OTC antlerless archery licenses will not be valid in any of the E-2 or E-6 GMUs.

Issue Raised by:	Game Management Biologist Darby Finley, Game Management Biologist Becca de Vergie, Game Management Biologist Eric VanNatta, NW Game Management Senior Biologist Brad Banulis, A6 AWM Mike Swaro, A10 AWM Kris Middledorf
Author of the issue paper (if different than person raising the issue):	
CC:	NWRM Travis Black, NWDRM Garett Watson
Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**YES**

Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NW Region**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should opportunities for youth hunters with unfilled doe pronghorn licenses be limited to the DAU from which the original license is issued?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

In 2008, the Wildlife Commission approved a regulation which allows any youth (12-17 years old) pronghorn hunter with an unfilled limited doe or either-sex license to hunt in any December or January pronghorn doe season in the state, regardless of which data analysis unit (DAU) the license was originally issued in. While this regulation was useful and served its purpose initially, it creates challenges to herd management and in the collection of accurate harvest and youth participation data. As an example, PH-1, in northeastern Colorado, is below the population objective and female licenses have been reduced for several years. PH-1's proximity to large population centers, including Denver, Greeley, and Ft. Collins, makes it a convenient location for extended youth pronghorn hunting opportunities, which can lead to higher female harvest than is predicted annually.

In the 2025-2029 Big Game Season Structure, late pronghorn doe seasons occur between November 1 and January 31. Intended to manage populations and disperse animals causing damage to agriculture, these late seasons are an effective management tool as pronghorn congregate in large groups in the winter. Late season hunt codes can be private-land-only (P5-R) or be valid for all land types (L1-R) and specific season dates vary across the state. Most game management units (GMUs) with late season youth pronghorn hunting opportunities are in the NE and SE regions with limited GMUs in the SW Region. Currently, youth hunters with an unfilled limited doe or either-sex (E/S) license are allowed to hunt in any GMU across the state with a late doe season, regardless of the hunt code on the original license. Many youth are taking advantage of this opportunity and hunting doe pronghorn during the late seasons by purchasing a leftover license, list B license, or drawing a license from an undersubscribed hunt code. During the late season in northeastern Colorado, it is not uncommon for DWMs to contact a disproportionate number of youth pronghorn hunters with a license issued in another DAU, compared to hunters with a limited license for that specific late season.

Capturing the details of youth hunter participation (season(s) hunted, GMU(s) hunted, etc.) in harvest surveys remains difficult because the potential pool of youth with unfilled licenses that will participate in any one DAU with a late season is unknown. As a result, additional, and sometimes undesirable, doe harvest may occur in a DAU with a late season because license quotas are set without knowing next year's participation from youth hunters outside of the DAU. Thus, as DAUs with late seasons, like PH-1, achieve or fall below population objectives, accounting for some level of youth participation is now necessary during the license setting process. Therefore, restricting pronghorn youth extended hunting opportunities to the DAU where the original license was issued will make license allocation more predictable and useful within the DAU and allow for more accurate harvest reporting.

Additional changes to youth pronghorn hunting could be made to reduce regulation complexity and better align youth hunting opportunities for pronghorn with regulations for deer extended youth seasons. Currently, for pronghorn, a youth must possess either an unfilled limited doe or either-sex license to extend hunting into any subsequent doe pronghorn late season. For deer extended season, only unfilled limited doe licenses may be used, and youth with these licenses may only hunt an open rifle season in the DAU for which they purchased their original license. Since there are very few either-sex pronghorn licenses, changing youth eligible pronghorn licenses to doe-only will reduce regulation complexity and align the regulations of the two species. Another opportunity to align youth extended deer and pronghorn is to eliminate the current late season pronghorn framework and allow any unfilled limited youth pronghorn license to be extended to any open doe rifle season including first, second or late, given the doe rifle season is within the DAU the license was originally issued.

Therefore, CPW proposes several changes to youth extended pronghorn hunting that allow more useful license allocation, more accurate harvest reporting, and better align youth extended pronghorn hunting

regulations with youth extended deer and elk hunting. Figure 1 is a proposed map illustrating youth pronghorn opportunities for the 2027 Big Game brochure.

- Eliminate the requirement that youth possess an unfilled limited pronghorn doe *or either-sex license*. Replace with the requirement that youth possess an unfilled limited pronghorn *doe license.*

- Require that youth extended pronghorn participation be *constrained to the same DAU* in which the original license was issued.

- Eliminate youth late season pronghorn opportunity as written in Chapter W-2 regulation #207(C). Replace with youth extended pronghorn opportunity aligned to youth deer (Chapter W-2 regulation #207(B)), whereas:
    1) Youth may participate in any open regularly scheduled doe rifle pronghorn season starting after the last day of the season listed on the original license
    2) The youth extended opportunity will be expanded to include all pronghorn DAUs in Colorado.

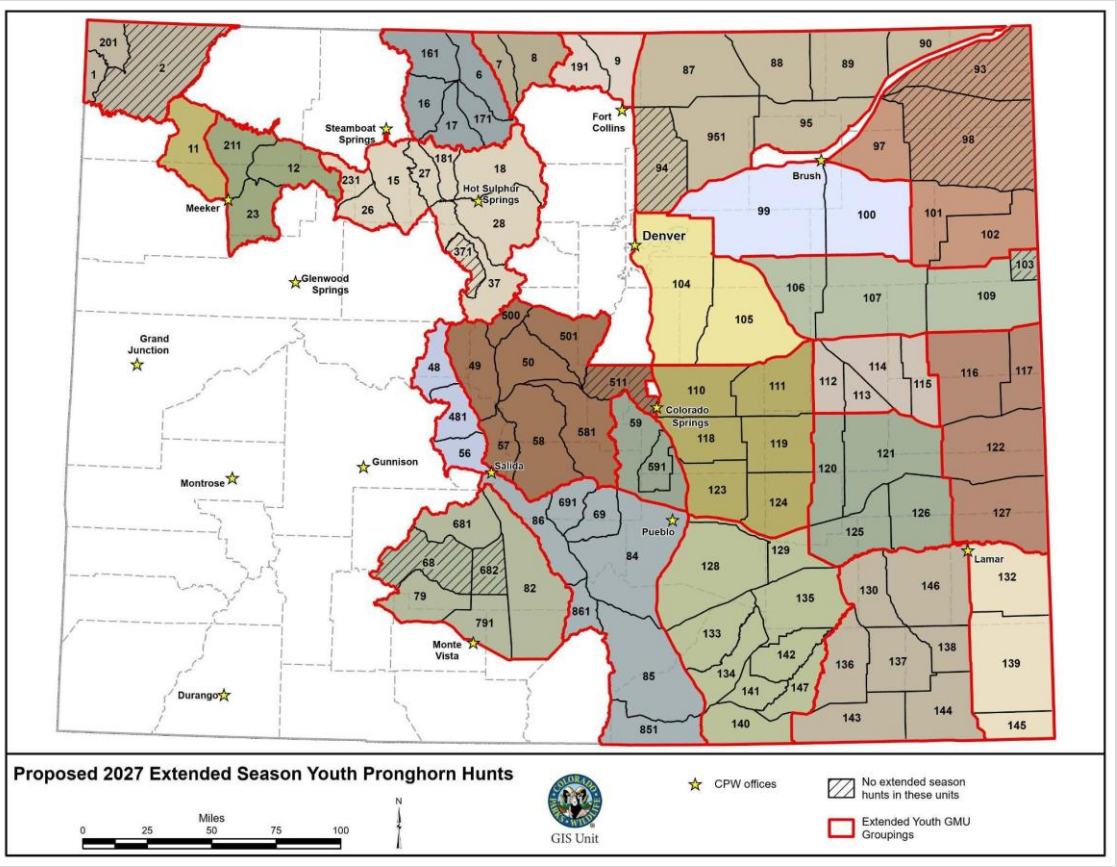


Figure 1. DAU groupings for Extended Youth Pronghorn hunting opportunity

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Terrestrial Big Game Staff, NE, SE, NW, SW Field Staff, TERP, were the internal stakeholders who support for this issue paper for three reasons:

1-More accurate harvest reporting
2- Addressing the unintended challenges with harvest predication in the current framework, and
3- Addressing regulation complexity in the current framework.

An internal concern mentioned by internal stakeholders was a potential public perception that this change could negatively impact youth pronghorn hunting opportunities.

Sportspersons groups have not been solicited.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Replace Chapter W-2 regulation #207(C) with the following:

   Except on Ranching for Wildlife properties, youths ages 12-17 may participate in any open regularly scheduled antlerless pronghorn rifle hunt starting after the last day of the season listed on their original license, in the same DAU, provided they possess an unfilled limited antlerless pronghorn license originally valid in that same DAU from a season that has already been completed, and comply with applicable regulations for the specific open regularly scheduled antlerless rifle hunt in which they participate.

2. **Status quo**

Issue Raised by:	Area 4, NE GMT
Author of the issue paper (if different than person raising the issue):	Joe Halseth, Ben Kraft, Brandon Muller
CC:	Shannon Schaller, Frank McGee, Cory Chick, Travis Black Matthew Eckert, Brad Banulis, Jamin Grigg, Julie Stiver

Approved for further consideration by:	**Brian Dreher, Shannon Schaller, Frank McGee**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the antlered hunt code for M9, MM004O1X, be split into two hunt codes, MM004O1X and MM014O1X; and, should antlerless opportunity in M9 be expanded to include additional GMUs across the DAU?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Moose data analysis unit (DAU) M9, the Yampa North Moose Herd, encompasses five game management units (GMUs) in northwest Colorado: 4, 5, 14, 214, and 441. CPW's current harvest management structure in M9 includes one antlered hunt code, valid in GMUs 4, 5, and 14 (Figure 1), and three floated-quota antlerless hunt codes, valid in GMU 14 only for archery, muzzleloader, and rifle seasons (Figure 2).

Moose harvest in M9 began in 2011, when licenses were valid in GMU 14 only. At that time, CPW issued two antlered and two antlerless licenses, and most moose in M9 were concentrated in GMU 14. Since then, this population has continued to grow and expand into previously unoccupied habitat across the DAU, and CPW has gradually increased license quotas accordingly. In 2022, CPW expanded antlered moose hunting opportunity by adding GMUs 4 and 5 to the previously single-unit antlered hunt code. The antlerless license structure has remained unchanged, with licenses valid only in GMU 14. For the 2026 hunting season, CPW has allocated 25 antlerless licenses and 33 antlered licenses for these hunt codes.

Obtaining precise moose population estimates from standard aerial inventory surveys is currently difficult in M9 due to low sightability in moose winter habitat, including oak brush, mixed aspen and conifer forests, and dense willow drainages. In addition, it has been difficult to justify flying much of this habitat during winter because nearly all deer and elk have migrated to lower-elevation winter range, and CPW often prioritizes aerial surveys in these areas. However, based on numerous conversations with landowners, hunters, CPW staff, and other members of the public, CPW believes moose densities are continuing to increase in GMUs 4, 5, 214, and 441. Recent data from 60 moose cameras in GMUs 5, 214, and 441 from 2023–2026, which have documented adult females with calves and adult males across multiple age classes, corroborate these observations.

Given the observed population expansion across the DAU, along with continued harvest rates and license allocations in GMU 14, CPW has been considering a license restructure in M9 to better reflect current and anticipated changes in moose density and distribution. CPW recommends adjusting the existing antlered hunt code and creating a new antlered moose hunt code to provide additional hunting opportunity and improved management control. Specifically, CPW is considering an adjustment to the existing hunt code so that it would be valid in GMUs 4, 5, 214, and 441 (Figure 3), which represent slightly lower-density areas and newly colonized habitat. CPW would also create a new hunt code valid in GMU 14 only, which represents the area of highest moose density (see maps below illustrating current and proposed hunt code groupings). GMUs 214 and 441 have not previously been open to moose harvest, so this change would mark the first time these units are included as valid hunting units.

CPW is also proposing changes to the existing antlerless license structure. This restructuring would open GMUs 4, 5, 214, and 441 to antlerless harvest through new floated hunt codes: MF004O1A, MF004O1M, and MF004O1R (Figure 4). The existing floated antlerless hunt codes for GMU 14 would remain unchanged.

For both the antlered and antlerless changes, CPW presents a second alternative that would omit GMUs 214 and 441 from the proposed multi-GMU groupings and include only GMUs 4 and 5. Although camera data have documented cow moose and calves in GMUs 214 and 441, indicating natural reproduction is occurring there, this alternative would be a more conservative approach because GMUs 214 and 441 contain less public land and likely have the lowest moose densities across the DAU.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Discussions have been taking place both internally and with moose hunters. In a recent public engagement survey, 81% of respondents (n=223) supported the draft regulatory changes to increase moose hunting opportunity.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative:** Following big game season structure for dates, floated quotas, and seasons of choice:
   - Modify valid units for MM004O1X to include GMUs 4, 5, 214, and 441;
   - Create the new hunt code MM014O1X (valid in GMU 14 only);
   - Create the new, floated-quota hunt codes MF004O1A, M, and R valid in GMUs 4, 5, 214, and 441;
   - Retain the existing floated-quota hunt codes MF014O1A, M, and R**.**

2. **Second Alternative:**
   - Modify valid units for MM004O1X to include GMUs 4 and 5;
   - Create the new hunt code MM014O1X (valid in GMU 14 only);
   - Create the new, floated-quota hunt codes MF004O1A, M, and R valid in GMUs 4 and 5;
   - Retain the existing floated-quota hunt codes MF014O1A, M, and R.

3. **Third Alternative, Status Quo:**
   - No changes to the existing antlered hunt code (MM004O1X) or antlerless hunt codes (MF014O1A, M, and R).

Issue Raised by:	Terrestrial Biologists Eric VanNatta, Becca DeVergie, and Darby Finley, Area 10 Staff, Area 6 Staff
Author of the issue paper (if different than person raising the issue):	Eric VanNatta
CC:	AWM Kris Middledorf, AWM Mike Swaro, NW Senior Biologist Brad Banulis

Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NW Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

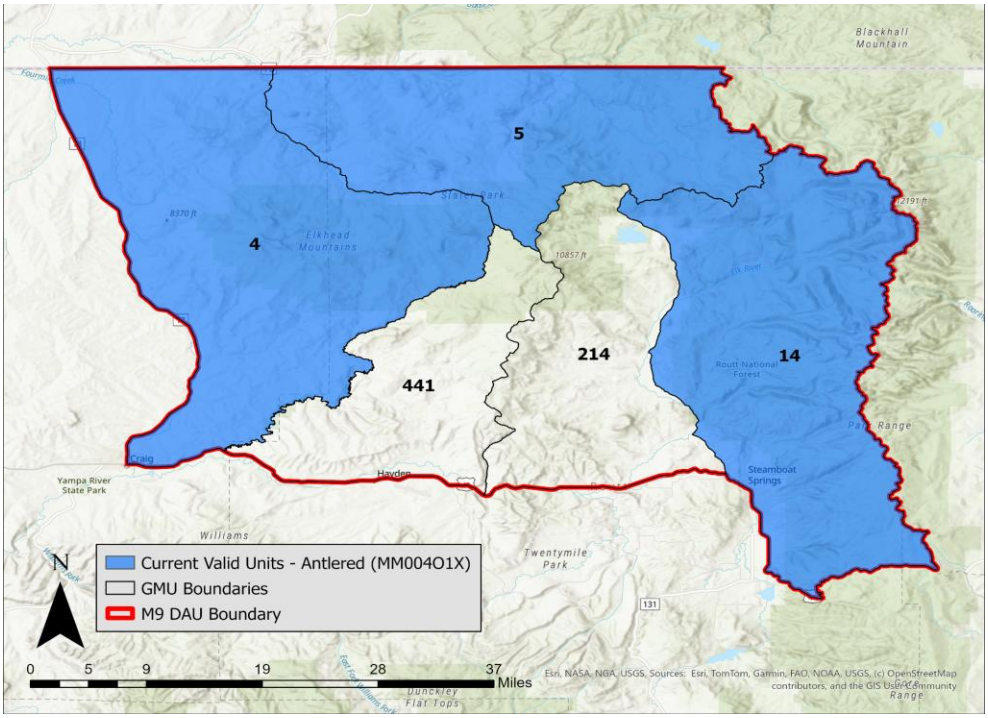


Figure 1: Map depicting valid hunting GMUs for the current bull moose hunt code in M-9. Hunt code MM004O1X is valid in GMUs 4, 5, and 14.

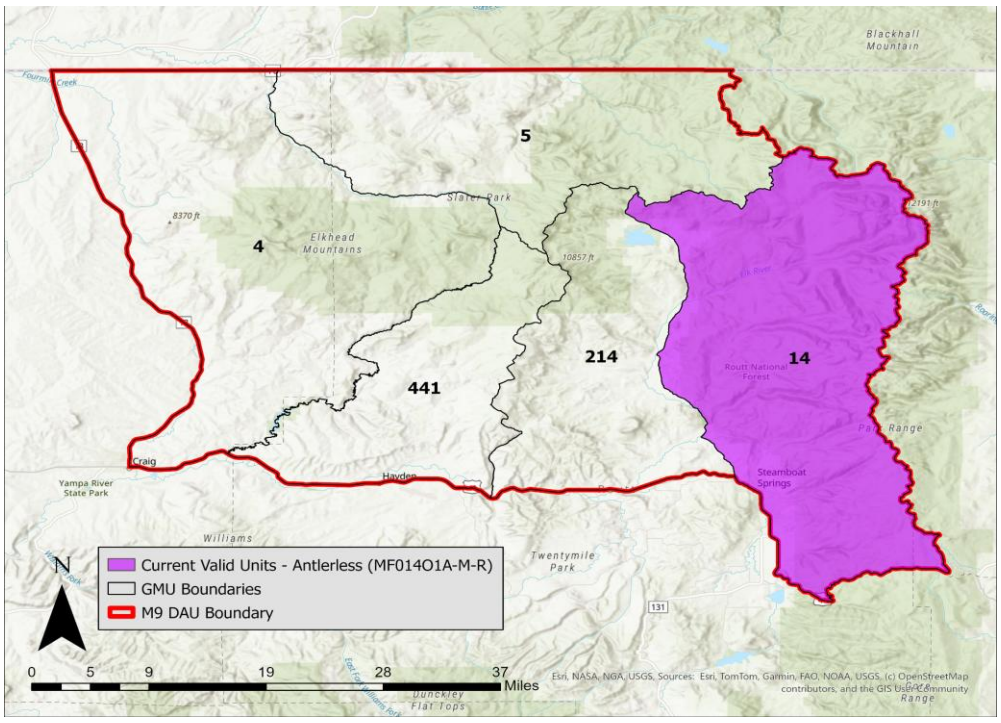


Figure 2: Map depicting valid hunting GMUs for the current antlerless moose hunt code in M-9. Hunt codes MF014O1A, MF014O1M, and MF014O1R are valid in GMU 14.

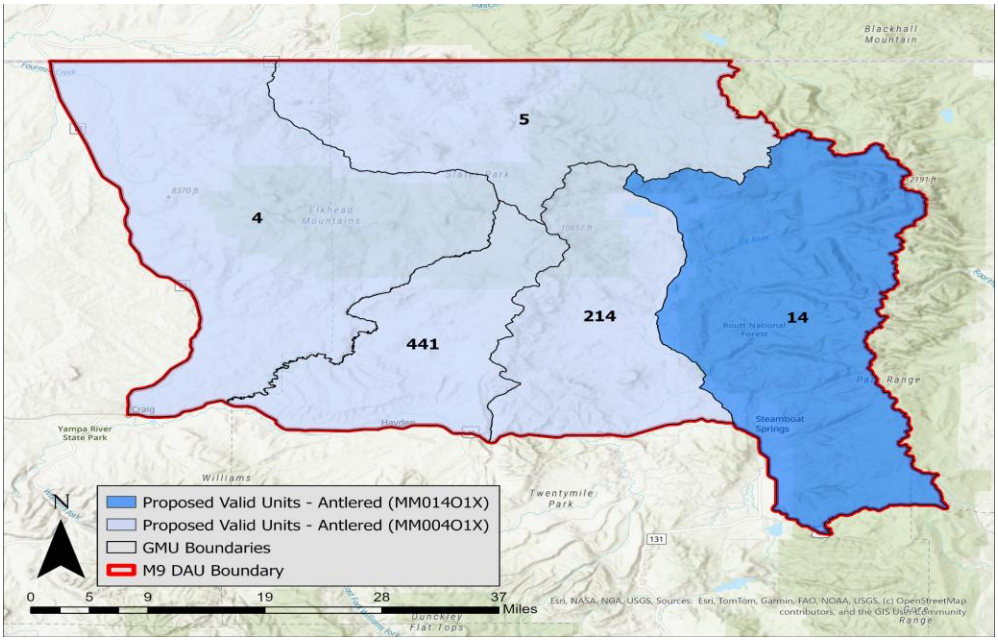


Figure 3: Map depicting proposed new bull hunt code changes in M-9. GMU 14 will be the only valid GMU for hunt code MM014O1X. GMUs 4, 4, 214, and 441 will be valid GMUs in hunt code MM004O1X.

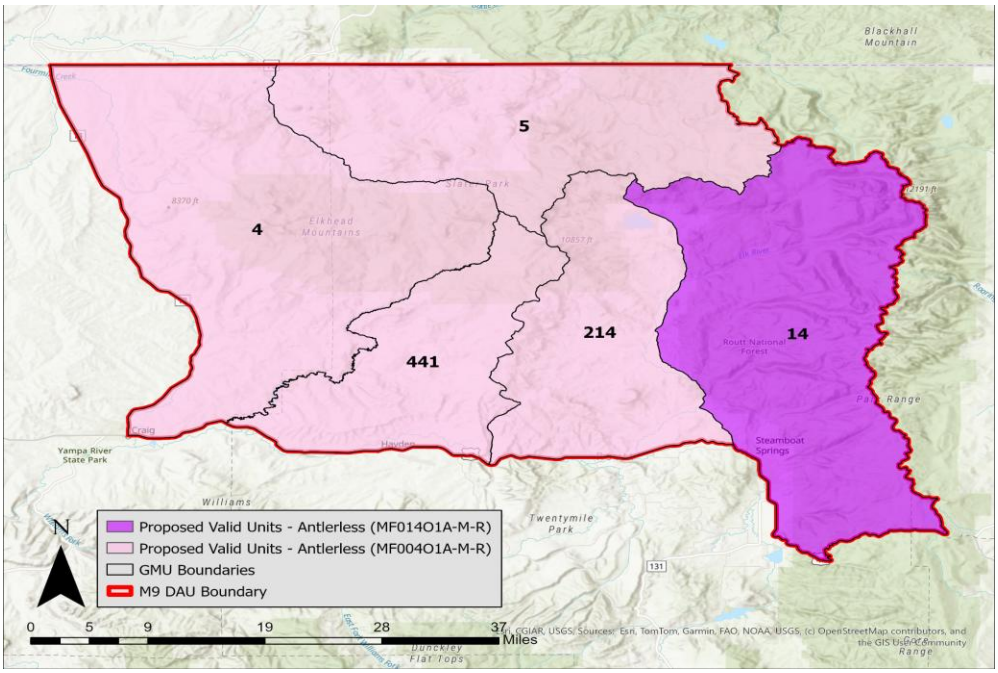


Figure 4: Map depicting proposed new antlerless hunt code changes in M-9. GMU 14 will continue to be valid in MF004O1A, MF004O1M, and MF004O1R. GMUs 4, 5, 214, and 441 will be valid for antlerless moose hunting with hunt codes MF004O1A, MF004O1M, and MF004O1R.

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should the S39 archery ram season be changed to a rifle season?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Rocky Mountain bighorn sheep game management unit S39 is located in central Colorado and is referred to as the Mount Silverheels Herd. The herd historically occupied the range along Hoosier Ridge from Colorado Highway 9 (Hoosier Pass) to Whale Peak, and from just south of the town of Breckenridge to Como in the South Park valley, mainly on federally owned lands. The terrain occupied by the sheep includes multiple 13,000 foot peaks with wide open tundra and scree covered landscapes with limited escape terrain.

Minimum counts from 2009 to 2020 were as high as 67 animals, and license quotas were as high as 7 ram and 3 ewe licenses. In 2021, hunters and CPW staff reported seeing only small groups totaling 12-15 bighorns. Two rams and two ewes were harvested that season, and nine animals were counted during the 2021 post-hunt ground count. Totals from aerial and ground counts remained in the single digits for the next two years. 2024 and 2025 classification flights, along with a fixed wing flight using high-resolution cameras resulted in 17 (2024) and 22 (2025) sheep counted exclusively on Mt. Silverheels (Figure 1). Lamb observations have been extremely low since 2021, with a high of 2 in 2024, and lamb survival appears to be low, as yearling observations have remained low for the past five years. After the 2021 hunting season, ewe licenses were eliminated and ram licenses were limited to a single archery hunt. The dates for this archery hunt have been expanded to two full months to maximize opportunity, but hunters have not been successful in the past four seasons (Figure 2).

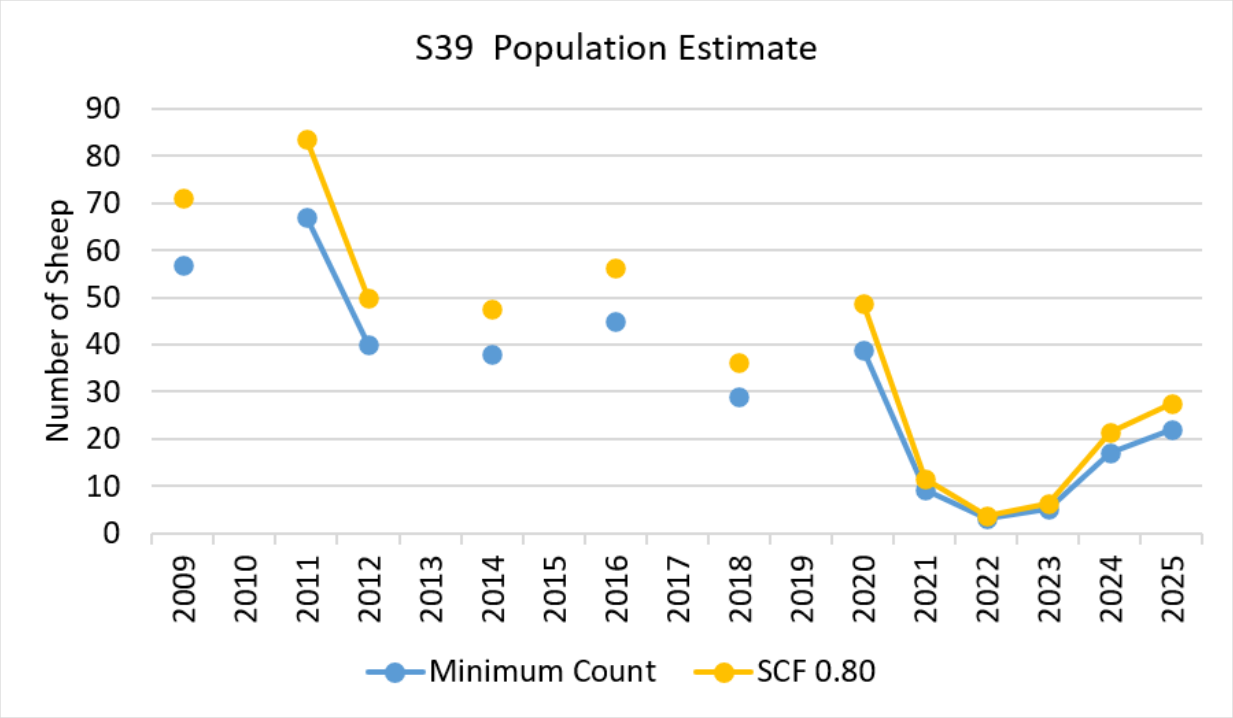


Figure 1. Minimum count and 0.80 sight ability correction factor estimate for S39 2009 - 2025.

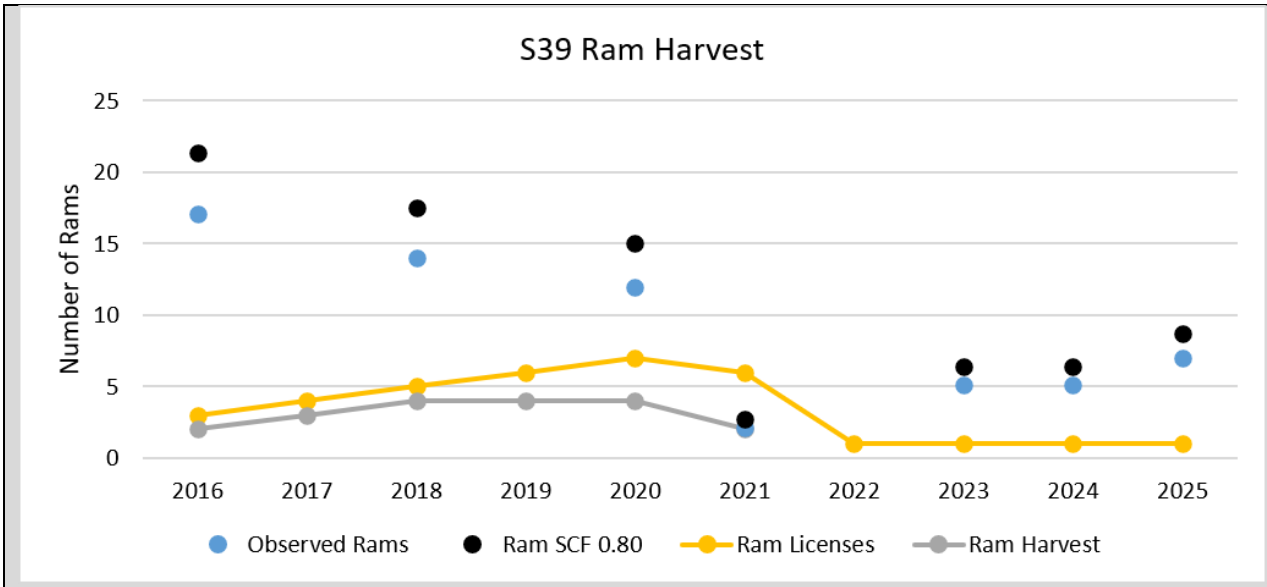


Figure 2. S39 ram observations, licenses, and harvest 2016 - 2025.

Although most of the land in S39 is public, hunter reports, flight observations, and GPS collar points show that the sheep currently in the Silverheels group, including the mature rams, spend most of the current hunting season on several private parcels and mining claims on the northeast side of Mt. Silverheels. This area contains most of the cliff bands and escape terrain available on the mountain and sheep retreat to this safety when pressured, especially by archers. So far, the owners of these private parcels have been unwilling to allow hunting, and access to the available rams remains limited. Sheep in this group begin to disperse from the cliff faces and private property beginning in October, and can be found in different parts of Mt. Silverheels, and Hoosier ridge as winter approaches.

Although the group of sheep in S39 has shown very slow growth, several mature rams are available for harvest. For the 2027 season, CPW would like to eliminate the S39 archery season ram hunt code, and create a ram rifle season opening September 15th, and closing November 15th to maximize hunter opportunity and provide opportunity for disease sample collection from any harvested ram. CPW will continue to survey the unit during annual flights and re-evaluate management strategies on an annual basis.

STATE LAW REQUIRES CPW TO SOLICIT INPUT FROM STAKEHOLDERS THAT MAY BE AFFECTED POSITIVELY OR NEGATIVELY BY THE PROPOSED RULES. THE FOLLOWING STAKEHOLDERS HAVE BEEN ADVISED OF AND INVITED TO PROVIDE INPUT ON THE REGULATORY CHANGES PROPOSED IN THIS ISSUE PAPER:

***IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.**

Internal: District Wildlife Managers, Area Wildlife Manager, Area Wildlife Biologists, and Senior Biologist.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Eliminate hunt code SMS39O1A and create an annual rifle season SMS39O1R from September 15 through November 15 annually.

2. Status quo.

Issue Raised by:	Mark Fisher - NE Game Management Team Biologist
Author of the issue paper	

(if different than person raising the issue):	
CC:	Scott Murdoch, Shannon Schaller, Ben Kraft
Approved for further consideration by:	Brian Dreher
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE Region and Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should S40 be closed to sheep hunting due to low population size?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

GMU S40 is part of RBS-01 and is located in northern Larimer County. The S40 herd is a small herd that utilizes a mix of public and private property including Cherokee Park State Wildlife Area. From 2011-2017, the S40 population was estimated to be 35 sheep. In 2018, the reported population estimate dropped to between 12 and 15 sheep, where it has remained for the past 8 years. While the cause for this decline is unknown, a large-scale domestic sheep grazing operation (~500-1,000 head) on private property adjacent to occupied range has occurred seasonally, from late April through mid-July, since 2016. It's possible a disease event occurred in this herd that went undetected.

In early 2026, collaring began to monitor changes to landscape use as a large municipal reservoir expansion project is initiated. In January 2026, the capture crew only found 7 sheep, collaring three of them. Additional surveys with drones and ground efforts in spring and summer 2026 were initiated and we now believe there are 10 or fewer sheep.

Sheep hunting licenses valid in S40 are combined with S58, the lower Poudre River canyon. These hunt codes are SMS40O1R, SFS40O1R and SMS40O2R. Most of the harvest occurs in S58, however 3 rams and 4 ewes have been harvested in S40 since 2018. License allocation remains low for the combined units, having been reduced in 2020 to one per hunt code for a total of 2 male and 1 female license. The historical high is 3 male and 3 female licenses in 2017 and 2018.

With the chronically low population over the past decade and the apparent recent further decline, we propose suspending S40 sheep hunting until the population recovers.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

CPW staff have discussed this with local landowners and some current and past hunters who have expressed support with closing this sheep unit to hunting. Rocky Mountain Bighorn Society (RMBS) is supportive of this issue paper.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Close S40 to sheep hunting and eliminate hunt codes SMS40O1R, SFS40O1R and SMS40O2R. Create new hunt codes SMS58O1R, SFS58O1R and SMS58O2R valid in S58 only.
2. **Status quo**

Issue Raised by:	Joe Halseth, Area 4 Staff
Author of the issue paper (if different than person raising the issue):	
CC:	**Area 4, Shannon Schaller, Matt Eckert, Ben Kraft**
Approved for further consideration by:	**Brian Dreher**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**

Region, branch, or section leading implementation:	**NE Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

Issue:	**Should the November, SMS37O1A, hunt code be closed in the St. Vrain Bighorn Sheep Herd, S37, until the herd rebounds from a respiratory disease outbreak?**

Discussion (facts and figures, explanation of issue):

The St. Vrain Bighorn Herd, game management unit (GMU) S37, is located on the northern Front Range in Boulder, Grand, and Larimer Counties. The bighorn herd is currently affected by a respiratory disease outbreak that began in 2021 from a virulent combination of *Mycoplasma ovipneumiae* and *Bibersteinia trehalosi*. Respiratory disease has resulted in an all-age die-off and persistent low to absent lamb recruitment. After the disease outbreak, the total number of bighorn and the number and age of bighorn rams observed in the core range east of Peak-to-Peak Highway have declined substantially. The reported population size has declined from over 60 bighorn in 2021 to 35 bighorn in 2025. Harvest metrics have also declined, and some hunters are surrendering licenses after scouting and observing the number of bighorn in the GMU. An aerial survey in August 2026 found only 16 bighorn. Therefore, CPW proposes closing the November SMS37O1A hunt code until the number and age of rams in the core area east of Peak-to-Peak Highway rebounds. Legal rams still occur during the summer and early fall in the high elevation alpine in the western portion of the GMU, so no changes are proposed to the September SMS37O1R hunt code.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

There were internal discussions about reducing bighorn hunting opportunity, but the consensus is that harvest opportunity is limited and the herd needs to recover from respiratory disease. Several NE bighorn herds are experiencing similar disease and population trajectories.

Sportspersons, NE and NW game biologists and NE and NW Region Staff

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Eliminate hunt code SMS37O1A until the herd recovers from respiratory disease.

2. **Status Quo.**

Issue Raised by:	**Ben Kraft, Jason Duetsch, Jeromy Huntington, Elissa Slezak**
Author of the issue paper (if different than person raising the issue):	**Ben Kraft and Jason Duetsch**
CC:	**Matt Eckert, Shannon Schaller, Brad Banulis, Travis Black**

Approved for further consideration by:	**Shannon Schaller**
Requires new space in the brochure?	**NO**
Does this change comply with BGSS?	**YES**
Are adequate staff and funding resources available to implement?	**YES**

Region, branch, or section leading implementation:	**Terrestrial, NE & NW Regions**
Any additional regions, branches or sections involved in implementation:	**TERP**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026
ISSUE:	**Should S28 (Vallecito Bighorn Herd) be closed to hunting?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Vallecito Bighorn Herd, S28, is part of the Weminuche Rocky Mountain Bighorn Population (RBS-20, GMUs S15, S16, S28) located in southwest Colorado (Figure 1). This native Tier 1 population has an estimated aggregate population of approximately 300 animals, with historic estimates of 1,000+ bighorns (see the RBS-20 Herd Management Plan). Over the past 30 years, the S28 herd reached a high of an estimated 125 bighorn in 2006-2011 (Figure 2). Since then, the population has declined, and the estimate for 2025 was 50 bighorns. This estimate is likely to decrease in 2026 based on flight and anecdotal observations. It is feasible that fewer than 30 bighorn remain in the population. Locals interested in the S28 herd, the Rocky Mountain Bighorn Society, and S28 hunters have expressed concerns about the herd's population performance over the past several years. Bighorn sheep are not being seen in areas where large numbers were consistently observed in the past, and the overall number of bighorn sheep has decreased. The recent helicopter inventory conducted by CPW reflects these observations, though sightability of bighorns during aerial surveys can be low. In August 2025 and January 2026, the unit was flown to search for bighorn. During the August flight, only four bighorn were observed (Table 1). The January flight was slightly better with eleven bighorn found. Conditions during the January flight were good with recent snow. Fresh snow on the ground often increases sightability and makes bighorn easier to locate by finding and following tracks. Bighorn numbers observed during the 2025 flights were considerably lower than in past years. The sample size of bighorn sheep observed during helicopter classification flights since 2012 has averaged 22, with a high of 40 in December 2018. S28 is currently a hunted population. In 2010 and 2011, there were three ram licenses and 1 ewe license in S28, which was the highest number of licenses in the unit for the past 20 years (Figure 3). Currently (2026), there is one ram license allocated. Based on the decline in bighorn sheep numbers in S28, CPW recommends closing the unit to hunting until the population rebounds.

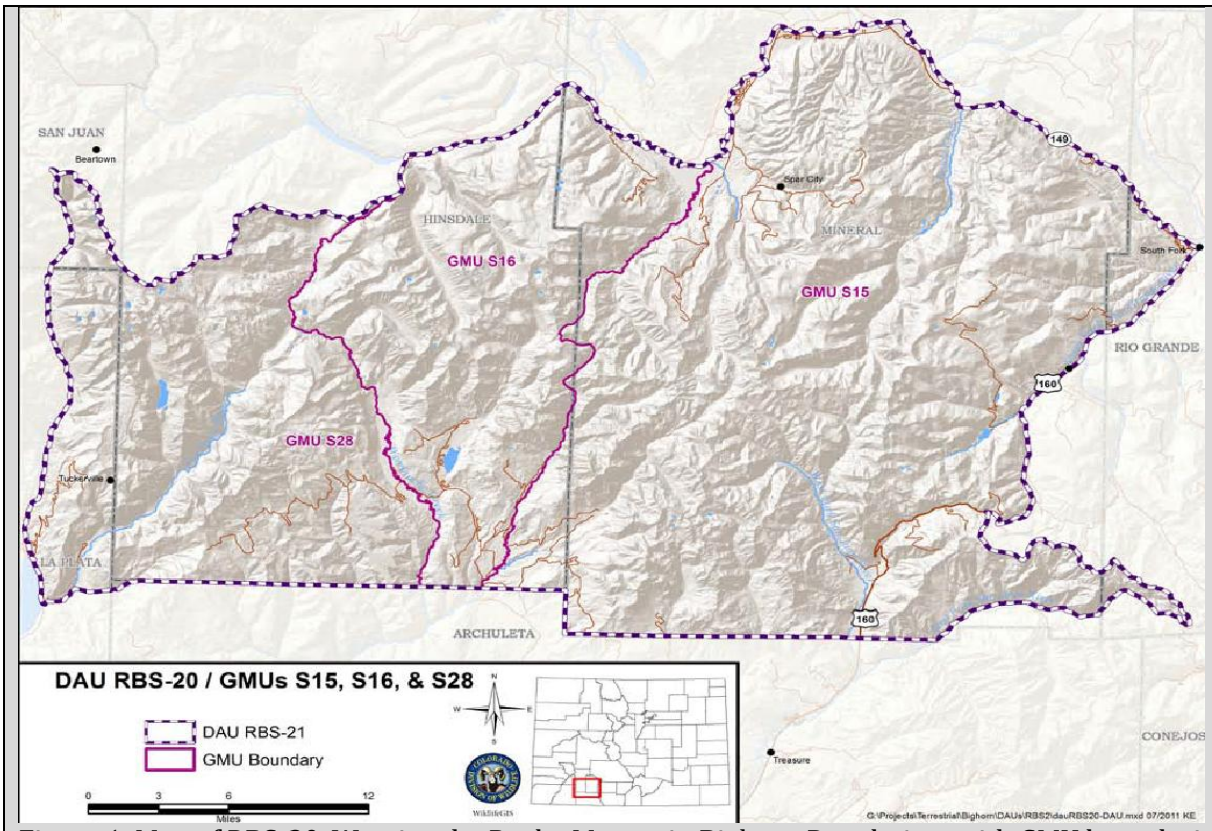


Figure 1. Map of RBS-20, Weminuche Rocky Mountain Bighorn Population, with GMU boundaries.

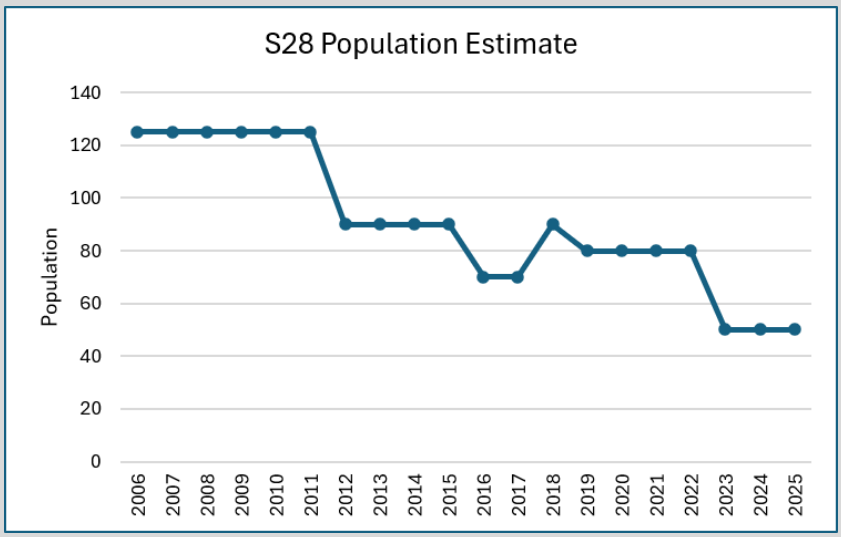


Figure 2. S28 population estimate 2006–2025.

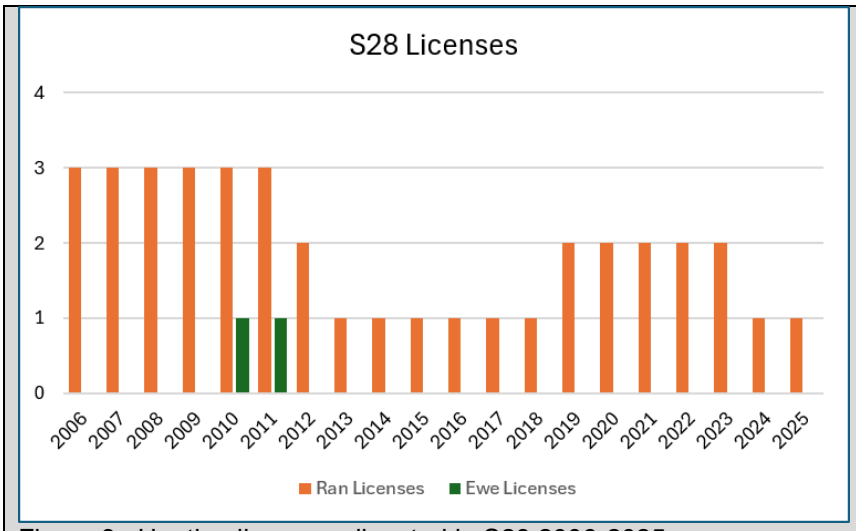


Figure 3. Hunting licenses allocated in S28 2006-2025.

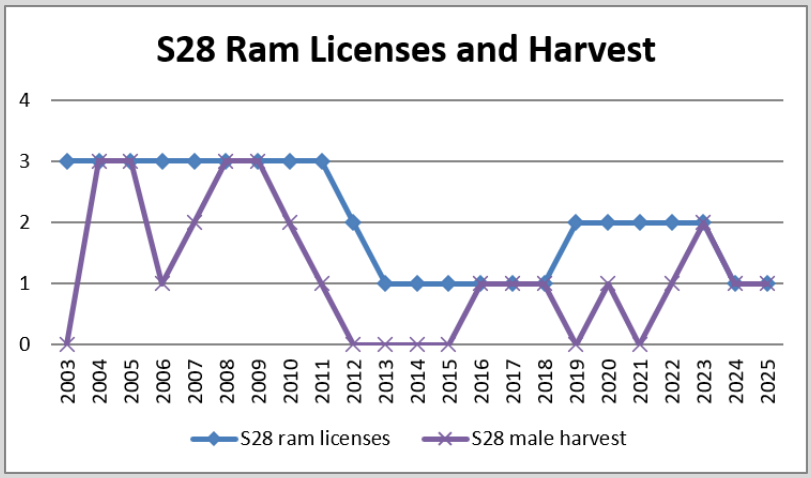


Figure 4. Ram licenses and harvest in S28 2003-2025

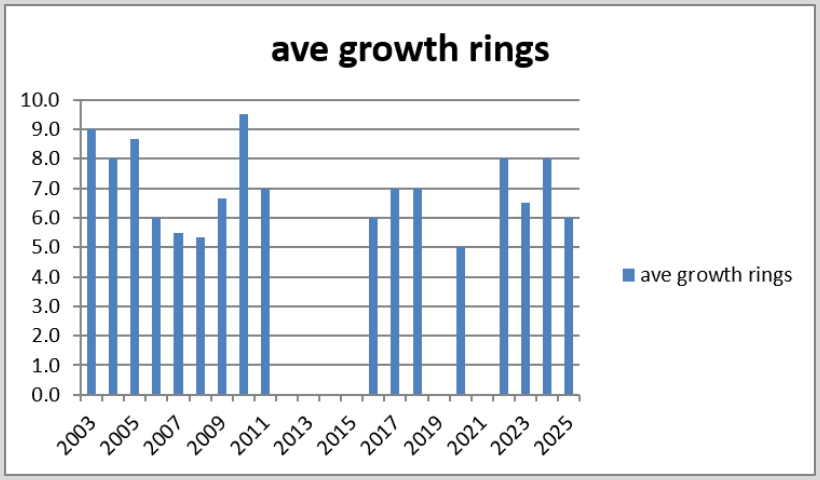


Figure 5. Average number of growth rings of bighorn rams harvested annually in S28, 2003-2025.

Table 1. Helicopter classification data for S28 from 2012–2025.

Year	Pre/Post season	Sample Size	Lamb:100 Ewes	Ram:100 Ewes
2012	Pre	17	70	0
2015	Pre	16	20	40
2018	Pre	20	18	64
2018	Post	40	26	8
2019	Pre	5	0	0
2022	Pre	18	60	20
2022	Post	23	82	27
2023	Post	35	79	71
2025	Pre	4	100	0
2025	Post	11	67	17

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Locals interested in the S28 herd, the Rocky Mountain Bighorn Society, S28 hunters, and the Southern Ute and Ute Mountain Ute Tribes. Local interest and RMBS were supportive of moving this issue paper forward. The Southern Ute Indian Tribe and the Ute Mountain Ute Tribe were both notified of the proposal. Neither tribe provided a response (As a side note, there has not been any harvest of bighorn sheep in S28 under the Brunot agreement).

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Close S28 to hunting (eliminate hunt code SMS28O1R)
2. **Status quo**

Issue Raised by:	Brad Weinmeister, Wildlife Biologist
Author of the issue paper (if different than person raising the issue):	
CC:	Angelo Ramirez DWM, Ty Smith AAWM, Adrian Archuleta AWM, Jamin Grigg Senior Biologist

Approved for further consideration by:	**Cory Chick**
Requires new space in the brochure?	**NO**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial, SW Region**
Any additional regions, branches or sections involved in implementation:	**Area 15**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026
ISSUE:	**Should a late rifle ram season be added to GMU S04?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Bighorn sheep data analysis unit (DAU) RBS-4 is in CPW's NE and NW Regions and includes game management units (GMUs) S03, S04, and S41. Game management unit S04 is within Park, Clear Creek, and Jefferson counties (Figure 1). The post-hunt population estimate of 389 bighorns exceeds the current population objective (200-300) and has a high observed sex ratio of 86 rams per 100 ewes.

To manage the herd's sex ratio and provide hunting and harvest opportunities, CPW proposes establishing a late ram rifle season (December 15 – January 15) in GMU S04. Adding a late rifle season to S04 would help increase ram harvest in the DAU, bringing the ram: ewe ratio down to a more desirable level. It will also give hunters another opportunity to hunt rams without creating hunter crowding issues.

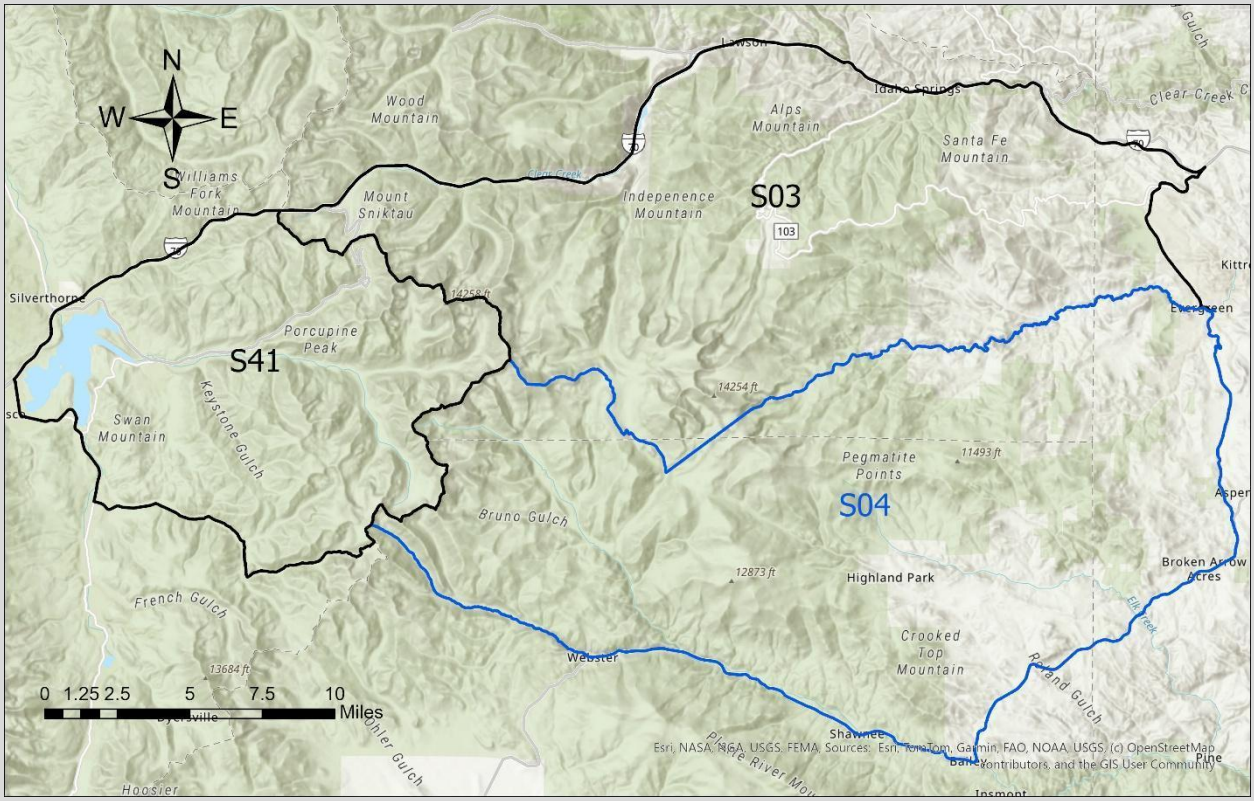


Figure 1. RBS-4 highlighting GMU S04 boundary

During the 2025 ground survey of S04, eleven 1/2 curl, five 5/8 curl, sixteen 3/4 curl, eight 7/8 curl, and two full curl rams were observed. Additionally, 39 rams were observed in the western portion of the GMU during the G-7 mountain goat aerial survey. The three-year average of hunter success for S04 rams is currently 67%, and the three-year average age for harvested rams in S04 is 6.4. Both survey and harvest data indicate a productive and healthy age structure of rams in the GMU, which allows additional harvest and hunting opportunities.

Data from four sheep collared in January 2025 show that they moved down in elevation from Mt. Blue Sky between mid-October and late December (Figure 2). Local DWMs note that this movement period to

lower elevations varies with snow depth and temperatures, but it typically occurs from late November to mid-January. This ram herd that winters around Harris Park contains approximately 25 individuals, many of which are legal rams.

Adding a late rifle season from December 15 to January 15 would allow hunters a unique opportunity to harvest one of the many legal rams that are usually difficult for S04 ram license holders to access. The later dates of this proposed season will help ensure that these rams are lower in elevation from the deep snow that characterizes Mt. Blue Sky during the winter months, and accessible to hunters in a timberline setting.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Area Wildlife Manager, Assistant Area Wildlife Manager, District Wildlife Managers, Senior Biologists, and other Area 1 personnel have been consulted with and are supportive of the changes.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create a late rifle ram hunt code, SMS04O3R, in S04 to run from December 15th to January 15th annually.

2. **Status quo**

Issue Raised by:	Area 1 and NE Terrestrial
Author of the issue paper (if different than person raising the issue):	Joe Lamb (Area 1&5 Wildlife Biologist)
CC:	Ben Kraft (NE Sr. Wildlife Biologist), Lance Carpenter (E. Slope Sr. Conservation Biologist), Scott Murdoch (Area 1 AWM), Shannon Schaller

Approved for further consideration by:	**Brain Dreher**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE GMT and NE Region**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should a second ewe rifle season be added to GMU S03?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Bighorn sheep data analysis unit (DAU) RBS-4 is in CPW's NE and NW Regions and includes game management units (GMUs) S03, S04, and S41. Game management unit S03 is within Clear Creek, Jefferson, and Park counties and includes Mount Blue Sky (Figure 1). The post-hunt population estimate (389) exceeds the current population objective (200-300), and the observed sex ratio is high at 86 rams per 100 ewes. To reduce the population to within the objective, CPW proposes establishing a second ewe rifle season in GMU S03 to run from October 15th to November 15th.

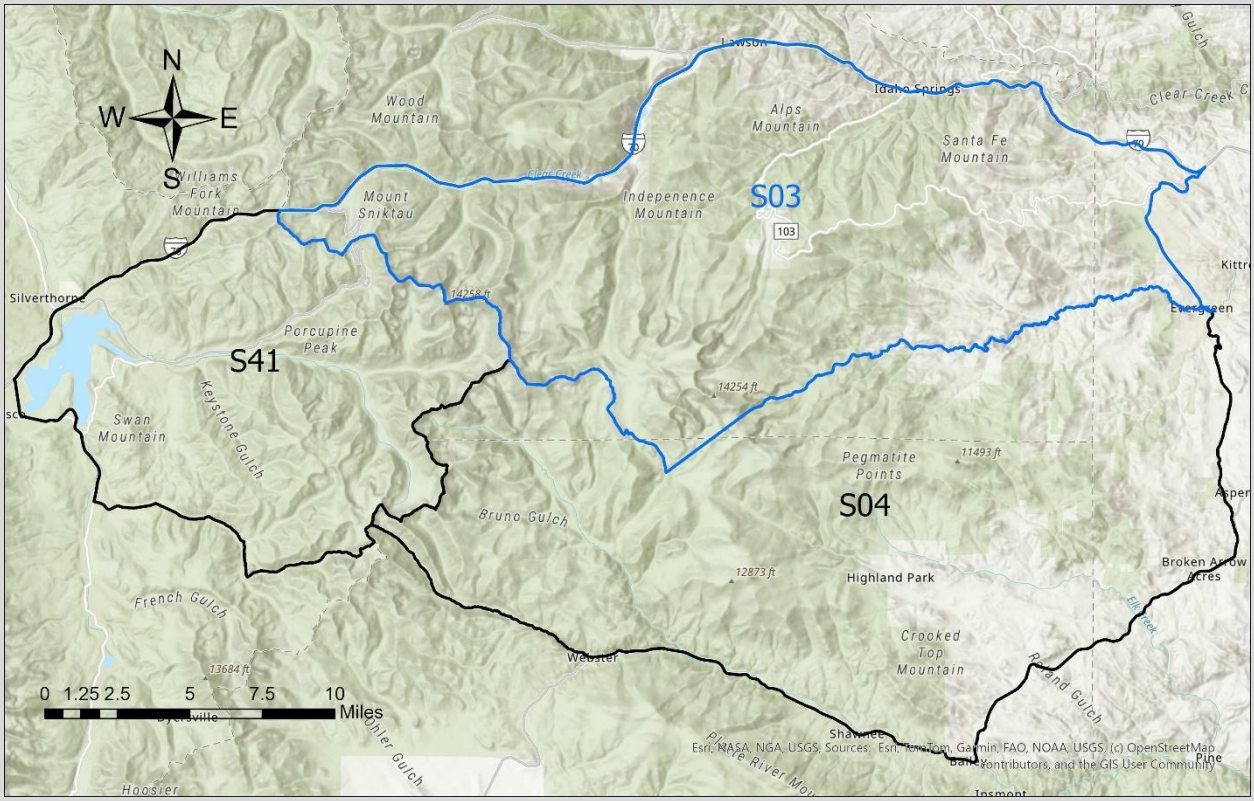


Figure 1. RBS04 highlighting GMU S03 boundary

S03 currently has two ewe hunting seasons. An August archery season runs from the 8th to the 21st (currently with 6 licenses), and a September rifle season begins 21 days after Labor Day and runs for 14 days (currently with 12 licenses). CPW believes adding more licenses to existing hunting seasons may lead to hunter crowding.

Adding a second rifle season in S03 will increase ewe harvest and move the herd towards the population objective range.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**	
Area Wildlife Manager, Assistant Area Wildlife Manager, District Wildlife Managers, Senior Biologists, and other Area 1 personnel have been consulted with and are supportive of the changes.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Add a second ewe rifle season in S03 to run from October 15th – November 15th annually (SFS03O3R). **2. Status quo**	
Issue Raised by:	NE Terrestrial and Area 1
Author of the issue paper (if different than person raising the issue):	Joe Lamb (Area 1&5 Wildlife Biologist)
CC:	Ben Kraft (NE Sr. Wildlife Biologist), Lance Carpenter (E. Slope Sr. Conservation Biologist), Scott Murdoch (Area 1 AWM), Joe Nicholson (DWM), Joe Walter (DWM), Jacob Sonberg (DWM)

Approved for further consideration by:	**Shannon Schaller**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE GMT and NE Region**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

Date:	October 23, 2026

ISSUE:	**Should an archery ram season be added to GMU S04 and the rifle ram seasons be aligned with S03?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Bighorn sheep data analysis unit (DAU) RBS-4 is in CPW's NE and NW Regions and includes game management units (GMUs) S03, S04, and S41. Game management unit S04 is within Park, Clear Creek, and Jefferson counties (Figure 1). CPW proposes establishing an archery ram season in GMU S04. DAU RBS-4 is over the current population objective range (200-300) with a post-hunt population estimate of 389 bighorn. In addition, the observed sex ratio is high at 86 rams per 100 ewes. Adding an archery ram season in S04 would increase ram harvest in the DAU, help manage the ram: ewe ratio, and provide additional hunting opportunities.

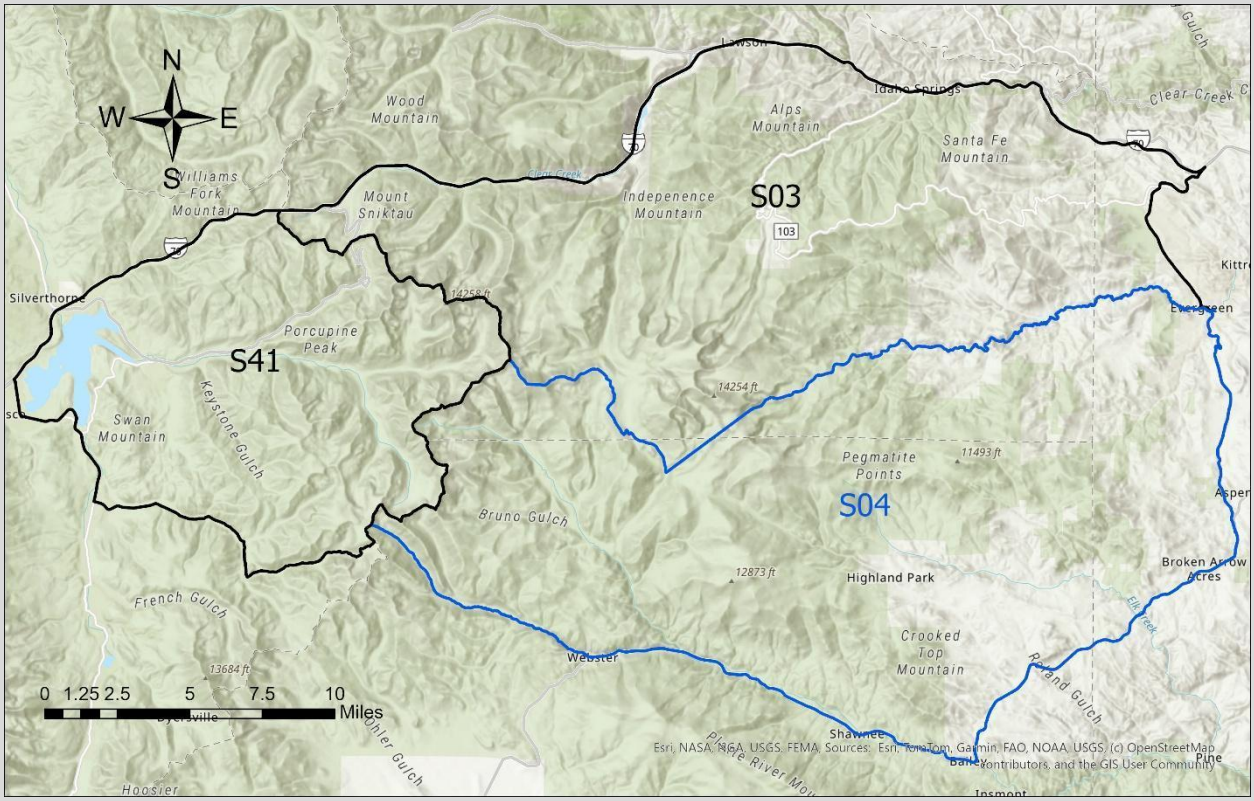


Figure 1. RBS-4 highlighting GMU S04 boundary

During the 2025 ground survey of S04, eleven 1/2 curl, five 5/8 curl, sixteen 3/4 curl, eight 7/8 curl, and two full curl rams were observed. Additionally, 39 rams were observed in the western portion of the GMU during the G-7 mountain goat aerial survey. The three-year average of hunter success for S04 rams is currently 67%, and the three-year average age for harvested rams in S04 is 6.4. Both survey and harvest data indicate a productive and healthy age structure of rams in the GMU, which allows additional harvest and hunting opportunities.

CPW proposes adding an archery ram season in S04 that mirrors the season dates of the neighboring unit, S03, and runs from August 1st to August 21st. We also propose aligning the S04 rifle ram seasons and season dates with S03 rifle seasons.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

***It is assumed that all necessary internal parties have been notified*.**

Area Wildlife Manager, Assistant Area Wildlife Manager, District Wildlife Managers, Senior Biologists, and other Area 1 personnel have been consulted with and are supportive of the changes.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create an early archery season to GMU S04 (SMS04O1A) to run August 1st to August 21st, similar to SMS03O1A. Adjust SMS04O1R season dates to align with SMS03O1R season dates to begin one day AFTER Labor day and is open for 14 days. Adjust SMS04O2R season dates to align with SMS03O2R to begin 21 days after Labor and is open for 14 days.

2. **Status quo**

Issue Raised by:	NE Terrestrial and Area 1
Author of the issue paper (if different than person raising the issue):	Joe Lamb (Area 1&5 Wildlife Biologist)
CC:	Ben Kraft (NE Sr. Wildlife Biologist), Lance Carpenter (E. Slope Sr. Conservation Biologist), Scott Murdoch (Area 1 AWM, Shannon Schaller, Elissa Slezak

Approved for further consideration by:	**Brian Dreher**
Requires new space in the brochure?	**YES**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**NE GMT and NE Region**
Any additional regions, branches or sections involved in implementation:	**NO**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**

ISSUES SUBMITTAL FORM

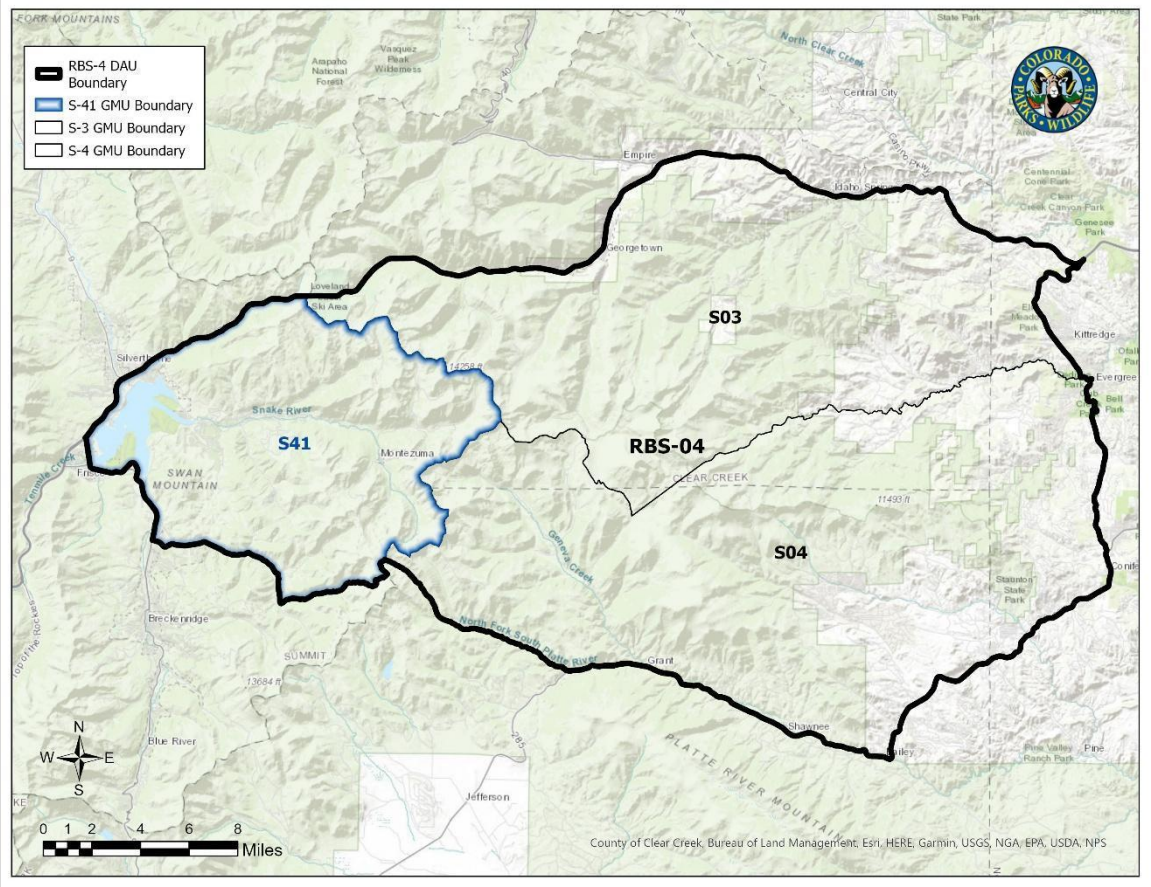
Date:	October 23, 2026

ISSUE:	**Should the existing ewe rifle seasons in GMU S-41 (portion of RBS-4) be split into two shorter consecutive rifle seasons?**

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

GMU Description:

Game management unit (GMU) S-41 (Peru Creek) is part of Bighorn Sheep data analysis unit (DAU) RBS-4 (Mount Blue Sky). GMU S-41 was added to RBS-4 in 2009.



Population:

The current overall population objective range for RBS-4 is 200-300 sheep (2016 DAU Plan). GMU S-41 is managed for approximately 75 bighorn sheep (60-90). The population is assessed annually in late July via a coordinated ground survey, and some years during G7/G16 helicopter surveys. In 2025, 68 sheep were observed on the annual July ground survey, and a high of 93 bighorn sheep were observed during the G7 helicopter survey in August.

The 3 and 5 year average numbers of sheep observed on the annual ground survey are 63 and 50 sheep, respectively, with a historical average of 37 sheep from 2008-present. The S-41 population has been increasing since 2020 (Figure 1). Based on the ground survey total count, the population appears stable. However, the 93 sheep observed during the helicopter survey indicate either a growing population, or redistribution of sheep from elsewhere in the DAU into S-41 during July and

August.

Observed age ratios in 2025 were 41 lambs per 100 ewes on the ground survey, and 50 lambs per 100 ewes on the helicopter survey. The ground survey age ratio average is 50 lambs per 100 ewes over the past three years. Recent age ratios are consistent with the 10-year average of 41 lambs per 100 ewes (Figure 2).

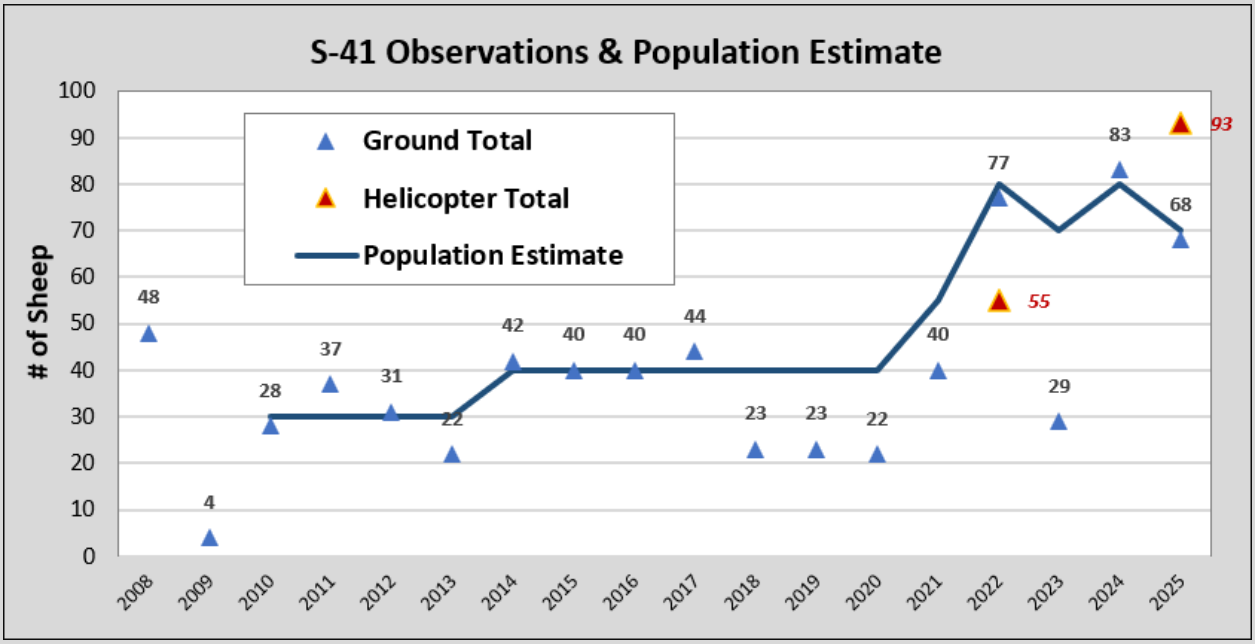


Figure 1. S-41 pre-hunt coordinated ground survey and helicopter survey results, 2008-2025.

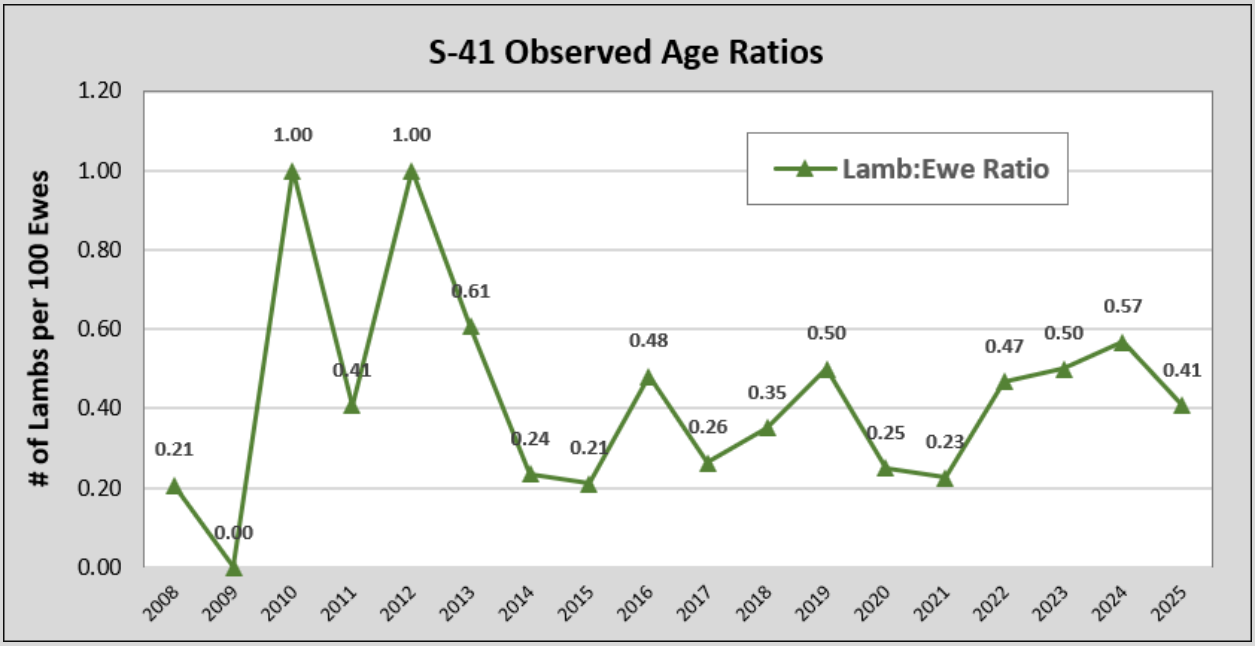


Figure 2. S-41 pre-hunt ground survey observed age ratios, 2008-2025.

License & Harvest History:
Hunting in S-41 was initiated in 2010 with a single ram license, and the first ewe license was added

in 2016. Since then, ewe licenses have been periodically increased to the current allocation of 4 ewe licenses, in addition to the single ram license. Ewe harvest success has been relatively high, ranging from 67%-100% (Figure 3), with 3 and 5-year average success rates of 73-78%. Ewe success in 2025 was 80%, and overall success in S-41 (ram and ewe hunters combined) was 83%.

Annual average estimated age of harvested ewes has ranged from 1 - 12 years old since the ewe season was initiated in 2016. The average age of harvested ewes in 2025 was 6 years old, with an average of five growth rings. The overall average age of harvested ewes since 2012 is 6.1 years old, with an average of five growth rings (Figure 4).

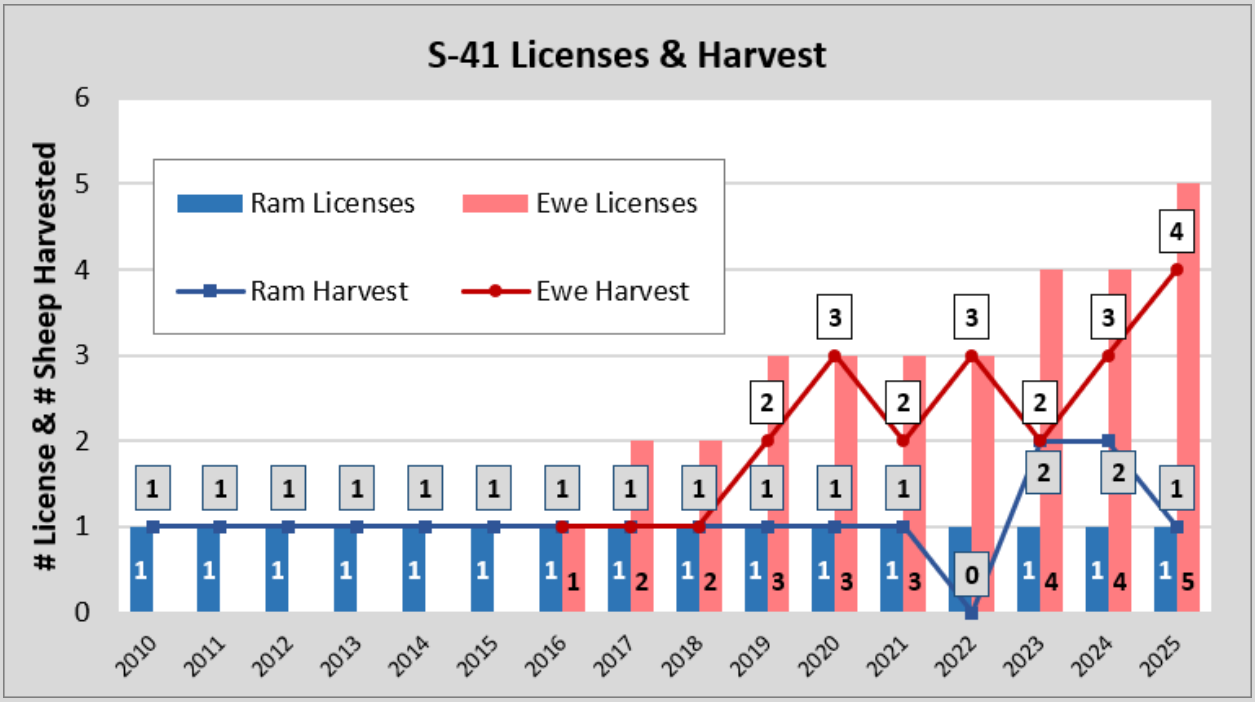


Figure 3. S-41 licenses numbers and harvest numbers, 2010-2025.

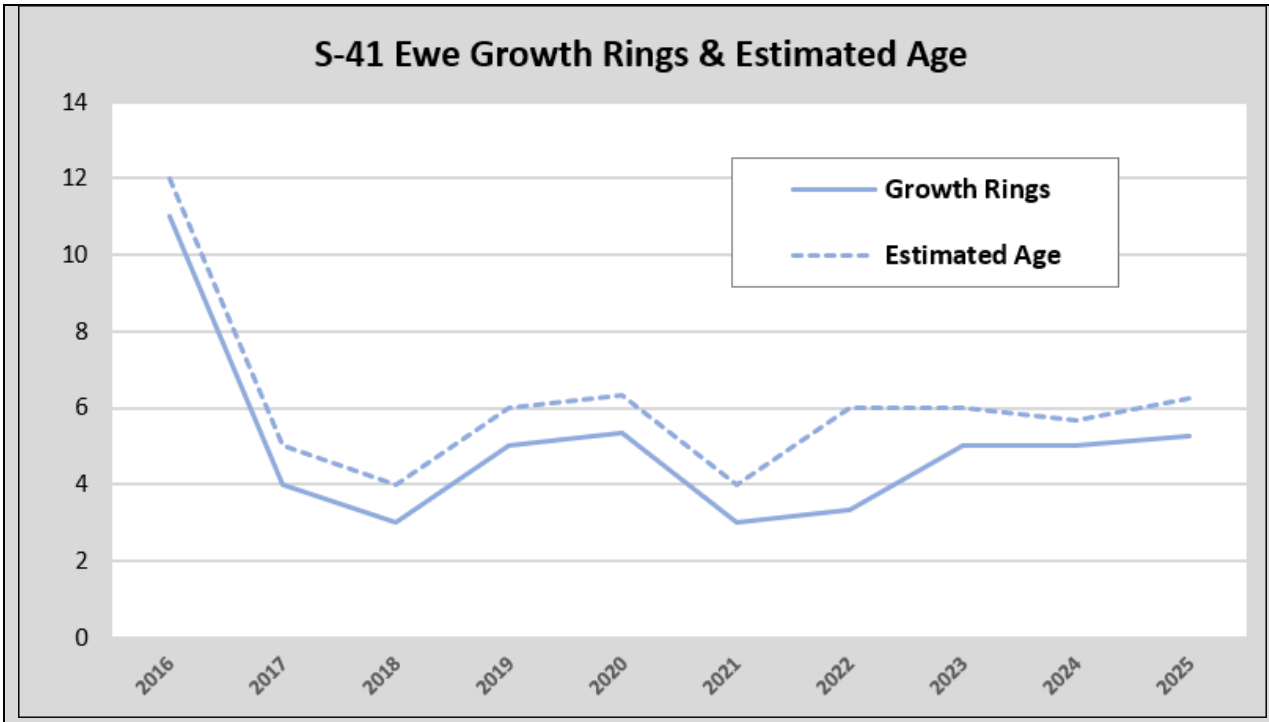


Figure 4. S-41 annual average growth rings and estimated ages of harvested ewes, 2016-2025.

Per the Colorado Bighorn Sheep Management Plan (2009), the recommended ewe harvest objective is 12% of the pre-hunt ewe population. Based on the current observed estimate of 58 ewes in the August pre-hunt S-41 population, 12% offtake is 7 ewes. The current license allocation and predicted harvest falls within this guideline and allows potential for additional ewe licenses. There are currently 4 licenses allocated for the single S-41 ewe rifle hunt code SFS41O1R. While there is desire to increase ewe hunting opportunity and harvest, additional ewe licenses in this single hunt code may increase crowding of hunters due to the limited number of groups of sheep in the unit.

The current ewe season structure in the DAU is a single, month-long rifle season that runs from the first week in September through the first week in October (currently Sept. 1 - Oct. 1, 2026). This season overlaps very slightly with the beginning of the S-41 ram hunting season (currently Sept. 28 – Nov. 15, 2026).

From 2016-2025, ewe hunters in S-41 spent an average of 1 - 3.7 days hunting, with a high of 9 days spent by one hunter in 2024 and one hunter in 2025.

Proposed Change:
The current 31-day season is underutilized, and if more ewe licenses are added, it will increase the number of hunters that are concentrated during the first week of the season and may impact the quality of ewe hunting experiences. Staff agrees that while population size may allow for additional ewe licenses, adding such licenses under the current season structure may cause crowding among ewe hunters, and may impact ram hunters in some areas. This limits the ability of staff to provide additional hunter opportunity, or to utilize ewe harvest as a tool for managing population size or potential disease outbreaks.

CPW proposes splitting the existing S-41 rifle ewe season dates into two separate, consecutive seasons within the existing season time period, approximately 14 days each. Splitting the current

season into two ewe rifle seasons would allow for an increase in overall ewe licenses without increasing the number of overall sheep hunters in the field at one time during each season. Because ewe hunters typically utilize only the first portion of the season, and the average days of hunting are less than the length of the proposed shorter ewe seasons, hunter success will likely not be impacted by this change. The ram season in this unit is much later and longer than the ewe seasons, and the ram hunter(s) will not be impacted by this change.

State law requires CPW to solicit input from stakeholders that may be affected positively or negatively by the proposed rules. The following stakeholders have been advised of and invited to provide input on the regulatory changes proposed in this issue paper:

Internal discussions have been taking place between Area 1 and Area 9 staff. The input received in the recent public engagement survey indicated that 73% of respondents (n=206) were supportive of the proposed changes to the ewe season.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Split the current S-41 ewe rifle seasons into two shorter ewe rifle seasons during the same overall time period.
   Hunt codes:
   1) SFS41O1R *existing* (dates: Sept 1-15 annually)
   2) SFS41O2R *new* (dates: start the day after the previous season ends, and run for 14 days)

2. **Status quo**

Issue Raised by:	Area 1 and Area 9 Biologists & DWMs
Author of the issue paper (if different than person raising the issue):	Elissa Slezak, A9 Terrestrial Biologist
CC:	**Jeromy Huntington (Area 9 WM), Brad Banulis (NW Sr. Wildlife Biologist), Ben Kraft (NE Sr. Wildlife Biologist), Joe Lamb (Wildlife Biologist), Hannah Grimes (DWM)**

Approved for further consideration by:	**Travis Black**
Requires new space in the brochure?	**Yes**
Are adequate staff and funding resources available to implement?	**YES**
Region, branch, or section leading implementation:	**Terrestrial**
Any additional regions, branches or sections involved in implementation:	**NA**
Complies with Big Game Season Structure?	**YES**
Recommended for consent agenda?	**NO**