

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the culpable mental state for luring or attracting wildlife in violation of W-0 #021 be changed from “intentionally” to “knows or reasonably should know”?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Feeding wildlife, particularly big game, is a pervasive problem in Colorado, especially along the urban interface on the Front Range. Feeding big game is prohibited because it can facilitate the spread of disease, cause illness in wildlife from unnatural food sources, increase human-wildlife conflict by causing habituation, and unnaturally increase wildlife populations. Parks and Wildlife Commission Regulation W-021 prohibits feeding and attracting big game and other species of wildlife. As it is currently written, to prove a violation, a prosecutor must show a person intended to lure or attract wildlife. This is very difficult to prove. Successful prosecution often requires direct observation of an individual as well as a statement or some other proof that the individual intended to lure or attract big game. The high culpable mental state means successful prosecutions for violating W-021 are rare, even for habitual violators. This does not promote the protection of wildlife or the public by changing the behavior of individuals who feed. Changing the culpable mental state for luring or attracting wildlife from “intentionally” to “knows or reasonably should know” would make a violation easier to prove, provide a greater incentive for violators to change their behavior, and increase compliance with feeding and baiting regulations. In turn, this could reduce the spread of disease, reduce human-wildlife conflict, and contribute to healthier and better-managed wildlife populations. The redline draft would further these goals by changing the culpable mental state required to prove a violation of W-021.A and clarifying other aspects of the rule.	
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 1, Area 5, Area 14, Matt Eckert, 23rd Judicial District, Mule Deer Foundation (support letter available)	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Change the culpable mental state required to prove a violation of W-021 from “intentionally” to “knows or reasonably should know.” A. Except as provided in subsections (A)(1-4) of this regulation no person shall place, deposit, distribute, or scatter grain, hay, minerals, salt, or other foods the person knows or reasonably should know so as to intentionally constitute a lure, attraction, or enticement for big game not lawfully held in captivity. 1. Crops and crop aftermath, including hay, alfalfa and grains, produced, harvested, stored or fed to domestic livestock in accordance with normal agricultural practices shall not be subject to this regulation. 2. When the Director determines it necessary to authorize feeding to prevent damage to private property.	

3. When the Director determines it necessary to authorize feeding to mitigate the population loss anticipated by a predicted winter mortality that will exceed 30 percent of the adult female segment of a big game ungulate population in any one Game Management Unit.

4. When the Director determines it appropriate to feed big game as a part of a research or management program.

5. This subsection A does not apply to luring bears, which is governed by § 33-6-131, C.R.S.

B. ~~It~~ No person shall ~~be unlawful to~~ place or deposit minerals or salt ~~in an area so as to~~ the person knows or reasonably should know constitute a lure or attractant for wildlife. Nothing in this regulation shall restrict the use of salt or mineral blocks in normal agricultural practices.

C. Except as provided in subsections (A)(1-4) of this regulation no person shall place, deposit, distribute or scatter any food or other substance ~~so as to intentionally~~ the person knows or reasonably should know constitute a lure, attraction, or enticement for coyotes or fox in an area where the discharge of firearms is precluded by law. This regulation shall not apply to any person using any bait or other attractants for the purpose of luring coyotes and fox for take as otherwise authorized by law.

D. No person shall fail to take remedial action to avoid contact or conflict with black bears, coyotes or fox, which may include the securing or removal of outdoor trash, cooking grills, pet food, bird feeders or any other similar food source or attractant, after being notified by the Division that black bears, coyotes or fox are in the area and advised to undertake such remedial action. Further, after an initial contact or conflict with a black bear, coyotes or fox, no person shall continue to provide, or otherwise fail to secure or remove, any likely food sources or attractants, including, but not limited to, outdoor trash, grills, pet food or bird feeders.

2. Status quo

Issue Raised by:	Sean Dodd (DWM-Castle Rock South)	
Author of the issue paper (if different than person raising the issue):	Sean Dodd – District Wildlife Manager 23 rd Judicial District	
CC:	Martinez, Area 5, Carpenter, Eckert, Cannon, Leslie	
APPROVED FOR FURTHER CONSIDERATION BY:	Mark Leslie	
REQUIRES NEW SPACE IN THE BROCHURE?	NO	
ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?	YES	
REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION	Area 5, NE Region	
RECOMMENDED FOR CONSENT AGENDA?	NO	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should first rifle season buck hunt codes be added to DAU D-30?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Beginning in 2025, a new five year Big Game Season Structure (BGSS) was adopted by the Colorado Parks and Wildlife (CPW) Commission. The new BGSS gave CPW the latitude to create buck hunt codes for the first rifle season. There is general support to add these hunt codes and opportunities in Data Analysis Unit (DAU) D-30, the San Juan Mule Deer Herd, which consists of Game Management Units (GMUs) 75, 77, 78, 751, and 771. The buck ratio in the DAU has been at or above the upper end of the management objective for the past ten plus years. CPW will continue to manage towards buck ratio objectives outlined in the Herd Management Plan (HMP) with the addition of the new proposed hunt codes. If approved, current licenses will generally be redistributed from the other rifle season quotas to balance hunting opportunities, manage crowding issues, and align with HMP objectives. The licenses for the proposed hunting opportunities would be List A. The following hunt codes are proposed:

- DM075O1R valid in GMUs 75 and 751
- DM077O1R valid in GMUs 77, 78, and 771

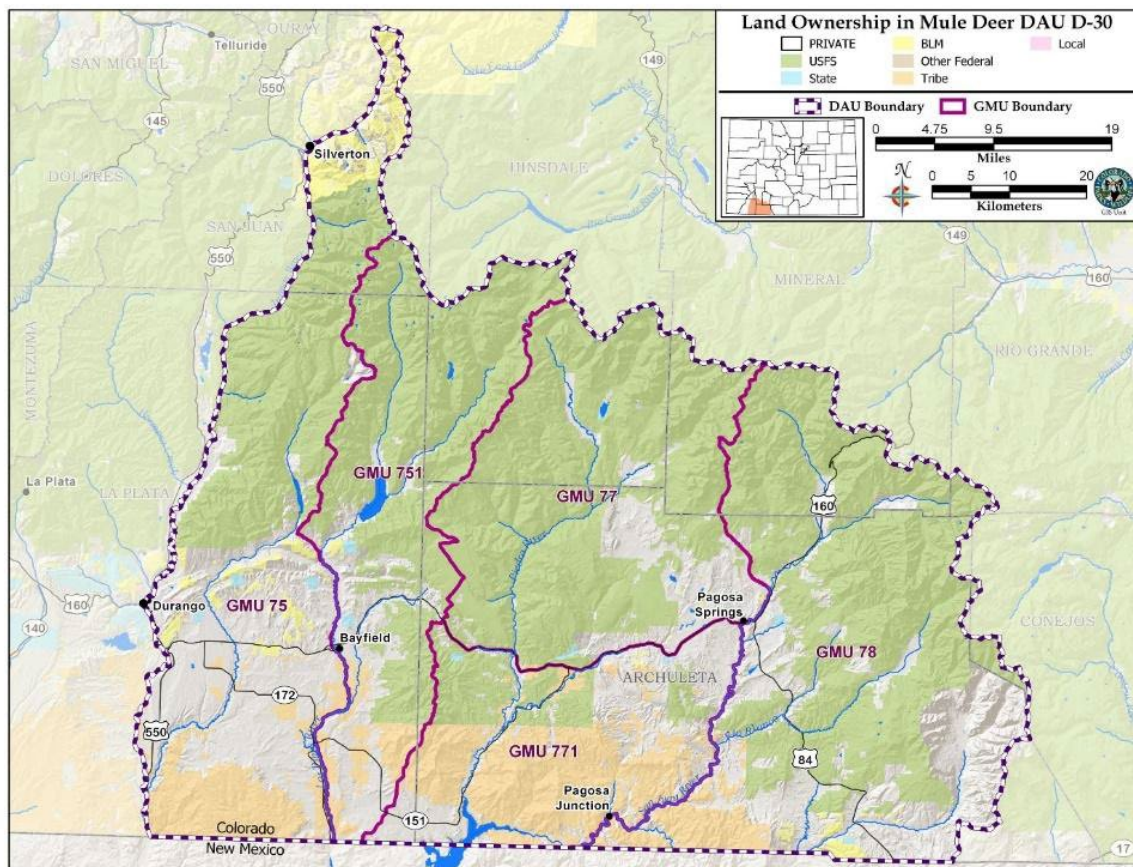


Figure 1. Deer Data Analysis Unit D-30.

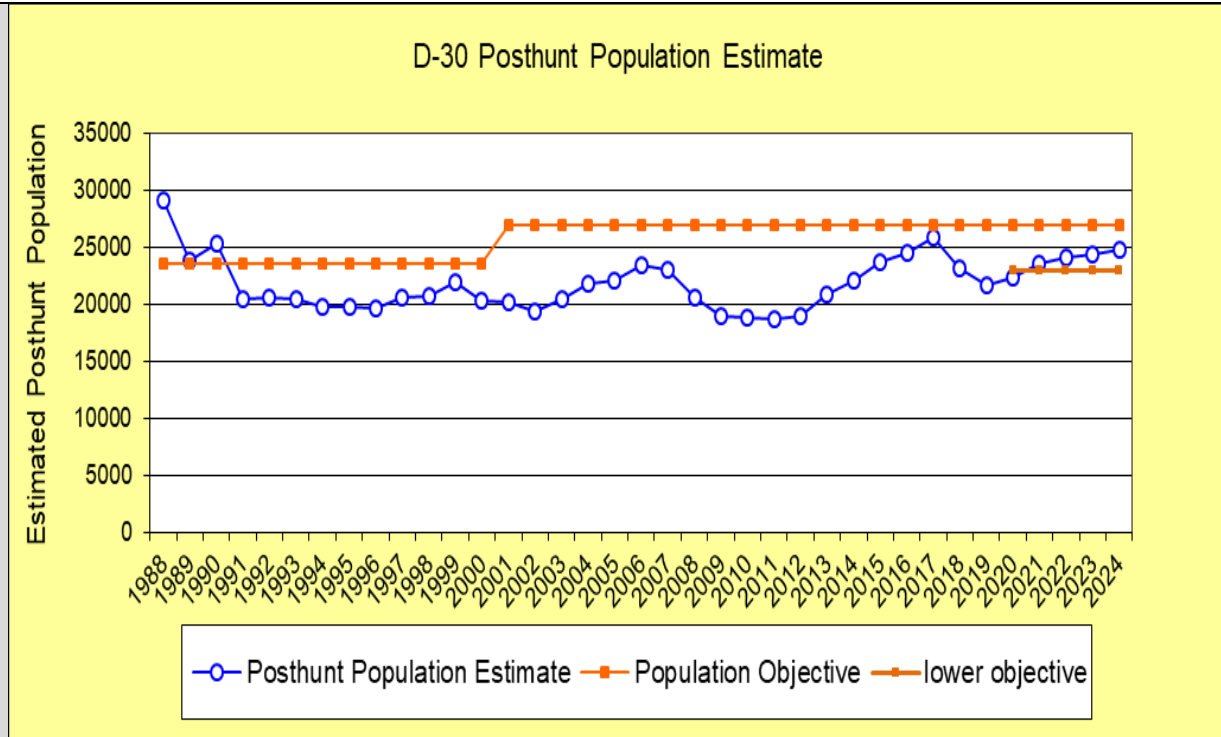


Figure 2. Posthunt population estimate for D-30.

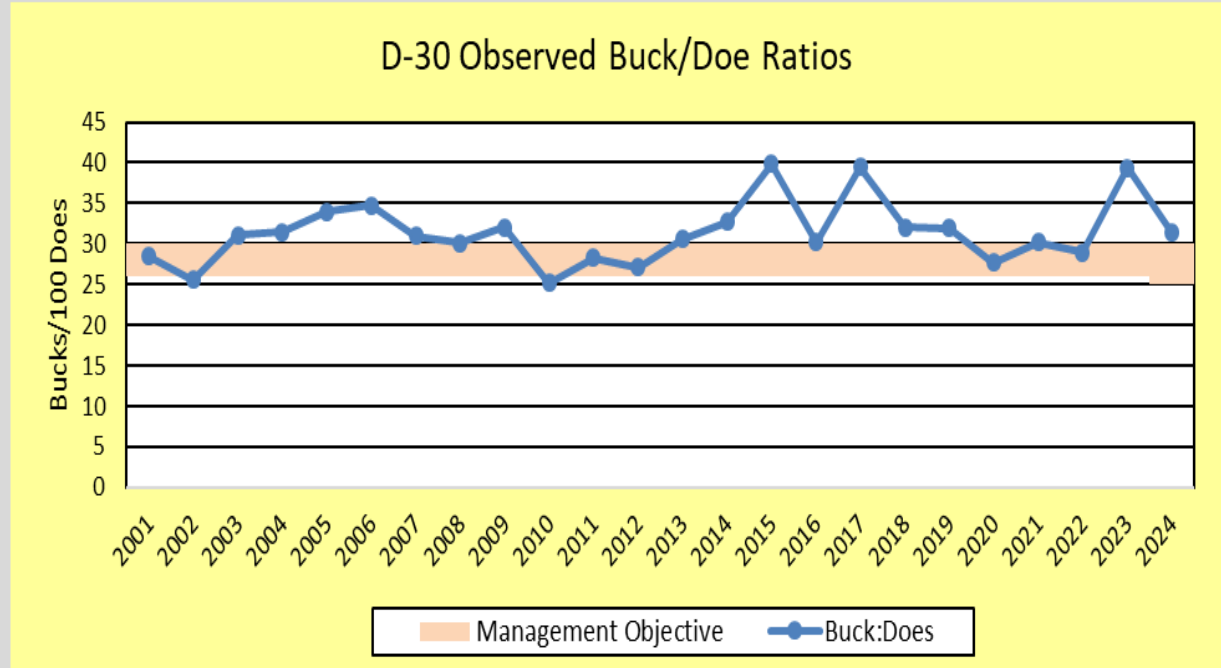


Figure 3. Observed buck to doe ratios for D-30.

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 general interest from hunters to have the increased opportunity even though there wasn't any formal effort to gather input. The draft issue paper was reviewed internally, beginning at the Area level. It was also reviewed by the Southern Ute Indian Tribe for their approval.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Add the proposed first season List A hunt codes: DM075O1R valid in GMUs 75 and 751 DM077O1R valid in GMUs 77, 78, and 771 2. Status quo: Do not add the new hunt codes.	
Issue Raised by:	Brad Weinmeister, Wildlife Biologist, Area 15
Author of the issue paper (if different than person raising the issue):	
CC:	Jamin Grigg, Area 15
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
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

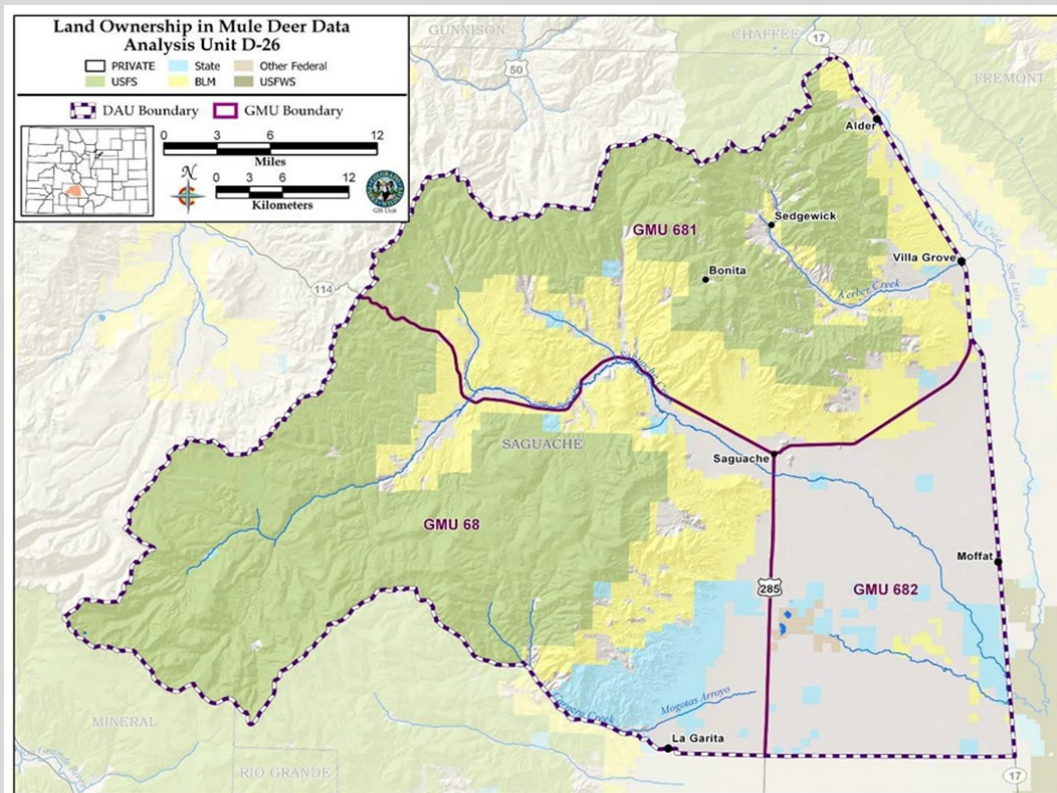
ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should a new private land only deer hunt code be created for GMU 682?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Data Analysis Unit (DAU) D-26 mule deer herd is in the western region of the San Luis Valley. The DAU comprises Game Management Units (GMUs) 68, 681, and 682, approximately 1,302 square miles. The mule deer winter range within the DAU includes roughly 483 square miles, whereas the summer range encompasses about 963 square miles. The DAU is entirely within Saguache County. Public land constitutes 74% of the DAU, while the private sector owns 26%. GMUs 68 and 681 encompass about 1,047 square miles of primarily public land (88%), much of which is suitable habitat for mule deer. GMU 682, on the other hand, makes up about 255 square miles, the vast majority of which (89%) is privately owned and is considered to be poor mule deer habitat.



GMU 682 is bounded on the North side by US Highway 285, on the East by Colorado Highway 17, on the South by Saguache County Road G, on the West by US Highway 285, and is dominated by greasewood and rabbitbrush flats, agriculture, or urban centers. The lack of quality forage, current land use practices, and human population centers in GMU 682 results in poor habitat for mule deer. The deer in GMU 682 are generally found in or around the town of Saguache. While deer from GMUs 68 and 681 do pass through the area sporadically, it is generally during the spring along Saguache Creek while it is still flowing or in alfalfa fields immediately following harvest. Although several properties in GMU 682 do qualify for the Landowner Preference Program (LPP), these licenses are almost always used on public land in GMUs 68 and 681, thus not being used to hunt the deer that their properties support. Agricultural issues related to damage from deer are extremely limited in GMU 682 and are currently addressed by the issuance of dispersal licenses to individual properties experiencing conflict.

Based on post hunt surveys conducted by Colorado Parks and Wildlife (CPW) over the past five (5) years, it is estimated that there were an average of 15 hunters per year in GMU 682 (out of an average of 792 hunters for D-26) across all seasons. These 15 hunters harvested an estimated 5 buck deer per year (out of an estimated 384 bucks harvested for D-26).

It is recommended that GMU 682 be removed as a valid unit from the current D-26 hunt codes and the creation of a single new private land only hunt code, DE682P5R, which would run from September 1st to December 31st annually. This change would not only provide hunters with a longer season, but also greater harvest opportunity by allowing the take of either male or female animals. Limiting this license to private land only, which makes up 89% of GMU 682 and is where the majority of the deer are found, would benefit landowners by reducing the number of overall applicants during the draw, allowing them a greater opportunity to draw licenses for their own property. It would also help bring fairness to the distribution of LPP licenses by removing landowners with property in GMU 682 from the pool of GMU 68 and 681 LPP applicants. Private land licenses also help to relieve hunting pressure on public lands and encourage the creation and maintenance of wildlife habitat. Any agricultural damage caused by deer would continue to be handled via dispersal licenses.

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

An email was sent to all active deer Landowner Preference Program (LPP) applicants in GMU 682. Only two responses were received, with a few clarifying questions; one was supportive of the changes while the other didn't provide an opinion either way.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Removal of GMU 682 from all current D-26 Hunt Codes (DM068O1A, DM068O1M, DM068O2R, DM068O3R, DM068O4R) and creation of a new Hunt Code for GMU 682 (DE682P5R), which would run from September 1st to December 31st annually.
2. Status quo.

Issue Raised by:	William Miedema (DWM, Saguache), Tyler Cerny (DWM, Monte Vista)
Author of the issue paper (if different than person raising the issue):	
CC:	Brent Frankland (Wildlife Biologist), Jamin Grigg (SW Sr. Wildlife Biologist), Rod Ruybalid (AAWM, Area 17), Rick Basagoitita (AWM, Area 17), Heath Kehm (SW Deputy Regional Manager), Cory Chick (SW Regional Manager)
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, SW Region
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should 2nd and 3rd rifle season bull elk licenses be converted from unlimited Over-The-Counter to Limited in GMUs 54, 55, and 551?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Game Management Units (GMUs) 54, 55, and 551 (Figure 1) in the northern Gunnison Basin are currently fully limited for elk licenses during the archery, muzzleloader, first rifle, and fourth rifle hunting seasons. Second and third rifle seasons support limited cow elk licenses, but remain unlimited, or over-the-counter (OTC), for bulls. GMU 54 is one of the GMUs in elk Data Analysis Unit (DAU) E-05, which also includes GMUs 53 and 63. GMU 54 is currently fully limited for archery elk licenses, while GMUs 53 and 63 remain unlimited OTC for Colorado resident archery hunters. GMUs 55 and 551 make up elk DAU E-43, and both GMUs are fully limited for archery elk licenses. E-05 has a population objective of 7,800 - 8,800 (2024 post hunt estimate = 8,400), while E-43 has a population objective of 6,200 - 7,200 (2024 post hunt estimate = 7,300); both populations are within or near their population objective. Similar to most DAUs offering unlimited OTC licenses for bulls during the second and third rifle seasons, CPW has limited ability to influence bull:cow ratios or manage to a specific bull:cow ratio objective. Observed post hunt bull:cow ratios tend to fluctuate between 15-20 bulls:100 cows in each herd. The Herd Management Plans (HMPs) for both herds were adopted in 2023 and state that CPW will manage towards an objective of 23-28 bulls:100 cows post hunt, should license allocation shift from OTC to Limited during the ten-year lifespan of the HMPs.

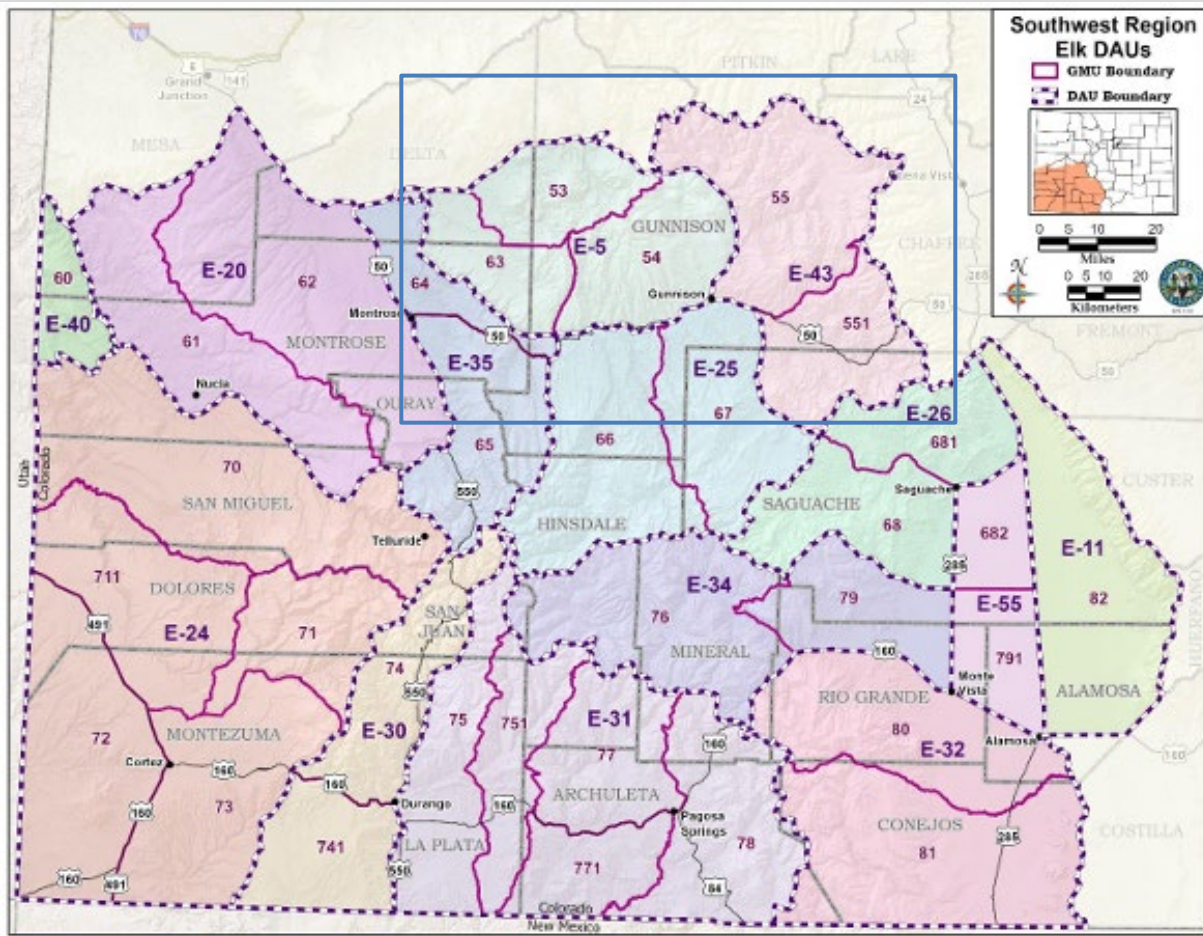
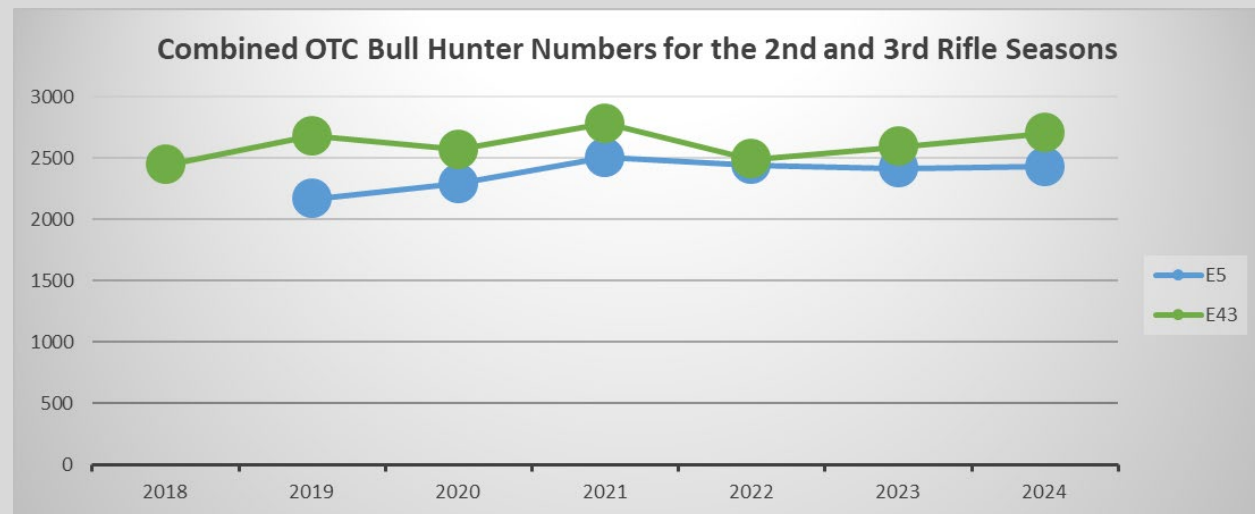


Figure 1. Elk Data Analysis Units (DAUs) in Southwest Colorado. E-05 and E-43 are outlined in blue.

Current Colorado Parks and Wildlife Commission (PWC) policy states that changes to elk license limitations will be considered via a public nomination process, a CPW staff-supported Issue Paper, or through the Big Game Season Structure (BGSS) process. The potential for statewide elk license limitations was one of the primary topics of discussion during the public comment period leading up to the adoption of the 2025-2029 BGSS. While the PWC ultimately did not adopt a BGSS framework limiting second and third rifle season licenses for elk statewide, limitations were advocated for by members of the Gunnison Basin community during public meetings and throughout the BGSS public comment process. Discussions surrounding total limitations in the Gunnison Basin go back several decades, which has resulted in full license limitations in the southern Gunnison Basin units in 1999 (GMUs 66 & 67; DAU E-25), as well as archery license limitations in 2010 (GMUs 54, 55, 551). More recently, advocacy for limiting rifle licenses during the 2nd and 3rd rifle seasons increased following the implementation of the 2020-2024 BGSS. The 2020-2024 structure was markedly different than previous structures, in that it included significantly longer breaks between seasons, resulting in season dates falling later on the calendar. Later season dates created a myriad of management issues that have been scrutinized since implementation. In the Gunnison Basin, one of those primary issues has been the increased vulnerability to hunting for migratory elk in heavily roaded, sagebrush-dominated GMUs, where bull hunting is unlimited during the 2nd and 3rd rifle seasons. The newly adopted 2025-2029 BGSS was somewhat modified from the previous; however, the overall structure will still generally facilitate a high level of vulnerability for bull elk during the unlimited 2nd and 3rd rifle seasons, based on the perpetuation of longer breaks and later season dates.



Members of the Gunnison Wildlife Association (GWA), whose mission is “...protecting and enhancing the health and sustainability of wildlife and public lands in the Gunnison Basin,” were regular participants during CPW’s public process surrounding the 2025-2029 BGSS. GWA is a long-standing local organization that has served as a conduit to the wildlife community, including big game hunters. In January 2025, based on the ongoing interest in limiting OTC licenses during the 2nd and 3rd rifle seasons, GWA organized and hosted an educational and information-sharing event open to the general public. The event featured a panel of speakers, including the GWA President, CPW’s Southwest Region Sportsperson Roundtable Member, and CPW staff, to discuss the current status and future management of elk populations in the Gunnison Basin. GWA conducted a live poll of attendees during that meeting and also developed an online survey that they advertised for several weeks following the in-person meeting. Results from GWA’s public engagement indicate majority support for full limitations of elk licenses in the northern Gunnison Basin, particularly from local residents. GWA provided a summary report of their findings for CPW review. Analysis of 153 unique survey responses yielded a variety of results, including:

- 54% of respondents identified as “hunter,” 28% identified as a combination of “hunter” and “stockgrower, outfitter/guide, business owner, or wildlife enthusiast.”
- 74% of meeting attendees and 53% of total respondents supported entirely limited elk licensing.

- 61% of meeting attendees indicated a lack of satisfaction with the overall experience of current OTC licensing for elk in units 54, 55, and 551 (either “unsatisfied” or “very unsatisfied”).
- 45% of total respondents reported being either “unsatisfied” or “very unsatisfied” with their overall experience of current OTC licensing in units 54, 55, and 551.
- 79% of meeting attendees and 52% of total respondents viewed current OTC rifle seasons in GMUs 54, 55, and 551 as “significantly crowded.”
- Meeting attendees largely favored (53%) a slight reduction in licenses if total limitations were to be implemented, with a smaller number (29%) favoring a significant reduction.
- 33% of total respondents indicated they’d like to see a significant reduction in licenses if total limitations were to be implemented, followed by 29% favoring a slight reduction in licenses.

In addition, when comparing the northern versus southern Gunnison Basin GMUs, “opt-in” questions asked during CPW’s annual big game harvest surveys indicate that hunters are generally more satisfied with their hunts and feel less crowded in the southern Gunnison Basin (GMUs 66 & 67; DAU E-25) where all licenses are currently limited (Appendices A-C: 2024 Big Game Harvest Survey - Elk Hunter Attitudes for a comparison of hunter satisfaction during the second and third rifle seasons). Considerable discussion has occurred over the past several years regarding hunter preferences, particularly with respect to concepts such as “crowding” and “experience.” That said, GWA outreach suggests that some level of majority opinion exists relative to those concepts.

Proponents of limiting the 2nd and 3rd OTC rifle seasons in the Gunnison Basin have raised the following potential management advantages, most of which were discussed during recent BGSS planning:

- More prescriptive local management that accommodates changes to BGSS policy
- Mitigating for hunter crowding and enhancing hunter experience
- Potentially influencing elk distribution between public and private lands
- Bolstered management ability; adapting to local or statewide stochasticity (e.g., displacement of large numbers of bull hunters in the NW following the severe winter of 22-23, post-fire hunter displacement)
- Enhanced management towards specified and agreed-upon bull:cow ratios

There are also potential disadvantages to total limitations, some of which were referenced in GWA’s summary report. Those include:

- Potential impacts to the local economy
- Potential reduction in the opportunity to procure a license every year for local GMUs
- Potential displacement of OTC bull hunters into adjacent GMUs/DAUs
- Entry into and administration of the Landowner Preference Program (LPP)
- Potential impact to CPW budget

Based on ongoing constituent engagement in the Gunnison Basin, and the apparent majority sentiment, CPW supports the total limitation of bull elk licenses during the 2nd and 3rd rifle seasons in GMUs 54, 55, and 551. CPW does not recommend or support limiting bull elk licenses during the 2nd and 3rd rifle seasons in GMUs 53 and 63 (DAU E-05) at this time to maintain consistency with archery license allocation, and also recognizing differences in community engagement and sentiment relative to potential limitation.

If this alternative were to be adopted, to phase into the new licensing model, CPW proposes that bull license numbers be initially set near the three-year average number of licenses, or reduced by no more than 10%. A phase in period would have the following advantages:

- Maintains high license numbers while hunters adjust to applying for a limited license
- Mitigates potential impacts to the local economy and CPW budget
- Creates a “ceiling” for managing bull hunter numbers; mitigates for local and statewide management stochasticity

- Provides managers with an evaluation period to assess application demand and draw statistics - Current allocation policy will favor residents in the draw if demand exists (i.e., 75% resident / 25% non-resident)	
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IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED.	
Gunnison Wildlife Association (GWA) Gunnison County Stockgrowers' Association is in support Big game hunters via the annual big game harvest survey Big game hunters during the 2025-2029 Big Game Season Structure public input process	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Remove GMUs 54, 55, and 551 from EM000U2R and EM000U3R Create hunt codes EM054O2R and EM054O3R, valid in GMU 54 Create hunt codes EM055O2R and EM055O3R, valid in GMU 55 Create hunt codes EM551O2R and EM551O3R, valid in GMU 551 2. Status Quo	
Issue Raised by:	Gunnison Wildlife Association, Area 16 CPW Staff
Author of the issue paper (if different than person raising the issue):	Brandon Diamond and Jamin Grigg
CC:	Cory Chick, Matt Eckert, Brian Dreher, Andy Holland
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, SW Region
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

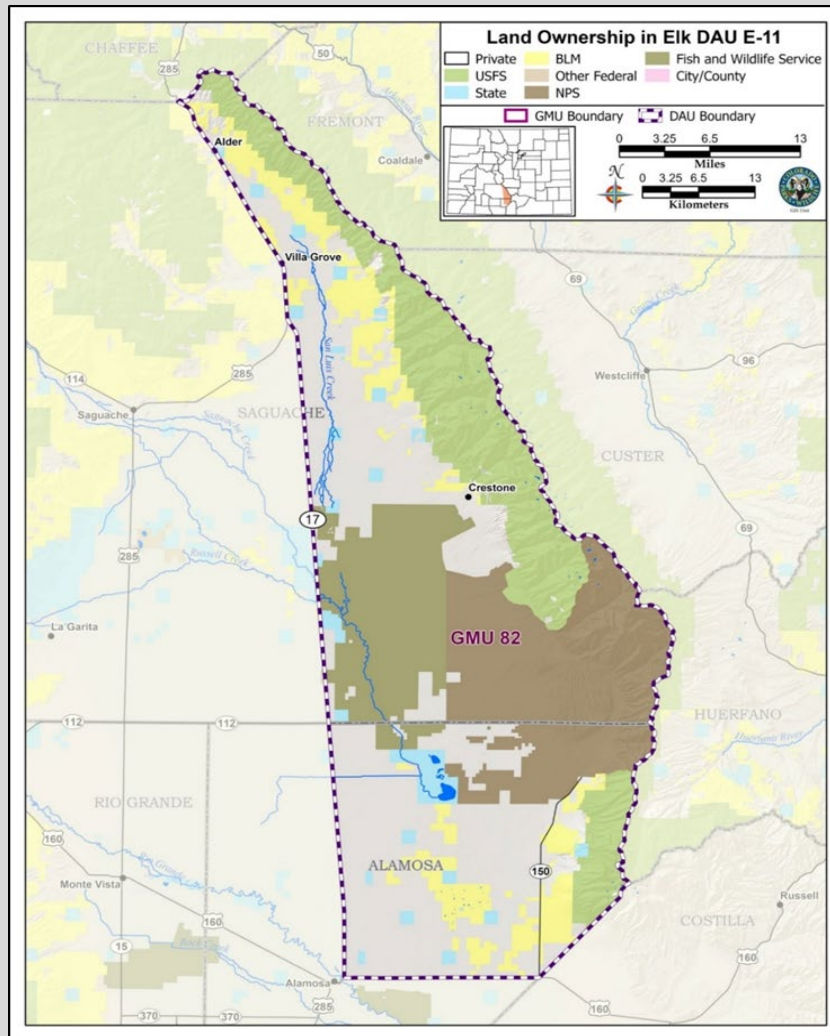
ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should Elk Antler-Point Restrictions be Removed in GMU 82?

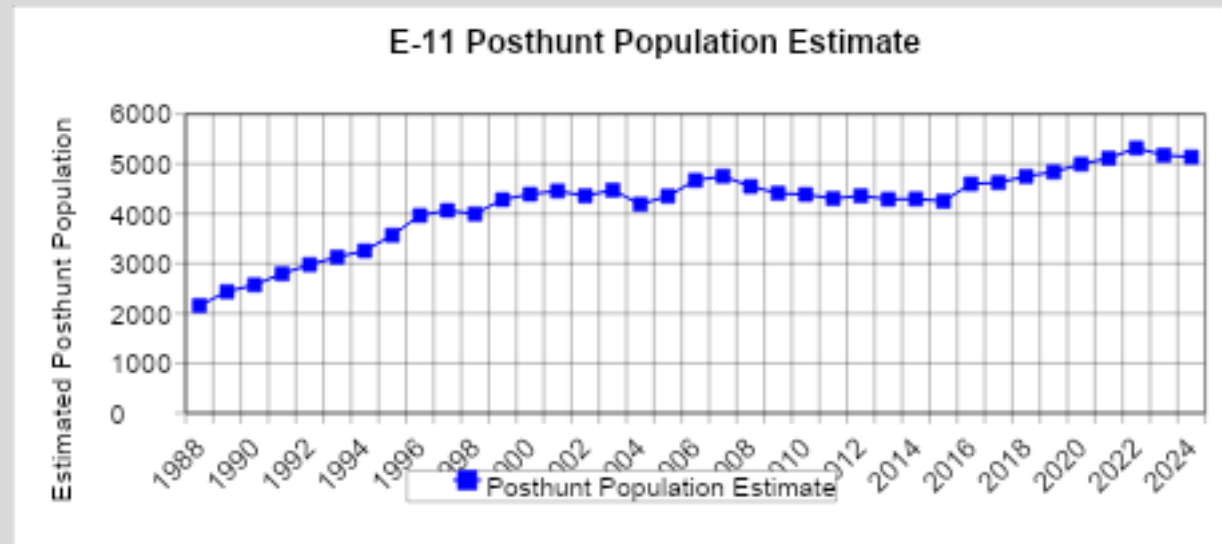
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Data Analysis Unit (DAU) E-11, Sand Dunes, elk herd is in the northeastern section of the San Luis Valley. The DAU (geographical area) comprises a single Game Management Unit (GMU) 82, approximately 1,088 square miles. Elk winter range within the DAU includes roughly 526 square miles, whereas the summer range encompasses about 803 square miles. Portions of Alamosa and Saguache counties make up the entire area. Public land constitutes about 71% of the entire DAU, while private property is approximately 29% of the area. GMU 82 is bounded on the North by Poncha Pass, on the North and East by Rio Grande-Arkansas River divide, on the South by the Alamosa-Costilla County line and U.S. Highway 160, and on the West by Colorado State Highway 17 and U.S. Highway 285.

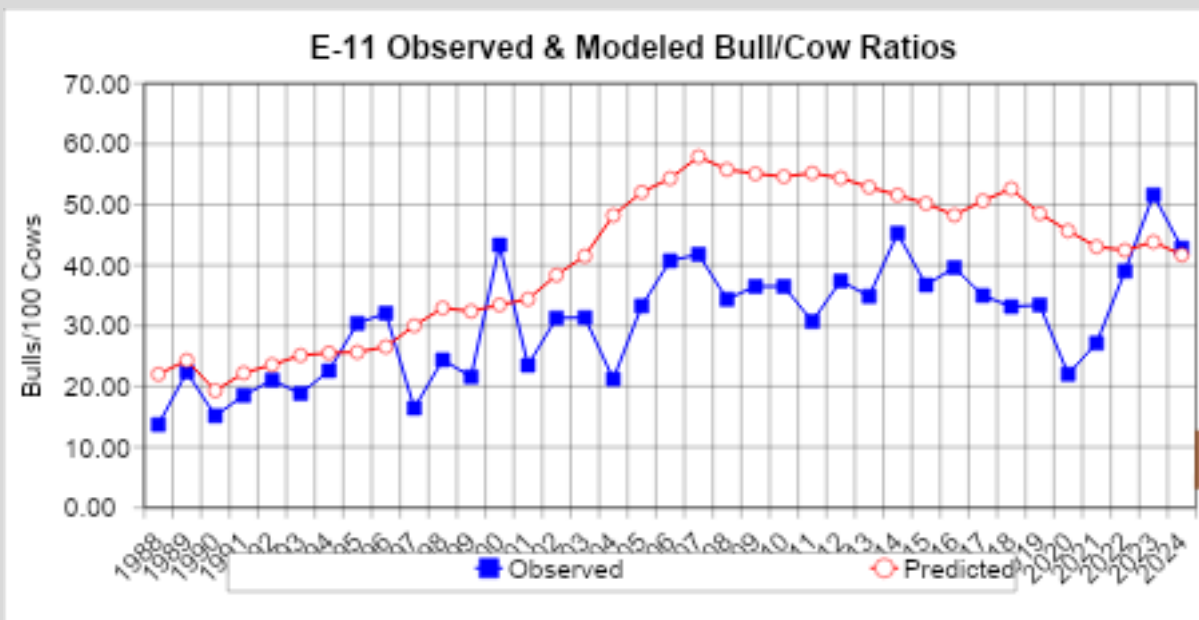


This herd is managed as an Over-The-Counter (OTC) hunting opportunity for bulls during the archery, second rifle, and third rifle seasons. The last Herd Management Plan (HMP) was approved in 2023, where the Parks and Wildlife Commission approved the extension of the previous HMP from 2021, which set the post-hunt population objective at 3,000-4,000 animals and a sex ratio objective of 17-23 bulls per 100 cows. The current (2024) post-hunt population estimate is 5,139 animals and a sex ratio of 41.7 bulls

per 100 cows. While efforts have been made to get this herd within management objectives, such as the issuance of private land only vouchers to address agricultural damage outside of traditional hunting seasons, volunteer culling efforts on the Baca National Wildlife Refuge, and generous license allocation numbers across all public land seasons, the herd still remains above management objectives.



DAU E-11 post hunt population; population objective (3,000-4,000) range bracketed in brown.

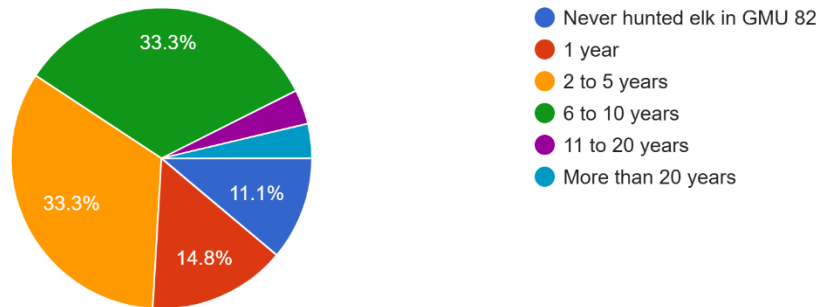


DAU E-11 bull/bow ratios; bull/cow ratio objective (17-23/100) range highlighted in brown.

Below are the responses to an online survey conducted in 2025 by local CPW staff, which sought to gauge public opinion of the removal of antler-point restrictions in GMU 82.

How many years have you hunted for elk in GMU 82?

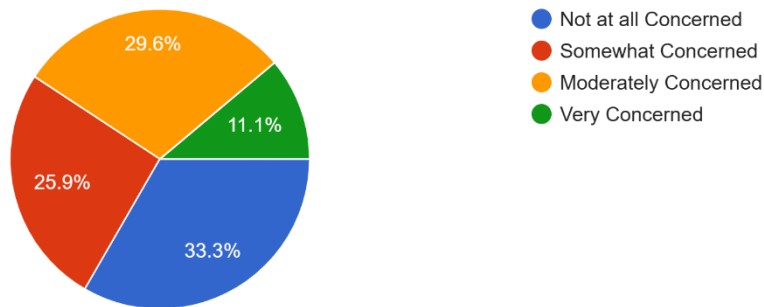
27 responses



The majority of respondents (89%) had previously hunted for elk in GMU 82.

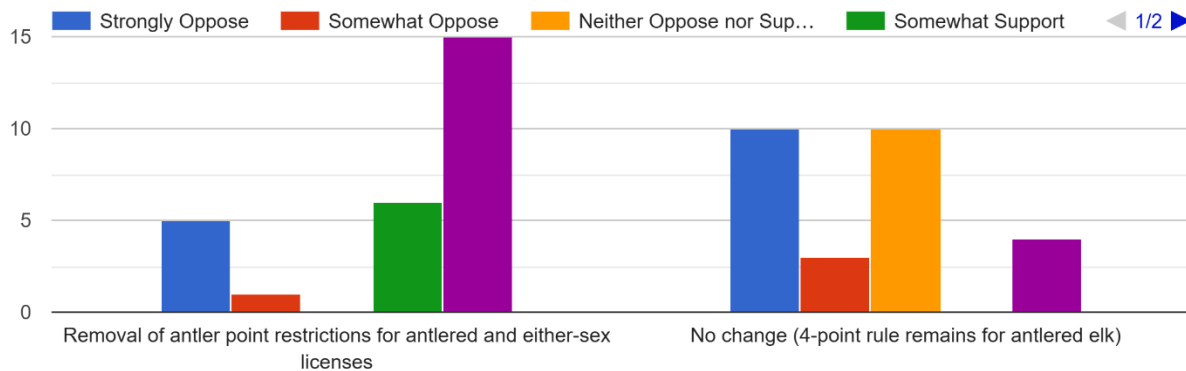
How concerned are you with the GMU 82 elk population being over objective? (Please check one.)

27 responses



The majority of respondents (67%) were concerned with the E-11 elk herd being over objective.

To what extent do you support or oppose the following strategies to manage the GMU 82 elk population? (Please check one response per statement.)



The majority of respondents (78%) supported the removal of antler-point restrictions in GMU 82. Strongly opposed 5, somewhat opposed 1, neutral 0, somewhat support 6, strongly support 15.

As shown by the survey, the majority of the public is concerned with the elk herd being over objective and supports the removal of the antler-point restrictions in GMU 82. This change would also allow greater harvest opportunity for the public, helping CPW to manage towards current post hunt population and sex ratio objectives. Additionally, the removal of the antler-point restrictions on public land licenses in GMU 82 would bring consistency with private land agricultural damage vouchers, which already allow the take of any antlered elk on antlered elk licenses. Allowing the take of any antlered elk would also result in fewer citations issued by local Wildlife Officers, who currently write a few citations every year for violation of antler-point restrictions. Other management strategies, such as private land agricultural damage vouchers and volunteer culling efforts on the Baca National Wildlife Refuge, would continue to be implemented.

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

A Google Survey was posted to the local Monte Vista CPW Facebook page asking for hunter feedback. The survey received 27 responses with 67% of respondents being concerned with the GMU 82 elk herd being over objective and 78% of respondents supporting the removal of antler-point restrictions for antlered and either-sex licenses in GMU 82.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Remove antler-point restrictions for all GMU 82 antlered and either-sex elk hunt codes (EE082VIA, EE000U1A, EE082O1M, EE082O1R, EM000U2R, EM000U3R, EE082O4R). This change would result in these GMUs being removed from Regulation #254.A and added to Regulation #254.B.
2. **Status Quo**

Issue Raised by:	William Miedema (DWM, Saguache), Leon Martinez (DWM, Alamosa)
Author of the issue paper (if different than person raising the issue):	
CC:	Brent Frankland (Wildlife Biologist), Jamin Grigg (SW Sr. Wildlife Biologist), Rod Ruybalid (AAWM, Area 17) Rick Basagoitita (AWM, Area 17), Heath Kehm (SW DRM) Cory Chick (SW Regional Manager)
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
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should antlered hunt codes for the 1st and 4th rifle seasons in elk DAU E-2 be changed back to either-sex hunt codes?
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 Bear's Ears elk herd, data analysis unit (DAU) E-2, from 2003-2012, and again from 2020-2022. Elk populations in E-2 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 37% and 40% for the 1st and 4th rifle seasons respectively. From 2020-2022, average antlerless harvest was even higher, at 44% for 1st rifle, and 64% for 4th rifle. Due to the high mortality in the Bear's Ears herd as a result of the 2022-2023 severe winter, the either-sex licenses for 1st and 4th rifle were replaced with antlered-only licenses in 2024 to reduce antlerless harvest and help the population rebound more quickly. The current population objective for E-2 is 15,000-18,000 elk. In 2022, the post hunt population estimate was 15,359, which is at the lower end of the objective, and in 2023 it dropped to 10,567, significantly below objective. The winter of 2023-2024 was mild, followed by a wetter-than-average spring and summer, and an even more mild winter in 2024-2025. This has helped with the overall health and fecundity of the herd, and resulted in low mortality. The post hunt population estimate in 2024 was 15,838 elk, and we predict that the post hunt 2025 population will be upwards of 16,500. Given the quick rebound of the Bear's Ears herd back into the middle of its objective range, CPW recommends changing the antlered hunt codes for 1st and 4th rifle seasons back to either-sex, as they were before the severe winter. The Bear's Ears herd is more productive than most elk herds in the state, and the antlerless harvest was severely reduced in response to the severe winter. CPW and stakeholders are concerned that the herd will quickly exceed the population objective, again, if we do not increase antlerless harvest. From 2013-2019, when 1st and 4th rifle licenses were antlered-only, the cow harvest rate was an average of 6% lower than from 2003-2012 when the licenses were either-sex. The herd grew above the objective range then, and is likely to do so again if we do not take a proactive approach to managing antlerless harvest.	
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 has not been public outreach on this specific question, but staff have received feedback related to increasing antlerless harvest in the Bear's Ears herd, so as not to exceed the population objective. This feedback has come almost entirely from Ranching for Wildlife managers and landowners.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Replace existing antlered hunt codes EM003O1R (valid in GMUs 3, 4, 5, 301, 441), EM003O4R (valid in GMUs 3, 301), EM004O4R (valid in GMUs 4, 441), and EM005O4R (valid in GMU 5) with either sex hunt codes EE003O1R (valid in GMUs 3, 4, 5, 301, 441), EE003O4R (valid in GMUs 3, 301), EE004O4R (valid in GMUs 4, 441), and EE005O4R (valid in GMU 5). 2. Status quo: The EM003O1R, EM003O4R, EM004O4R, and EM005O4R licenses remain available.	

Issue Raised by:	Area 6 Terrestrial Biologist Becca de Vergie and Area 6 staff
Author of the issue paper (if different than person raising the issue):	Becca de Vergie
CC:	NW Senior Biologist Brad Banulis, A6 AWM Johnathan Lambert, AAWM Mike Swaro, Terrestrial Biologist Darby Finley, A6 DWMs who cover E2; A10 AWM Kris Middledoft, AAWM Justin Pollock, Terrestrial Biologist Eric VanNatta, A10 DWMs who cover E2.
APPROVED FOR FURTHER CONSIDERATION BY:	RM 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	NW Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should a PLO either-sex archery hunt code be created in DAU E-13?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The newly approved Big Game Season Structure for 2025-2029, limits archery licenses for non-residents, while still allowing resident archers to acquire over-the-counter (OTC) archery licenses. Elk data analysis unit (DAU) E-13, the Williams Fork elk herd, has a high proportion of private lands that elk use during the archery season, particularly in game management units (GMUs) 28 and 37 (Figure 1). Currently, the Williams Fork elk herd is estimated at approximately 3,500 elk, below the objective range of 4,000-5,500. Access in this DAU can be challenging due to high elevations, beetle kill and downed timber on USFS lands, and crowding occurs at many public hunting access points. High numbers of OTC licenses in recent years have led to increased crowding in the field and contributed to pushing animals onto private land refuges, where they often remain through the rifle seasons.

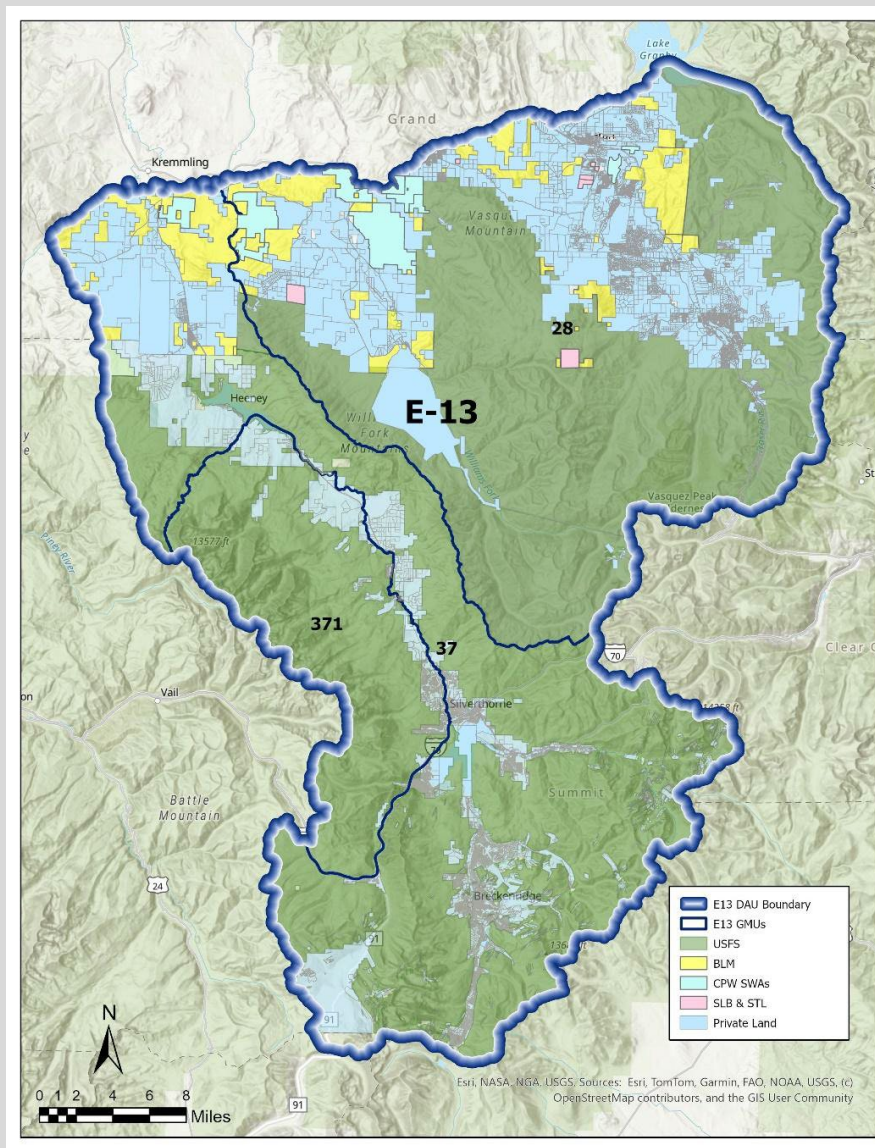


Figure 1. E-13 Land Ownership Map.

Issue:

The recent BGSS limitation of non-resident archery licenses is intended to reduce crowding on public lands once license numbers are reduced from historic sale levels. By reducing these limited licenses, however, private land outfitters may struggle as competition increases for non-resident archery licenses. This may reduce hunting opportunity and pressure on private lands within this DAU, creating challenges for outfitters, and allowing for elk to congregate on these private land refuges and reduce availability of elk for public land archery hunters.

Proposal:

Establishing a private land only (PLO) archery hunt code would allow resident and non-resident hunters to draw a license valid on private lands within E-13 GMUs where OTC licenses were previously utilized. The proposed hunt code would establish an additional license quota for resident and non-resident hunters that traditionally hunted on private lands with OTC licenses, and help minimize competition for the limited NR license quota once those licenses are reduced adequately to address archery crowding issues on public lands.

The creation of this PLO hunt code would not contribute to crowding, which the new NR license limitation was intended to address. The proposed PLO hunt code would benefit landowners, who rely on income from non-resident hunters, by allowing hunting clients to apply for a license valid on private lands. Maintaining hunting pressure on private lands during archery season will help with distribution of animals by reducing numbers of elk on private land refuges, which will increase availability of elk for public hunters.

This hunt code would provide management flexibility to meet the needs of landowners while allowing for license adjustments to manage crowding on public lands during archery season. The proposed PLO hunt code would be consistent with the regular archery season and method of take.

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 include:

- general public - public land archery elk hunters – informal conversations have taken place
- landowners
- private land outfitters

Outreach has been conducted through staff conversations with landowners, private land managers and some public hunters.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create a private land only (PLO) archery hunt code valid DAU-wide, during the archery season:
 - EE028P1A - valid in GMUs 28, 37, 371

2. Status quo**Issue Raised by:**

Jeromy Huntington, A9 AWM; Dan Coil, A9 AAWM; Jeff Behncke, DWM; Elissa Slezak, A9 Biologist

Author of the issue paper (if different than person raising the issue):

Elissa Slezak, A9 Bio

CC:	Travis Black, NWRM, Garrett Watson, DRM, Brad Banulis, NW Senior Bio
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
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should a private land only either-sex archery hunt code be created in DAUs E-20 and E-35?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The recently approved Big Game Season Structure for 2025-2029 limits archery licenses for non-residents while still allowing resident archery hunters to acquire over-the-counter (OTC) licenses. A private land only (PLO) hunt code would help distribute hunting pressure in areas where elk congregate to keep hunting pressure on private lands. Two data analysis units (DAUs), E-20 and E-35, in southwest Colorado near Montrose, Ridgway, and Nucla would benefit from additional PLO licenses for different management purposes (Figure 1).

The current population estimate in elk DAU E-20 of 14,400 is near the top of its objective range of 11,000-15,000. Various management techniques, including a PLO either-sex archery license, can help increase harvest and stabilize this herd. Conversely, E-35's population is currently at the bottom of the objective range of 6,000-9,000, with 6,400 elk. The PLO hunt code will help management of this herd by applying pressure on elk refuging on private lands. This DAU has historically had issues with elk refuging on large swaths of private land with limited hunting pressure. By ensuring licenses are available for private land only hunting, this will redistribute elk across public and private land, reducing private land elk refuging.

Creating a PLO archery hunt code would allow resident and non-resident hunters to draw a license valid on private lands within limited GMUs where OTC licenses were previously used. Creating a PLO hunt code would benefit landowners, who rely on income from non-resident hunters, by allowing hunting clients to apply for a license valid on private lands. The creation of this hunt code would not affect hunter-crowding issues on public land, which the new license limitation as part of the new Big Game Season Structure was intended to address. It will allow an additional license quota for resident and non-resident hunters to apply for those who traditionally hunt on private lands with OTC licenses, and help minimize competition for the limited license quota valid on public and private lands. This would also help redistribute hunters to private lands where elk often refuge from public-land hunting pressure. Creating a PLO archery elk hunt code would be consistent with other methods of take with limited license quotas.

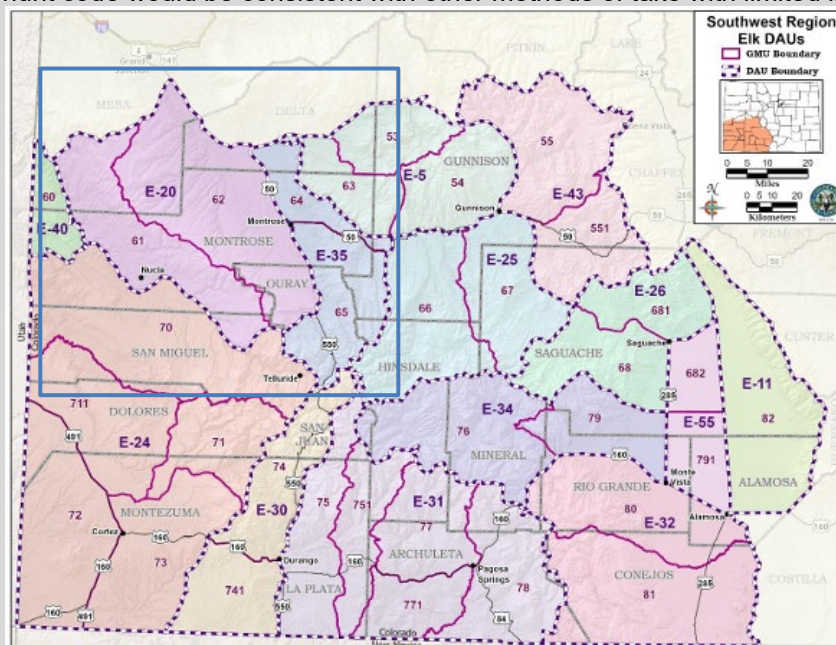


Figure 1. Elk data analysis units (DAUs) in Southwest Colorado. E-20 and E-35 are outlined in blue.

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 include:

- Hunters
- Landowners
- Private land outfitters

Stakeholders were contacted during the HMP process in 2023. Support was given to manage E-20 within the population objective.

In E-35, hunters have expressed frustration with limited public land hunting opportunities, due to private land refuging, and landowners are also frustrated with harboring large herds of elk year-round on their properties. Both groups are supportive of this change.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Add hunt codes EE062P1A (valid for GMU 62 during the archery season) and EE064P1A (valid for GMUs 64 and 65 during the archery season)

2. **Status quo:** No additional licenses will be added to E-20 or E-35.

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
RECOMMENDED FOR CONSENT AGENDA?	NO
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the pronghorn data analysis unit A-22 be hunted?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
A-22 is a pronghorn data analysis unit (DAU) in the North Fruita Desert, north of Fruita, Colorado. This herd is an extension of the Southern Bookcliffs pronghorn herd in Utah and has been supplemented by translocations conducted by the Colorado Division of Wildlife. From 1958 to 1962, this population of pronghorn was hunted with reasonable success, but the population dwindled, and the decision was made to cease all hunting until the herd could be increased. This population has existed as the edge of the Southern Bookcliffs herd in Utah. In the 1987 pronghorn augmentation plan, the pronghorn population was estimated at 30 total animals, with those animals largely distributed close to the Utah border. Shortly after this document was written, 90 pronghorn were translocated to the north bookcliffs herd. Modelling done at that time estimated that the pronghorn population should grow to reach between 300 and 400 animals by 2002 based on typical fawn:doe ratios in Colorado herds. Since that time, there have been some efforts to estimate the population through aerial and ground counts, and it became apparent that this herd would likely never reach that objective range. Between 1990 and 2025, the highest number of total animals counted was in August 2024 at 214 animals. It appears that there has been a slower-than-expected increase in the population over time. This is likely due to low fawn:doe ratios. The average fawn:doe ratio for this herd between 1990 and 2025 is 25.3 fawns per 100 does, which is significantly lower than the statewide average of 40 to 50 fawns per 100 does. However, it appears that for the last couple of years, this population has held stable at a reasonable number of pronghorn. Based on years of ground and aerial surveys, the pronghorn in A-22 cluster primarily in the western area of the North Fruita Desert near the Utah border, to the agricultural fields on the north sides of Loma and Mack. Small sub-groups have been occasionally located as far east as the Grand Junction Airport and below Mt. Garfield. Primarily, these pronghorn stick to desert flatlands, and few have been recorded climbing into the higher elevations of the Bookcliffs. The habitat in the North Fruita Desert is marginal. Large sections of bare ground or invasive species, like cheatgrass, are providing little to no nutritional value to pronghorn. This area has been evaluated for habitat improvement projects, but due to existing cattle allotments, long-term aridification, and the low probability of treatment success, there is little chance of habitat improvement in the near future. It is likely we are reaching this habitat's capacity for pronghorn. This pronghorn population extends over the Colorado-Utah border. Utah manages the other half of this herd and maintains a limited hunt. The South Bookcliffs Pronghorn Herd on the Utah side is estimated to have a population of 540 animals. They issued eight archery buck tags and 34 buck rifle tags for a total of 42 buck tags issued this last year. They find that most of the harvest occurs between Cottonwood Creek and the Colorado-Utah border. In recent years, there have been complaints and applications for game damage claims in the agricultural fields on the North side of Loma and Mack, Colorado. These landowners are experiencing upwards of 100 pronghorn on their alfalfa fields during the summer and early fall. To address this, Colorado Parks and Wildlife personnel attempted to haze these animals off these properties and issued game damage permits for doe pronghorn. 14 were harvested using these permits in 2024. With the increasing pressure to address the game damage issues and the increasing number of pronghorn spotted during annual surveys, this population could benefit from some very limited hunting. Colorado Parks and Wildlife strives to effectively manage our wildlife populations with the North American Model of Conservation. CPW recommends that limited pronghorn harvest be resumed in A-22 within the	

existing big game season structure to address increasing pronghorn numbers, game damage issues, and utilize public hunters as a tool to manage this herd. The public hunt code is included to ensure that both private and public hunters are able to utilize this resource.

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*.**

Multiple stakeholders were spoken to locally about this issue, and all parties supported limited pronghorn hunting in this area.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create 3 new hunt codes as follows:
Archery ES - AE03001A: Season dates defined by the 2025-2029 BGSS (37-day season, with fixed dates annually beginning August 15th).

Rifle Buck - AM03001R: Season dates defined by the 2025-2029 BGSS (9-day season, opening on the first Saturday in October).

Private Land ONLY Rifle - AM030P5R: This season would begin the Saturday prior to the opening of the current rifle pronghorn season and would be open through the weekend following the close of the current pronghorn rifle season. For 2026, the proposed PLO pronghorn season would be 9/26/20126 - 10/18/2026."

2. Status quo

Issue Raised by:	Genevieve Fuller, Terrestrial Biologist; Scott Hoyer, DWM-DeBeque; Kirk Oldham, AWM Area 7; Albert Romero, AAWM 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	
RECOMMENDED FOR CONSENT AGENDA?	NO	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES	

ISSUES SUBMITTAL FORM

Date: 07/10/2025

ISSUE:	Should a second antlerless pronghorn season be established in A-03 (North Park)?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
The North Park pronghorn herd (A-03), located entirely within Jackson County, includes game management units (GMUs) 6, 16, 17, 161, and 171. As of 2025, the estimated population of A-03 is approximately 1,600 animals (2024 post hunt estimate: 1,579). Over the past several years, this herd has consistently remained near the top or above the herd management plan (HMP) post hunt population objective range of 1,400–1,600 pronghorn. To manage A-03 towards this objective range, Colorado Parks and Wildlife (CPW) has gradually increased doe harvest opportunity across archery, muzzleloader, and rifle seasons for the past 3 years. At the same time, CPW has maintained conservative buck license quotas in response to high public demand for quality buck hunting opportunities. In 2024, for example, rifle buck licenses required approximately 20 preference points to draw. A3 has been within the HMP buck:doe ratio objective of 30-40 bucks/100 does for the past 5 years, but the herd has been above the HMP population objective of 1,400-1,600 during this same time period. CPW wants to maintain the same quality and number of bucks in A3, but reduce the overall herd size slightly, which can be accomplished with the current level of buck harvest and continued pressure on doe harvest (CPW increased doe licenses in 2024). In alignment with the 2025 Big Game Season Structure, CPW proposes the addition of a second rifle doe pronghorn season in A-03. This addition is not primarily intended to increase overall doe harvest, but rather to provide flexibility in how existing rifle doe licenses are distributed. By splitting the current quota of 110 rifle doe licenses between two seasons, CPW can reduce hunter crowding during the regular rifle season. This would help preserve the quality of the buck hunting experience, particularly on public lands, while still supporting population management goals for the herd. If future population estimates exceed the current objective, additional doe licenses could be issued in this season as needed.	
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 impacted are hunters, wildlife viewers, residents, and landowners in Jackson County. Our plan is to conduct a public survey this fall. At this time, we don't feel there is a strong public sentiment either way on this topic (looking back to conversations with hunters over the past 5 years). However, if we continue to offer a higher number of doe licenses, buck hunters may feel pressure during the regular pronghorn rifle season. Internal parties are Area 10 DWMs and biologists, and Northwest Region staff.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Create a second season rifle antlerless/doe pronghorn hunt code (i.e., AF006O2R) valid in GMUs 6, 16, 17, 161, and 171, with season dates defined by the 2025-2029 BGSS (9-day season starting on the third Saturday in October).	

Alternative 2. Create three second-season rifle antlerless/doe pronghorn hunt codes aligning with the three regular rifle season GMU groupings (i.e., AF006O1R valid in GMU 006, AF016O1R valid in GMUs 16, 17, & 171, AF161O1R valid in GMU 161), with season dates defined by the 2025-2029 BGSS.

Alternative 3. Status quo, no new hunt code.

Issue Raised by:	Area 10 Staff: AAWM Josh Dilley, DWM Jacob Way, DWM Kyle Schliecher, and Terrestrial Biologist Eric VanNatta.	
Author of the issue paper (If different than the person raising the issue):	Eric VanNatta	
CC:	Kris Middledorf, AWM, Travis Black, NWRM, Garrett Watson NWDRM, Brad Banulis, NWSB	
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 Region	
RECOMMENDED FOR CONSENT AGENDA?	NO	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the Rocky Mountain Bighorn Sheep hunt code SMS79O1R be removed?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Rocky Mountain Bighorn game management unit (GMU) S-79 is located in South Central Colorado between the towns of Pueblo and Florence along the Arkansas River. It is known for a very small population of bighorns, estimated to be about 35 animals, that produces very large rams. In 2023, CPW staff were aware that there were about 8 rams over the age of eight years old in the population and elected to open the unit to bighorn sheep hunting in 2024, with both a Bighorn Sheep Access Program (BSAP) license (a program that gives the public access to huntable bighorn sheep populations on private land in exchange for property specific bighorn sheep hunting licenses) provided by a BSAP contract with the Ranchland Ranch, and a unit-wide draw license (hunt code SMS79O1R). The addition of the SMS79O1R license allowed a hunter to hunt the entire unit, including public land on the Lake Pueblo State Wildlife Area and private land with permission. This license also gives the Auction and Raffle (A&R) license holders the option to hunt the entire GMU. In 2024, hunters were very successful and harvested 4 rams. The harvests included the ram license for the Ranchland Ranch that was available through the CPW draw, the general season hunter holding the SMS79O1R tag, the auction license holder, and the raffle license holder. Three of those rams were harvested on the Lake Pueblo State Wildlife Area. These licenses allowed us to obtain disease samples from the unit in addition to the ram harvest. Hunters were very responsive and gathered the lungs from the harvested sheep, and we were able to test them for diseases correlated with low lamb ratios in bighorn sheep herds. Fortunately, we did not detect any of the bacteria strains that are a concern for bighorn populations. After the completion of the 2024 hunting season, we performed another count of rams and recorded 5 additional rams within the unit that are 8 years old or older, along with a couple of younger legal rams that will provide future hunting in the unit. It is still possible that 4 rams could be harvested out of this unit in the 2025 season, depending on the raffle and auction hunters choosing to hunt within the GMU. The BSAP contract with Ranchland Ranch has 2 licenses remaining, allowing hunting of rams through the 2027 season. After the conclusion of those hunts, the population will be reevaluated to see if another contract will be offered. CPW recommends removing the unit-wide SMS079O1R license to further manage the male segment of the population. If the SMS079O1R license is removed, Auction license and Raffle license holders will be limited to hunting only on the Ranchland Ranch property in S-79. The Ranch limits access to bighorn sheep hunting on the property for non-BSAP license holders by charging a trespass fee. The removal of SMS079O1R will allow the population to recover from the two high harvest hunting seasons and maintain the ram segment of the 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: *IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.	
We have had conversations with hunters applying for the license, the Rocky Mountain Bighorn Society volunteers, and the owner and outfitter from the Ranchland Ranch. While they like seeing the unit hunted,	

they do not want the population impacted by further hunting of the ram component, and all have supported the removal of the unit-wide license.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Remove the SMS79O1R hunt code

2. **Status quo:** No change

Issue Raised by:	Allen Vitt, Gretchen Holschuh, Zach Holder
Author of the issue paper (if different than person raising the issue):	Allen Vitt
CC:	Mike Brown, Sean Shepherd, Julie Stiver, Mitch Martin, Frank McGee
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	Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	No
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	NA

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should bighorn sheep game management unit S-35 be closed to hunting due to low population size?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Bighorn sheep game management unit (GMU) S-35 is located southwest of the town of Pueblo, surrounding Greenhorn Mountain. It is located between the towns of Walsenburg, Westcliffe, and Pueblo. Bighorn sheep were extirpated from the mountain shortly after European settlement, and the bighorns were reintroduced in 1976 when 6 rams and 14 ewes were captured from the Trickle Mountain herd and released on North Greenhorn Peak. The population grew to about 85 animals and has been hunted since 1986. License numbers peaked in 2011 with 5 archery ram licenses, 1 rifle ram license, and 2 rifle ewe licenses. In 2015, staff noted a 50% reduction in animals observed during our annual classification flight. This reduction was further evident in the following years, and CPW determined that the population had suffered a decline. The cause of the decline was unknown but could possibly have resulted from disease. As a result, CPW lowered archery licenses from 5 ram licenses to 1 ram license, and lowered the ewe licenses from 2 licenses to 1 license in 2019. CPW removed the ewe license in 2020. This resulted in one archery and one rifle ram license remaining in S-35. In 2025, CPW conducted numerous ground counts and talked with hunters who had drawn the 2025 archery and rifle licenses. Through these various counts, CPW was only able to locate a maximum of 3 legal rams (½ curl and larger) and 2 sub-legal rams. Following these counts, staff met and agreed that closing the unit to hunting was the best course of action, as recruitment is not keeping up with the amount of harvest in the unit. Additional counts within the unit will be conducted to further evaluate the bighorn sheep population. Additionally, in February 2025, CPW performed a range expansion of the S-35 bighorn herd. CPW released 20 sheep, including 3 rams, 12 ewes, and 5 lambs, into suitable bighorn habitat within the Junkins Park Burn Scar. Closing the entire unit to hunting will allow the newly transplanted bighorns to become established in S-35 before they experience hunting pressure.	
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 various license holders in the unit who were unhappy with the low numbers of sheep in the unit, especially the lack of older rams. We have also had conversations with volunteers with the Rocky Mountain Bighorn Society, who have also expressed concerns about continuing to hunt this herd.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Close bighorn sheep GMU S-35 to hunting and remove both the archery and rifle licenses (hunt codes SMS35O1A and SMS35O1R) 2. Status quo: No change	

Issue Raised by:	Allen Vitt and Area 11 staff	
Author of the issue paper (if different than person raising the issue):	Allen Vitt	
CC:	Julie Stiver, Mike Brown, Cody Purcell, Mitch Martin, Frank McGee	
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	SE Terrestrial	
RECOMMENDED FOR CONSENT AGENDA?	NO	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	NA	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should sheep hunt codes in S1 and S18 be changed to a single either-sex hunt code?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Bighorn sheep data analysis unit RBS-1 spans Larimer and Jackson counties, straddling the boundary between CPW's Northeast and Northwest Regions. RBS-1 includes game management units (GMUs) S40 in the North Fork of the Cache la Poudre drainage, S58 in the lower Cache la Poudre canyon, S01 in the upper Cache la Poudre canyon, and S18 in the Rawah Wilderness. S18 is a remote, high-elevation wilderness unit, while adjacent S01 is a more accessible, relatively low-elevation area along the Cache la Poudre River. Radio-collar data from past monitoring projects and agency observations indicate some interchange of rams between S18 and S01 during the rut and winter months. Although no ewe collar data exist to confirm a similar linkage, CPW staff believe habitat in S18 and S01 are used by many of the same sheep at different times of the year. Over the past decade, population estimates in S18 have ranged from 20 to 40 animals, while S01 has ranged from 35 to 80. Current CPW estimates—based on surveys, field observations, and hunter reports—indicate fewer than 10 sheep remain in S18 and perhaps only 30–40 in S01, with very few legal rams present. CPW staff suspect a disease event began in late 2023, affecting sheep in S58, S01, and potentially S18. In the fall of 2023, dead adult sheep from S58 were submitted to the Wildlife Health Lab, and coughing sheep were observed in S01 in both 2023 and 2024. That same year, an archery hunter in S18 recovered the head of a dead ram. While CPW staff suspect a disease event is responsible, the exact cause of this decline remains unknown and potential contributing factors include shifts in habitat use following the 2020 Cameron Peak Fire and/or increasing recreation pressure. Annual summer ground surveys in S18 were robust from 2020–2022, each documenting 40 or more sheep. In contrast, only six rams were observed in 2023, zero sheep were observed in 2024 (although hunters observed a single group of five rams that year), and just five sheep in 2025 (4 ewe, 2 lamb, ½ curl ram). Sheep numbers in S01 have also declined sharply. Over the past decade, winter ground counts there ranged from a high of 66 in 2014 to a low of four in 2023. The November 2024 coordinated ground count documented just 14 sheep. In response to declining sheep observations, CPW also carried out several aerial surveys in recent years to supplement limited ground survey data. In S18, winter helicopter flights recorded only three sheep in January 2024 and four sheep in January 2025, all rams. An aerial survey in August 2025 recorded only a single ram. In S01, helicopter surveys in February 2024 and January 2025 each recorded only 20 individuals (15 females and 5 males in 2024, and 16 females and 4 males in 2025). Very few older age class rams have been observed since the 2023 surveys and those observed were likely harvested in 2023 and 2024. Currently, CPW offers three hunt codes for S01 and S18: an early-season (2025 dates Sept. 2–Oct. 5) ram and ewe license valid in both units, and a late-season (2025 dates Oct. 11–Nov. 2) ram license valid in S01 only. Over the past 10 years, quotas for these three hunt codes have ranged from a combined six ram and three ewe tags in 2018–2019 to a low of two ram and one ewe tag in 2025, when each hunt code quota was reduced to a minimum of one. Ewe harvest occurs most years; ram harvest has varied, with two of five hunters successful in 2022 and 2023, and four of five in 2024. Only one ram has been harvested in S18 since 2023; the remainder have come from S01. Given the sharp decline in sheep observations from coordinated ground counts, aerial surveys, hunters afield, and the general public, we recommend eliminating the early season sex specific hunt codes, SMS01O1R and SFS01O1R, and create a new either-sex hunt code, SES01O1R. We also recommend	

eliminating the late season ram hunt code, SMS01O2R. The establishment of an either-sex license would allow for the take of a single sheep each year if the quota was set to one. Even at the current herd size, S1/S18 could still sustain light ewe harvest annually and transitioning to an either-sex license allows a hunter the opportunity to choose to harvest a ram or ewe. Harvest reduction in S01 and S18 should remain in effect until this subpopulation of RBS-1 rebounds in the future.

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 (acting), Asst. Area Wildlife Manager, Area Wildlife Biologist, and Senior Biologist.

External publics have not been notified

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Eliminate hunt codes SMS01O1R, SFS01O1R, and SMS01O2R and create a new hunt code SES01O1R, valid for either sex in S18 and S01. This new hunt code will follow the same season dates as the current early season in this DAU, beginning 1 day after labor day, running for 34 days and ending on a Sunday.

2. Alternative 2: Eliminate hunt codes SMS01O1R, SFS01O1R, and SMS01O2R

3. Alternative 3: Status quo

Issue Raised by:	Joe Halseth (Area 4 Biologist) and Eric Vannatta (Area 10 Biologist)
Author of the issue paper (if different from the person raising the issue):	
CC:	Mark Leslie, Travis Black, Matt Eckert, Jason Surface, Brandon Muller, Lance Carpenter, Kris Middendorf, Justin Pollock, Brad Banulis
APPROVED FOR FURTHER CONSIDERATION BY:	Mark Leslie
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
RECOMMENDED FOR CONSENT AGENDA?	No
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	NA