

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the exceptions for the lifetime bag limits be expanded to include reward program licenses?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Under the current regulations, there is a lifetime bag limit on the harvest of antlered moose, and beginning in January 2028, ram bighorn sheep and mountain goat harvested with a male or either-sex license. Accordingly, if a hunter harvests an antlered moose, bighorn sheep ram, or a mountain goat on a male or either-sex license, they will no longer be able to apply for a male or either-sex license for that species. There are currently a few exceptions to the lifetime bag limit, including: auction licenses, raffle licenses, game damage licenses, and disease licenses. Any person who has voluntarily provided information that results in another person being charged with the illegal take or possession of big game or turkey can be eligible for a Turning in Poachers (TIPS) license. Under the current regulations, TIPS licenses are not listed as an exception to the lifetime bag limits for moose, bighorn sheep, or mountain goat. In 2024, a customer received a moose TIPS license and successfully harvested a bull moose. This customer had been applying for preference points for years and wanted to use those points to apply for another bull moose license in the future. The customer was unaware that when he accepted the TIPS license, it would preclude him from applying for another bull moose license in his lifetime. As CPW wishes to continue incentivizing hunters to report poaching and other illegal activities, CPW does not want TIPS licenses to be a barrier to future hunting opportunities. A change to regulations such that the lifetime bag limits for male moose, bighorn sheep, and mountain goats exclude those harvested with a TIPS license will allow hunters to redeem a reward for their efforts to report wildlife crimes without losing their regular opportunity to apply through the draw for male or either-sex licenses for those species.	
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 CPW staff support the change.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: See Below 2. Alternative 2: Status Quo	
Issue Raised by:	Travis Sauder
Author of the issue paper (if different than person raising the issue):	Andrea Gess
CC:	Katie Gray, Sherri Huwer
APPROVED FOR FURTHER CONSIDERATION BY:	Danielle Isenhardt, LRCO
REQUIRES NEW SPACE IN THE BROCHURE?	NO

ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?	YES
REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION	Terrestrial and LRCO
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH BIG GAME SEASON STRUCTURE?	YES

#205. A.

5. Moose

a. One License - Any hunter may obtain one moose license. The lifetime bag limit for antlered moose is one, except when taken on an auction or raffle license, a rewards program license, or a license issued in accordance with regulation #271 or #272. Any person who harvests an antlered moose shall be ineligible to draw either an antlered or either-sex license.

7. Bighorn Sheep

a. One License - Any hunter may obtain one rocky mountain bighorn sheep license or one desert bighorn sheep license. The lifetime bag limit for desert bighorn sheep is one. Provided further that application restrictions in regulation #206 apply. The lifetime bag limit for a bighorn sheep ram is one for rams harvested after January 1, 2028, except when taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272. Any person who harvests a ram, after January 1, 2028, shall be ineligible to draw a ram or either-sex license unless harvested on one of the above listed exempted licenses.

8. Mountain Goat

a. One License - Any hunter may obtain one mountain goat license. Provided further that application restrictions in regulation #206 apply. The lifetime bag limit for a mountain goat harvested with a male or either-sex license is one if harvested after January 1, 2028, except when taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272. Any person who harvests a male goat, after January 1, 2028, shall be ineligible to draw a male or either-sex license unless harvested on one of the above listed exempted licenses.

#206.B

2. Restrictions by Species

a. Until January 1, 2028, Bighorn Sheep: Any person who harvests a Rocky Mountain bighorn sheep ram, except one taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272, shall not be eligible to apply for, or participate in the drawing for a Rocky Mountain bighorn sheep ram license for the five years following the year in which the harvest occurred. During this five-year period a person may apply for a ewe license, but if unsuccessful will not receive preference points or chances. Any person who harvests a desert bighorn sheep, shall never again be eligible to apply for or participate in a desert bighorn sheep license drawing.

Bighorn Sheep: Any person who harvests a Rocky Mountain bighorn sheep ram, on or after January 1, 2028, except one taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272, shall not be eligible:

1. to apply for, or purchase another license for a Rocky Mountain bighorn sheep ram.
2. to apply for a point, or participate in the drawing for a ewe-only license for the five years following the year in which the harvest occurred. Any person who harvests a desert bighorn sheep, shall never again be eligible to apply for or participate in a desert bighorn sheep license drawing.

b. Until January 1, 2028, Mountain Goat: Any person who harvests a mountain goat, except one taken on an auction or raffle license, a special goat management license, a rewards program license or a license issued in accordance with regulation #271 or #272, shall not be eligible to apply for or participate in the drawing for a mountain goat license for the five years following the year in which the harvest occurred.

Mountain Goat: Any person who harvests a mountain goat on a male or either-sex license on or after January 1, 2028, except one taken on an auction or raffle license, a special goat management license, a rewards program license or a license issued in accordance with regulation #271 or #272, shall not be eligible:

1. to apply for or purchase a male or either-sex mountain goat license.
2. to apply for a point, or participate in the drawing for a nanny-only license for the five years following the year in which the harvest occurred.

c. Until January 1, 2028, Moose: Any person who harvests an antlered moose, except one taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272 shall never again be eligible to apply for or participate in an antlered or either-sex moose license drawing.

Beginning January 1, 2028, Moose: Any person who harvests an antlered moose, except one taken on an auction or raffle license, a rewards program license or a license issued in accordance with regulation #271 or #272, shall never again be eligible:

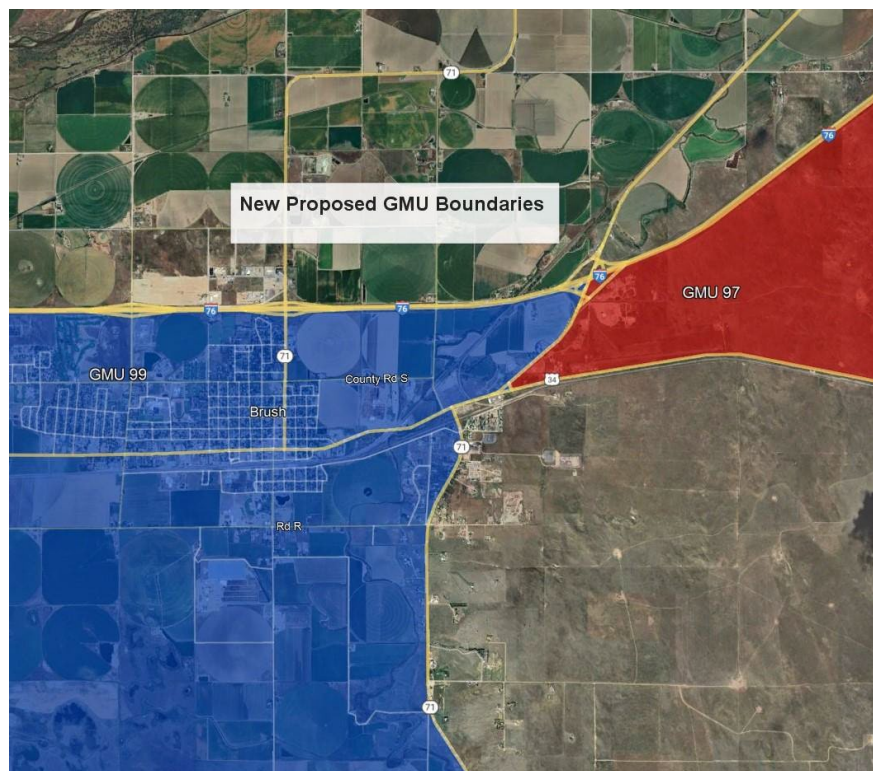
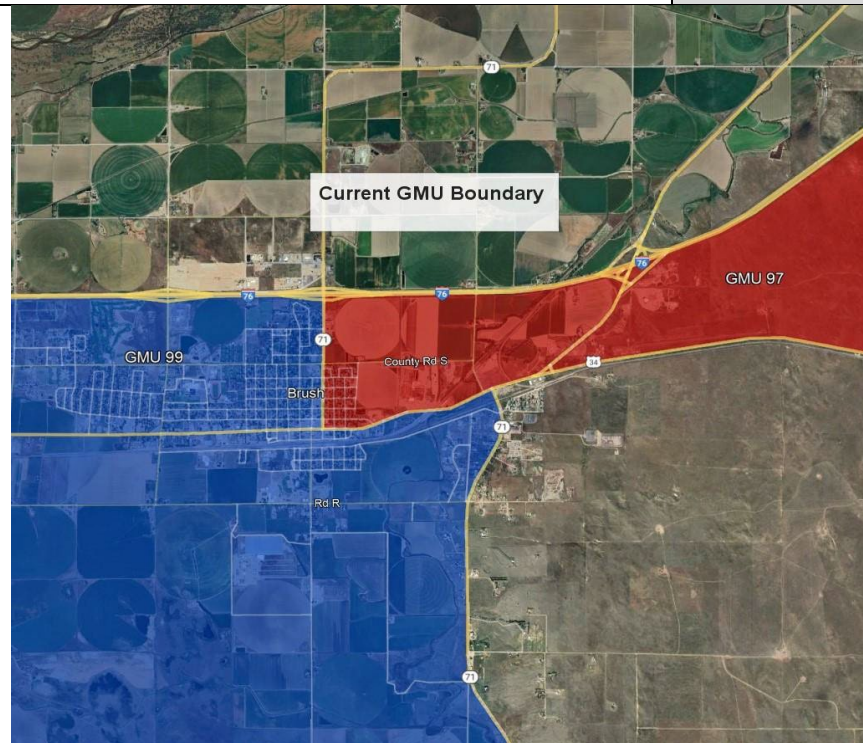
1. to apply for or purchase an antlered or either-sex moose license.
2. to apply for a point or participate in the drawing for an antlerless moose license for the five years following the year in which the harvest occurred.

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the boundaries of GMUs 97 and 99 be corrected and realigned?		
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):			
Currently, the boundary descriptions for the SW corner of GMU 97 and NE corner of GMU 99 are incomplete and missing the additional I-76 business/U.S. 34 spur descriptor. By default, maps for these GMUs have been drawn based on the Hwy 71 description for GMU 99. However, GMU 97 boundary description does not match and is clearly missing a descriptor, which could create law enforcement issues. Therefore, we propose to fix and complete that portion of the boundaries on the SW corner of GMU 97 and NE corner of GMU 99, related to a 2-mile section of Hwy 71 that runs 1 mile west and 1 mile north through the city of Brush to Interstate 76. We propose changing that portion of the boundary to follow I-76 business/U.S. 34 east 0.3 miles and north 1 mile to I-76, which will also move the GMU boundaries outside the city limits of Brush and fix and correct the boundary descriptions for GMUs 97 and 99 the way they were intended. The net change would result in shifting 1.3 sq. miles from GMU 97 to GMU 99, which is shown on CPW maps. Therefore, this GMU boundary realignment will have no impact to DAU objectives or any big game species within the respective GMUs and DAUs.			
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*. Landowners and big game hunters in GMUs 97 and 99. No input was solicited.			
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):			
1. *Preferred Alternative*: Change the 2-mile portion of the boundary between GMU 97 and 99 from Hwy 71 to I-76 business/U.S. 34 spur. The boundary description for GMU 97 will read as: ...bounded on N and E by Colo. 61; on S by U.S. 34; on W by I-76 business/U.S. 34 spur and I-76. See below for proposed boundary descriptions. 97 LOGAN, WASHINGTON & MORGAN COs. bounded on N and E by Colo. 61; on S by U.S. 34; on W by I-76 Business/U.S. 34 spur and I-76. 99 WELD, MORGAN & ADAMS COs. bounded on N by I-76; on E by I-76 Business/U.S. 34 spur, U.S. 34 and Colo. 71; on S by U.S. 36; on W by Colo. 79 and 144th Ave.; on S and W by Adams CR 25N, 152nd Ave. and I-76; on W by I-76.			
2. Status Quo			
Issue Raised by:	Marty Stratman-Wildlife Biologist, Robert Emanuel (Area 3 DWM)		
Author of the issue paper (if different than person raising the issue):			
CC:	Area 3, Cozad, Carpenter, 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 3, NE Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES



ISSUES SUBMITTAL FORM

Date:

10/31/2025

ISSUE: Should deer hunt codes DM004P5A and DF004P5A be removed?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Starting back in 2007, the former Colorado Division of Wildlife received citizen complaints regarding deer causing landscape and property damage within the city limits of Craig. CDOW worked with the City of Craig, the City of Craig Deer Committee, Mayor, and the City Council to try and solve this problem. Two informal surveys were created and distributed to the community and the results of both indicated that the majority of people in Craig are tolerant of deer within the city limits. The CDOW also conducted basic deer counts within city limits. The number of deer within city limits fluctuated greatly year to year when being surveyed. Severe winters were particularly hard on deer located in the city limits as they were likely in poorer body condition due to their forage base. The CDOW then created a White Paper in 2009 listing possible solutions to the problem and one of those outcomes was the establishment of a PLO archery hunt code for antlered and antlerless deer outside of the city limits but in close proximity to town. The hunt codes were valid in the following area:

CRAIG DEER HUNT AREA

T6N R90W SECTIONS 5-6

T6N R91W SECTIONS 1-3

T7N R90W SECTIONS 29-32

T7N R91W SECTIONS 25-27 & 34-36

TOTAL AREA = 15 SQ. MILES

(SEE ATTACHED MAP)

When these hunt codes were established hundreds of licenses were placed in each to meet and exceed demand as they were list B licenses intended to be utilized to reduce deer densities in the greater Craig area. Within years of setting up these hunt codes local DWMs were seeing these licenses utilized outside of the established 15 square mile area and throughout the associated GMUs illegally.

This was likely the case because there were leftover licenses associated with these hunt codes up to and during the archery hunting seasons. The valid archery deer licenses that can be utilized GMU wide is drawn out by first choice applicants during the big game draw (DE003O1A and DE011O1A).

Additionally, local DWMs have responded to additional archery related wounded deer in the city limits. Some of these deer are carrying arrows which prompts calls from concerned Craig citizens.

As a result of illegal use of licenses and wounded deer in town local staff incrementally reduced the number of licenses available in these hunt codes to 10 each.

Local staff does not see any benefit in keeping these licenses as they have not had the desired results. Local deer populations in the greater Craig area have not declined as a result of this harvest opportunity and DWMs continue to see law enforcement issues associated with these licenses. Severe winters are still the driving factor for the local population near and in the city limits. The extreme 2023 winter had a large reducing effect on the local city limit 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.	
Assistant Area Wildlife Manager Mike Swaro presented the removal of these hunt codes to the Craig City Council on 5/27/25. It was put on the City Council's open agenda available to the public for comment and review. AAWM Swaro presented the history and current state of the hunt codes that were established. Swaro also explained how the licenses were being illegally used and the increase in wounding calls. Neither Mayor Nichols nor City Council had any concerns about removing the hunt codes. The item was also opened for discussion without any general public response.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Remove hunt codes DM004P5A and DF004P5A. 2. Status quo: keep hunt codes DM004P5A and DF004P5A and maintain minimum quotas of 10 each.	
Issue Raised by:	Area 6 AAWM Mike Swaro, DWMs Evan Jones, Seth Schwolert, Jared Lamb, and Jeffrey Goncalves
Author of the issue paper (if different than person raising the issue):	Mike Swaro
CC:	A6 Terrestrial Biologists Darby Finley and Becca deVergie, A6 AWM Johnathan Lambert
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	Area 6 Field Staff
RECOMMENDED FOR CONSENT AGENDA?	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should a private-land-only urban deer management hunt code be created for the Colorado City/Rye area in Game Management Unit (GMU) 84?
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DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

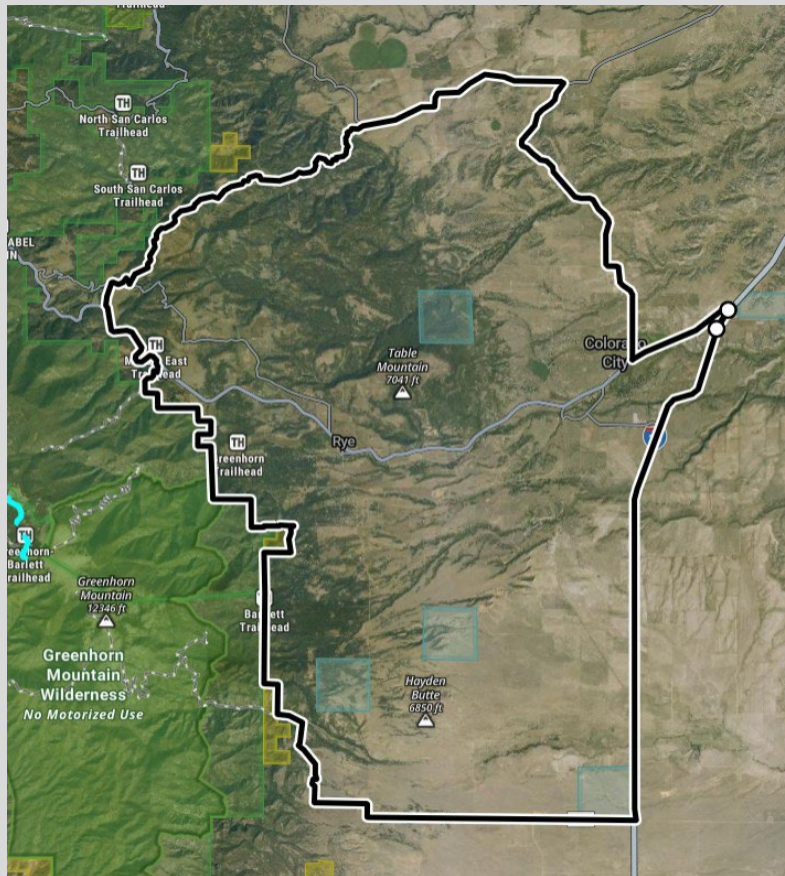
Colorado City and Rye are located in South Central Colorado within Game Management Unit (GMU) 84. CPW staff routinely respond to urban deer-human wildlife conflicts within these communities. Conflicts include roadkill, landscaping consumption, deer entanglements, interactions with domestic dogs, agricultural damage, fence damage, and dead deer calls. The community of Colorado City has expressed concern regarding the growing deer population in recent years.

CPW held a community meeting in Colorado City on February 26, 2025, to discuss deer-human conflicts in the community, hear public sentiments about the number of deer, and gauge public opinion about management alternatives. CPW Policy and Planning staff facilitated a discussion among community members to consider the topic. Live polling technology was used to capture input. Additionally, a form was created for those who were not able to attend the meeting. Approximately 60 people participated in the public meeting, and an additional three responses were recorded through the online form.

The majority of residents think there are too many deer in the area and would like to see a lower deer population. When discussing management alternatives, there were various opinions on how to achieve the goal of reducing the local deer population. The management alternative favored by residents was the creation of a private-land-only doe hunt within specific boundaries to target the local deer population. The other management alternative was to implement archery hunting on property owned by the Colorado City Metro District. However, there was concern regarding public safety if implementing an in-town archery hunt due to proximity to dwellings.

Based on feedback from this meeting, CPW recommends the creation of an antlerless deer license within this conflict area. We will create a List B hunt code (DF084P5R) valid from August 15 - October 15 annually. The license would only be valid within the boundaries of the Colorado City/Rye deer conflict area as described below:

Bounded on the N by San Martines Rd., Deiffendeffer Rd, and 3R Rd; on E by S, Crow Cutoff, Colo165, and I-25; on S by Huerfano CR 650 (Lascar Rd); on W by the San Isabel National Forest Boundary, Millet Trl, Colo 165, and Robb Rd.



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

Colorado City Metro Board, along with the local community members, hunters, and local landowners. We held a public meeting at Craver Middle School in Colorado City on February 26, 2025. The local District Wildlife Manager has had numerous conversations with stakeholders regarding deer conflict in this area.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create a List B private land only hunt code (DF084P5R) valid within the identified Colorado City/Rye deer conflict area, valid from August 15-October 15 annually.

2. **Status quo:** Continue to address deer conflict with dispersal licenses and community outreach.

Issue Raised by:	Cody Purcell, District Wildlife Manager, Colorado City/Rye
Author of the issue paper (if different than person raising the issue):	Allen Vitt, Area 11 Wildlife Biologist
CC:	Allen Vitt, Julie Stiver, Mike Brown, Mitch Martin, Frank McGee
APPROVED FOR FURTHER CONSIDERATION BY:	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	Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should limited fourth rifle season antlered deer hunt codes be added in Data Analysis Unit D-19?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Chronic Wasting Disease (CWD) prevalence in deer is increasing statewide, and the Southwest Region is no exception. Data Analysis Unit (DAU) D-19, is located on the Uncompahgre Plateau between Nucla and Montrose, which consists of Game Management Units (GMUs) 61 and 62. The estimated population size is 12,800, which is near the bottom of the herd's objective range of 12,000-15,000 deer and a five-year average modeled buck ratio of 31:100 bucks with an objective range of 30-35 bucks:100 does (Figure 1, Figure 2, Figure 3). The buck ratio has been steadily increasing over the past five years and with CWD prevalence increasing from 3.4% in 2017 to 13.8% in 2022 during mandatory testing efforts, local wildlife managers are looking to limit the spread of this deadly disease.

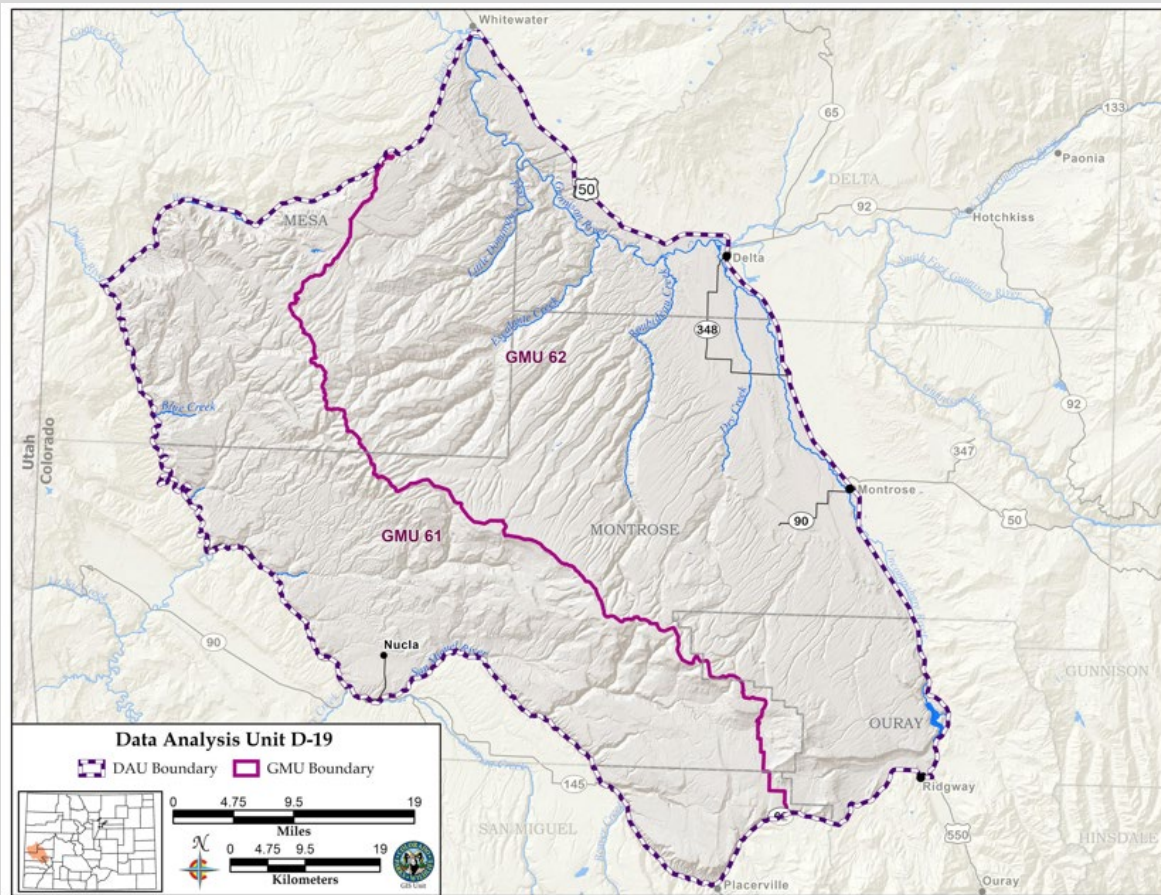


Figure 1. Deer data analysis unit (DAU) D-19 located on the Uncompahgre Plateau between Nucla and Montrose in southwestern Colorado.

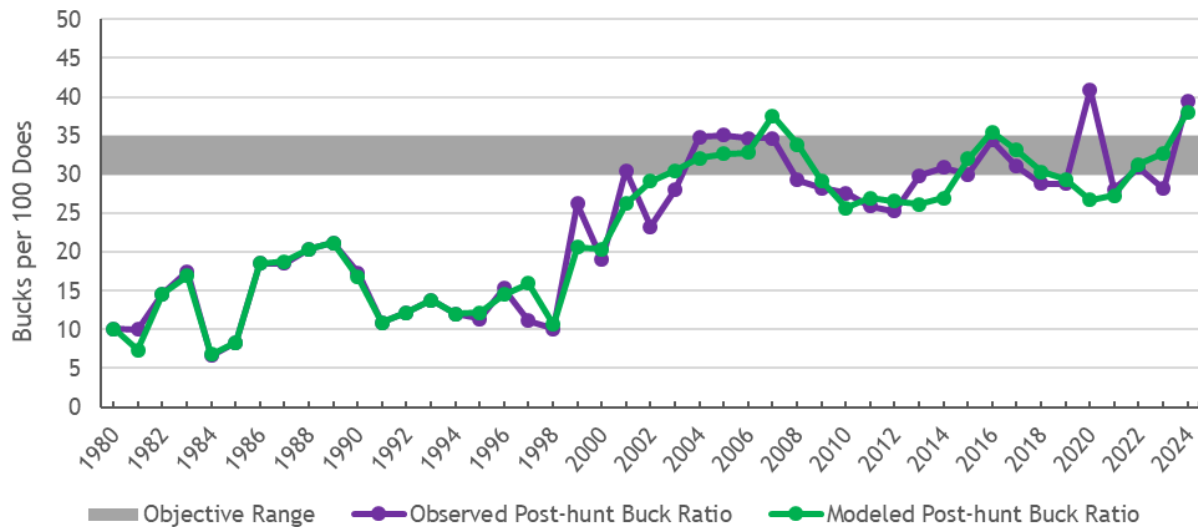


Figure 2. Observed and modeled buck:doe ratios in D-19.

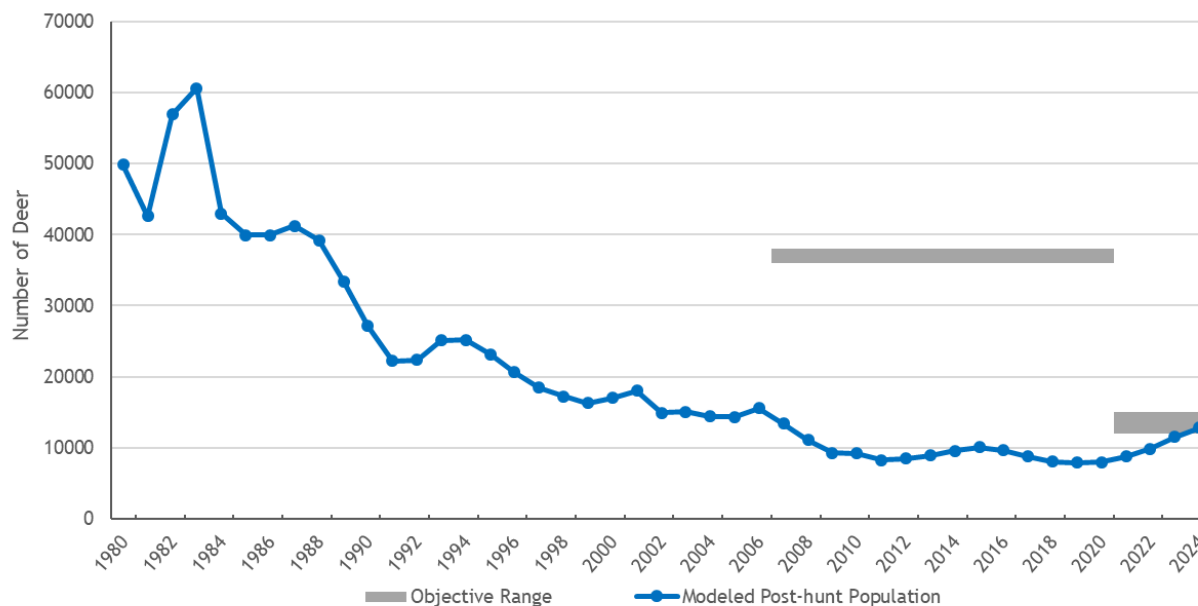


Figure 3. Modeled post-hunt population in D-19.

The CPW Chronic Wasting Disease Response Plan recommends several management techniques for lowering disease prevalence in deer herds, including managing towards the lower end of buck ratio objectives and focusing on hot spots where CWD exists in high concentrations. Area 18 has used several management strategies 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 that occurs in August focuses harvest on resident deer populations located 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 will be the first year that hunters will be able to take advantage of the new first rifle season deer hunts. We expect these hunts to alleviate hunter crowding further and increase CWD-positive deer harvest.

By adding fourth rifle season hunt codes, hunters will have more access to deer on agricultural and private lands where hot spots exist and more opportunity to harvest mature bucks (which tend to be more likely to carry CWD) during the fourth season when they are most active during the rut. These additional hunt codes will be used as a tool to help reach management objectives for these herds and alleviate the increasing prevalence of CWD.

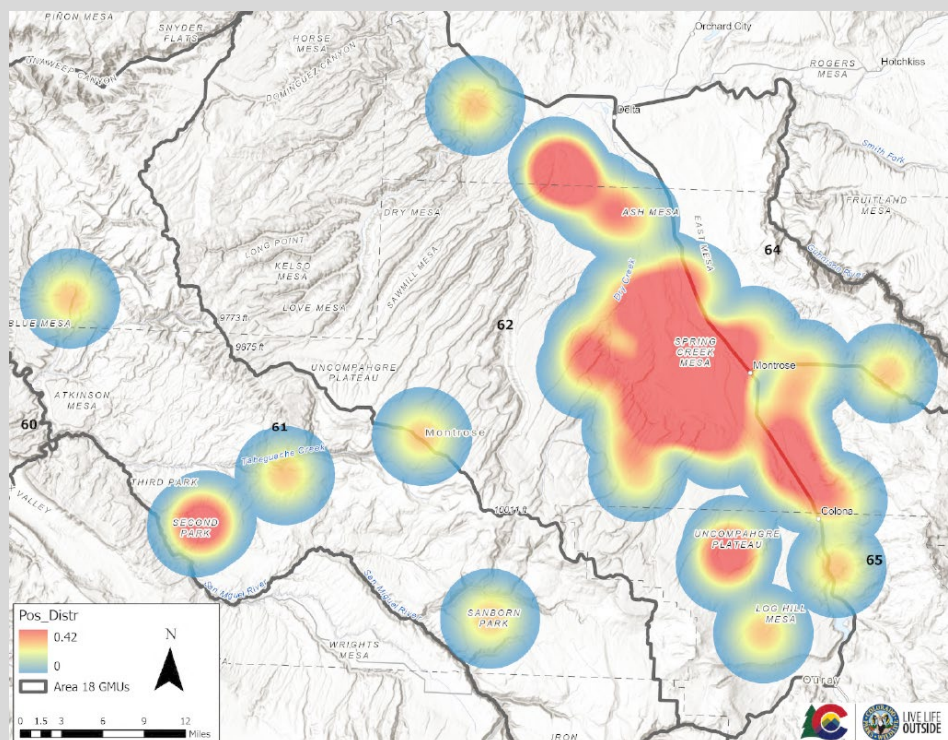


Figure 4. Distribution of positive CWD samples collected during the 2022 mandatory checks in Area 18. The red areas represent the areas with more positive samples.

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

- Hunters— informal conversations have taken place over the years
- Landowners
- Outfitters

Data from the 2024 Hunter Attitude Survey showed that hunters in D-19 would prefer to hunt more mature bucks 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 fourth rifle season hunt codes that will increase their opportunity to encounter more mature bucks during the rut.

Landowners have been very supportive of CWD management in the Uncompahgre Valley, which has been discussed at length in public meetings and informal conversations over time.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Add fourth rifle season hunt codes to D-19: DM061O4R (valid in GMU 61), DM062O4R (valid in GMU 62). 2. Status quo: Continue without adding hunt codes to DAU 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
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should private land only doe hunt codes be created for D-24?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Deer Data Analysis Unit (DAU) D-24 in southwest Colorado, northwest of Durango, and consists of Game Management Units (GMUs) 70, 71, and 711 (Figure 1). This deer population has increased over the past five years and is projected to continue growing (Figure 2). The population objective for this herd increased in 2024 and the post hunt population estimate is at the upper portion of this management objective. Additionally, it is expected to be above the objective next year if the growth continues. There is reluctance to further increase the population objective due to damage conflicts occurring on agricultural private lands. The Herd Management Plan recognizes that there is a large proportion of the population on private lands compared to public lands. It also states that the general public and CPW would like to see an increase in the population on public lands while checking growth on private lands.

Currently, there are private land only (PLO) doe hunt codes in GMU 70, but not in 71 or 711. It is proposed to add PLO doe hunt codes to expand hunting opportunities, address deer/ag conflict, and increase management tools for GMUs 71, and 711. PLO licenses would help address deer population growth on private lands while allowing the population to continue to increase on public lands. The licenses would be List B. The following hunt codes are proposed:

Valid for GMUs 71 and 711:

D-F-071-P2R

D-F-071-P3R

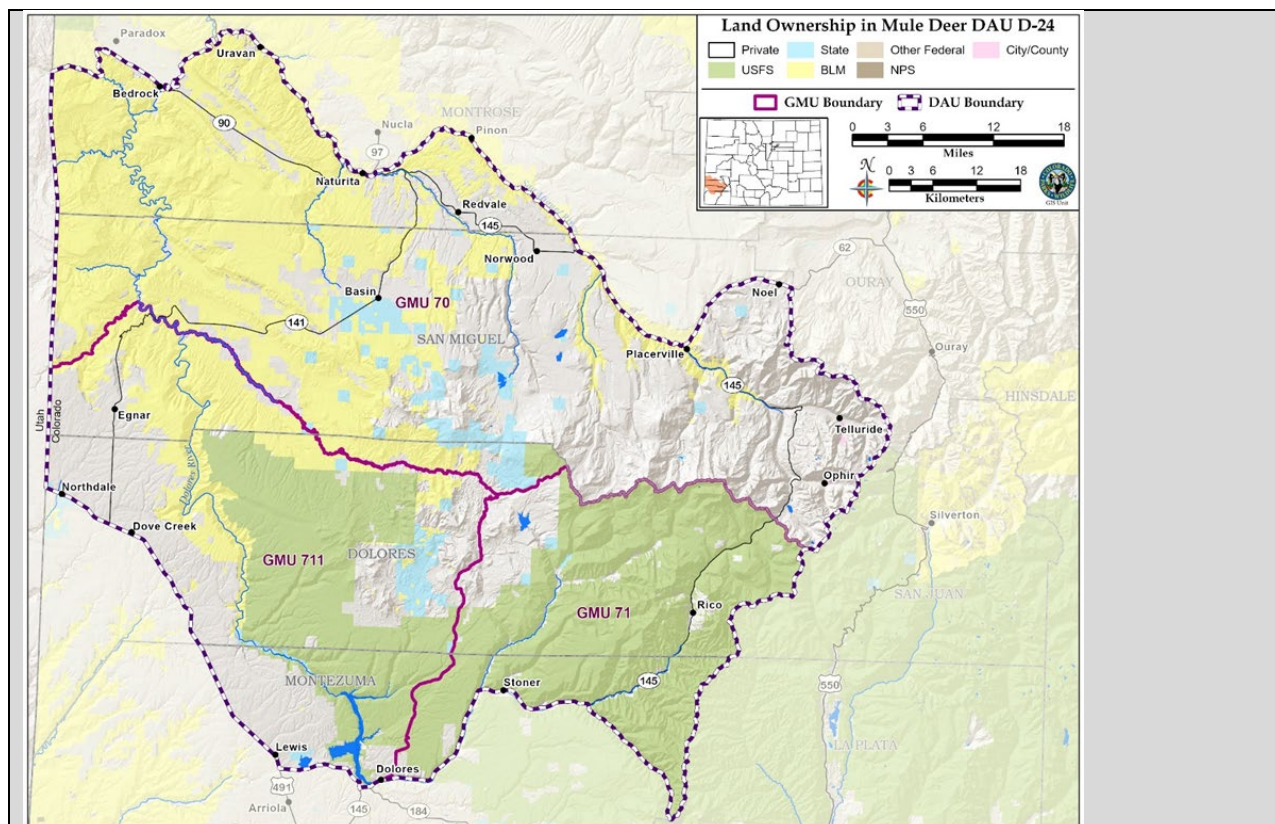


Figure 1. Deer Data Analysis Unit D-24 in southwest Colorado.

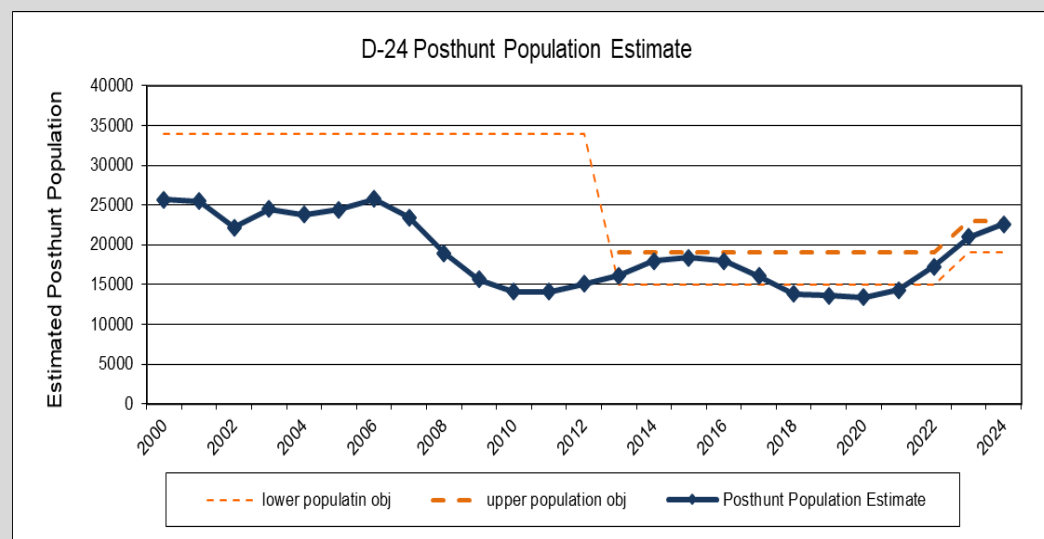


Figure 2. D-24 Post hunt population estimate 2000-2024 and management objectives.

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

External public, including hunters, landowners, and federal land management agencies were consulted during the Herd Management Planning (HMP) process in 2023/24. Support was given to manage the population at the HMP's population objective. No additional outreach has been done.

The draft issue paper was reviewed internally beginning at the Area level.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative***: Create the proposed List B antlerless deer rifle hunt codes:

Valid in GMUs 71 and 711:
DF071P2R
DF071P3R

2. **Status quo**

Issue Raised by:	Brad Weinmeister, Wildlife Biologist, Area 15
Author of the issue paper (if different than person raising the issue):	
CC:	Jamin Grigg, Rachel Sralla, Adrian Archuleta, Steve McClung, Matt Sturdevant, Tony Bonacquista, Kelly Crane, Alyssa Kircher
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?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should CPW change regulation W-02 #254.C to match the antler point restriction for a Ranching for Wildlife enrolled ranch to the GMU/DAU antler point restrictions?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
In 2023 an issue paper was submitted to change the antler-point restriction for Ranching for Wildlife in the E-6 White River and E-2 Bears Ears Elk herd to match the 4-point restriction in place in that DAU in response to the severe winter of 2022-23. This change is limited by years and will expire after the 2025 Ranching for Wildlife seasons. Upon implementation of this term change, discussion ensued with both CPW staff and enrolled ranches about the desire for this change to become permanent for all Ranching for Wildlife Ranches. Reasons for this were to provide consistency, within a DAU/GMU, for the legal take of antlered elk and continue to protect early year age-classes of bull elk. Per Regulation chapter W-02 #210.A, the Division Director is authorized to implement the Ranching for Wildlife program, including the authority to establish additional Ranching for Wildlife operating guidelines subject to the provisions listed in that regulation. The mandate of an antler point restriction falls within the authority of the Director. However, to add this change to regulation #254, the Commission must approve it. Regulation chapter W-02 #254.C currently excludes Ranching for Wildlife properties from having an antler point restriction for elk during Ranching For Wildlife hunting seasons. CPW proposes to modify this regulation to match the antler point restriction of the DAU/GMU in which a ranch is located. Where a RFW property spans multiple GMUs, the more restrictive of the GMUs would be the default antler point restriction for the ranch.	
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 involved in implementing the RFW Program. Currently enrolled RFW ranches.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Modify regulation Chapter W-02 #254 C. as follows: C. There are no antler point restrictions for elk on Ranching For Wildlife properties during Ranching For Wildlife seasons, except in those GMUs most impacted by the severe winter of 2022-2023. All antlered elk taken on any enrolled Ranching For Wildlife properties within GMUs 3, 4, 5, 11, 12, 13, 14, 23, 24, 25, 26, 33, 34, 131, 211, 214, 231, 301, 441 shall have four (4) or more points or a brow tine on one antler, effective for all 2024-2025 and 2025-2026 hunting seasons. Antler point restrictions on Ranching for Wildlife properties shall follow the antler point restrictions for the GMU/DAU in which the ranch is located. Where a ranch spans multiple DAU/GMUs the most restrictive of the restrictions shall be applied to the entirety of the RFW enrolled property. 2. Status quo	
Issue Raised by:	Ray Aberle, CPW Area 6 Staff and Biologists
Author of the issue paper	

(if different than person raising the issue):	
CC:	
APPROVED FOR FURTHER CONSIDERATION BY:	Ray Aberle, Deputy Assistant Director Lands
REQUIRES NEW SPACE IN THE BROCHURE?	YES
ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?	YES
REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION	Outdoor Recreation and Lands - Lands Unit
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should a late-season cow elk season be reinstated in E19?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
The Glade Park E-19 DAU is located in west-central Colorado within Mesa County and includes both Glade Park and Pinon Mesa, southwest of Grand Junction, Colorado. From 2007 to 2012, E19 held a late-season antlerless hunt. Initially, this hunt endeavored to increase cow harvest in a unit that was overpopulation objective, without crowding bull and buck hunters in seasons that require a large number of points to draw. In this, it was a successful and popular hunt. However, due to the way youth extended seasons operated, the late cow season was experiencing a high volume of harvest that was outside of license limits and impossible to limit. This became problematic when population estimates dropped below objective ranges. The hunt was then removed for the 2013 season. E19's 2024 population estimate of 6,145 elk is well over the population objective range established in the 2024 Northwest Elk Herd Management Plan, which is set at 2,800 - 3,800 elk. This increasing trend has been seen between 2017 and 2024, with no signs of stopping. The need for additional cow harvest is the same as this herd faced in 2007 when this hunt was initially established, and the need to keep crowding to a minimum has only increased. As of 2024, in a regular season, a public-land hunter would need between 9 and 29 points to draw an either-sex elk license or between 3 and 14 points to draw a buck license. Only about 65% of the overall elk summer range in this unit is accessible public land for hunters. While there have been some recent increases in cow elk tags in the regular season, it is important not to crowd hunters in these either-sex and buck tags by adding more. Additionally, the youth hunter license issues experienced when the late season was last in effect would no longer be problematic, as youth hunts are now restricted to the DAUs where they are issued. Reinstating the late cow season would allow for an increase in cow harvest without affecting high point elk and deer hunts within the regular seasons on public land within E-19.	
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 showed general support for this change. Some expressed concern that the elk hunting season was too long, considering pressure from Utah hunters late into January. Most of the stakeholders spoken with were supportive of this move to increase cow harvest in the unit so long as it does not lead to a long-term decline through youth licenses like last time.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Re-open the late antlerless-only season in DAU E-19. Re-create hunt code EF040L1R, valid in GMU 40, for season dates: December 1 to December 15 annually. 2. Status quo	

Issue Raised by:	Genevieve Fuller, Terrestrial Biologist, Javier Magana, DWM-Glade Park; 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?	YES	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES	

ISSUES SUBMITTAL FORM

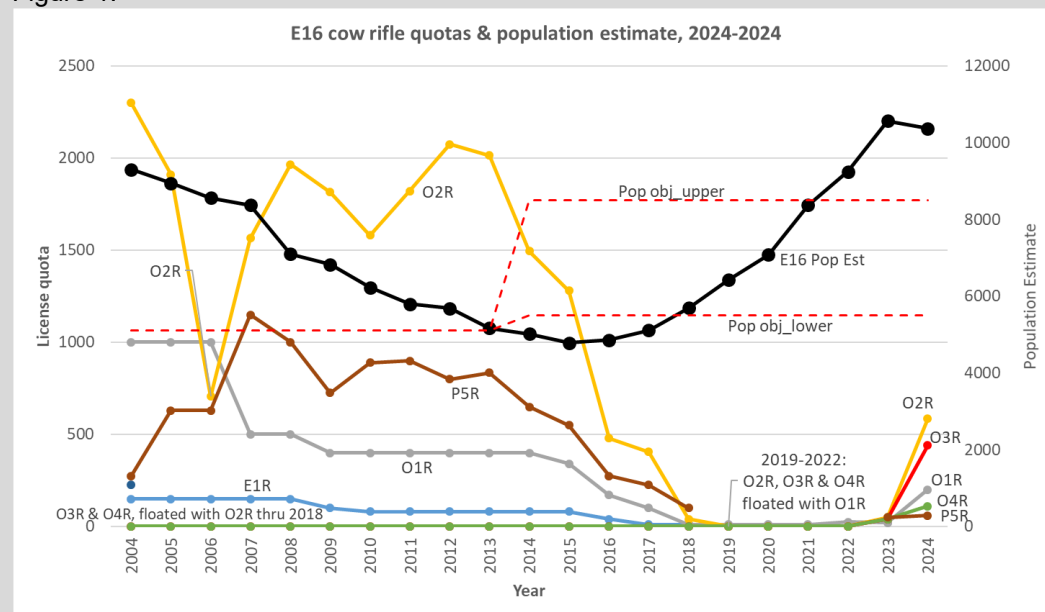
Date: 10/31/2025

ISSUE: Should antlerless hunt codes in elk DAU E-16 be changed to List B to promote more hunter participation in cow licenses in a herd that is over its population objective?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

In the mid-2010s, E16 had declined below its population objective range, so antlerless license quotas were drastically reduced during the years 2018-2022 (Figures 1). Starting in 2019, E16's public land cow licenses were also changed from List B to List A. During this period of minimal cow harvest, the elk population grew rapidly due to the survival and reproductive success of cows that would have otherwise been harvested under the previous higher harvest rates (Figure 2). The population has now grown above its population objective range for the past 3 years.

Figure 1:



In 2023, antlerless quotas were increased slightly to begin to address the above-objective population, and in 2024, quotas were again raised to moderately low levels relative to the peaks in the late 2000s/early 2010s (Figure 2). However, application demand for these licenses remained low, in part perhaps because hunters were not aware of the quota increases, but also because E16's public land cow licenses are still List A tags, so interest in these tags is limited. Many elk hunters prefer a bull or either-sex license as their List A tag and do not want a List A cow license. Although all of the 2024 cow licenses eventually sold out as leftovers, the number of 1st choice applicants was below 50% of license quota, with the exception of the GMU 444 private-land-only hunt code which is a List B license (Figure 3). We therefore did not increase E16 cow license quotas in 2025 while these licenses are still List A, despite the need for increased cow harvest to achieve our population management objectives.

We propose changing E16's cow licenses to be List B in order to encourage more elk hunters to purchase and use cow licenses in these units. List B licenses can be used as a second license to a hunter's List A license or a hunter could acquire 2 List B licenses. This would encourage higher participation in cow harvest in E16, allowing CPW to more effectively use cow harvest to manage the population within objective range.

Figure 2:

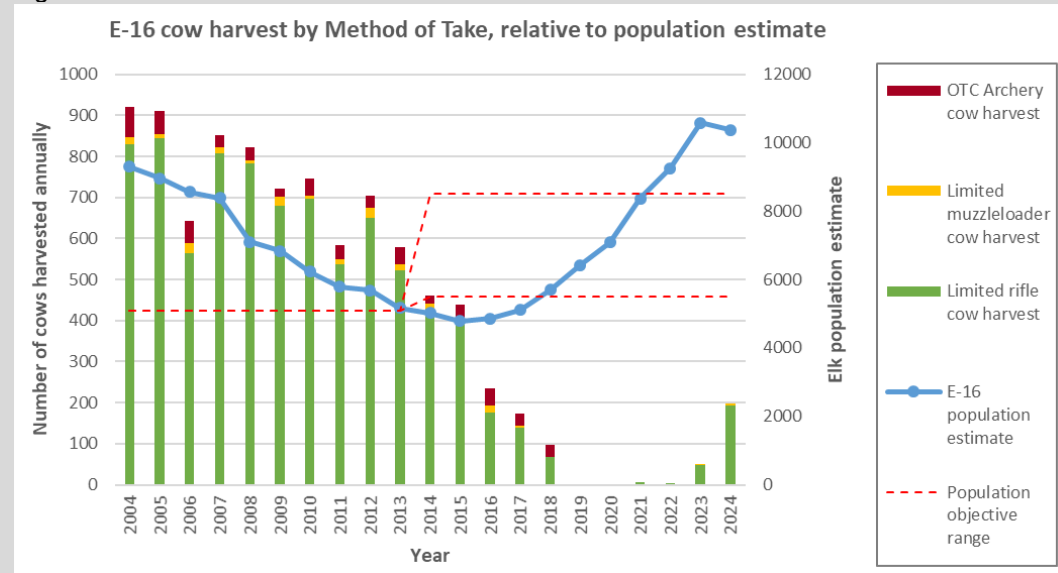
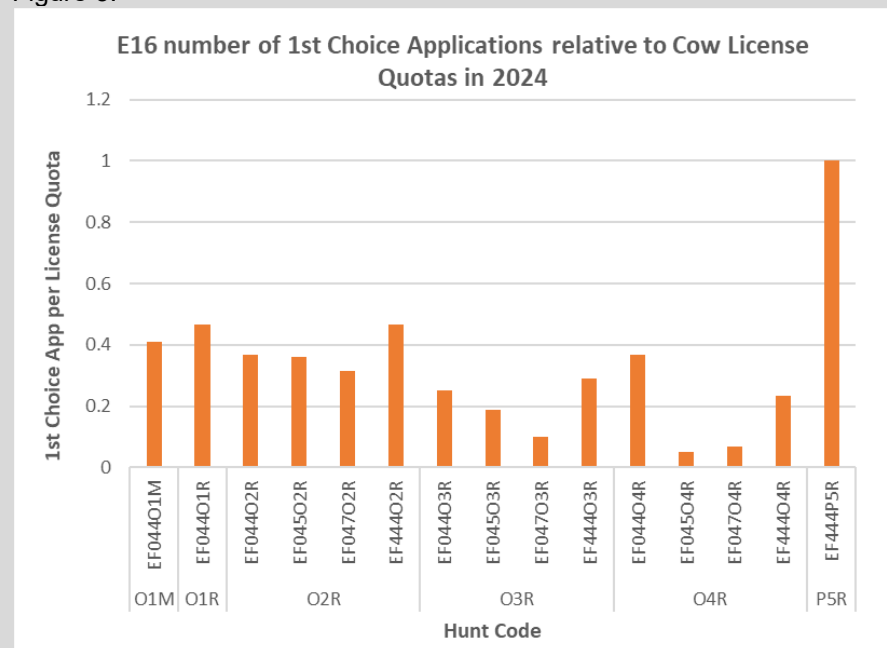


Figure 3:



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*.**

Public survey is scheduled for mid-Sept to mid-October.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

- *Preferred Alternative*:** Add GMUs 44, 45, 47, and 444 to regulation #205.A.2.b.3.

2. Status quo: No change.	
Issue Raised by:	Julie Mao (Terrestrial Biologist-Area 8), Kurtis Tesch (DWM-Aspen), Peter Boyatt (DWM-Basalt), Layton Stutsman (DWM-Edwards), and Devin Duval (DWM-Vail)
Author of the issue paper (if different than person raising the issue):	
CC:	Matt Yamashita (AWM-Area 8), Brad Banulis (NW Sr. Terrestrial Biologist), Travis Black (NW Regional Manager)
APPROVED FOR FURTHER CONSIDERATION BY:	Brian Dreher, Asst. Director-Terrestrial Branch
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?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should bull rifle licenses change to either-sex in E10?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Yellow Creek elk herd (DAU E-10) is comprised of GMU's 21, 22, 30, 31, and 32 located in portions of Mesa, Garfield, and Rio Blanco Counties. Population centers include Grand Junction, Rangely, Palisade, Parachute, and Rifle. In E-10, steady increases in population estimation have resulted in this herd exceeding objective ranges for over a decade.

Attempts to increase cow harvest and bring the population estimate down using existing hunt codes have been unsuccessful. This is likely due to overcrowding in easy-to-access areas, private land refuges, and limited hunter access. Changes in the number of cow licenses issued in current hunt codes have not resulted in differences in cow harvest, but only resulted in changes in hunter crowding (Figure 1).

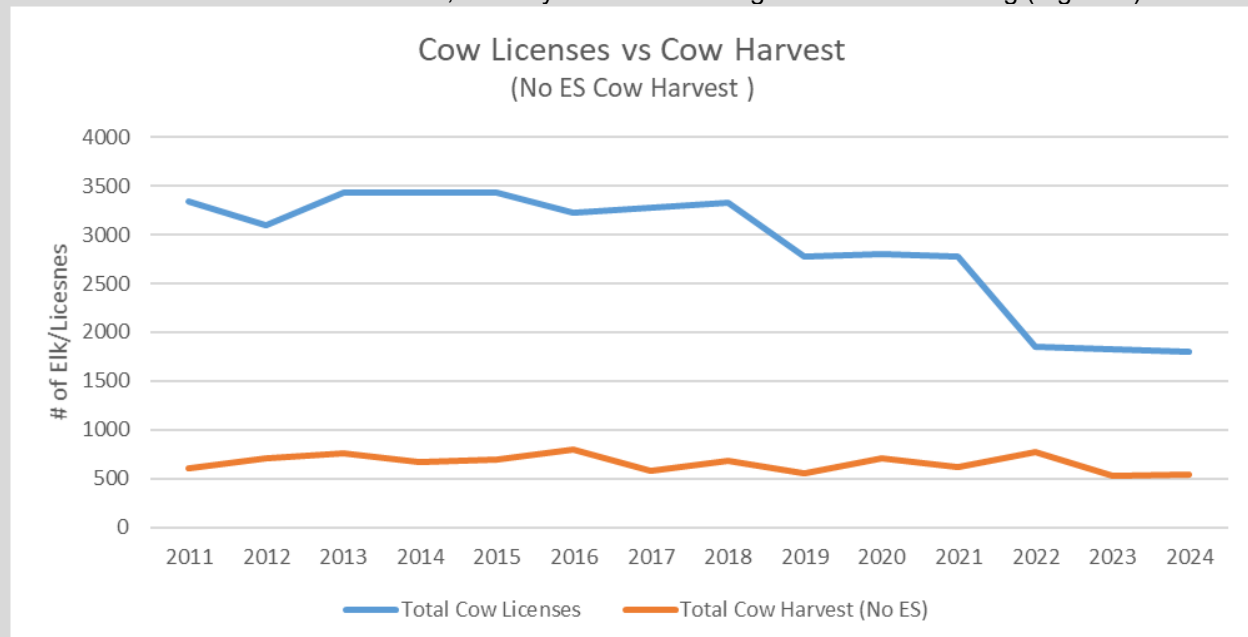


Figure 1. Chart of the number of cow licenses issued and the total cow harvest, excluding cow harvest that resulted from Either-Sex licenses (ES).

Some of the issues regarding private land refuting on oil and gas properties that dis-allow hunting cannot be solved through hunt code changes as these properties are unlikely to allow hunter access in the near future. However, in other units, either-sex licenses issued for 1st and 4th rifle seasons have been successful in increasing cow harvest. This was implemented from 2003 - 2012 in E-6 when the DAU was well over objective as a strategy to achieve additional cow harvest, during that time percent cow harvest on the ES licenses averaged 40% (39% cow harvest on ES licenses 1st season, 46% cow harvest on ES licenses 4th season).

To attempt to increase cow harvest, despite the challenges of private land refuges, it is recommended that the Bull 1st and 4th Rifle seasons be changed to Either-Sex 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.	
A survey was posted to Engage CPW for 30 days with a press release announcing its availability. The survey provided the background to the issue paper and allowed respondents to identify if they support the proposed change in regulation. 70% of respondents voted in favor of the proposed change.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Remove 1st Bull Rifle (EM021O1R) and 4th Bull Rifle (EM021O4R) Add 1st Either-sex Rifle (EE021O1R) and 4th Either-sex Rifle (EE021O4R) valid in GMUs 21, 22, 30, 31, 32.	
2. Status quo	
Issue Raised by:	Genevieve Fuller, Terrestrial Biologist; Darby Finley, Terrestrial Biologist; Scott Hoyer, DWM-DeBeque; Tom Knowles, DWM-Meeker; Terry Wygant, DWM-Rangely; Nathan Harrel, DWM-DeBeque; Jonathan Lambert, AWM Area 6; 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 and 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	NW Terrestrial, Area 7
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

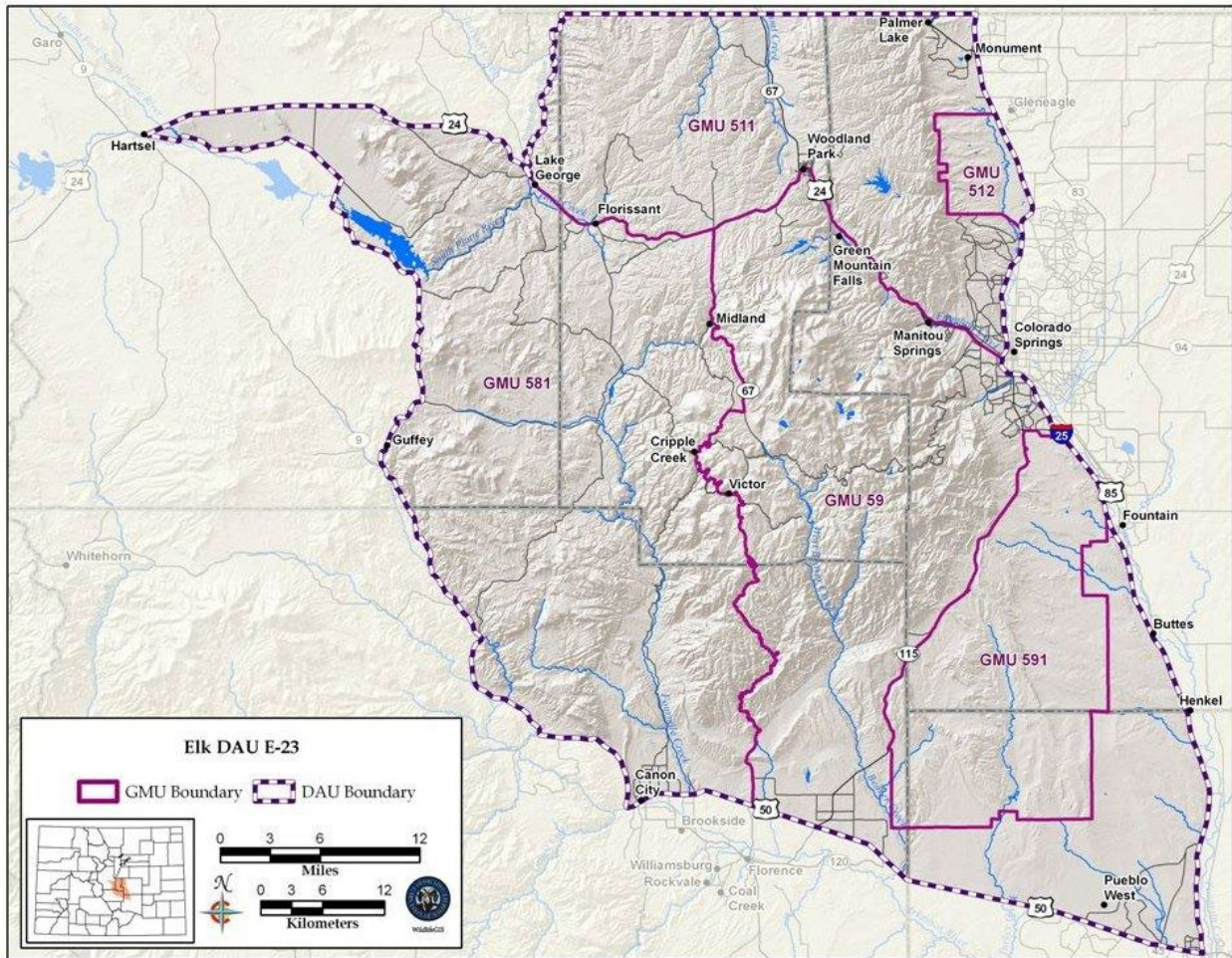
ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should antlerless licenses for the Eleven Mile Elk Herd (E-23) be reverted from List A to List B? In addition, should antlerless archery-only licenses be reinstated in E-23?

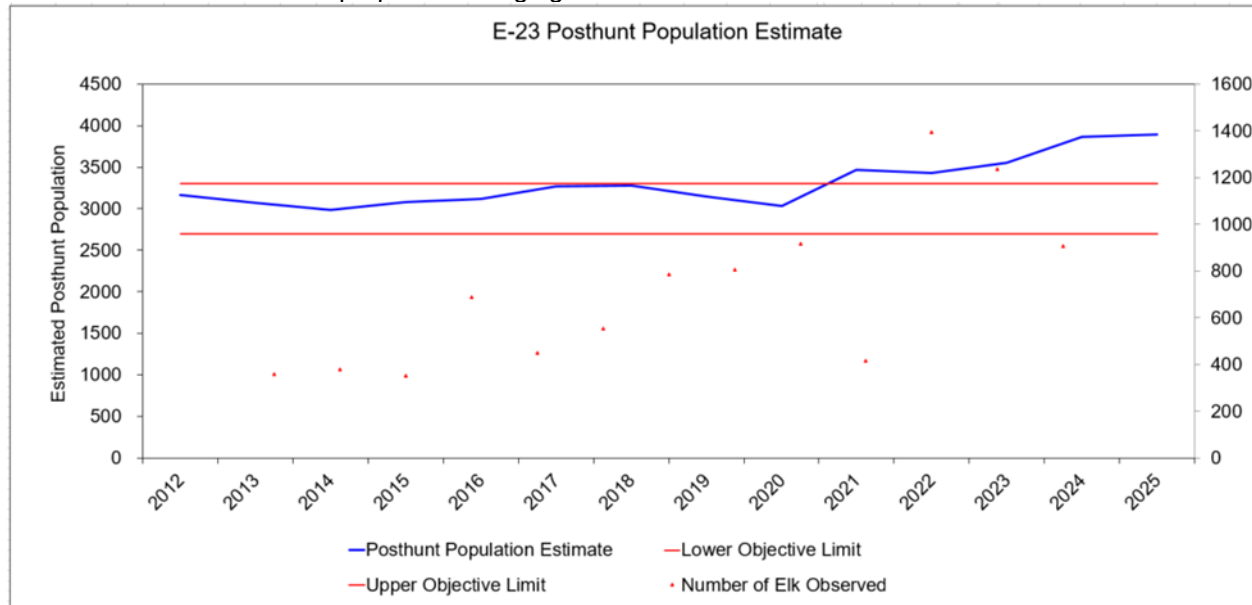
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The E-23 Eleven Mile elk data analysis unit encompasses an area of 5,023 km² in central Colorado, directly west of Colorado Springs (Figure 1). It includes game management units (GMUs) 59, 511, 512, 581, and 591. The DAU is bounded on the north by US 24 and the Douglas County line, on the east by I-25, on the south by US 50, and on the west by Colo 9 and Park CR 59. The DAU includes parts of El Paso, Fremont, Park, Pueblo, and Teller Counties. The population is managed in accordance with the Herd Management Plan (HMP), which sets the Population Objective Range at 2,700-3,300 elk, with a bull to cow ratio of 15-25.



Prior to 2016, antlerless licenses in E-23 were List B. In 2016, CPW changed antlerless elk licenses in E-23 from List B to List A. At the time, the population had seen a steady decline for more than five years, and the population estimate was nearing the lower end of the objective. In an effort to reverse the decline, wildlife managers recommended a series of changes, one of which included moving antlerless licenses from List B to List A. These changes have remain in effect.

In the last 5 years, the E-23 population has been increasing. The 3-year average population estimate is 3,600 elk. This estimate exceeds the Upper Objective Limit of 3,300 elk. Staff have been working to address the issue through increases in license numbers. This includes more recent changes, adding an additional 150 private land only licenses. While harvest has increased on private lands, there has been a simultaneous decrease in harvest on public lands. The outcome has yielded no significant changes in harvest rate. With the population estimate exceeding the Upper Objective Limit and licensing changes yielding insignificant results, staff are suggesting changes to ease the restrictions on the harvest of antlerless elk in E-23. Staff proposes changing all antlerless elk licenses in E-23 from List A to List B.



In addition to the list change, staff also proposes reinstituting an archery-only antlerless season for elk in E-23. To do this, GMUs 59, 511, 581, and 591 will be added to the resident Over-The-Counter Antlerless Archery Only hunt code group: EF000U1A. Additionally, due to newly created non-resident limited archery hunt codes, the hunt code EF059V1A will need to be created and added to the brochure.

These changes are reflective of a population that is exceeding the objective. Similar changes have been made historically in units with growing populations, while the converse is true for herds falling below the Lower Objective Limit. The list change will increase opportunity and flexibility for hunters in the field, while the addition of archery licenses will increase opportunities for hunters. Additionally, this DAU incorporates multiple military installations. List B licensing and antlerless archery licenses are particularly advantageous for those soldiers whose schedules may require more flexibility to have an opportunity to hunt each year.

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 outreach has been conducted through in-person conversations with stakeholders, including E-23 landowners, as well as notifications sent to partners at Fort Carson, United States Air Force Academy. Landowners are supportive of this change.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Make all antlerless licenses in E-23 List B and restore Antlerless Archery licenses through the following regulation Chapter W-2 updates: • Article I – GENERAL PROVISIONS – #205.A.2.b.3. ○ Add GMUs 59, 511, 581, and 591 to the list of valid units • Article IX - ELK - #255.B.1. ○ Add GMUs 59, 511, 581, and 591 to the list of valid units for EF000U1A ○ Add Hunt Code EF059V1A (GMUs 59, 511, 581, and 591) to the table of elk archery Hunt Codes.		
2. Status quo: Antlerless elk licenses for E-23 remain List A, and no antlerless archery licenses will be available in GMUs 59, 511, 581, and 591.		
	Ty Woodward (Area 14 Biologist), Tim Kroening Area 14 (AWM)	
Author of the issue paper (if different than person raising the issue):		
CC:	Ty Woodward (Area 14 Biologist), Tim Kroening (Area 14 AWM)	
APPROVED FOR FURTHER CONSIDERATION BY:	Brian Dreher, 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	Terrestrial	
RECOMMENDED FOR CONSENT AGENDA?	YES	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the season dates be changed and split into two seasons for hunt code EF060P5R?
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DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Game Management Unit (GMU) 60 is the only GMU in Data Analysis Unit (DAU) E-40 (Figure 1). This unit is located on the Colorado-Utah border, near Gateway and Bedrock. Management is difficult in this unit because deer and elk herds move extensively between both states depending on snow levels. To further complicate management in this unit, a resident elk herd inhabits an agricultural area known as Paradox Valley, often causing game damage concerns on growing crops.

Currently, game damage licenses, kill permits, and a PLO cow license, EF060P5R, are being used to limit damage to local crops, but success has been limited. CPW proposes splitting the extended season into two seasons to concentrate harvest earlier in the year to target resident elk causing the majority of the game damage, but also keep a later season to limit the need for game damage licenses if snow levels cause large concentrations of elk in the agricultural region in the winter months. The two seasons will occur from August 15th to October 31st and from November 1st to January 31st. Additionally, we propose both hunt codes to be List B in order to encourage more elk hunters to purchase and use cow licenses in this area. List B licenses can be used as a second license to a hunter's List A license, or a hunter could acquire two List B licenses. These changes would allow for the most opportunity to harvest elk, causing damage to agricultural products in Paradox Valley.

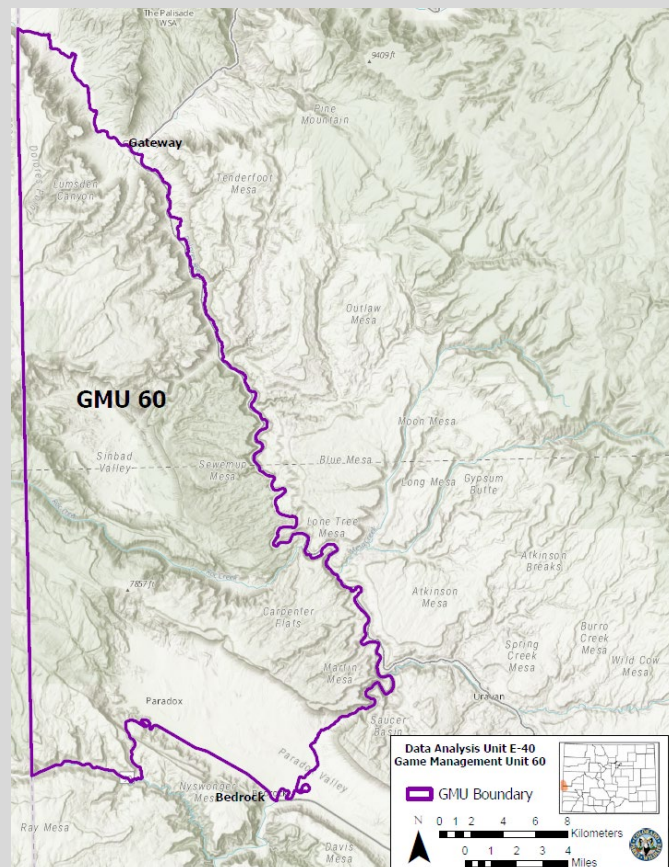


Figure 1. Elk data analysis unit (DAU) E-40 located near Bedrock and Gateway in southwestern Colorado.

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:

- Private land hunters – informal conversations have taken place and they support the change
- Landowners- discussions have occurred and landowners are supportive since this would alleviate game damage concerns on growing crops

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*:

Change the season dates for EF060P5R from 9/1-12/31 annually to 8/15-10/31 annually.

Add EF060P6R valid in GMU 60 with season dates 11/1-1/31 annually. Both hunt codes will be List B.

2. Status quo: Continue without adding hunt codes to DAU E-40.

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?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

DRAFT ISSUES SUBMITTAL FORM

Date:

10/31/2025

ISSUE: Should male and female muzzleloader licenses and female private land only (PLO) licenses for pronghorn be added to A-37 for GMUs 15, 26, and 231?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Pronghorn Data Analysis Unit (DAU) A-37 has been open to hunting since 1999, and initially included Game Management Units (GMUs) 18, 27, 28, 37, and 181. In 1999, the population objective was set at 630 animals, and GMUs 18, 27, 28, and 181 were opened to hunting; GMU 37 was added to the hunt codes in 2005. Since 2007, the unit has been managed utilizing archery, muzzleloader, and rifle harvest of both male and female pronghorn.

The DAU plan (aka Herd Management Plan or HMP) was revised in 2020. This current DAU plan added GMUs 15, 26 and 231, after pronghorn were observed and documented moving between these units and the Middle Park units (18, 27, 28, 37, 181) as early as 2009. Animals were observed migrating from winter ranges in GMUs 27 and 181 west into GMUs 15 and 26 in the early spring, and staying for the summer months. Some of these animals migrate back to winter ranges in GMUs 27 and 181 in late November, while a portion of the population has remained in GMUs 15 and 26 year-round during milder winters. In addition to observations of these movements by CPW staff and landowners, a pronghorn movement and migration study using GPS collars was conducted in A-37 from 2020-2023. The study confirmed these pronghorn movements between Middle Park and GMUs 15 and 26 (Figure 1).

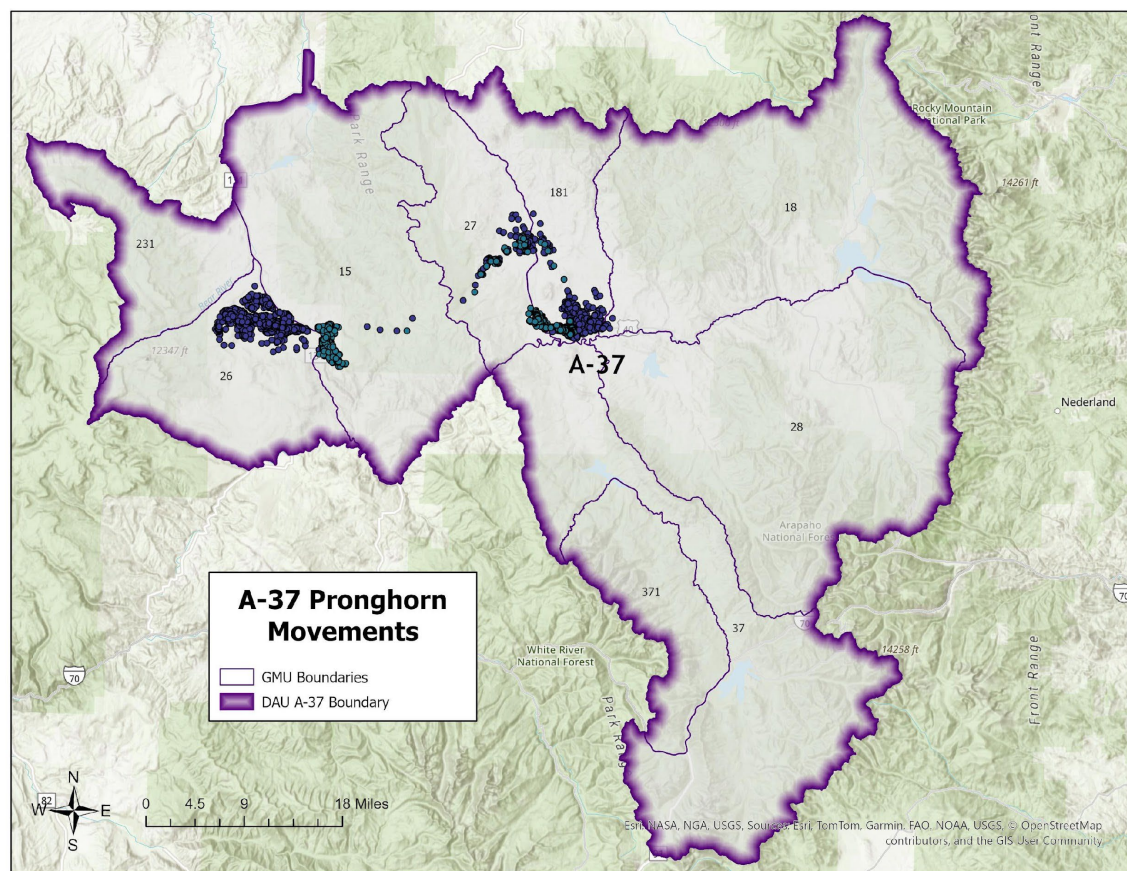


Figure 1. A-37 collared pronghorn movements between Middle Park and GMUs 15 & 26.

Current population estimates for A-37 include GMUs 15, 26, and 231. The population objective in the 2020 DAU plan was updated from 630 to a range of 600-800 animals. The current post hunt population is near the high end of the objective range, at approximately 790 animals (Figure 2).

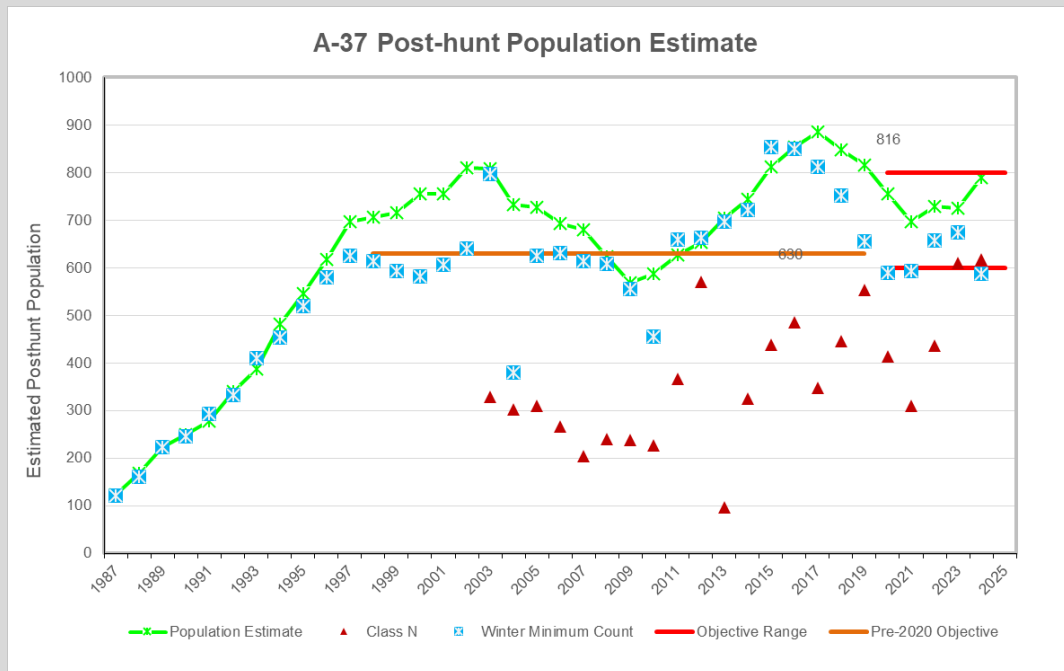


Figure 2. A-37 post hunt population estimate, 1987-2024.

When GMUs 15, 26, and 231 were added to the DAU, these units were listed as over-the-counter (OTC) either-sex for archery licenses, and 015 hunt codes were created for rifle doe and buck licenses to include all three new GMUs. The rest of the DAU (GMUs 18, 27, 28, 37, and 181) is included in the 018 hunt codes, and in addition to rifle these units have muzzleloader doe and buck licenses, plus private land only (PLO) doe and buck licenses. No muzzleloader or PLO licenses currently exist for the 015 hunt codes.

Issues:

Since opening to pronghorn hunting in 2021, the number of pronghorn observed in units 15, 26, and 231 during both summer aerial classification surveys (Figure 3) and winter ground surveys has increased. While archery OTC and limited rifle opportunities exist in these units, there is currently no muzzleloader season in this portion of the DAU. CPW is proposing to add both buck and doe muzzleloader hunt codes for GMUs 15, 26, and 231 to increase public opportunity and help achieve harvest objectives in this portion of the DAU.

A factor that has arisen is the concentration of pronghorn on private lands during both archery and rifle seasons in GMUs 15 and 26, making it challenging for public hunters to access pronghorn. Private land within these GMUs provides important habitat as well as hunting opportunities, and a majority of the known harvest occurs on private lands.

Throughout the rest of the DAU (018 hunt code), the PLO season dates are set during the two weeks prior to the regular pronghorn rifle season, with slight overlap. These dates incentivize hunting pressure on private lands to help re-distribute animals, ideally onto adjacent public lands, to make them more available to public land hunters during the regular rifle season. The existing PLO season in A-37 currently allows CPW managers to proportionately allocate public land and private land hunting opportunities in the 018 hunt codes, but not in the 015 hunt codes.

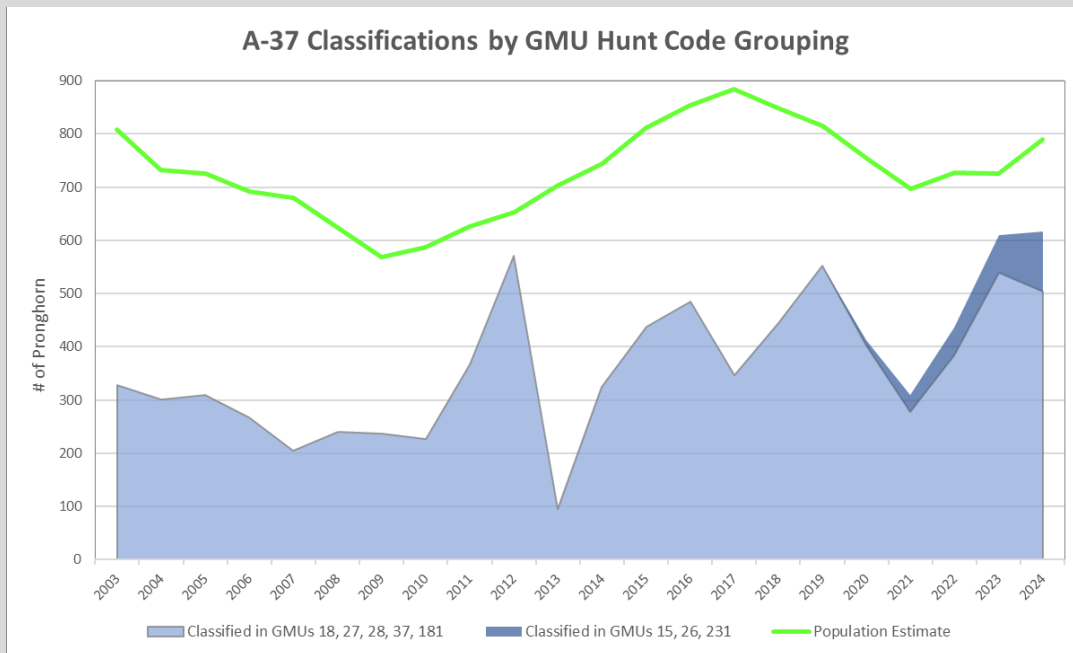


Figure 3. Pronghorn classified in A-37 by GMU hunt code groupings, 2003-2024.

CPW staff is proposing a PLO season in GMUs 15, 26, and 231 with dates concurrent with the 018 PLO season. While the population is near the high end of the objective range, observed sex ratios are currently slightly below objective (Figure 4) and CPW is proposing only female PLO licenses at this time. These additional PLO doe licenses will help to re-distribute pronghorn onto public lands prior to and during the regular rifle seasons, and increase doe harvest in this segment of the DAU to help achieve overall harvest objectives.

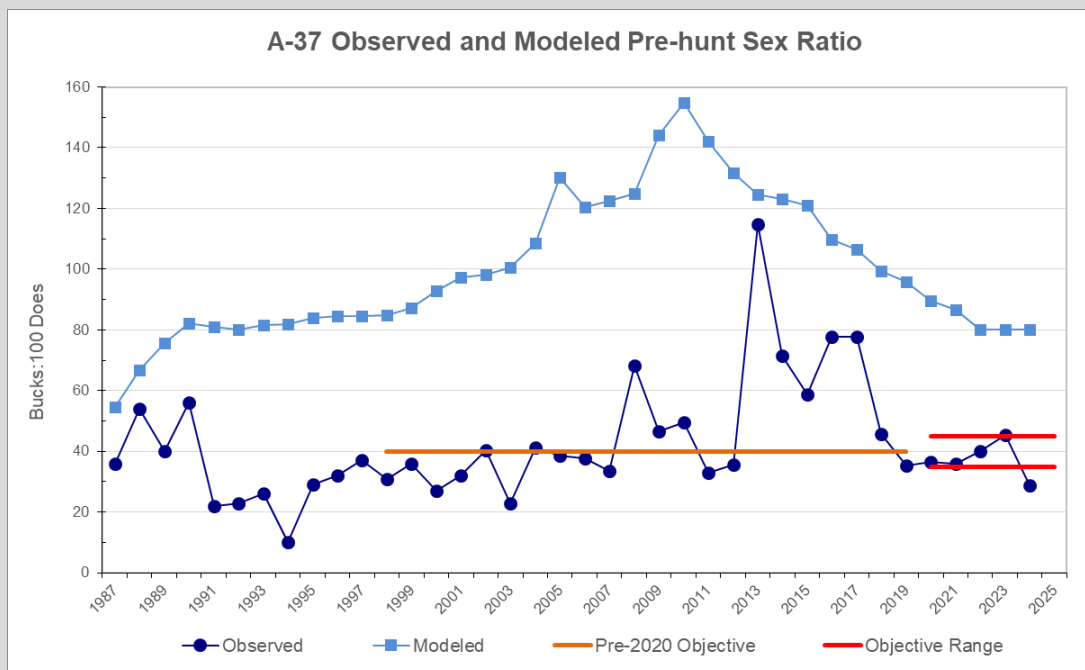


Figure 4. A-37 observed and modeled pre-hunt sex ratios, 1987-2024.

WHO ARE THE EXTERNAL PUBLICS IMPACTED BY THIS ISSUE? WHAT PUBLIC INPUT PROCESS HAS OCCURRED, IF ANY?

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

Private landowners and other hunters who have access to private lands will be able to apply for these licenses in lieu of regular rifle season licenses, reducing competition for doe licenses with public land hunters. CPW staff has reached out to local landowners and support exists for the PLO licenses. A number of local landowners are open to increasing harvest and opportunity for pronghorn hunting, and have expressed that they would apply for and utilize the PLO licenses. While no landowners expressed concern with the proposed license change, some landowners did not respond or declined to discuss the issue entirely.

1. ***Preferred Alternative*:** Add a muzzleloader (doe and buck) season and a PLO (doe only) season valid in GMUs 15, 26 and 231. Season dates will be concurrent with corresponding seasons under existing 018 hunt codes. The following 015 hunt codes would be created:
 - A. *Muzzleloader:*
 - AF015O1M
 - AM015O1M
 - B. *Private Land Only (PLO):*
 - AF015P1R

2. Alternative 2: Status Quo

Issue Raised by:	Elissa Slezak (Wildlife Biologist), Area 8, 9 & 10 staff
Author of the issue paper (if different than person raising the issue):	Elissa Slezak (Wildlife Biologist)
CC:	Brad Banulis (Sr. Wildlife Biologist), Areas 8, 9 & 10 AWMs and AAWMs
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	Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should a female-only moose hunt code be created for Game Management Units (GMUs) 48, 56, 481, and 561, which fall within Data Analysis Unit (DAU) M-12 in the Sawatch Range?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
The M-12 DAU includes six Game Management Units (GMUs): 55 and 551 in the Gunnison Basin, and GMUs 48, 56, 481, and 561 in the Upper Arkansas River Basin. The DAU consists of the following hunt codes, and associated GMUs and number of licenses for the 2025 hunting season: MM048O1X (48 and 481; 4 licenses), MF055O1A, M, R (55; 2 licenses), MM055O1X (55 and 551; 5 licenses), and MM056O1X (56 and 561; 4 licenses). The DAU provides quality moose habitat, and thus the population has become well established. Harvest success is high for the MM048O1X and MM056O1X bull moose hunt codes, and CPW has recommended increases in bull licenses over the last several years. Hunters consistently find and harvest mature bulls throughout these GMUs. Observations of moose from the public, hunters, and staff, as well as consistent bull moose harvest success, indicate that these units contain a sustainable moose population. Currently, CPW does not offer female moose hunting opportunities in the eastern GMUs (48, 56, 481, and 561) of the M-12 DAU. To provide additional moose hunting opportunities, we propose adding a female-only moose hunt code for GMUs 48, 56, 481, and 561. This management strategy would mirror the female moose hunting opportunities in GMU 55 on the east side of 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.	
This new hunt code will benefit moose hunters who desire an alternative to male-only hunting opportunities. Internal staff who manage brochures and licensing will be affected by this change. No formal outreach was conducted; however, Area 13 staff have received comments from some members of the hunting community who desire an opportunity to hunt female moose in the proposed hunt code GMUs.	
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Create cow moose hunt code MF048O1 A/M/R (quota will float among methods of take) that will be valid in GMUs 48, 56, 481, and 561. The license will be List A. 2. Status Quo: No cow moose hunting in GMUs 48, 56, 481, and 561.	
Issue Raised by:	Area 13 Staff, and Bryan Lamont (Terrestrial Biologist, Salida)
Author of the issue paper (if different than person raising the issue):	Bryan Lamont
CC:	Jackson Baroni (DWM-Leadville), Kevin Madler (DWM-Buena Vista), Tyler Kersey (DWM-Salida), Sean Shepherd (Area 13 AWM), Zach Baker (Area 13 AAWM), Julie Stiver (SE Senior

	Terrestrial Biologist), April Estep (SE DRM), and Frank McGee (SE RM)
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	Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

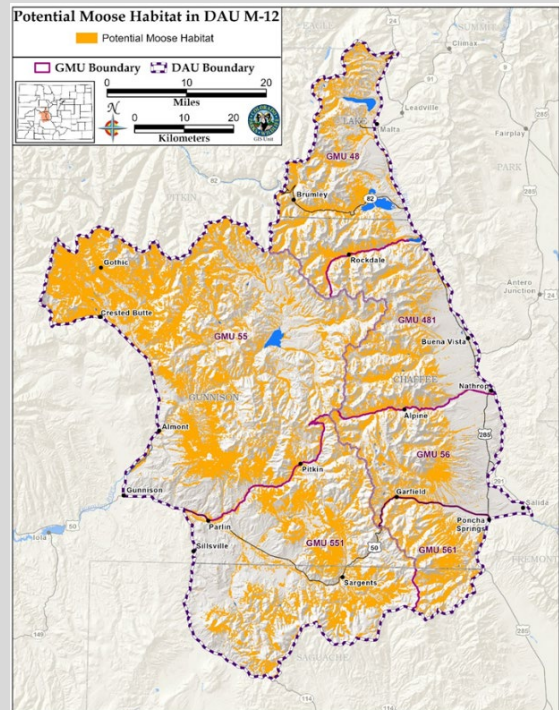
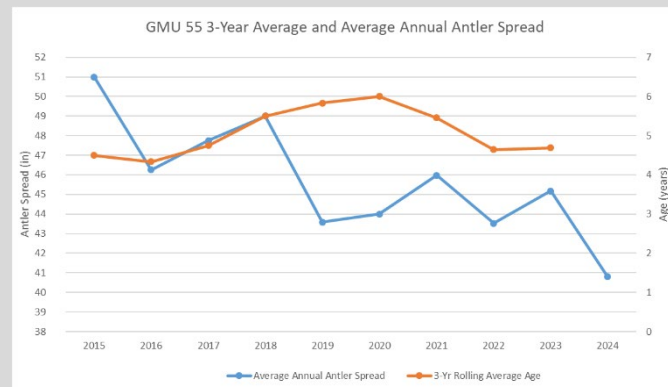
ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should GMU 551 be separated from hunt code MM055O1X, creating hunt code MM551O1X, and should GMU 55 be split into east and west sub-units for moose hunting?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Data Analysis Unit (DAU) M-12 encompasses both sides of the Collegiate Peaks between Gunnison and Buena Vista, and includes Game Management Units (GMUs) 48, 481, 55, 551, 56, and 561. Approximately 125 to 175 moose are estimated in this population, with slightly more than half of those moose residing in GMU 55 in the Taylor Park and Crested Butte areas. Since moose hunting was initiated in this DAU in 2015, GMU 55 accounts for roughly 69% of the harvested moose for the DAU. However, the distribution of hunters throughout the GMU does not match the distribution of moose. Hunters have heavily biased their efforts to drainages already known to have had moose harvested from them, as documented in the annual harvest reports available to the public. As a result, of the 36 bulls harvested since 2015 in GMU 55, 21 (58%) have been taken from just two drainages within the GMU. This is likely contributing to the decreasing trend in antler spread in harvested bulls, as well as potentially contributing to an increase in human-moose conflicts throughout the GMU in areas where there is minimal hunting pressure and moose are becoming increasingly habituated to people. Additionally, hunt code MM055O1X includes both GMUs 55 and 551, but only 1 bull moose has been harvested in GMU 551 since 2015 despite consistent reports of moose inhabiting the GMU.

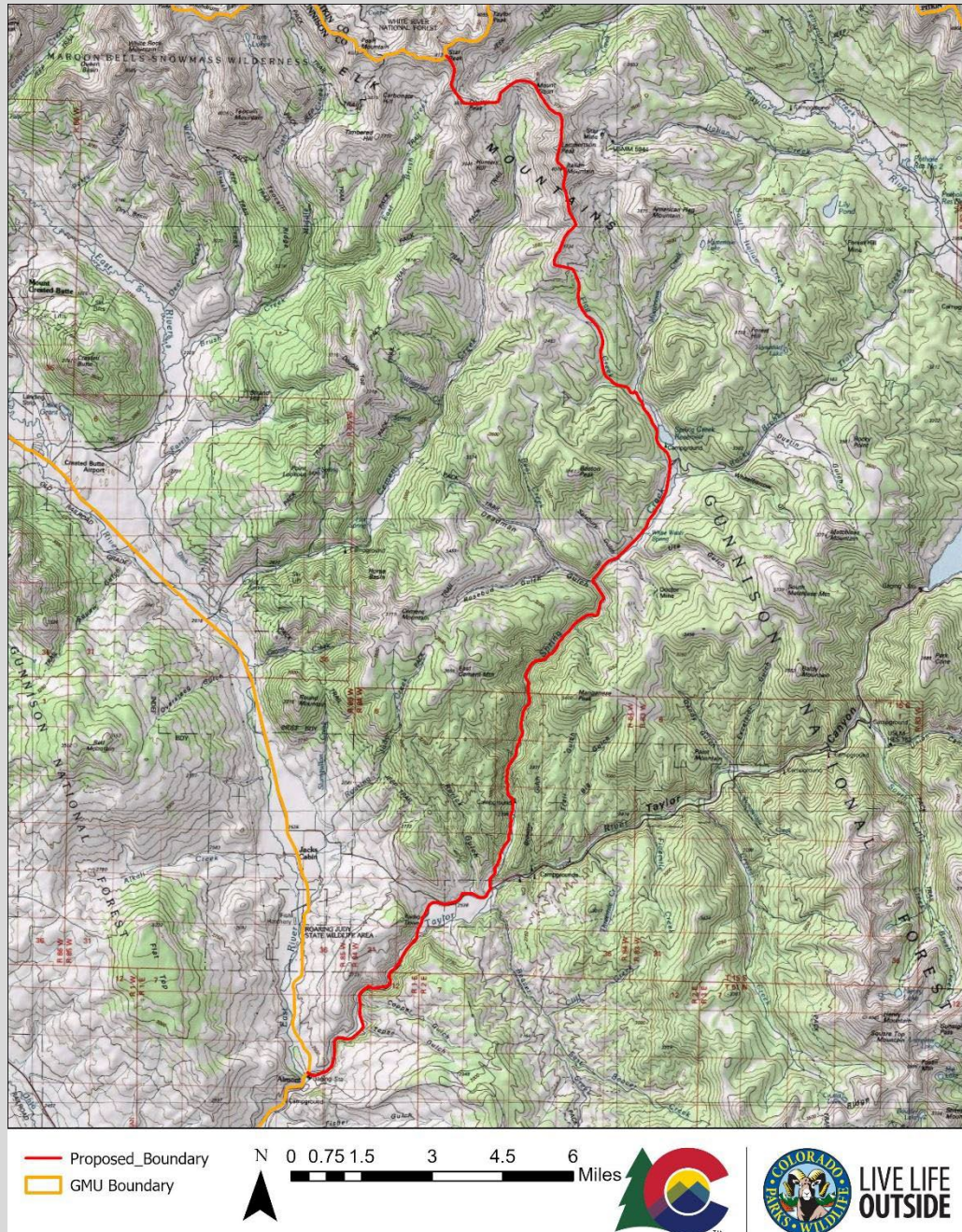


GMU 551: To further distribute moose hunters throughout this DAU, we recommend creating a separate hunt code for GMU 551 rather than continuing to include both GMUs in MM055O1X. GMU 551 has large swaths of moose habitat with observations of moose regularly reported by CPW staff and the public. Staff is confident there are a sufficient number of moose in GMU 551 to support this once-in-a-lifetime hunt.

GMU 55: To better distribute hunters and potentially offer additional hunting opportunity within the GMU, we propose dividing GMU 55 into eastern and western sub-units. The proposed sub-unit boundary would be as follows:

- East Subunit: Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by Continental Divide; on S by Taylor River-Tomichi Creek divide and Cumberland Pass, USFS 765 (N Quartz Creek Rd.), Quartz Creek Rd. and U.S. 50; on W by Colo. 135, CR 742, CR 744 (Spring Creek Rd), Flag Creek, ridgeline of Reno Ridge to Italian Mountain, Mount Tilton, Crystal Peak, and Star Peak.

- West Subunit: Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by ridgeline of Star Peak to Crystal Peak, Mount Tilton, Italian Mountain, Reno Ridge, Flag Creek, CR 744 (Spring Creek Rd), CR 742; on W by Colo. 135, CR 12 (Kebler Pass Rd.), Kebler Pass and Ruby Range Summit.



In summary, two small areas within GMUs 55 and 551 have sustained the majority of moose harvest in M-12 over the last decade, despite growing moose populations and expanding distribution. To better distribute hunters and harvest throughout the unit, mitigate for potential moose conflict over time, and potentially create additional hunting opportunities, we propose dividing GMU 55 into eastern and western sub-units and creating separate hunt codes for GMU 55 and GMU 551.

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:

- CPW Staff
- Hunters
- Local residents

Conflicts with moose have been increasing around the Crested Butte area, leading to concerns about the expanding moose population among residents. Additionally, hunters consistently comment on the crowding especially in areas like Taylor Park. CPW Staff would like to combat these two issues by distributing the hunters more equally throughout GMU55 while still providing opportunity for moose hunting, and hopefully decreasing moose conflicts in these areas by providing hunting pressure. No official outreach has been conducted; however, Area 16 staff is confident the proposed changes would maintain hunter opportunity while also addressing these other concerns.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Create new sub-units within GMU 55 and a new hunt code for GMU 551
 - **MM055O1X** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by Continental Divide; on S by Taylor River-Tomichi Creek divide and Cumberland Pass, USFS 765 (N Quartz Creek Rd.), Quartz Creek Rd. and U.S. 50; on W by Colo. 135, CR 742, CR 744 (Spring Creek Rd), Flag Creek, ridgeline of Reno Ridge to Italian Mountain, Mount Tilton, Crystal Peak, and Star Peak.
 - **MF055O1A** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by Continental Divide; on S by Taylor River-Tomichi Creek divide and Cumberland Pass, USFS 765 (N Quartz Creek Rd.), Quartz Creek Rd. and U.S. 50; on W by Colo. 135, CR 742, CR 744 (Spring Creek Rd), Flag Creek, ridgeline of Reno Ridge to Italian Mountain, Mount Tilton, Crystal Peak, and Star Peak.
 - **MF055O1M** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by Continental Divide; on S by Taylor River-Tomichi Creek divide and Cumberland Pass, USFS 765 (N Quartz Creek Rd.), Quartz Creek Rd. and U.S. 50; on W by Colo. 135, CR 742, CR 744 (Spring Creek Rd), Flag Creek, ridgeline of Reno Ridge to Italian Mountain, Mount Tilton, Crystal Peak, and Star Peak.
 - **MF055O1R** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by Continental Divide; on S by Taylor River-Tomichi Creek divide and Cumberland Pass, USFS 765 (N Quartz Creek Rd.), Quartz Creek Rd. and U.S. 50; on W by Colo. 135, CR 742, CR 744 (Spring Creek Rd), Flag Creek, ridgeline of Reno Ridge to Italian Mountain, Mount Tilton, Crystal Peak, and Star Peak.
 - **MM055S1X** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by ridgeline of Star Peak to Crystal Peak, Mount Tilton, Italian Mountain, Reno Ridge, Flag Creek, CR 744 (Spring Creek Rd), CR 742; on W by Colo. 135, CR 12 (Kebler Pass Rd.), Kebler Pass and Ruby Range Summit.
 - **MF055S1A** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by ridgeline of Star Peak to Crystal Peak, Mount Tilton, Italian Mountain, Reno Ridge, Flag Creek, CR 744 (Spring Creek Rd), CR 742; on W by Colo. 135, CR 12 (Kebler Pass Rd.), Kebler Pass and Ruby Range Summit.
 - **MF055S1M** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by ridgeline of Star Peak to Crystal Peak, Mount Tilton, Italian Mountain, Reno Ridge, Flag Creek, CR 744

(Spring Creek Rd), CR 742; on W by Colo. 135, CR 12 (Kebler Pass Rd.), Kebler Pass and Ruby Range Summit.

- **MF055S1R** – Portion of GMU 55 bounded on N by Gunnison-Pitkin Co. Line; on E by ridgeline of Star Peak to Crystal Peak, Mount Tilton, Italian Mountain, Reno Ridge, Flag Creek, CR 744 (Spring Creek Rd), CR 742; on W by Colo. 135, CR 12 (Kebler Pass Rd.), Kebler Pass and Ruby Range Summit.

- **MM551O1X** – Bounded on N by U.S. 50, Quartz Creek Rd., North Quartz Creek Rd. and Taylor River-Tomichi Creek divide; on E by Continental Divide; on S and W by Colo 114.

2. Status quo

Issue Raised by:	Alyssa Meier, Wildlife Biologist, Area 16	
Author of the issue paper (if different than person raising the issue):	Alyssa Meier Codi Prior	
CC:	Jamin Grigg, Area 16	
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?	YES	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

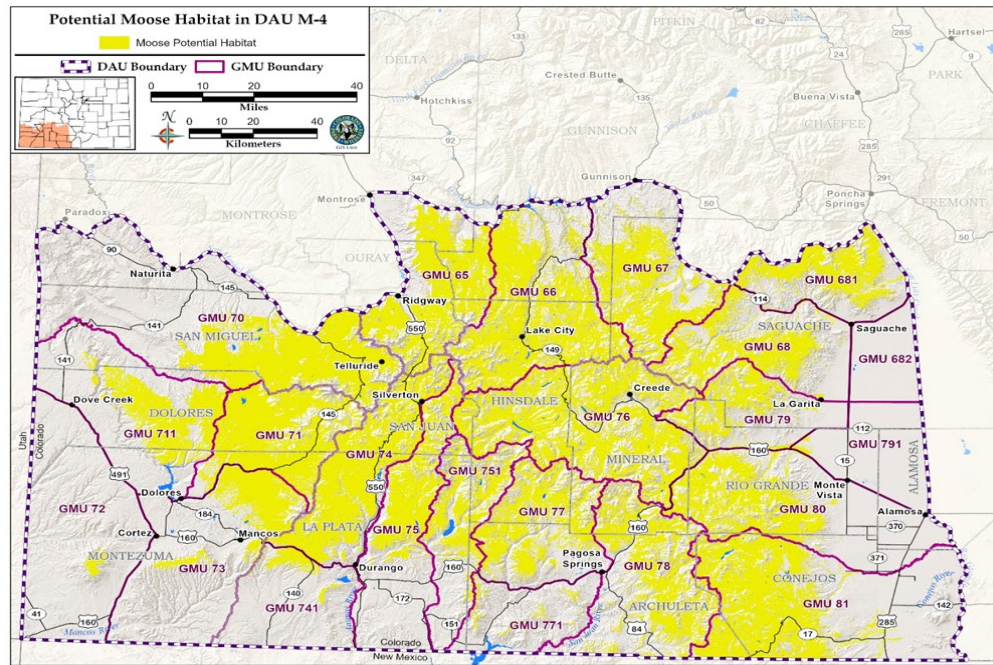
ISSUE: Should GMU 79 have a separate limited bull moose hunt from GMUs 68 and 681?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Following moose transplants to the Upper Rio Grande Valley near Creede in the early 1990s, CPW staff and the public have witnessed the expansion and colonization of moose into suitable habitats outside of the core transplant area, including Game Management Units (GMUs) 79, 68, and 681 within Data Analysis Unit (DAU) M-4. In 2015, moose hunting was established in GMUs 68, 681, and 79 with the creation of hunt code MM068O1X, with a quota of one resident bull license. Over the next 5 years, the majority of the moose harvest came from GMU 79, and this unit was the focal point for moose hunters. However, as moose continued to pioneer into GMU 68 and 681, both hunters and CPW staff began to have more moose sightings in these areas. The license quota has gradually gone up as well, and currently, we have 3 resident bull licenses available. In 2021, we began to get hunter harvest in GMU 68, and it has had consistent harvest over the past 4 years. For the first time in 2024, GMU 68 had the majority of the moose harvest, with 2 bulls coming from GMU 68 and one from GMU 79. Moose harvest has not yet come from GMU 681, but local CPW staff believe the potential is there.

Although no formal inventory of moose is conducted in these three GMUs, observations by CPW staff, public hunters, and the general public indicate that the resident moose population is increasing, as is the moose population in GMUs 68 and 681. Moose sightings have been occurring more frequently and are widespread throughout the above-mentioned GMUs. CPW staff have identified potential moose habitat in DAU M-4 (below), and all three GMUs have substantial suitable habitat. It is not uncommon to spot multiple moose while flying CPW's annual elk classification surveys each winter in these areas as well.

Creating a separate limited bull moose hunt in GMU 79 will create an additional opportunity for hunters. In the 2025 moose draw, 355 hunters applied for moose licenses in these units first choice, entering the draw with as many as 22 weighted points. With two hunt codes (and additional licenses) to choose from, the individual hunt application pressure should be reduced, and hunter opportunity will be increased.



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 for several years with hunters in GMU 79, 68, and 681 have indicated not only a growing moose population, but also support for creating the new hunt.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Add a bull moose hunt code for GMU 79 (MM079O1X) and remove GMU 79 from MM068O1X.
2. **Status quo:** GMU 79 remains a valid unit for a MM068O1X license.

Issue Raised by:	DWM Jeremy Gallegos (GMU 79) and DWM William Miedema (GMU 68 and 681)
Author of the issue paper (if different than person raising the issue):	
CC:	Brent Franklin, Rick Basagoitia, Jamin Grigg
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?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should wilderness-only moose hunt codes be added to GMU 66 in M-4?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The Data Analysis Unit (DAU) M-4 moose population comprises twenty-three Game Management Units (GMUs): 65, 66, 67, 68, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 681, 682, 711, 741, 751, 771, and 791. Eleven of the GMUs are open for hunting (65, 66, 67, 68, 74, 75, 76, 77, 79, 681, and 751) while the rest remain un-hunted. The DAU encompasses a large portion of southwest Colorado on both sides of the Continental Divide, totaling approximately 6,050 square miles. Portions of Gunnison, Hinsdale, Mineral, Rio Grande, Saguache, and San Juan counties make up the entire area. CPW estimates the current moose population in M-4 at approximately 500 animals, primarily concentrated in GMUs 66 and 76, based on incidental observations by agency personnel, the public, harvest information, and observations gathered during deer and elk aerial surveys.

GMU 66 is approximately 575,000 acres, comprised roughly of 78% public land. This unit contains 200,128 acres of USFS land, 103,680 acres of USFS Wilderness, and 259,712 acres of BLM land. Within GMU 66 there are several portions or the entirety of designated wildernesses and wilderness study areas (WSA); this includes: Powderhorn Wilderness, La Garita Wilderness, Uncompaghre Wilderness, Red Cloud Peak WSA, Handies Peak WSA, Bill Hare Gulch WSA, Powderhorn WSA, American Flats WSA, and Uncompaghre WSA (see Figure 1).

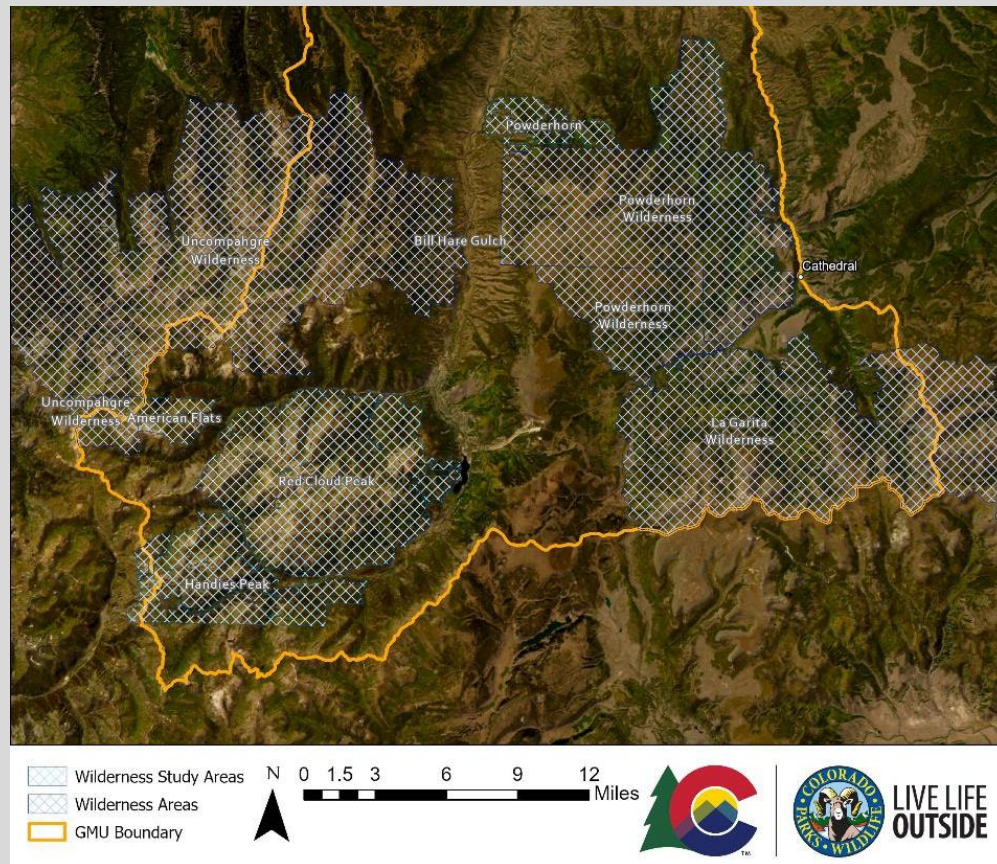


Figure 1: Map of designated Wilderness Areas and Wilderness Study Areas in GMU 66

Only 19% of harvests since 2020 have occurred within wilderness despite the overwhelming availability of moose habitat within wilderness and observational evidence of moose within wilderness areas. Moose populations have been increasing within M-4 over the last decade with GMU 66 providing some of the highest concentrations of moose given aerial survey information and moose-human conflicts within the areas. While success rates remain high in GMU 66, harvest consistently occurs in focal areas representing a relatively small proportion of the available moose habitat. This is often characterized by greater ease of access and closer proximity to roads. A large proportion of moose habitat in more difficult to access areas experiences little to no moose hunting pressure. Generally, these areas are found in roadless areas in USFS designated wilderness areas and wilderness study areas and present additional moose hunting opportunities for hunters who wish to experience a more remote backcountry moose hunt.

Year	Total Harvest	% USFS	% BLM	% Wilderness
2020	5	80%	20%	0%
2021	8	38%	13%	50%
2022	9	50%	25%	25%
2023	9	67%	11%	22%
2024	8	57%	14%	29%

Table 1: Moose harvest in GMU 66 and percentage of harvest in each designated ownership type

SW Terrestrial and Area 16 field staff propose to create wilderness-only moose hunts in GMU 66. This hunt will increase hunter opportunity by focusing additional hunting pressure on segments of moose habitat in GMU 66 that currently do not experience the same level of pressure. Area staff are confident that quality moose exist within the wilderness areas that will satisfy hunter expectations for a once-in-a-lifetime hunt.

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:

- CPW Staff
- Hunters

CPW staff expressed the desire to maintain/increase opportunity for moose hunters in this unit. As always, hunters have expressed issues with crowding. No external outreach has been conducted; however, Area 16 staff are certain of the level of opportunity available in wilderness areas for moose hunters to both decrease crowding and maintain access to moose for a once-in-a-lifetime tag.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*:

Create new hunt codes for wilderness only moose hunt valid within any land designated USFS Wilderness or USFS Wilderness Study Areas with GMU 66. This includes: Powderhorn Wilderness, La Garita Wilderness, Uncompahgre Wilderness, Red Cloud Peak WSA, Handies Peak WSA, Bill Hare Gulch WSA, Powderhorn WSA, American Flats WSA, and Uncompahgre WSA.

MM066S1X

MF066S1A MF066S1M MF066S1R		
2. Status quo		
Issue Raised by:	Alyssa Meier – Area 16 Big Game Biologist	
Author of the issue paper (if different than person raising the issue):		
CC:	Jamin Grigg, Area 16	
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?	YES	
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES	

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should a limited private land only rifle bear hunt code be created for unit 211 valid from October 1st through the end of the concurrent 4th rifle season?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
CPW currently offers limited bear licenses that are valid in GMUs 3, 301, 11 and 211, during the regular elk/deer seasons. These GMUs are located in the Northwest part of Colorado, near the towns of Meeker and Craig and within CPW Area 6. CPW has been approached by the management of Morgan Creek Ranching for Wildlife (RFW) and other private landowners within GMU 211 requesting a PLO rifle bear license that would be valid for the dates between the September rifle bear season, and the regular rifle seasons. RFW seasons do not align with the regular seasons, so a PLO rifle bear license valid from October 1st through the end of the fourth rifle season in GMU 211 would create bear hunting opportunities for RFW elk hunters, as well as for elk hunters using the EF011P5R PLO antlerless elk license, and other private land hunters. The following bear hunting licenses are currently available for GMUs 3, 301, 11 and 211: Limited Archery license valid during archery season (September 2-30 annually). BE003O1A Limited Muzzleloader license valid during muzzleloader season (the same as deer/elk). BE003O1M Limited Rifle license valid during the early bear rifle season (September 2-30 annually). BE003O1R Limited Rifle license valid during the four regular rifle deer/elk rifle seasons. BE003O5R. Creating a PLO bear license would create an opportunity to hunt bears on private lands during the PLO antlerless elk season, and during the RFW seasons for Morgan Creek and the ranches in GMUs 3, 301 and 11. Licenses would be reallocated to this new PLO hunt code from the existing hunt codes within the DAU. The call for this PLO license stems from GMU 211, but we would like to include GMUs 3, 301, and 11 in this hunt code as well to avoid hunter confusion, since all other bear licenses that are valid in GMU 211 include GMUs 3, 301 and 11. There are also landowners in GMU 11 who would likely utilize this PLO license. From 2022-2024 (3YA) 63% of bear harvest from the GMU 3, 301, 11, 211 unit group was in GMU 211, so we would expect most of the harvest from this PLO license to come from 211. The B15 DAU has low bear harvest, and the percentage of females has been low in recent years (3 out of 11, or 27%, 3YA). There are currently over-the-counter (OTC) PLO bear licenses that are valid from October 1 through the end of the fourth rifle deer/elk season in all of the other bear DAUs within the Northwest Region. One of these OTC licenses (BE012P5R) is valid in GMUs 12, 13, 23, and 24, which are included with GMU 211 in many elk and deer hunt codes. B15 is the only bear DAU in the Northwest Region that does not have any kind of PLO license available. The new hunt code for this license would be BE003P5R.	
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.	
The general public: A survey was posted to Engage CPW for 30 days with a press release announcing its availability. The survey provided the background to the issue paper and allowed respondents to identify if	

they support the proposed change in regulation. 74% of respondents voted in favor of the proposed change.

Private landowners within DAU B15 - discussions have occurred previously that resulted in this issue paper.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Create a private land only rifle bear hunting license (BE003P5R) valid from October 1 to the end of the fourth rifle season, in GMUs 3, 301, 11, and 211.

2. Alternative 2: Status quo with the current bear hunting licenses.

Issue Raised by:	Area 6 DWM Ross McGee and Area 6 Terrestrial Biologist Becca de Vergie
Author of the issue paper (if different than person raising the issue):	Becca de Vergie
CC:	Area 6 AWM Johnathan Lambert, AAWM Mike Swaro, Terrestrial Biologist Darby Finley
APPROVED FOR FURTHER CONSIDERATION BY:	RM 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	Area 6 field staff
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the 2nd season ram hunt be removed in Waterton Canyon?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
Rocky Mountain bighorn sheep game management unit S42 is located in northeast Colorado and is referred to as the South Platte River Waterton Canyon Herd. The Waterton Canyon herd occupies the range along the South Platte River from Strontia Springs Reservoir to the mouth of the Waterton Canyon on Forest Service lands, Denver Water property, and private property. Access to these lands used by bighorn is primarily through Denver Water property. Waterton Canyon also experiences high recreational use from hikers, bikers, and wildlife photographers, so potential for conflicts between hunters and other recreationalists is a consideration. Bighorn population estimates since the 1950s have fluctuated between 20 and 80 animals, with one all-age disease-related die-off occurring when population levels were at their highest in 1980, at about 80 animals. After the 1980 disease event, population numbers remained low at 20-30 bighorn for many years. After the all-age die-off in 1980, bighorn hunting was closed on Denver Water property, and subsequently, no licenses were allocated in S42. As the bighorn population increased, CPW and Denver Water agreed on the need for active herd management. In partnership with Denver Water, bighorn hunting was reopened in 2015 in S42 and allowed on Denver Water property to reduce the population toward the objective range. License allocation was minimal, and unit-specific regulations were created to minimize the potential for conflicts between hunters and other recreationists. From 2008 to 2018, population estimates steadily increased with total counts averaging 47 animals, reaching a high of 71. Adult ram numbers during that period averaged 13, with a high of 20 in 2014 and 2016. CPW and Denver Water recognized the need for further population management, and in 2018, a second 5 day season with an additional ewe and ram license was initiated. From 2015 to 2024, the first season and second season ram hunts have each been 90% successful, resulting in 9 males taken during the first season and six during the second season in the past 10 years. In the 2023, 2024, and 2025 seasons, Denver Water and CPW employees and CPW volunteers reported seeing low numbers of adult rams in the canyon. During the 2024 fall count, 8 rams were counted, and during the 2024 hunting season, 2 of those rams were harvested. CPW proposes eliminating the second-season ram hunt code in S42 to allow the ram segment of the population to mature and grow. A hunt code cannot be zeroed and must be eliminated during the time of the season closure. CPW will continue to survey the unit and re-evaluate the possible re-establishment of a second season ram hunt and hunt code 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, Area Wildlife Biologist, and Senior Biologist. External: Denver Water Staff. District wildlife managers and Denver Water Staff expressed support for a reduction in ram harvest. Private landowners, hunters, and land management agencies, including the US Forest Service, will be surveyed after internal review.	

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Eliminate hunt code SMS42O2R.	
2. Status quo	
Issue Raised by:	Melanie Kaknes (Area 5 DWM)
Author of the issue paper (if different than person raising the issue):	Mark Fisher
CC:	Matt Martinez, Mark Leslie, and Lance Carpenter
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
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should a late season archery hunt be added to bighorn sheep game management units S23 and S27?		
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):			
Rocky Mountain Bighorn Sheep data analysis unit (DAU) RBS-06 consists of game management units (GMUs) S23 (Kenosha), S27 (Tarryall), and S43 (Hayman) in Park, Jefferson, and Douglas counties. Prior to releases in the Hayman Burn area in the early 2000s, the RBS-06 sheep were all native and were once one of the largest herds in the state, contributing to more than 20 transplants beginning in 1944. Several disease events resulting in all age die offs have occurred in the DAU, including the most recent in the late 1990s. GMUs S23 and S27 currently allow two ram rifle licenses from September 3rd to October 3rd. S43 is closed to hunting. The current estimate for the populations in S23 and S27 is approximately 150 animals with an increasing trend. The 5 year average sex ratio is 40 rams per 100 ewes. Although ram numbers could support more harvest, it is common for hunters and staff to find rams during the primary season in bachelor groups. This would likely result in hunter crowding if license numbers were increased in a single season. Implementing another season, later in the fall, once ram groups have dispersed into smaller sub-groups, is anticipated to provide a hunt opportunity without hunters being crowded. CPW recommends adding a late archery season to complement the existing rifle season in S23 and S27 with a new hunt code (SMS23O1A).			
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*. Sheep hunters, outfitters and wildlife viewers.			
ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):			
1. *Preferred Alternative*: Establish hunt code SM23O1A for sheep GMUs S23 and S27, November 1st - November 30. 2. Status quo			
Issue Raised by:	Area 1 staff		
Author of the issue paper (if different than person raising the issue):	Mark Fisher		
CC:	Scott Murdoch, Mark Leslie, Dawson Swanson, Derek Brown, Lance Carpenter		
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 1
RECOMMENDED FOR CONSENT AGENDA?			YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE			NA

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE: Should archery licenses be established in bighorn sheep Game Management Unit S03?

DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Biologists and Area 1 staff propose establishing an early archery season in Game Management Unit (GMU) S03. GMU S03 is located in Clear Creek County south of Interstate 70 (Figure 1). The early archery season will increase hunter opportunities in a GMU where the post-hunt population estimate was 269 animals. S03 is within the Data Analysis Unit RBS-04 (includes GMUs S03, S04, and S41). The post-hunt population trend in RBS-04 has been increasing since 2014 and is above the current population objective (200-300), with an estimate of 409 animals.

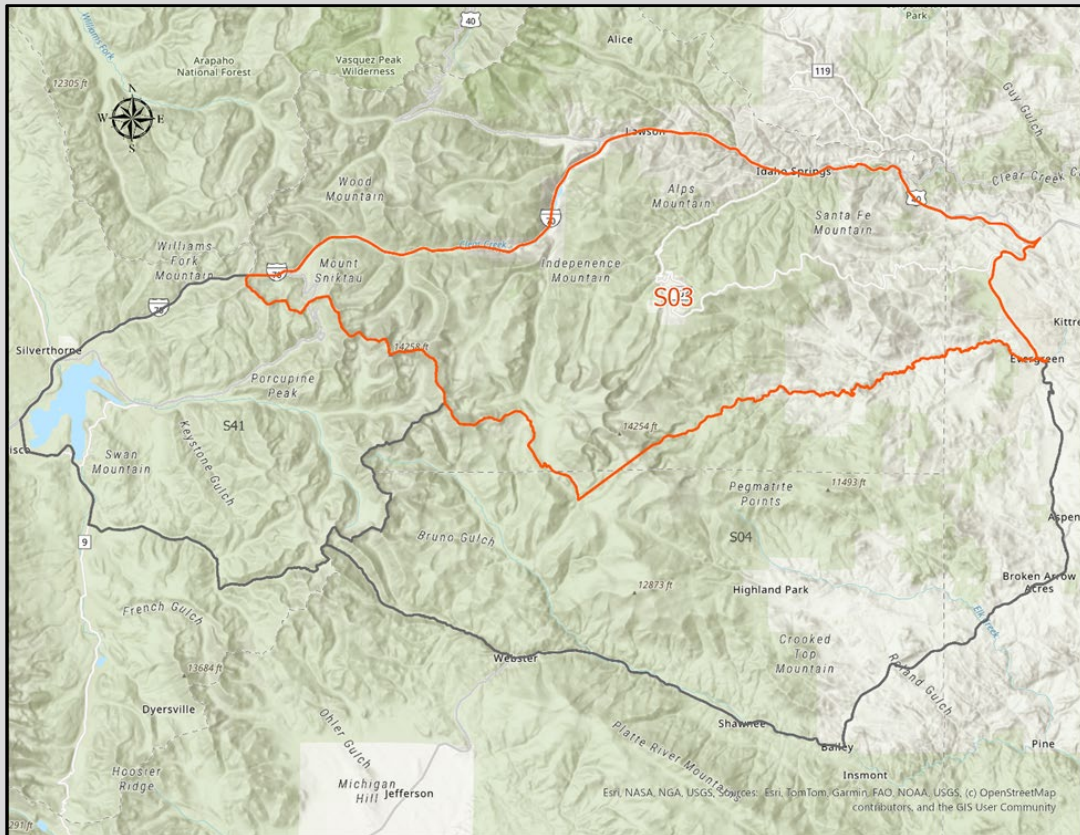


Figure 1. RBS - 4 highlighting GMU S03 boundary.

Currently, S03 has two rifle seasons: the first begins in early August and lasts 2.5 weeks, and the second begins in early September and extends into October. There are 19 licenses, 4 rams during the first season, and 15 (3 rams and 12 ewes) licenses during the second season. Area 1 staff and biologists do not want to add additional tags to the existing rifle seasons because of concerns with overcrowding.

The expected results from this regulation change would increase harvest, help manage the bighorn sheep population within S03 and RBS-4, increase hunter opportunities, and help with hunter crowding concerns during the rifle seasons. Accordingly, CPW recommends establishing an early archery season in GMU S03 for rams (SMS03O1A) and ewes (SFS03O1A). Existing rifle seasons will be shortened to 14 days and shifted to begin after Labor Day under a Calendar Rule, while the archery season will be open within

the month of August and begin on the first date based on a Fixed Rule. Proposed season dates for archery and rifle in S03 are as follows:

SMS03O1A - August 1st through August 21
 SFS03O1A - August 8 through August 21
 SMS03O1R - Begins one day AFTER Labor Day and is open for 14 days
 SMS03O2R - Begins 21 days AFTER Labor Day and is open for 14 days
 SFS03O2R - Begins 21 days AFTER Labor Day and is open for 14 days

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 staff included district managers, area managers, area biologists, and senior biologists

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. *Preferred Alternative*: Establish an early archery season in Game Management Unit S3 to increase hunter opportunity and allow for additional adaptive population management strategies.

SMS03O1A - August 1st through August 21
 SFS03O1A - August 8 through August 21
 SMS03O1R - Begins one day AFTER Labor Day and is open for 14 days
 SMS03O2R - Begins 21 days AFTER Labor Day and is open for 14 days
 SFS03O2R - Begins 21 days AFTER Labor Day and is open for 14 days

2. Status quo

Issue Raised by:	Rebecca Boyce and Area 1 staff
Author of the issue paper (if different than person raising the issue):	Rebecca Boyce
CC:	Scott Murdoch, Mark Leslie, Joe Nicholson, Lance Carpenter
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	Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

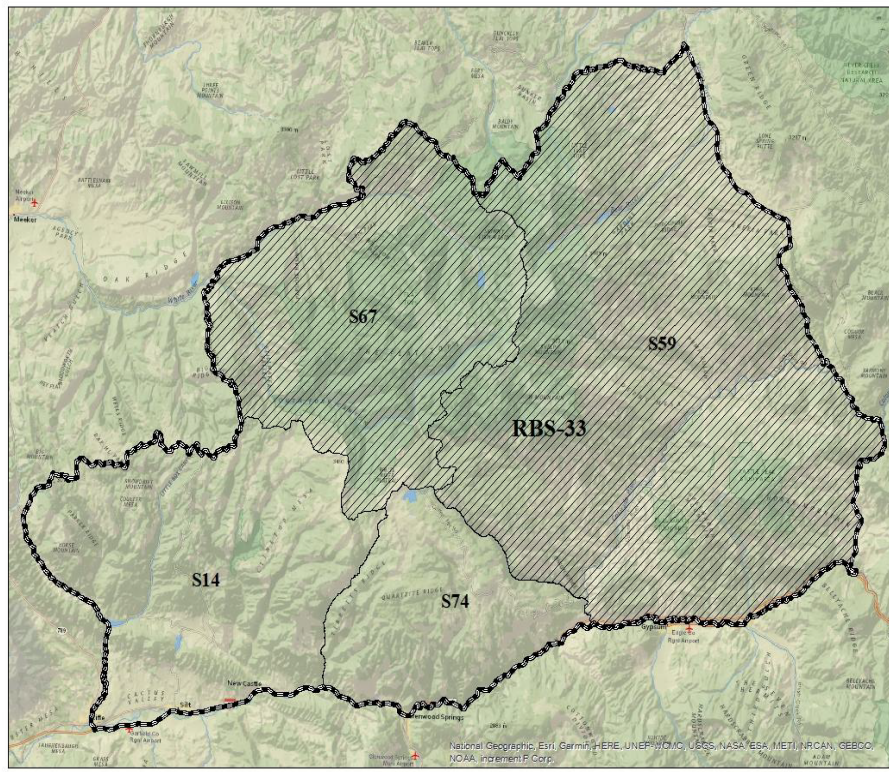
ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should GMU S67 be added to the valid GMUs for hunt code SMS59O1R and therefore should hunt code SMS67O1R be eliminated?
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DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

DAU RBS 33 is located in northwest Colorado within the Flattops Wilderness Area north of Glenwood Springs and includes GMUs S14, S59, S67, and S74.



The quota for hunt code SMS59O1R was increased from 1 to 2 in 2024 to allow for additional hunter opportunity. The bighorn sheep herd within GMU S59 currently has sufficient ram numbers to provide good hunting opportunity, with 100% success in four of the last 5 years. Since the Flat Tops bighorn sheep herds are at high risk for a respiratory disease event, CPW staff are promoting hunting opportunity while there are currently rams available to be harvested.

In contrast, GMU S67 has experienced a steadily declining bighorn sheep population over the last several years. A single ram license is allocated for S67 annually. The declining bighorn sheep population has made it increasingly difficult for the single ram hunter to locate bighorn sheep in S67. Despite a ram being harvested four of the last five years, S67 hunters have reported that locating sheep has become especially difficult the last 5 years despite significant scouting and hunting efforts. In an attempt to increase hunting opportunity the season length for S67 was extended from a month-long season to a 3-month season in 2024. Although the extended season dates provided for more hunting opportunity in 2024, hunters reported having an extremely difficult time locating sheep within S67. No sheep have been observed the last 3 years during CPW survey efforts.

Making SMS59O1R licenses valid for GMUs S59 and S67 would allow for increased hunter opportunity spread across both GMUs.

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 6 and Area 8 staff. Outfitters and hunters within S67

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

- 1. *Preferred Alternative*:** Licenses valid in SMS59O1R will also be valid in GMU S67, and hunt code SMS67O1R will be turned off.
- 2. Alternative 2:** Turn off hunt code SMS67O1R if it is not added to SMS59O1R.
- 3. Status quo**

Issue Raised by:	Bailey Franklin, Darby Finley, Julie Mao
Author of the issue paper (if different than person raising the issue):	Darby Finley, Julie Mao
CC:	Johnathan Lambert, Matt Yamishita, Mike Swaro, Bailey Franklin, Brad Banulis
APPROVED FOR FURTHER CONSIDERATION BY:	NW 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 Region/Terrestrial Section
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should season dates for bighorn sheep GMU S-34 (the Rampart bighorn sheep herd) be changed to better align with annual herd movements?
DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):	
The Rampart Bighorn Sheep Data Analysis Unit RBS-14, GMU S-34, is an archery-only unit, with both ewe and ram licenses offered in the GMU. The herd is managed for hunting opportunity, especially for mature rams, and as a source herd for transplants. The eastern boundary of RBS-14 is within the Colorado Springs city limits, and sheep from the herd are often found in local attractions on the west side of the city (i.e., Garden of the Gods park or Glen Eyrie), which creates a watchable wildlife opportunity for residents and visitors. The GMU encompasses 16,600 acres of potential bighorn sheep habitat in Teller and El Paso counties. However, the herd only uses a small fraction of the available habitat (~2,750 acres), which includes a limited amount of public land managed by the US Forest Service. To minimize hunter crowding on public lands, CPW currently offers three separate hunting seasons: October 1-14 for ewe licenses, October 15-31 for 1st season ram licenses, and December 1-15 for 2nd season ram licenses. However, in recent years, the herd is frequently on private property during these seasons, which creates a challenge for sportspersons trying to access the herd. Harvest rates for the 1st season October ram licenses have become predictably low. For the last 4 years, the effective harvest rate of mature rams during the first ram season has been 0%. This low success rate is largely due to changes in the seasonal movement patterns of rams within the herd. Habitat use has shifted in more recent years from an area known as the "Scar", which is located on US Forest Service property and is accessible to the public, to being more reliant upon private property and neighborhoods on the city's edge. Bighorn sheep rams historically moved on to public land earlier in the season, yielding opportunity for hunters during the month of October. This pattern has, however, changed in recent years, in which rams are no longer moving to public lands during the month of October, but instead moving up in pursuit of breeding opportunities during the fall rut in November. In light of this, CPW staff are proposing changes to the season dates for the following hunt codes: Current: SMS3401A: October 15-31 SMS3402A: December 1-15 Recommended: SMS3401A: November 15-29 SM03402A: December 7-21 These dates will be fixed season dates; the same season dates will be applicable from year to year, providing a level of predictability and consistency for hunters and staff.	
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*.	
Outreach included discussions with hunters at mandatory checks and follow-up conversations after the seasons had concluded. Additionally, neighboring landowners and agency staff were engaged in conversations to clearly identify the issue and discuss potential solutions.	

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):	
1. *Preferred Alternative*: Change the season dates for these two hunt codes: Recommended Season Dates: SMS3401A: November 15-30 SM03402A: December 7-21 2. Status quo: Current Season Dates: SMS3401A: October 15-31 SMS3402A: December 1-15	
Issue Raised by:	Corey Alder (Area 14 DWM), Ty Woodward (Area 14 Wildlife Biologist)
Author of the issue paper (if different than person raising the issue):	Ty Woodward
CC:	Tyrel Woodward (Area 14 Biologist), Tim Kroening (Area 14 AWM), Corey Adler (Area 14 DWM)
APPROVED FOR FURTHER CONSIDERATION BY:	Brian Dreher, 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	Southeast Terrestrial
RECOMMENDED FOR CONSENT AGENDA?	Yes
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	Yes

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should the following mountain lion regulation changes (harvest limit group composition) presented in the approved East Slope Mountain Lion plan be implemented beginning in the April 2026-March 2027 lion season?
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DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

The East Slope Mountain Lion Management Plan was approved on November 15, 2024 by the Parks and Wildlife Commission (PWC). The harvest limit Game Management Unit (GMU) grouping regulation changes necessary to implement the plan, beginning in April of 2025, were included in that document and required harvest limit group composition changes across two lion seasons (2025-2026 and 2026-2027). The first and most significant round of changes are being implemented in this current season that begins on November 24, 2025. This issue paper implements the second year's harvest limit GMU group changes already approved in the East Slope Lion Management Plan.

The 2026-2027 changes proposed in this issue paper will be implemented following completion of the Upper Arkansas lion research project, a decade-long mountain lion study conducted in the Upper Arkansas River drainage. Field work for the project will conclude at the end of the winter of 2025-2026. Harvest limit groupings for the GMUs covering the research area were maintained for the final year of the Upper Arkansas study design, and need to be combined as approved in the East Slope Mountain Lion Management Plan.

- 1) Harvest Limit groups (Chapter W-2, #242 A.3.): The top of the table shows the current status of the four 2025-2026 harvest limit GMU groups that need to be combined for 2026-2027. Under this proposed regulation, these current four harvest limit groups would be combined into two harvest limit groups, as shown at the bottom of the table.

Harvest Limit Group Hunt Code	List of GMUs in harvest limit group (2025-2026)
LE048O1R	48, 56, 481, 561
LE049O1R	49, 57, 58, 581
LE085O1R	85, 851
LE069O1R	69, 84, 86, 691, 861

Harvest limit groups above change to groups below

Harvest Limit Group Hunt Code	List of GMUs in harvest limit group (2026-2027)
LE048O1R	48,49,56,57,58,481,561,581
LE069O1R	69,84,85,86,691,851,861

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 represents the harvest limit group regulations that were put forth in the East Slope Mountain Lion Management Plan. Therefore, these proposed regulations were explicitly part of the later

phases of public outreach, plan drafting and review process. The process of reviewing the draft plan included 4 weeks of online comments and outreach to stakeholder groups. Additionally, these regulations were presented at the August 2024 and November PWC meetings, so interested parties were also notified and provided an opportunity for input as part of that process.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Revise mountain lion regulations for the license year beginning in April 2026 to implement the aforementioned GMU harvest limit group changes approved in the East Slope Mountain Lion Management Plan.
2. **Status quo.** This would not allow implementation of harvest limit GMU groups as approved in the East Slope Plan.

Issue Raised by:	Mark Vieira, Carnivore and Furbearer Program Manager
Author of the issue paper (if different than person raising the issue):	
CC:	Julie Stiver, Lance Carpenter, Frank McGee, Mark Leslie, Sherri Huwer, Matt Eckert, Katie Gray
APPROVED FOR FURTHER CONSIDERATION BY:	Brian Dreher, Assistant Director
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?	YES

ISSUES SUBMITTAL FORM

Date: 10/31/2025

ISSUE:	Should mountain lion harvest limit groups LE60O1R (GMUs 60, 61, 70 West, 72 and 73) and LE062O1R (GMUs 62, 64, 65, 70 East, 71, and 711) be reorganized, and the split in GMU 70 be removed?
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DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):

Southwest Region staff are proposing a reorganization of the Game Management Units (GMUs) included in mountain lion harvest limit groups LE060O1R and LE062O1R into groupings that are more logical, both biologically and geographically. Mountain lion harvest limit group LE060O1R, which is labeled as L-50 in the West Slope Mountain Lion Management Plan, currently includes Game Management Units (GMUs) 60, 61, 70 West, 72, and 73. Harvest limit group LE062O1R, which is labeled as L-51 in the West Slope Plan, currently includes GMUs 62, 64, 65, 70 East, 71, and 711 (Figure 1). GMUs 60, 61, 62, 64, 65, 70 East, and 70 West are within Area 18 while GMUs 71, 72, 73, and 711 are within Area 15. This arrangement of GMUs has been in place since 2021 when the West Slope Mountain Lion Plan went into effect. For several decades prior, most of these had individual harvest limits applied to each GMU. The exception was GMUs 71 and 711, which were arranged in a harvest limit group of two GMUs for a number of years prior to being included in the current harvest limit group.

From 2004 to 2015 the mountain lion research project on the Uncompahgre Plateau had a study area boundary that included the southern half of GMUs 61 and 62 and a small part of GMU 70. During the hunting seasons from 2004 to 2008 the research area was closed to mountain lion hunting, then hunting resumed for the 2009 to 2014 hunting seasons where the research area had its own harvest limit (Logan and Runge 2020). After the conclusion of the research project, individual harvest limits were applied to each GMU until the formation of the current harvest limit group structure in 2021.

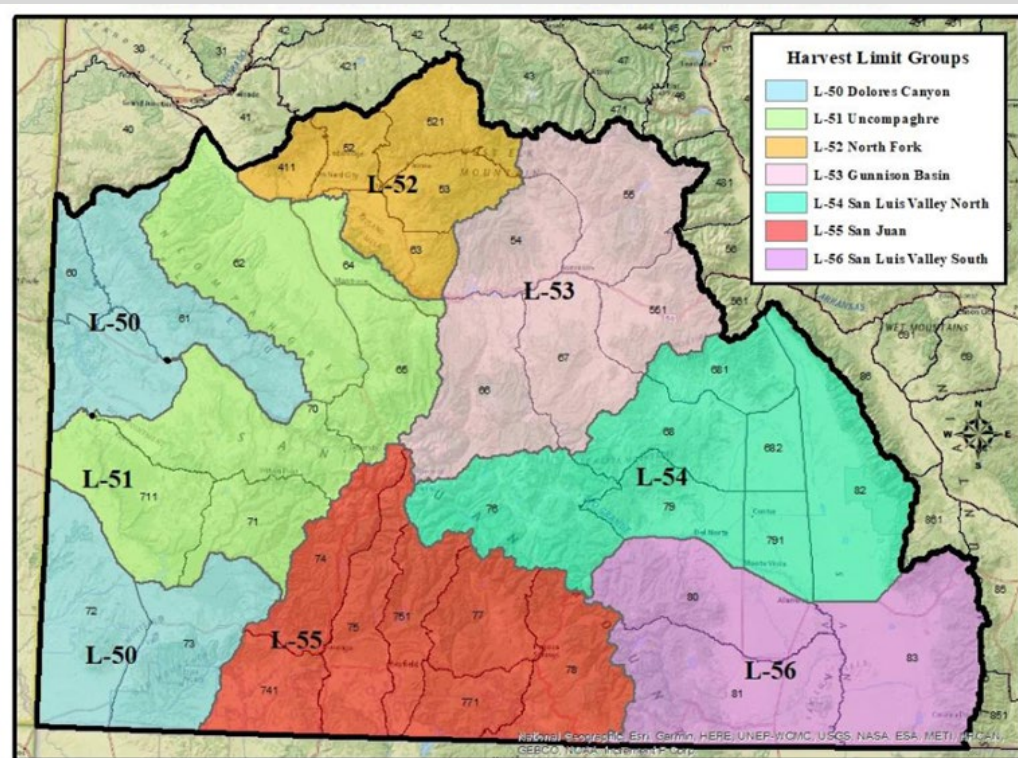


Figure 1. map of harvest limit groups in the Southwest Region from the West Slope Mountain Lion Plan.

Harvest limits for the individual GMUs (GMU 62, 64, 65, and 70 East) and harvest limit group (71, and 711) that now make up LE06201R varied over time, but the sum of these harvest limits from 2015 to 2020 averaged 39.7 with a high total harvest limit of 42 in 2019 and 2020 (Table 1). With the implementation of the current harvest limit group LE06201R the harvest limit was set at 48 mountain lions and remained at that level for the last four years. There were 33, 44, 37, and 28 total mountain lions harvested in LE06201R over the last 4 years respectively, which is consistently below the harvest limit of 48.

	62		64		65		70E		71 and 711		Total		L51 group	
Year	Harv. Limit	Total Harv.	Harv. Limit	Total Harv.	Harv. Limit	Total Harv.	Harv. Limit	Total Harv.	Harv. Limit	Harvest	Harv. Limit	Total Harv.	Harv. Limit	Total Harv.
2015	9	8	5	0	5	5	10	4	9	9	38	26		
2016	9	10	5	3	5	5	10	9	9	10	38	37		
2017	9	9	5	3	5	5	10	9	9	9	38	35		
2018	9	9	5	1	7	8	10	8	9	8	40	34		
2019	9	9	5	4	7	7	10	8	11	8	42	36		
2020	9	10	5	2	7	7	10	10	11	8	42	37		
2021													48	33
2022													48	44
2023													48	37
2024													48	28

Table 1. Harvest limits by GMU or harvest limit group from 2015 to 2024.

The southern portion of GMU 62 is a popular area for lion hunters and has been for years due to its accessibility with roads in high quality lion habitat and its proximity to the Montrose area. GMU 65 became very popular for lion hunters when the Uncompahgre Plateau lion research project temporarily closed the southern portions of GMU 61 and 62 to lion hunting. Once the research area opened again to hunting, the popularity of hunting mountain lions in GMU 65 remained very high and both GMU 65 and the southern part of GMU 62 attract a proportionally higher amount of lion hunting pressure than the surrounding units and areas. Prior to the formation of the current harvest limit groups, the harvest limit in GMU 65 was consistently met every year prior to the end of the season, at which point the pressure from running hounds in the unit would end. In GMU 62, lion harvest reached the harvest limit five of the six years from 2015 to 2020. The other units including 64, 70 East, 71, and 711, have not met their harvest limit as consistently as GMU 62 and especially GMU 65. Since 2021, GMUs 65 and the southern portion of 62 have experienced additional pressure from lion hunters later into the season than previously. Harvest of lions in GMU 62 and 65 increased within the first two years of implementing the new plan as a result of increased hunting pressure in those units. In subsequent years, harvest declined while hunting pressure remained at an elevated level in those two GMUs (Figure 2). Since the implementation of the current harvest limit groups, there has been a marked increase in mountain lion activity and conflicts within the human populated areas around Montrose and Ridgway.

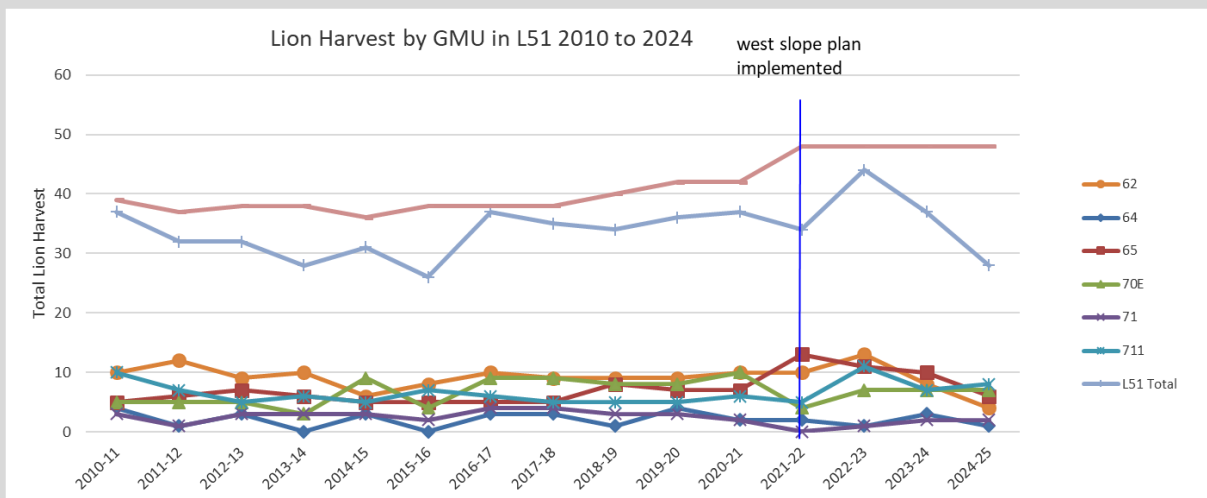


Figure 2. Mountain Lion harvest in LE06201R (L-51) by GMU from 2010 to 2024.

Under current management as L-51, the higher hunting pressure areas of GMUs 62 and 65 are included with the lower hunting pressure GMUs of 70 East, 71, and 711 under a single harvest limit. This has led to hunting pressure on the east side of L-51 that continues until the season end. The proposed harvest limit group change would redistribute lion hunting pressure and would allow for the higher pressure east units to close when the harvest limit is met, while continuing to allow opportunity for lion hunting in the lower pressure units to the west and south. We propose to adjust the GMUs in the harvest limit groups of L-50 and (LE60O1R) and L-51 (LE62O1R) into three harvest limit groups.

In addition, GMU 70 has been managed as a split game management unit with two individual harvest limits since at least the mid-1990s. GMU 70 East includes the higher elevation portion of the unit from the San Juan Mountain Range around Telluride down to Highway 141. GMU 70 West includes the lower elevation part of the unit from Highway 141 to the Colorado-Utah border, where the primary feature is the Dolores River Canyon. This split was originally established to encourage more harvest of mountain lions in the western portion of GMU 70, where desert bighorn sheep were reintroduced beginning in the 1990s in an attempt to reduce potential predation of the newly established bighorn sheep population. Over the years, with the successful establishment of the desert bighorn sheep population, the management of mountain lions in GMU 70 shifted so that more harvest was allowed in the eastern portion of the GMU, where harvest limits were rarely met in the last several decades. This, in combination with the current trend to move towards managing mountain lions and analyzing harvest data at larger landscape scales, negates the need for GMU 70 to be split. Due to the complexity it creates for harvest data management, we propose to remove the split for GMU 70 for mountain lions and include the entirety of GMU 70 in one harvest limit group.

The new proposed harvest limit groups better align with landscape geographic features and local ungulate movements to winter ranges.

Preferred Alternative:

Due to the differing interests and management goals across the GMUs that make up LE60O1R and LE62O1R, we propose to reorganize these GMUs into three separate harvest limit groups. The first group would include GMUs 60, 61, and all of Unit 70 (pale yellow on the map in Figure 3). The second harvest limit group would include GMUs 62, 64, and 65 (green on the map in Figure 3). The third harvest limit group would include 71, 72, 73, and 711 (blue on map in Figure 3). In addition, we propose to remove the split in GMU 70 to make data management more streamlined and efficient (Figure 3).

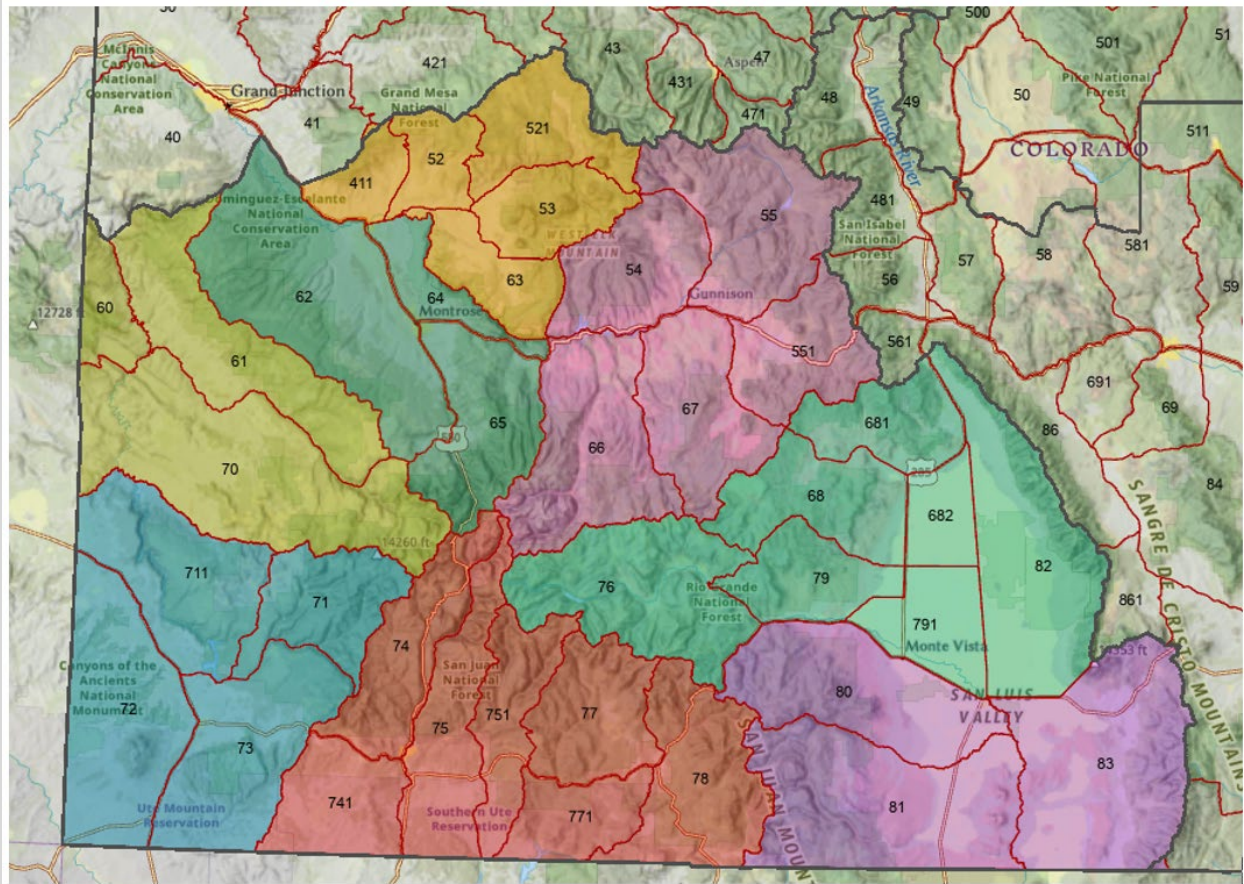


Figure 3. The proposed new harvest limit groups for mountain lions in the Southwest Region.

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*.**

Stakeholders include lion hunters, private landowners, outfitters, and local residents. Informal conversations with stakeholders have taken place.

ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):

1. ***Preferred Alternative*:** Reorganize the Game Management Units in LE06001R and LE06201R into three harvest limit groups. The first group would include GMUs 60, 61, and all of Unit 70. The second harvest limit group would include GMUs 62, 64, and 65. The third harvest limit group would include 71, 72, 73 and 711. Remove the split in GMU 70.

2. Status quo

Issue Raised by:

Matt Ortega, Kelly Crane, Evan Phillips

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

Evan Phillips

CC:	Jamin Grigg, Brad Weinmeister, Mark Vieira, Rachel Sralla, Adrian Archuleta, Cory Chick
APPROVED FOR FURTHER CONSIDERATION BY:	Cory Chick, Jamin Grigg
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
RECOMMENDED FOR CONSENT AGENDA?	YES
COMPLIES WITH THE BIG GAME SEASON STRUCTURE	Yes