

## ISSUES SUBMITTAL FORM

	Date: 11/01/24
<b>ISSUE:</b>	<b>Should the regulation that allows for the take of coyotes by a hunter with an unfilled big game license be removed?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>Currently, big game hunters with an unfilled big game license can take coyotes under a provision allowing harvest during the season with the same method of take as their big game license. Hunters that drew their big game license during the limited license draw are required to purchase a qualifying license, which includes a resident or nonresident small game license as an option to meet that requirement. Unlimited and leftover limited big game licenses don't require a qualifying license. Recent data show that 89% of resident and 71% of non-resident big game license holders possess a small game or furbearer license.</p> <p>Coyotes may be harvested under a small game license, without the hunter needing to buy a furbearer harvest permit, but small game, waterfowl, and coyote hunters must register with the Harvest Information Program (HIP). HIP registration allows CPW to identify a small game, waterfowl, and coyote hunter survey sample and produce annual harvest estimates, including for coyote. However, big game license holders taking coyotes under the unfilled big game provision aren't required to register for HIP and, therefore, are not included in the CPW annual small game harvest survey, which includes a specific question to estimate coyote harvest.</p> <p>Removing this regulation, which allows big game hunters to take coyotes on an unfilled big game license, will address three issues.</p> <ol style="list-style-type: none"> <li>1) It removes a secondary, redundant method, to take coyotes during big game seasons that is already met by almost all big game hunters, as a strong majority already possess a small game license either as a qualifying license or because of their additional interest in hunting small game.</li> <li>2) It improves the coyote harvest estimation. This provision for coyote take on an unfilled big game license keeps those coyotes harvested under that provision from being appropriately included in the harvest estimate, which is derived from the HIP sample of small game and coyote hunters. By removing this regulation, CPW can improve the accuracy of the coyote harvest estimates, while not imposing a significant reduction in coyote harvest opportunity during the big game seasons.</li> <li>3) It addresses a possible law enforcement issue related to HIP registration and coyotes. While not in the brochure, on the IPAWS license pages, CPW recommends that big game hunters purchasing a small game license solely to meet the qualifying license requirement with no intention to hunt small game, waterfowl, or coyotes, not register for HIP. Those big game hunters possessing a small game license, who intend to hunt small game, waterfowl or coyotes need to register for HIP. Therefore, a hunter that takes a coyote during the big game seasons before filling his/her big game tag (allowing the take of coyote), but also holds a small game license (allowing the take of coyote) and hasn't registered for HIP, could be in an unclear regulatory situation relative to HIP registration.</li> </ol> <p>CPW proposes to delete <b>Chapter W-2, regulation #207, F</b> and the sentence related to coyote take on unfilled big game licenses in <b>Chapter W-3, regulation #304, B</b> from regulations, along with a more clear rewrite of <b>Chapter W-3, regulation #304..</b> Removing this provision will not impact coyote harvest opportunity for nearly all big game hunters, will improve coyote harvest estimates, and will not create a</p>	

confusing regulatory scenario for big game hunters possessing a small game license that do take coyotes during big game seasons.

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

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

This issue paper was discussed with leadership from the Colorado Trappers and Predator Hunters Association (CTPHA).

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\*:** The preferred alternative is to revise the regulations as redlined below:

**Chapter W-2: regulation #207 Season Participation**

~~**F. Any person may take coyotes with an unfilled big game license in the same unit and season and by the same manner of take.**~~

**Redline all of Chapter 3: #304 with new proposed #304 section below.**

Chapter 3: #304 - License Requirements Except as provided in 33-6-107(9) C.R.S., the following license requirements shall apply:

A. A small game license authorizes the take of coyotes and those species defined in #300(D) as small game, except wild turkey. A turkey license is required to take wild turkey.

B. A small game license combined with the purchase of a furbearer harvest permit authorizes the take of those species defined in #300(D) as small game, except wild turkey, and authorizes the take of all species defined in #300(B) as furbearers. An annual furbearer harvest permit can be purchased for \$10.00.

C. Any small game and fishing combination license combined with the purchase of a furbearer harvest permit authorizes the take of those species defined in #300(D) as small game, except wild turkey, and authorizes the take of all species defined in #300(B) as furbearers.

D. A furbearer license authorizes the take of all species defined in #300(B) as furbearers.

E. A youth small game license authorizes the take of all species defined in #300(D) as small game and all species identified in #300(B) as furbearers.

F. Common snapping turtles may be taken with either a small game license or a fishing license.

G. Each hunter must register their intent to hunt migratory birds, small game or coyotes by completing a Harvest Information Program (HIP) survey online ([www.cpwshop.com](http://www.cpwshop.com)) or by calling (1-855-521-3050) prior to their first hunting trip of the season. For the purposes of this regulation, "season" means the period March 1 through March 31 of the following year.

**2. Status quo**

<b>Issue Raised by:</b>	Brian Dreher, Assistant Director
<b>Author of the issue paper</b>	Mark Vieira, Carnivore and Furbearer Program Manager, and Brad Banulis, NW Senior Biologist

<b>(if different than person raising the issue):</b>	
<b>CC:</b>	Travis Black, NWRM, Matt Eckert, Deputy Assistant Director
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Brian Dreher
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>NO</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/24	
<b>ISSUE:</b>	<b>Should a first rifle, antlered deer season be established in D-3 (North Park)?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>The North Park deer herd in data analysis unit (DAU D-3) is located within Jackson County and consists of five game management units (GMUs): 6, 16, 17, 161, and 171.</p> <p>A recent mule deer migration study in D-3 revealed a significant shift in the herd's winter behavior from predominantly resident to migratory. Prior to the 1990s, nearly the entire herd utilized historic winter ranges within D-3. It is hypothesized that decades of liberal tag allocations and late season structures resulted in a significant number of these resident deer being harvested. Simultaneously, a small cohort of migratory deer, which utilized winter range in Wyoming and departed before the Colorado hunting season (thus encountering low rates of harvest pressure), became the dominant subgroup in D-3.</p> <p>As documented in this migration study, approximately 80% of D-3 deer now migrate to Wyoming each fall. This behavior presents challenges associated with inter-state wildlife management and an increased risk of Chronic Wasting Disease transmission. Among the remaining 20%, many deer migrate south to winter in Middle Park, with a very small subset continuing to use the historic winter range in North Park.</p> <p>CPW aims to revitalize the cohort of deer utilizing the historic North Park winter range by increasing harvest pressure on the migratory subset of the population. CPW believes this objective can be achieved by reallocating some third and fourth season rifle tags to the first and second rifle seasons. As such, staff proposes creating first rifle season deer hunt codes specific to each GMU in D-3.</p> <p>In addition to the biological objective, the addition of a first season hunt code may improve hunter satisfaction in the later rifle season by redistributing licenses across four regular rifle seasons, instead of three.</p>	
<p><b>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:</b></p> <p><b>*IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.</b></p>	
<p>External publics impacted are hunters, wildlife viewers, residents, travelers, as well as commercial operations. In addition, many Jackson County residents have commented that they would like to see mule deer return to the historic local winter range in North Park.</p> <p>Internal parties are Area 10 DWM's and staff who support the change.</p> <p>Outreach has been conducted through conversations with stakeholders as well as a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.</p>	
<b>ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):</b>	

**1. \*Preferred Alternative\*:** Establish 5 GMU-specific antlered deer hunt codes valid during the 1<sup>st</sup> regular rifle season. Hunt codes:

- DM006O1R
- DM016O1R
- DM017O1R
- DM161O1R
- DM171O1R

**2. Status quo**

<b>Issue Raised by:</b>	<b>AAWM Josh Dilley, DWM Jacob Way, DWM Zach Weaver, and Terrestrial Biologist Eric VanNatta</b>
<b>Author of the issue paper (if different than person raising the issue):</b>	
<b>CC:</b>	Kris Middledorf, AWM, Travis Black, NWRM, Garrett Watson NWDRM, Brad Banulis, NWSB
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/24	
<b>ISSUE:</b>	<b>Should an early antlerless deer rifle season be established in D-3 (North Park)?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>The North Park deer herd in data analysis unit (DAU D-3) is located within Jackson County and consists of five game management units (GMUs): 6, 16, 17, 161, and 171. As of 2024, D-3 is within the established population objective range of 4,000 – 6,000 animals (post-hunt 2023 estimate: 4,545).</p> <p>D-3 has historical precedence for implementing antlerless deer harvest. In 2013, CPW removed this opportunity in response to several years of high winter mortality, which resulted in this population falling below objective. CPW believes this herd is once again biologically capable of sustaining a limited harvest of antlerless deer, and seek to establish an early season rifle antlerless deer hunt code (aligning with the current early rifle season for antlered deer).</p> <p>CPW will closely monitor D-3's population performance and conservatively set license quotas to create sustainable hunting opportunities.</p>	
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<b>*IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.</b>	
<p>External publics impacted are hunters, wildlife viewers, residents, travelers, as well as commercial operations.</p> <p>Internal parties are Area 10 DWM's and staff.</p> <p>Outreach has been conducted through conversations with stakeholders as well as a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.</p>	
<b>ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):</b>	
<ol style="list-style-type: none"> <li>1. <b>*Preferred Alternative:</b> Convert DM006O1A to DE006O1A, add DF006O1M, and add DF006E1R. Each of these new hunt codes would be valid DAU-wide (GMUs 6, 16, 17, 161, and 171) and classified as list A.</li> <li>2. <b>Alternative 2:</b> Convert DM006O1A to DE006O1A, convert DM006O1M to DE006O1M, and add DF006E1R. Each of these new hunt codes would be valid DAU-wide (GMUs 6, 16, 17, 161, and 171) and classified as list A.</li> <li>3. <b>Alternative 3: Status quo</b></li> </ol>	
<b>Issue Raised by:</b>	AAWM Josh Dilley, DWM Jacob Way, DWM Zach Weaver, and Terrestrial Biologist Eric VanNatta
<b>Author of the issue paper</b>	

<b>(if different than person raising the issue):</b>	
<b>CC:</b>	Kris Middledorf, AWM, Travis Black, NWRM, Garrett Watson NWDRM, Brad Banulis, NWSB
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

## ISSUES SUBMITTAL FORM

	Date: 11/01/24
<b>ISSUE:</b>	<b>Should limited first rifle season antlered and antlerless deer hunt codes be added to select units in data analysis units D-19, D-23, D-24, D-40, and D-57?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>The newly approved 2025-2029 Big Game Season Structure includes the option to create new first regular rifle deer hunt codes to allow for more management flexibility to reach biological objectives outlined in herd management plans. CPW proposes to create first rifle season deer hunt codes in several data analysis units (DAUs). D-19, D-23, D-24, D-40, and D-57 are all mule deer DAUs located in southwestern Colorado, near Montrose, Nucla, and Gunnison, Colorado (Figure 1). The game management units (GMUs, which make up DAUs) included in the new proposed hunt codes for the first rifle season are GMU 60 (D-23); GMUs 61 and 62 (D-19); GMUs 64 and 65 (D-40); GMU 70 (D-24); and GMUs 54, 55, and 551 (D-57). The table below describes the demographics for each herd (Table 1). The first rifle season will be used as a tool to help reach management objectives for these herds and alleviate local issues such as increasing Chronic Wasting Disease (CWD) prevalence and hunter overcrowding concerns during the second and third regular rifle seasons.</p> <p>CWD prevalence is high in some units (D-19, D-23), while some units have lower CWD prevalence, but have small “hot spots” where CWD-positive deer concentrate (D-24). In order to limit the spread of this deadly disease, 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. The Uncompahgre Valley, including portions of GMUs 62, 64, and 65, already has an early season either-sex hunt that occurs in August. This hunt focuses on hunting resident deer populations located in “hot spots” within the agricultural and residential areas of the Uncompahgre Valley where the highest disease prevalence exists. Over the last four years, this hunt has proven successful at removing CWD-positive resident deer before lower-prevalence migratory deer move down into the Valley during the winter months. A first rifle season deer hunt would allow hunters to further target resident deer in the lower elevations where prevalence is greatest. Therefore, the first-season deer licenses would be a valuable management tool in D-19, D-23, and D-24.</p> <p>In addition, forty-eight percent (48%) of deer hunters reported feeling moderately to very crowded in these DAUs during the second and third general rifle seasons, according to 2023 opt-in hunter survey results. Another 29% reported feeling slightly crowded. Similarly, 43% of elk hunters reported feeling moderately crowded in these DAUs during the same overlapping seasons, with another 29% of elk hunters reporting that they felt slightly crowded. Adding first rifle deer licenses would help limit hunter crowding that occurs in the second and third seasons. These seasons run concurrently with unlimited over-the-counter elk seasons in many GMUs, often resulting in hunter crowding concerns and a less than satisfactory hunting experience for deer hunters. Redistributing licenses from these seasons into the first season will help spread out hunters temporally, likely improving hunter satisfaction. Success rates may also improve if there is less pressure on the landscape, making it more likely for hunters to encounter deer more often. Managers plan on using the first season to alleviate crowding issues in DAUs D-19, D-24, D-40, and D-57.</p>	

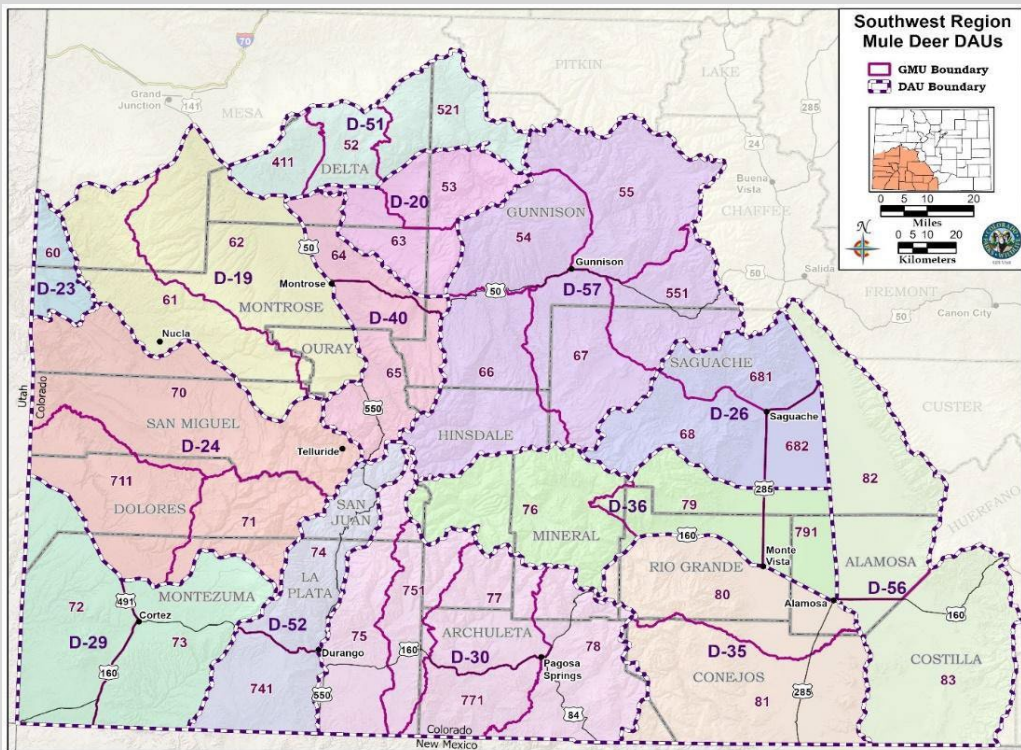


Figure 1. Data analysis units (DAUs) and game management units (GMUs) located in Southwest Colorado.

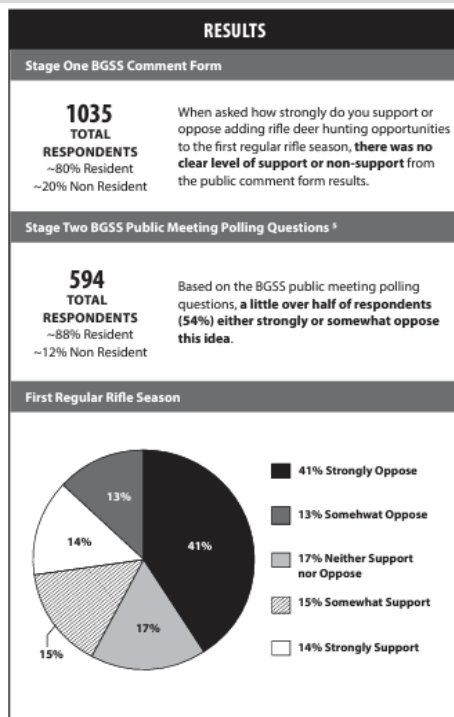
Table 1. Deer herd demographics for D-19, D-23, D-24, D-40, and D-57.

DAU	Current Population	Population Objective Range	Population Trend	Current Observed Buck Ratio	Buck Ratio Objective Range	CWD Prevalence*
D-19	11,200	12,000-15,000	Increasing	28	30-35	13.8%
D-23	1,700	1,500-1,800	Increasing	28	20-25	21.0%
D-24	21,000	19,000-23,000	Increasing	26	23-28	3.1%
D-40	6,500	6,500-8,500	Increasing	17	22-27	3.7%
D-57	18,000	17,000-20,000	Increasing	44	35-40	0.0%

\*CWD prevalence estimates gathered during mandatory testing. Testing years ranged from 2020-2022.

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Extensive public comment on the subject was gathered during the Big Game Season Structure process.

The primary concerns the public expressed regarding first-season rifle deer licenses were the potential for overcrowding during the first elk season, the potential for elevated pressure in alpine areas, and the potential to decrease buck numbers and limit the variety of age classes.

To alleviate these concerns, CPW will allocate a limited number of licenses to this season. Additionally, these seasons generally won't result in an overall addition of licenses, but rather shifting licenses from the later seasons. This will shift hunting pressure on deer during the rifle seasons and will reduce hunter crowding during the second and third rifle seasons. Additionally, many of these first rifle deer licenses will be used on private lands, limiting impacts to public land hunters.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

- \*Preferred Alternative\*:** Add first regular rifle season hunt codes to DAUs
  - D-19: DM061O1R, DM061P1R, DM062O1R and DM062P1R
  - D-23: DM060O1R and DM060P1R
  - D-24: DM070O1R and DM070P1R
  - D-40: DM064O1R and DM065O1R
  - D-57: DF054O1R, DF055O1R and DF551O1R
- Status quo:** Continue without adding hunt codes to the first regular rifle season in DAUs D-19, D-23, D-24, D-40, and D-57.

<b>Issue Raised by:</b>	Area 18 staff, Area 16 staff, Alyssa Meier, Alyssa Kircher, Brandon Diamond, Rachel Sralla
<b>Author of the issue paper (if different than person raising the issue):</b>	
<b>CC:</b>	Jamin Grigg, Cory Chick
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Cory Chick, Jamin Grigg
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial Section
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/2024

**ISSUE:** **Should regulation #271(A)(2) be modified to allow for management flexibility as it pertains to special population management efforts for cow elk in the Ranching for Wildlife program?**

**DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):**

A primary goal of the Ranching for Wildlife (RFW) program is to cooperatively work with private landowners to assist CPW with wildlife management priorities. This can include additional harvest of female ungulates where herds are over objective or causing game damage issues. One tool that can be employed is the use of “special population management licenses” as outlined in Chapter W-2, regulation #271(A)(2). This has been an effective tool to assist RFW enrolled ranches in supporting CPW herd management objectives. As currently written, this regulation requires that if the special management license is made available on a ranch, that it must be for all seasons and sexes of the species for which it is applied. This does not allow for the selective use of these licenses to meet the needs of management objectives being targeted and additionally, it has unintended consequences including: unrealistic expectations from hunters holding two elk licenses, increased competition between hunters, game law violations, and increased pressures on all seasons within ranch boundaries and on the target species.

To remedy these issues and apply better management towards herd objectives, CPW proposes amending the regulation to allow for the application of the special population management license for specific RFW seasons on an RFW enrolled ranch. An example of this would be: For a ranch that has three public elk seasons, the special management license could be applied to only the latest season to assist with game damage issues. The prior two seasons would not have the special population management vouchers and so hunters would only have their primary license. The number of special population management licenses issued via private vouchers would be equal to the total number issued on public licenses. As the regulation is currently written it would be applied to all three seasons (in the above example) and any private seasons with every licensed elk hunter eligible to have an additional special population management license.

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RFW collaborating ranches have been engaged and are in favor of this regulation change.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\***: Amendment to current regulation.

**Chapter W- 2, regulation #271(A)(2) :**

The Director shall have the authority to allocate antlerless deer and/or elk licenses on existing Ranching for Wildlife properties located in game management units where deer or elk populations significantly exceed the population objective. These licenses shall be in addition to the number of licenses allocated to each ranch pursuant to the Cooperative Agreement established in #210(A)(2). The additional allocation and use of the antlerless licenses provided for in this section shall be ~~allocated by season(s) and quota(s) in the same proportion, by species (not sex), as~~ established in the ranch’s respective Cooperative Agreement and subject to the following provisions:

- a. No ranch shall be required to accept any additional antlerless licenses.
- b. The public allocation of such additional antlerless licenses shall only be offered to

hunters who have successfully drawn antlered, either-sex or antlerless licenses for the same species on the ranch. Public hunters who choose to purchase one additional antlerless license from the Division shall be required to use the additional license during the season established for the license for which they drew. No more than one additional antlerless license will be available to any public hunter.

c. The allocation of such additional antlerless licenses for private seasons shall be equal to, and not to exceed, the total number of additional antlerless licenses allocated to public hunters.

**2. Status quo**

<b>Issue Raised by:</b>	Ray Aberle, Ranching for Wildlife Coordinator
<b>Author of the issue paper (if different than person raising the issue):</b>	
<b>CC:</b>	Darby Finley, Becca de Vergie, Josh Dilley, Mike Swaro
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>NO</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial Programs/Areas
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/24	
<b>ISSUE:</b>	<b>Should a PLO either-sex archery hunt code be created in DAU E-10?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>The newly approved Big Game Season Structure for 2025-2029, limits archery licenses for non-residents, while still allowing resident archers to acquire over-the-counter (OTC) archery licenses. Elk data analysis unit (DAU) E-10, the Yellow Creek elk herd, has a high proportion of private lands that elk use during the archery season. Currently, the Yellow Creek elk herd is estimated at just over 16,000 elk, above the objective range of 7,000-9,000. Harvest in this DAU can be difficult due to large acreages of private lands at high elevations that hold elk and can be refuges. Increasing general licenses leads to increased crowding and potentially pushing animals to private land refuges.</p> <p>Creating a PLO archery hunt code would allow for resident and non-resident hunters to draw a license valid on private lands within limited GMUs where OTC licenses were previously utilized. Creating a PLO hunt code would benefit landowners, who rely on income from non-resident hunters, by allowing hunting clients to apply for a license valid on private lands. The creation of this hunt code would not affect hunter-crowding issues on public land, which the new license limitation was intended to address. It will allow for an additional license quota for resident and non-resident hunters to apply for that traditionally hunted on private lands with OTC licenses and help minimize competition for the limited license quota valid on public and private lands. The creation of a PLO archery elk hunt code would be consistent with other methods of take that have limited license quotas.</p>	
<b>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:</b>	
<b>*IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.</b>	
<p>Stakeholders include:</p> <ul style="list-style-type: none"> <li>• General public - public land archery elk hunters – informal conversations have taken place over the years</li> <li>• Landowners</li> <li>• Private land outfitters</li> </ul> <p>Outreach has been conducted through conversations with stakeholders as well as a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.</p>	
<b>ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):</b>	
<ol style="list-style-type: none"> <li>1. <b>*Preferred Alternative*</b>: Create Private land only archery hunt code, EE021P1A, valid in GMUs 21, 22, 30, 31, and 32, from September 2nd-30th.</li> <li>2. <b>Status quo</b></li> </ol>	
<b>Issue Raised by:</b>	Darby Finley, Area 6 Biologist, Johnathan Lambert, AWM, Kirk Oldham, AWM and Area 6 and 7 staff
<b>Author of the issue paper (if different than person raising the issue):</b>	

<b>CC:</b>	Travis Black, NWRM, Garrett Watson, DRM, Brad Banulis, NW Senior Bio
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/24

**ISSUE:** Should the late antlerless elk seasons in DAU E-13 (GMUs 28, 37 & 371) be eliminated?

**DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):**

The Williams Fork elk herd, Elk data analysis unit (DAU) E-13, includes game management units (GMUs) 28, 37, and 371. The post-hunt elk population in E-13 has historically been above objective, which was set at 4,500 – 5,700 animals in the 2010 DAU plan. From 1991-2006, the average population of E-13 fluctuated between 6,000-7,000 animals. The modeled population reached the objective range in 2013, then began declining steadily in 2017 and dropped below the objective range in 2018. The current 2023 post-hunt population estimate is approximately 2,900 elk (Figure 1).

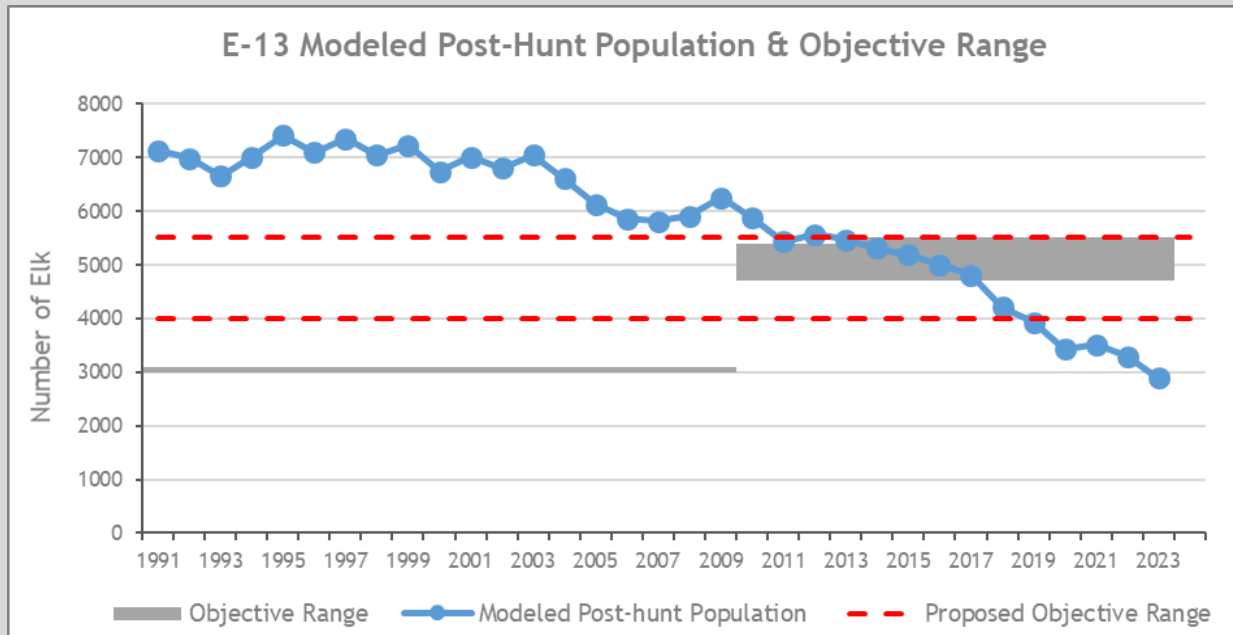


Figure 1. E-13 Population estimates in relation to population objectives, 1991-2023.

For the past two decades, management goals in E-13 have been to bring the size of this elk herd down within the objective range using liberal cow elk harvest, including a late antlerless season. This season has generally had higher harvest success rates than the regular rifle seasons, and typically sells out. The late season cow licenses are List B; in 2020 they drew out at 3rd choice for residents, in 2022 they drew out at 2nd choice; and in 2023 at 1st choice.

Late season license numbers have been adjusted annually based on the population estimate and desired goals. Since 2020, late season licenses have been decreased systematically (along with decreases in PLO and regular rifles season licenses), with the overall goal of stabilizing the E-13 population within the objective range. License reductions were made conservatively at first due to the historical tendency of this herd to increase quickly back over objective. However, the E-13 population has failed to rebound in recent years and has continued to decline. For 2024, the late season antlerless licenses were reduced to the minimum of 10 for each hunt code, 20 total (Figure 2).

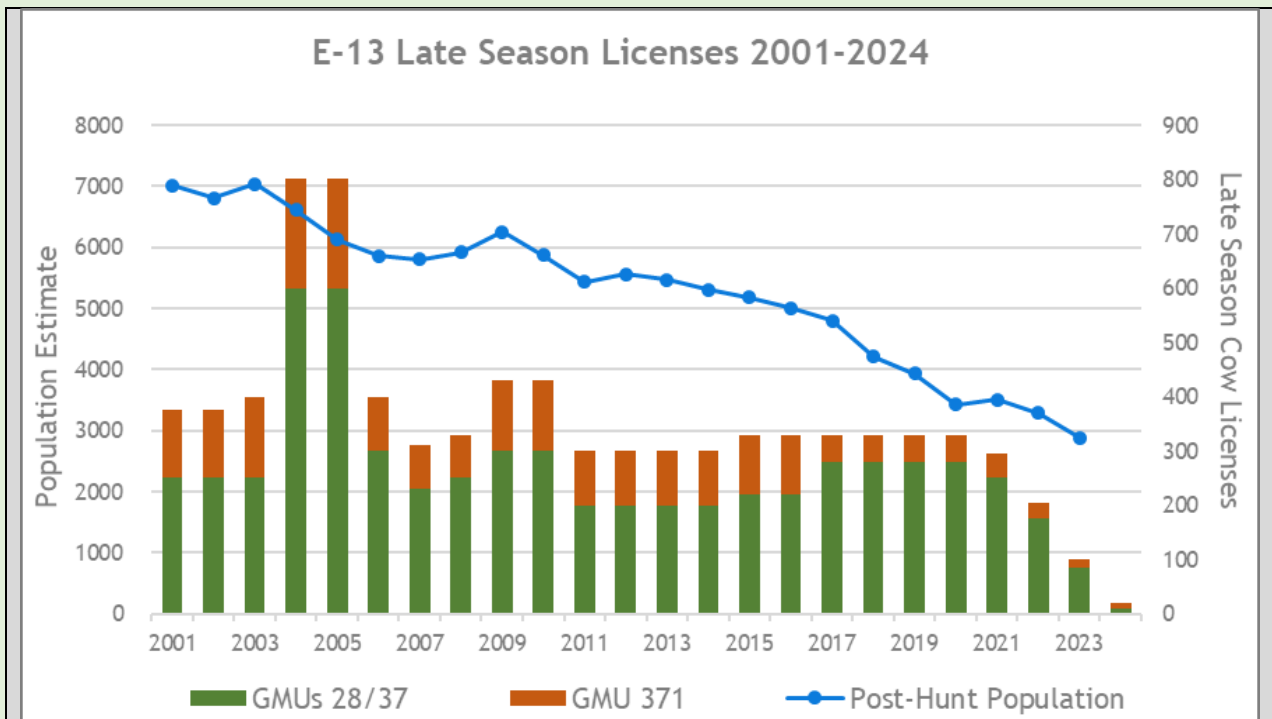


Figure 2. E-13 Late season cow license numbers relative to population estimates, 2001-2024.

The new proposed objective range in the draft NW Elk HMP is 4,000-5,500 elk. CPW believes that the late cow season is a tool that is no longer necessary to manage this herd due to this herd being approximately 40% below the current objective range and continuing to decline despite license reductions.

CPW has also received feedback and support from several entities including hunters, landowners, and other agencies regarding the new proposed population objective for E-13, which means growing the E-13 population by at least 30% from current numbers.

CPW proposes to eliminate the following two late season antlerless elk hunt codes for E-13, both of which are List B licenses:

- EF028L1R
- EF371L1R

**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\*.**

Some E-13 hunters will be impacted, as the late season cow licenses have been very popular locally because they are List B and can be acquired in addition to other elk licenses, and success rates have been relatively high when compared to the regular rifle seasons. However, in recent NW Elk HMP meetings and discussions with hunters, landowners and other management agencies, there is widespread agreement that E-13 numbers are low and that licenses need to be adjusted appropriately to limit harvest in order to increase the population, and there is support for eliminating these seasons.

Additional outreach has been conducted through a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\*:** Eliminate both late season antlerless elk hunt codes for E-13: EF028L1R and EF371L1-R
2. **Status quo:** Licenses would remain at the minimum of 10 per hunt code (20 total for DAU) until the population reaches the high end or exceeds the population objective range.

<b>Issue Raised by:</b>	Elissa Slezak (Area Wildlife Biologist), Brad Banulis (NW Senior Biologist), Area 9 Staff
<b>Author of the issue paper (if different than person raising the issue):</b>	Elissa Slezak (Wildlife Biologist)
<b>CC:</b>	Brad Banulis (NW Senior Wildlife Biologist) Jeromy Huntington (Area 9 AWM) Jeff Behncke (Area 9 Acting AWM)
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>NO</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

**ISSUES SUBMITTAL FORM**

Date: 11/01/24	
<b>ISSUE:</b>	<b>Should PLO archery hunt codes be created for previously limited archery elk DAUs/GMUs where OTC archery licenses are valid on private land?</b>
<b>DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):</b>	
<p>Elk data analysis units (DAU) E-2, E-6, and E-14 have limited archery hunting in select or all game management units (GMU). Furthermore, over-the-counter (OTC) either-sex and antlerless archery licenses have been valid on private lands in GMUs with limited quotas in DAUs E-2, E-6, and, more recently, E-14. The newly approved Big Game Season Structure for 2025-2029, limits archery licenses for non-residents, while still allowing resident archers to acquire OTC archery licenses. Since non-resident hunters will no longer have the opportunity to purchase OTC archery licenses, CPW is proposing to remove the regulation that allows for OTC either-sex and antlerless archery licenses to be used on private lands for units that are totally limited for resident and nonresident archery hunters.</p> <p>To address the reduced opportunity for hunting on private lands in the limited GMUs with OTC licenses, CPW proposes creating private land only (PLO) either-sex archery hunt codes to allow resident and non-resident hunters to apply for a license valid on private lands within DAUs E-2, E-6, and E-14. Creating this hunt code would not affect hunter-crowding issues on public land, which the new license limitation was intended to address. In fact, keeping hunting pressure on private lands may help distribute elk across private and public lands within these DAUs. The PLO hunt codes will also allow for an additional license quota for resident and non-resident hunters to apply for that traditionally hunted on private lands with OTC licenses and help minimize competition for the limited license quota valid on public lands. The creation of a PLO either-sex archery elk hunt code would be consistent with other methods of take that have limited license quotas.</p> <p>The preferred alternative is to remove the regulation allowing for the use of OTC on private lands in DAUs E-2, E-6, and E-14 and then create DAU-wide PLO hunt codes for DAUs E-2 and E-6, while E-14 gets split into PLO hunt codes for the north and south sides of the Grand Mesa. The second alternative removes OTC use on private lands and then creates more hunt codes just for the limited archery units following the same limited hunt code grouping as the general archery hunt codes.</p>	
<b>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:</b>	
<b>*IT IS ASSUMED THAT ALL NECESSARY INTERNAL PARTIES HAVE BEEN NOTIFIED*.</b>	
<p>Stakeholders include:</p> <ul style="list-style-type: none"> <li>• General public - public land archery elk hunters – informal conversations have taken place over the years</li> <li>• Landowners</li> <li>• Private land outfitters</li> </ul> <p>Outreach has been conducted through conversations with stakeholders as well as a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.</p>	
<b>ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):</b>	
<b>1. Preferred alternative:</b>	

- **Regulation #255.B. remove GMUs 4, 5, 12, 23, 24, 33, 41, 42, 52, 411, 421, 441, and 521 from the list of available OTC archery elk units, limiting all archery elk hunting within these units utilizing already existing limited hunt codes.**
  - 1. Archery Season Dates, Units (as described in Chapter 0 of these regulations), Limited or Unlimited License as shown by hunt code Unit(s) Season Dates: 09/02 – 09/30 Annually Unless Otherwise Shown License Numbers (2024) 3, 6, 11, 13, 14, 15, 16, 17, 18, 21, 22, 25, 26, 27, 28, 30, 31, 32, 34, 35, 36, 37, 38, 43, 53, 59, 60, 62, 63, 64, 65, 68, 79 (north and west of Colo 112), 82 (public lands only), 83, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 107, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 161, 171, 181, 211, 214, 231, 301, 361, 371, 431, 471, 511, 581, 591, 681, 691, 851 except Bosque del Oso SWA, 861, 951, ~~private land portions of 4, 5, 12, 23, 24, 33, 41, 42, 52, 411, 421, 441, and 521~~
- **Create DAU-wide PLO hunt codes for E2 and E6:**
  - EE003P1A Limited Private Land Only license available through the draw – valid private lands in (GMUs 3, 4, 5, 14, 214,301, 441)
  - EE011P1A Limited Private Land Only license available through the draw – valid private lands in (GMUs 11, 211, 12, 13, 23, 24, 25, 26, 33, 34, 131, 231)
- **Create GMU grouping hunt codes for E14:**
  - EE041P1A Limited Private Land Only license available through the draw - valid on private lands (GMUs 41, 42, 421)
  - EE052P1A Limited Private Land Only license available through the draw - valid on private lands (GMUs 52, 411, 521)

**2. Alternative 2:**

- **Regulation #255 B. Remove GMUs 4, 5, 12, 23, 24, 33, 41, 42, 52, 411, 421, 441, and 521 from the list of available OTC archery elk units, limiting all archery elk hunting within these units utilizing already existing limited hunt codes.**
  - 1. Archery Season Dates, Units (as described in Chapter 0 of these regulations), Limited or Unlimited License as shown by hunt code Unit(s) Season Dates: 09/02 – 09/30 Annually Unless Otherwise Shown License Numbers (2024) 3, 6, 11, 13, 14, 15, 16, 17, 18, 21, 22, 25, 26, 27, 28, 30, 31, 32, 34, 35, 36, 37, 38, 43, 53, 59, 60, 62, 63, 64, 65, 68, 79 (north and west of Colo 112), 82 (public lands only), 83, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 107, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 161, 171, 181, 211, 214, 231, 301, 361, 371, 431, 471, 511, 581, 591, 681, 691, 851 except Bosque del Oso SWA, 861, 951, ~~private land portions of 4, 5, 12, 23, 24, 33, 41, 42, 52, 411, 421, 441, and 521~~
- **Create new PLO hunt codes in limited archery GMUs in DAUs E-2, E-6, and E-14 following current limited hunt code groupings:**
  - EE004P1A Limited Private Land Only license available through the draw – valid private lands in GMUs 4, 5, and 441

- EE012P1A Limited Private Land Only license available through the draw – valid private lands in GMUs 12, 23, and 24 (23 N of the White River, 24 North of the North Fork of the White River)
- EE033P1A Limited Private Land Only license available through the draw – valid on private lands in GMU’s 23, 24, and 33 (23 S of the White River, 24 South of the North Fork of the White River)
- EE041P1A Limited Private Land Only license available through the draw - valid on private lands (GMUs 41, 42, 421)
- EE052P1A Limited Private Land Only license available through the draw - valid on private lands (GMUs 52, 411)
- EE521P1A Limited Private Land Only license available through the draw - valid on private lands (GMU 521)

**3. Status quo,** OTC resident licenses valid on private lands, but no option for Non-resident licenses on private lands

<b>Issue Raised by:</b>	BGSS Committee, Brad Banulis, NW Senior Biologist; Brandon Diamond, Area 16 AWM; Jonathan Lambert, Area 6 AWM staff; Darby Finley, Terrestrial Biologist; Kirk Oldham, Area 7 AWM	
<b>Author of the issue paper (if different than person raising the issue):</b>		
<b>CC:</b>	Travis Black, NWRM, Cory Chick, SWRM, Matt Eckert, Deputy Game Manager	
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Travis Black	
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>	
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>	
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial	
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>	
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>	

**ISSUES SUBMITTAL FORM**

	Date: 11/01/24
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<b>ISSUE:</b>	<b>Should late cow moose seasons be added to select game management units?</b>
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**DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):**

The newly approved 2025-2029 Big Game Season Structure includes the option for an additional late season for antlerless moose, valid during all regular rifle deer and elk seasons (with no hunting during the breaks between seasons) when necessary to meet management objectives. Late moose seasons can be beneficial to increase success rates on antlerless harvest and to distribute hunters.

**North Park (M-1)**

The North Park moose herd (M1) lies within Jackson County and consists of five game management units (GMUs): 6, 16, 17, 161, and 171. Currently, the estimated population size of M1 is approximately 600-700 animals (2023 post-hunt estimate: 630). For many years, M1 has remained at or above the herd management plan (HMP) population objective of 500 – 600 animals.

To manage towards the M1 population objective, CPW has continuously increased antlerless license quotas. However, despite increased license numbers, total antlerless moose harvest has not increased proportionally, and M1 population estimates remain above objective. CPW believes that increasing license quotas has only increased hunter crowding in areas targeted by moose hunters, resulting in reduced harvest success.

To increase antlerless moose harvest and meet the population objective, CPW proposes adding a second, late-season rifle antlerless moose hunt code to redistribute hunters. By redistributing licenses into two hunting seasons, CPW believes harvest success may increase due to reduced crowding, and will provide additional flexibility to meet herd management objectives

**Gore (M-3)**

The Middle Park moose herd (M3) encompasses all of Grand and Summit Counties, and portions of Eagle and Routt Counties and consists of nine GMUs; 15, 18, 27, 28, 36, 37, 181, 361 and 371. Currently, the estimated population size of M3 is approximately 300-600 animals (2023 post-hunt estimate: 419). For many years, M3 has remained above the herd management plan (HMP) population objective of 190 animals. Human-moose conflicts continue to be an issue in M3, particularly in popular recreation areas within Grand and Summit Counties, and the number of roadkill moose have been high over the past decade (25 in 2023).

To manage towards the M3 population objective, CPW has continuously increased antlerless license quotas and DAU-wide antlerless success has been relatively high over the past decade (average 70%). However, despite increased license numbers and harvest, M3 population estimates remain above objective and conflicts continue to occur with increasing frequency. CPW believes that increasing license quotas further with the current hunt codes will increase hunter crowding in areas targeted by moose hunters, resulting in reduced harvest success.

To increase antlerless moose harvest and work towards the population objective, CPW recommends adding a second, late-season rifle antlerless moose hunt code in M-3to redistribute hunters, and increase antlerless harvest.

**White River (M-6)**

The portion of the White River moose herd (M6) the late cow moose season is being proposed for includes GMUs 12, 23, 24. Currently, cow moose harvest success is low, 34%, during the archery, muzzleloader, and rifle seasons. To increase antlerless moose harvest success and assess whether current low hunter success is due to the timing of the early season in M6, CPW recommends adding a second, late-season rifle antlerless moose hunt code to temporarily redistribute hunters, and attempt to increase antlerless harvest success.

**Pikes Peak (M-14)**

The Pikes Peak moose herd is located in Douglas, Fremont, and Teller Counties. Moose hunting was initiated in 2020 for this herd, and harvest success rates have been high for both cows and bulls. CPW believes the moose population is expanding into new locations and growing in numbers based on general agency observations and reports from the public. For both the 2023 and 2024 seasons, CPW offered three bull and three cow licenses, which provides opportunities for a quality moose hunt while using harvest to manage the population. CPW would like to maintain the high harvest rates for moose in the area at this licensing level, but there is concern about hunter crowding during the regular moose rifle season. CPW proposes adding a second, late-season rifle antlerless moose hunt code in M-14 to redistribute cow moose licenses between the regular moose rifle season and the late season. By redistributing licenses into two hunting seasons, CPW believes there will be reduced crowding in M-14 and will provide additional flexibility to meet moose management objectives in upcoming years.

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

**NW Moose DAUs (M-1, M-3, M-6)**

External publics impacted are hunters, wildlife viewers, residents, travelers, as well as commercial operations. Numerous hunters report frustration with overcrowding during the regular October moose rifle season.

Internal parties are Area 10 DWM's and biologists, and Northwest Region staff.

**SE Moose DAU (M-14)**

External publics impacted are hunters, wildlife viewers, residents, and travelers.

Internal parties are DWMs, AWMs, Biologists, and Customer Service Representatives from Areas 5, 13, and 14, as well as SE and NE Regional Staff.

Outreach has been conducted through conversations with stakeholders as well as a survey that was posted to the CPW Engage page and distributed at Northwest Area offices and by District Wildlife Managers around the Northwest Region.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\***: Allocation of a late-season rifle antlerless moose hunt codes with season dates aligning with the four regular rifle seasons in the following moose DAUs:

- **M-1**: MF006L1R (valid in GMUs 6, 16, 17, 161, 171)
- **M-3**: MF015L1R (valid in GMUs 15, 27)
  - MF018L1R (valid in GMUs 18, 181)
  - MF028L1R (valid in GMU 28)
  - MF037L1R (valid in GMUs 37, 371)
- **M-6**: MF012L1R (valid GMUs 12, 13, 23, 24)
- **M-14**: MF051L1R (valid GMUs 51, 59, 511, 581)

2. **Status quo**: No additional moose hunt codes.

<b>Issue Raised by:</b>	Area 10 AAWM Josh Dilley; DWM Jacob Way; DWM Zach Weaver; and Eric VanNatta, Area 10 Terrestrial Biologist; Brad Banulis, Senior Biologist; Elissa Slezak, Area 9 Biologist; Ty Woodward, Area 14 Terrestrial Biologist
<b>Author of the issue paper (if different than person raising the issue):</b>	
<b>CC:</b>	Travis Black, NWRM, Frank McGee, SERM, Matt Eckert, DGMT, Julie Stiver
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Brian Dreher
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

## ISSUES SUBMITTAL FORM

Date: 11/01/24

**ISSUE:** Should a bighorn ram hunt code be established in S-80?

**DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):**

The Black Canyon/Gunnison Gorge Rocky Mountain bighorn sheep herd (DAU RBS-29, GMU S-80) population has fluctuated over the past 30 years due to impacts from respiratory disease events. Prior to 2012, bighorns were difficult to find and uncommon in the Black Canyon. Since then, the S-80 bighorn population has significantly grown and expanded. By 2021, bighorns were found across the majority of S-80 at different times of the year, and the population continues to grow (Figure 1). Areas 16 and 18 staff deployed 10 satellite collars on adult bighorns in the fall of 2022 and continued to monitor their survival and movements through 2024. As part of the collaring efforts, a mark re-sight study was conducted, including two winter helicopter flights revealing an estimated population of approximately 100 bighorns with an estimated sex ratio of 88 rams:100 ewes and an estimated age ratio of 51 lambs:100 ewes averaged across the two helicopter surveys. Numerous mature rams were observed. As the S-80 sheep population continues to grow and occupy a wide range of habitat, CPW believes the potential exists for hunter harvest opportunity.

Hunting would be an effective management tool for this herd in several ways. Reducing the number of rams would reduce competition. This could help limit foray events as the younger cohorts of males tend to leave the herd in search of females with less competition (Lassis et al. 2022). Limiting foray activity would help limit potential interactions with domestic livestock on the surrounding allotments and could prevent potential disease events resulting in die-offs or suppressed lamb recruitment (O'Brien et al. 2014, Garwood et al. 2020, Gross et al. 2000).

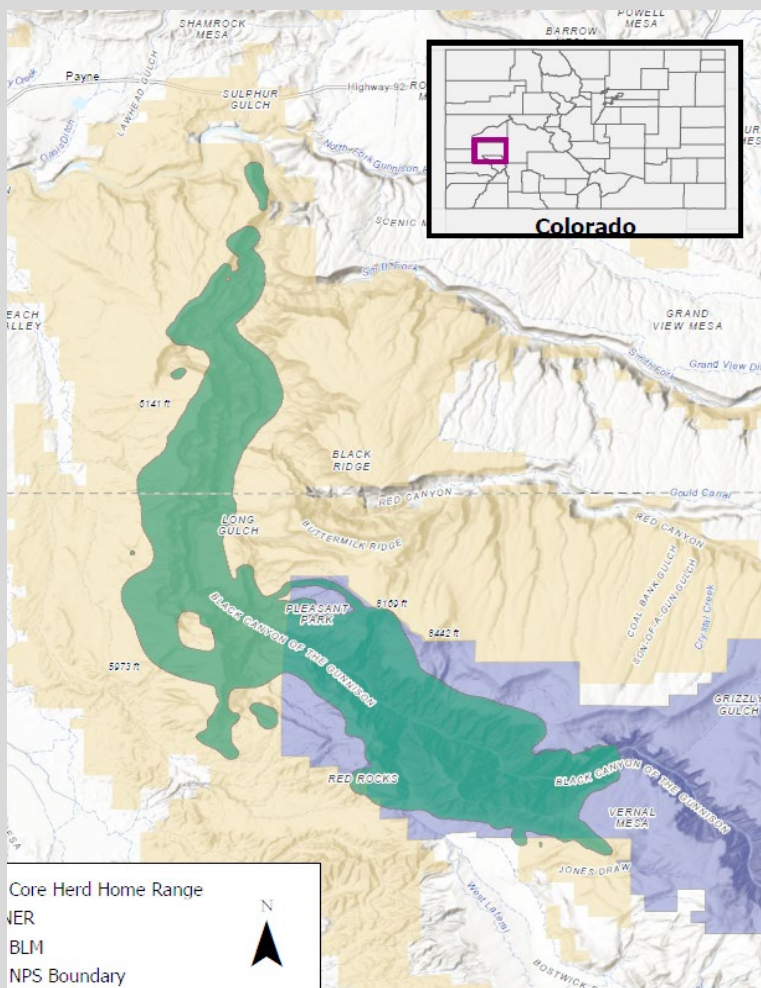


Figure 1. Core herd home range for the S-80 Rocky Mountain Bighorn sheep herd in southwestern Colorado.

Collar data has shown that the S-80 bighorn population regularly move between Black Canyon National Park and the Gunnison Gorge National Conservation Area (NCA) throughout the year.

This data also showed that bighorns spend large portions of late November and December outside of Black Canyon of the Gunnison National Park, where hunting is not allowed, and move onto the Gunnison Gorge NCA managed by the Bureau of Land Management (BLM), where hunting is permitted. These seasonal movements limit a hunting season to late fall or early winter when harvest opportunity is greatest on BLM lands; therefore, season dates of December 1-31 are what is proposed for this population.

**Literature Cited**

Garwood, T. J., C. P. Lehman, D. P. Walsh, E. F. Cassirer, T. E. Besser, J. A. Jenks. 2020. Removal of chronic *Mycoplasma ovipneumoniae* carrier ewes eliminates pneumonia in a bighorn sheep population. *Ecology and Evolution* 10: 3491-3502.

Gross, J. E., F. J. Singer, and M. E. Moses. 2000. Effects of disease, dispersal, and area on bighorn sheep restoration. *Restoration Ecology* 8:25-37.

O'Brien J. M., O'Brien C. S., McCarthy C., Carpenter T. E. 2014. Incorporating foray behavior into models estimating contact risk between bighorn sheep and areas occupied by domestic sheep. *Wildlife Society Bulletin* 38:321-331.

**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\*.**

Rocky Mountain Bighorn Society has reviewed and offered support for this issue paper.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\*:** Add an annual S-80 ram rifle hunt code SMS8001R from December 1-31.
2. **Status quo**

<b>Issue Raised by:</b>	Matt Ortega, DWM Area 18; Alyssa Kircher, Wildlife Biologist
<b>Author of the issue paper (if different than person raising the issue):</b>	
<b>CC:</b>	Jamin Grigg, Senior Biologist; Rachel Sralla, AWM Area18; Brandon Diamond, AWM Area 16; Alyssa Meier, Wildlife Biologist
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Cory Chick
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	Terrestrial
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>
<b>COMPLIES WITH THE BIG GAME SEASON STRUCTURE</b>	<b>YES</b>

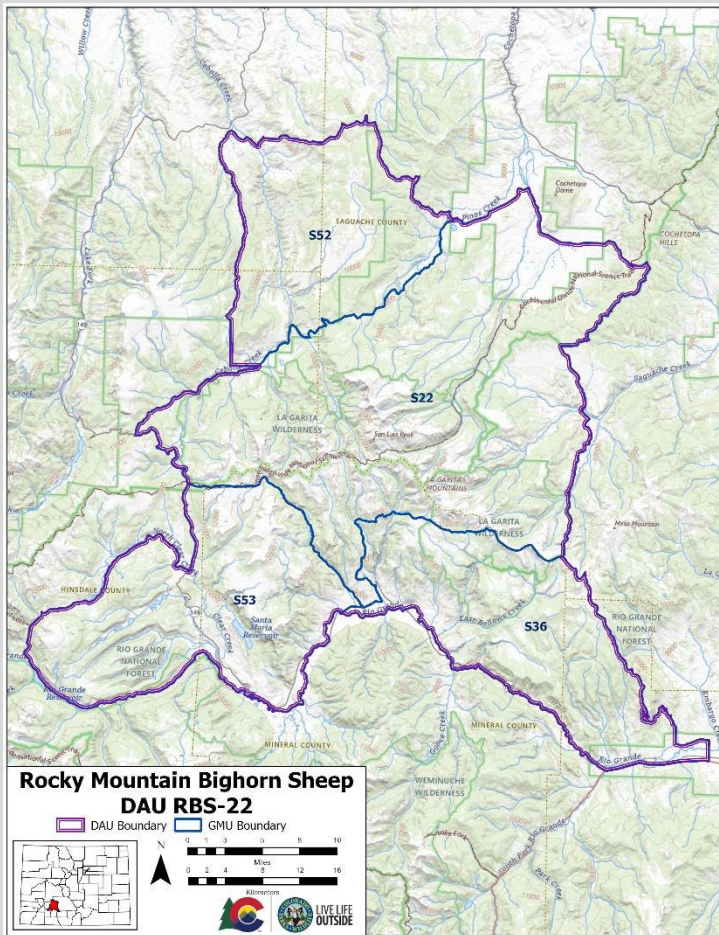
**ISSUES SUBMITTAL FORM**

Date: 11/01/24

**ISSUE:** Should a bighorn ewe hunt code be established in S-22?

**DISCUSSION (FACTS AND FIGURES, EXPLANATION OF ISSUE):**

Rocky Mountain bighorn sheep data analysis unit (DAU) RBS-22 (Central San Juans) consists of game management units (GMUs) S-22, S-36, S-52, and S-53. The San Luis Peak bighorn herd is indigenous to the region encompassed by GMU S-22. Informal surveys for bighorn sheep in this unit date back to the 1930s (Ghormley 2010), with anecdotal reports of wild sheep going back to the early 1900s. No documented translocations have occurred in the unit, further corroborating their native origin. The first official hunting season for bighorn rams in RBS-22 took place in S-22 in 1954, with 15 licenses issued and no sheep harvested (Bear and Jones 1973). The highest number of licenses available in S-22 was in 1979 when 31 ram tags were issued. In the year 1980, an all-time high ram harvest of 29 animals occurred in S-22. A total of 118 rams were harvested between 1980 and 1990. Comparatively, only 26 rams were harvested in S-22 from 2000 to 2012. Between 1994 and 2020, the annual number of ram licenses in S-22 exceeded 4, with an increase to 6 licenses in 2021 and 8 licenses in 2022 and 2023. The 2020-2023 three-year average hunter success rate is 73%. CPW recommends adding a ewe license in GMU S-22, similar to other bighorn sheep management units in Colorado, including the other GMUs (S-36 & S-53) within the RBS-22 DAU.



S-22 is a bighorn sheep herd between Powderhorn and Creede, CO that has historically been impacted by respiratory disease-related declines. In 1989-1990, the S-52 sub-herd suffered an all-age-class die-off that nearly extirpated the population. Though poorly documented, it was believed that this die-off may have also extended into the S-22 population. The population exhibited poor lamb recruitment and declining numbers through the 1990s and 2000s; however, the population has increased since the late 2010s. The most recent classification survey in 2023 found 29 lambs: 100 ewes and 29 yearling ewes: 100 ewes. Lamb: ewe ratios have been between 20-30 lambs: 100 ewes within the last 5 post-hunt classification surveys, which suggests this population can support ewe harvest of <5% of the total post-hunt population as per the 2013 RBS-22 Herd Management Plan objectives.

Figure 1: Map of DAU RBS-22 and GMU S-22.

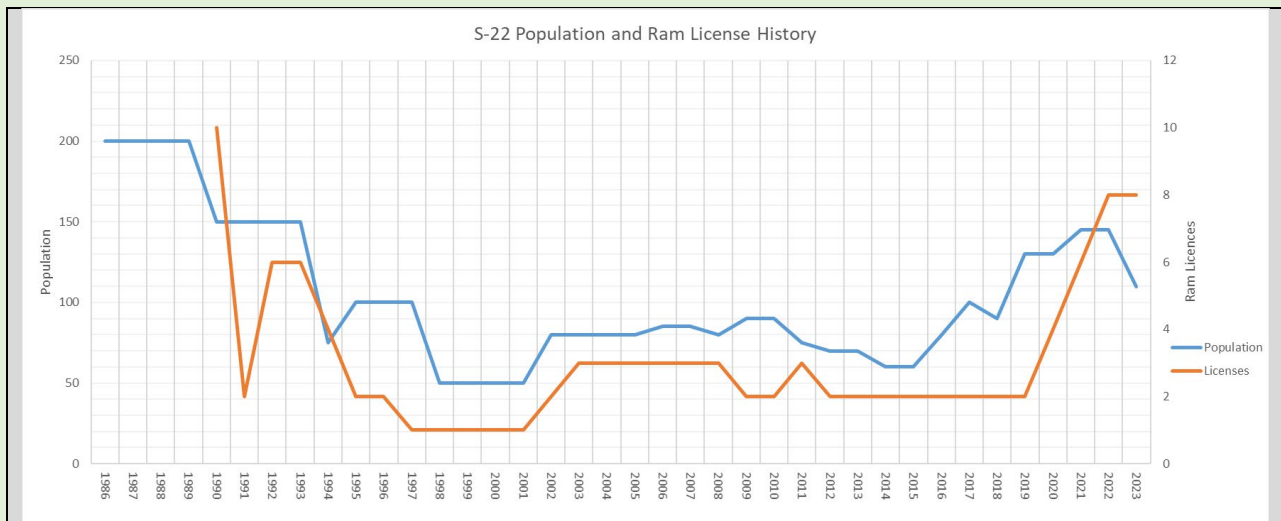


Figure 2: History of population estimates and ram license numbers in S-22.

Several studies of a bighorn sheep at Ram Mountain, Alberta, offer some of the best insights into bighorn population dynamics. Over 25 years, this herd was intensively studied, and the state manipulated population size with ewe harvest. Population size ranged from 95 to 210 (Jorgenson 1997). Lamb mass and winter survival decreased as density increased (Portier et al. 1998). Jorgenson et al. (1997) found that yearling female survival was negatively affected by density. Age at first reproduction is also negatively correlated with population size. Density did not appear to affect adult female survival. Male mortality increased once rams began participating in the rut (at 4-6 years old), and adult ewe survival declined at ages greater than seven (Jorgenson et al. 1997).

There continues to be some level of concern about ewe harvest from wildlife managers and the public. Bighorn sheep are particularly susceptible to disease outbreaks, with a higher probability of outbreak in relation to contact with domestic animals. The susceptibility to disease causes reluctance to apply additional ewe harvest to bighorn populations. Bighorn sheep licenses are often issued cautiously because of their high-profile nature and because CPW surveys some herds infrequently. Seasons also need to be structured so ewe hunters do not affect the quality of the ram hunting experience. A later opening day may reduce conflicts and increase the age of orphaned lambs. Lambs orphaned at >15 weeks old did not have lower survival than non-orphaned lambs (Jorgenson et al. 1993).

Ewe harvest is generally not applied consistently across states but is increasingly being considered and accepted. Montana has a history of setting similar numbers of ewe licenses as ram licenses. Many states have added ewe harvest in recent years, while some states have no ewe harvest. Colorado currently provides ewe licenses in 26, or about 50%, of its huntable bighorn sheep units statewide. This includes neighboring GMUs S-36 and S-53, which have supported ewe harvest for several years. The ewe licenses have proven to be very popular, with many hunters using their preference points to apply for these hunts. CPW recommends implementing and providing a single ewe rifle license to S-22. To monitor the population, local CPW staff will use field observations of the bighorn sheep, harvest results, and helicopter-based classification survey data. License numbers may be adjusted over time to achieve the desired harvest to sustain a viable population, provide an appropriate amount of hunter opportunity, and diminish disease pathogen prevalence.

Season dates will vary due to local conditions and management preferences:

**S-22:** CPW proposes the ewe rifle license start date beginning ten days following the opening date of the ram rifle seasons and ending on the same date as the end of the ram seasons, similar to the ewe season in S-36 and S-53.

#### Literature Cited

Bear, G. D. and G. W. Jones, 1973. History and distribution of bighorn sheep in Colorado. Colorado Division of Wildlife Game Research Report. 232pp

George, J.L. R. Kahn, M. Miller, and B. Watkins Editors. 2009. Colorado bighorn sheep management plan 2010-2019. Colorado Division of Wildlife special report 81.

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Jorgenson, J. T., M. Festa-Bianchet, and W. D. Wishart. 1993. Harvesting bighorn ewes: consequences for population size and trophy ram production. Journal of Wildlife Management 57:429-435.

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**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 discussion within Area 16, hunter comments, local landowners, and public citizens' concern for the herd's well-being. Rocky Mountain Bighorn Society has also given support via email.

**ALTERNATIVES: (POSSIBLE OUTCOMES or POSSIBLE REGULATIONS):**

1. **\*Preferred Alternative\*:** Add an annual S-22 bighorn sheep ewe hunt code: SFS22O1R (starting 10 days after the ram season start date and ending the same day as the ram season end date).
2. **Status quo.** Do not implement a ewe hunt code in S-22.

<b>Issue Raised by:</b>	Alyssa Meier, Wildlife Biologist; Brent Frankland, Wildlife Biologist; Jamin Grigg, Senior Biologist
<b>Author of the issue paper (if different than the person raising the issue):</b>	
<b>CC:</b>	Brandon Diamond, AWM Area 16; Nick Gallowich, DWM Area 16; Lucas Martin, DWM Area 16
<b>APPROVED FOR FURTHER CONSIDERATION BY:</b>	Cory Chick
<b>REQUIRES NEW SPACE IN THE BROCHURE?</b>	<b>YES</b>
<b>ARE ADEQUATE STAFF AND FUNDING RESOURCES AVAILABLE TO IMPLEMENT?</b>	<b>YES</b>
<b>REGION, BRANCH, OR SECTION LEADING IMPLEMENTATION</b>	SW Region, Area 16
<b>RECOMMENDED FOR CONSENT AGENDA?</b>	<b>NO</b>