



# COLORADO

## Parks and Wildlife

Department of Natural Resources

**To:** The Parks and Wildlife Commission

**From:** Big Game Season Structure Co-leads: Matt Eckert (Terrestrial Program Supervisor) and Amanda Biedermann (Policy and Planning Project Manager)

**Date:** February 22, 2024

**Re: 2025-2029 Big Game Season Structure Preliminary Alternatives and Staff Recommendations**

### Overview of the Big Game Season Structure Purpose and Process

#### ***What is Colorado's Big Game Season Structure?***

Big game management in Colorado is built on two main planning processes: Herd Management Plans (also called Data Analysis Unit [DAU] Plans) and Big Game Season Structure (BGSS). Herd Management Plans establish population objectives and sex ratios for each of the state's big game herds. BGSS defines a framework for achieving those objectives through hunting seasons for different species and methods. These two processes inform big game license recommendations through the annual rule-making process.

The BGSS planning process is a critical component of big game management and big game hunting regulation development and determines 1) what, when, and where various types of big game hunting opportunities are available and 2) how the timing of these opportunities are divided among hunters. Through this planning process, CPW can better maintain healthy wildlife populations in keeping with management objectives.

CPW currently uses a five-year BGSS cycle to provide hunters, hunting-related businesses, landowners, and communities an opportunity to plan ahead for the upcoming seasons. This timeframe also provides more flexibility and public engagement to assess the effectiveness of season structure changes than a longer cycle. While there may be advantages to a longer cycle for administrative reasons, we will continue the current five-year cycle to remain flexible and adaptive to BGSS changes and the complex challenges facing our wildlife, including a changing landscape, habitat fragmentation, harsh winters, and prolonged drought.

#### ***What does CPW consider when developing the BGSS?***

CPW considers various biological, social, and economic factors when determining whether to make changes to the BGSS. Herd Management Plan objectives, animal distribution, and disease management are the primary biological factors that CPW considers during this



process, as the season dates, lengths, and number of hunting seasons all affect these factors. Regarding social considerations, the BGSS planning process is purposefully long (~18 months) to allow for extensive engagement with internal staff as well as resident and nonresident members of the public. Additionally, the financial implications associated with changes to the BGSS influence overall agency objectives and priorities. Any changes to the BGSS impact not only CPW, but also may impact local economies and hunting-related businesses. Based on the totality of the factors listed above, CPW staff present alternatives and make recommendations to the Commission on changes to the BGSS. Ultimately, the Commission decides whether to make any changes to the BGSS and if so, what those changes are.

### **2025 - 2029 BGSS Topics for Consideration**

The 2025-2029 BGSS process was officially initiated in the fall of 2022 with the establishment of a staff Working Group to help guide this process. During the fall of 2022, the Working Group undertook an internal scoping effort to finalize the primary BGSS issues and discussion topics that would help frame the public outreach process for the 2025-2029 BGSS (building on the big game hunting topics analyzed in the [2022 Big Game Attitude Survey](#) (BGAS)).

CPW presented an [initial list of BGSS topics](#) to the Commission at the January 18, 2023 Commission meeting, and requested guidance from the Commission to move forward with these proposed topics for public and stakeholder engagement. At the January 2023 meeting, the Commission approved all staff-recommended primary BGSS topics that would be included in public engagement efforts, and minor administrative topics that would be entirely addressed by staff. CPW officially launched public outreach efforts in the spring of 2023 to inform the public and interested stakeholders about the upcoming BGSS and to collect input from the public. Refer to **Appendix A** of this memo for a detailed summary of our public engagement efforts and results.

### **Preliminary Alternatives and Staff Recommendations**

After carefully evaluating numerous factors, staff developed the following preliminary alternatives and staff recommendations for the Commission's consideration and input during the March 2024 Commission meeting. For a detailed list of some of the alternatives analyzed during internal staff outreach and external public engagement efforts but not brought forth to the Commission for consideration, refer to **Appendix B** of this memo.

Staff are requesting direction from the Commission on which alternatives staff should bring back as draft regulation changes for each topic to be considered at the May 2024 meeting. The draft regulations for some options vary greatly in the extent of changes. Limiting the draft regulations to two or fewer options will allow staff to correctly draft what could be extensive regulation changes. The Commission is scheduled to make a final decision on BGSS changes during its June meeting.

**1) Addition of an Optional Rifle Deer Hunt During the First Regular Rifle Season  
(Currently Elk Only)**

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| <b>Why is this topic included in the 2025-2029 BGSS process?</b>  |   |
| Staff included this topic to consider whether to allow deer hunting in the first rifle season to provide additional flexibility for meeting Herd Management Plan objectives. Additionally, staff included this topic to address hunters' suggestions that adding rifle deer hunting opportunities to the first regular rifle season could reduce hunter crowding and pressure in the later seasons.   |   |
| <b>What are the alternatives proposed for the Commission's consideration?</b>   |   |
| <b>Alternative 1<br/>(Staff Preferred<br/>Alternative)</b>  | Managers would have the option to add limited deer hunting during the first rifle season when necessary to meet biological objectives (established in Herd Management Plans) and/or social management objectives. Limited licenses would be shifted from existing rifle deer seasons (primarily the second and third seasons) to the first rifle season. Adding deer licenses to the first season would be optional and would be determined on a herd-by-herd basis (DAUs). |
| <b>Status Quo</b>   | No change. Maintain existing regular rifle seasons. Optional rifle deer hunting opportunities would not be added to the first regular rifle season.   |
| <b>What is our recommendation and why?</b>  |   |
| <p><b>Staff recommends Alternative 1.</b></p> <p>The primary rationale for recommending this alternative is that it would provide CPW staff additional flexibility for meeting biological objectives (established in Herd Management Plans) and/or social management objectives. CPW anticipates that this tool would only be used in select areas to achieve certain objectives and would not be implemented statewide. For instance, this management tool would be greatly beneficial when used locally to help distribute harvest and mitigate hunter crowding while still managing to Herd Management Plan objectives.</p> <p>This alternative could also potentially reduce hunter crowding and pressure on deer during the second and third rifle seasons by increasing the total number of deer hunting days and allowing access to summer ranges in some units during this first season. While success would likely be lower for deer hunters in mid-October, this alternative would allow elk hunters to also hunt deer in the same week, which could be beneficial for mixed method-of-take groups. While CPW acknowledges that deer hunting in the first season could potentially affect the success rates for elk hunters and contribute to perceptions of overcrowding in some units, the elk hunter experience would remain a primary</p> |   |

consideration for staff. Crowding concerns could be mitigated through license setting.

Based on public meeting polling results and discussions, there was some preliminary opposition to the addition of a first rifle deer season from members of the public (54% were either somewhat or strongly opposed to this proposed change). However, the polling question staff used did not clearly specify that deer would be added to the first rifle season on an optional basis only when there was a management need. When CPW presented this proposal to the Colorado Sportsperson’s Roundtable members, there was significantly higher support (71% were either somewhat or strongly supportive of the change) once they learned this option to add deer to the first season would be taken only when needed to meet biological and/or social management objectives. CPW would work to inform the public that the addition of deer hunting to the first rifle season would only be used as a tool in select units, and would be reviewed by the Commission on a case-by-case basis prior to approval or denial.

**2) Addition of an Optional Second Regular Rifle Buck and Doe Pronghorn Season**

***Why is this topic included in the 2025-2029 BGSS process?***

Staff included this topic to consider whether to allow for increased pronghorn hunting opportunity while providing additional flexibility for meeting Herd Management Plan objectives. Primarily, staff were interested in evaluating whether an additional pronghorn season could help address landowner concerns and reduce hunter crowding and pressure on the opening day of the pronghorn rifle season.

***What are the alternatives proposed for the Commission’s consideration?***

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| <b>Alternative 1<br/>(Staff Preferred Alternative)</b> | Managers would have the option to add a second nine-day rifle pronghorn season (starting the third Saturday in October) when necessary to meet biological objectives (established in Herd Management Plans) and/or social management objectives. Creating a second rifle pronghorn season would be optional and determined on a herd-by-herd basis (DAU/Game Management Unit (GMU)), allowing for regional flexibility. |
| <b>Status Quo</b>                                      | No change, maintain existing rifle pronghorn season. The rifle pronghorn season would continue to be a nine-day season, opening on the first Saturday in October, with limited buck and limited doe licenses issued by GMU/DAU.   |

***What is our recommendation and why?***

Staff recommends Alternative 1.

The primary rationale for recommending this alternative is that it would provide additional flexibility for meeting biological objectives (established in Herd Management Plans) and/or social management objectives. This tool would be optional and would only be used in select areas; it would not be implemented statewide.

For instance, this management tool would be used locally to help achieve Herd Management Plan objectives by offering the flexibility for landowners to provide hunting access to buck hunters during the first season and doe hunters during the second season. This tool could also be used to reduce hunter crowding and pressure during the opening weekend of the pronghorn rifle season, which may result in pronghorn staying on or returning to public lands, as opposed to them staying on private lands. To address crowding, CPW would shift some limited licenses from the first rifle season to the second season (quotas would not be increased unless necessary to manage a specific herd). The benefit of spreading out hunters over multiple weekends under this alternative would be more beneficial in GMUs where public land is not as available and hunter overcrowding is more of an issue. CPW could also utilize a second season if there was a management need to reduce the pronghorn population in a specific area and a need to reduce game damage concerns. Further, this tool may increase hunter harvest success and allow harvest of herds moving into Colorado from Wyoming in mid-late October as well as provide additional schedule flexibility to hunters.

Based on public meeting polling results and discussions, the public either generally supported this idea to allow for additional pronghorn hunting opportunities or were ambivalent due to the lack of local impacts in their respective area of the state. However, there was strong support (91%) from Sportsperson’s Roundtable representatives for this additional season. Additionally, landowners in the Southeast and Northeast Regions generally supported this proposed change. CPW would work to educate the public that staff would utilize this tool only in units where there was a biological and/or social management need. The decision to add a second pronghorn season would be reviewed by the Commission on a case-by-case basis prior to approval or denial.

**3a) Administrative Topics - Cow Moose**

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| <b><i>Why is this topic included in the 2025-2029 BGSS process?</i></b>  |  |
| Staff included this topic to consider increasing cow moose harvest in some units while reducing complexity in the cow moose season structure language. |  |
| <b><i>What are the alternatives proposed for the Commission’s consideration?</i></b>   |  |
| <b>Alternative 1<br/>(Staff Preferred Alternative)</b>   | Optional late cow moose season (MF***L1R hunt code) that would be additional to the regular moose rifle season, and would be valid for all regular rifle deer and elk seasons (with no hunting during the breaks between seasons) when necessary to meet management objectives for moose. All GMUs would have the regular MF***O1R season. |

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| <b>Status Quo</b>  | No change, maintain the language "Antlerless moose rifle season- 14-day season, with fixed dates of October 1-14th, annually, but with the option of moving this season to run concurrent with the regular rifle deer and elk seasons (with no hunting during the breaks between seasons) when necessary to meet management objectives for moose." |
| <b><i>What is our recommendation and why?</i></b>  |  |
| <p><b>Staff recommends Alternative 1.</b></p> <p>CPW is attempting to increase the harvest of cow moose in populations that need additional female harvest for population management. The current BGSS framework allows the antlerless rifle season to align with the antlered rifle moose season (October 1-14, annually), except when the antlerless season is moved to run concurrently with the regular rifle seasons. A small adjustment to the current season structure could allow managers to increase antlerless harvest. CPW initially considered making cow moose tags season choice, but determined that action would increase crowding issues with moose hunters in units with high cow license quotas.</p> <p>Therefore, staff are recommending this alternative to allow for more management flexibility to meet moose management objectives when necessary. Specifically, the creation of an optional additional late cow moose season would increase moose hunting opportunities and should increase cow moose harvest without contributing to crowding. The number of moose licenses issued in this optional late season would be low and should not conflict with elk and deer hunters. The decision to add a late cow moose season would be reviewed by the Commission on a case-by-case basis annually.</p> |  |

***3b) Administrative Topics - Private Land Only (PLO) Black Bear***

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| <b><i>Why is this topic included in the 2025-2029 BGSS process?</i></b>   |   |
| Staff included this topic to consider whether to retain the current BGSS language for PLO rifle bear licenses as written, as retaining this language would be detrimental to the success of bear management strategies for some bear populations and would decrease management flexibility. |   |
| <b><i>What are the alternatives proposed for the Commission's consideration?</i></b>  |   |
| <b>Alternative 1 (Staff Preferred Alternative)</b>  | Modify the existing language to clarify that PLO rifle bear licenses are not required to be unlimited OTC for every population/DAU (managers could still choose an unlimited PLO OTC strategy). |
| <b>Status Quo</b>   | No change; maintain the following language: "PLO rifle bear season has earliest opening September 2 and latest ending date with close of the  |

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|   | fourth rifle deer/elk season. Unlimited, OTC licenses issued by DAU/GMU; no season participation restrictions." |
| <b><i>What is our recommendation and why?</i></b>   |   |
| <p><b>Staff recommends Alternative 1.</b></p> <p>The BGSS language for PLO bear license setting was new for the 2020-2024 season structure and required all PLO licenses to be unlimited regardless of the management objectives of the DAU. After a few years of implementation, staff determined that this language should be slightly modified so that PLO licenses are not required to be unlimited OTC for every population/DAU.</p> <p>The preferred alternative would allow for bear managers to set PLO licenses according to the appropriate license setting strategy and reduce the likelihood of exceeding harvest limits for some bear populations. As a result, this alternative would allow CPW management flexibility in assigning bear PLO seasons to either unlimited or limited licensing strategy scenarios based on bear management plan objectives and trajectories.</p> |   |

**4) Season Structure for Early Seasons (Archery/Muzzleloader) for Deer and Elk West of I-25 and Game Management Unit (GMU) 140**

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| <b><i>Why is this topic included in the 2025-2029 BGSS process?</i></b>   |  |
| <p>Staff included this topic to evaluate whether to maintain the status quo with the current early season structures, revert back to the previous early season structures, or implement new early season structures. Staff also included this topic to confirm the BGAS results on crowding and safety concerns during the early seasons.</p> |  |
| <b><i>What is the alternative proposed for the Commission’s consideration?</i></b>  |  |
| <p><b>Alternative 1<br/>(Staff Preferred Alternative)</b></p>   | <p>Archery season would be a 29-day season and shall open September 2nd and close September 30th, annually. <i>(status quo)</i></p> <p>Managers would have the option to add an additional stand-alone limited archery antlered deer season that opens August 15th and closes September 1st, annually. This season would be optional and determined on a herd-by-herd basis (DAU/GMU), allowing for regional flexibility. <i>This optional antlered deer season would not replace existing antlered, either-sex, and antlerless deer archery seasons. (new)</i></p> <p>Muzzleloader season shall open on the second Saturday of September and run for nine days. <i>(status quo)</i></p> |

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| <b>Status Quo</b>   | No change. Archery, deer, and elk season would be a 29-day season and shall open September 2nd and close September 30th, annually. Muzzleloader season shall open on the second Saturday of September and run for nine days. Archery deer, elk, and September bear seasons are aligned. |
| <b><i>What is our recommendation and why?</i></b>   |   |
| <p><b>Staff recommends Alternative 1.</b></p> <p>Based on the results from the fall 2023 staff outreach effort, a strong majority of CPW staff (89%) prefers the status quo early season structure. Staff believe that starting deer, elk, and bear hunting on the same date is easy for hunters to understand and minimizes law enforcement issues. Data gathered during the 2023 public involvement process indicates that the current early season structure is also preferred by hunters more than other alternatives presented, such as the previous (2015-2019) BGSS.<sup>1</sup> Furthermore, the early seasons were a primary focus of the 2020-2024 BGSS process, and after an extensive public engagement process focused on early season alternatives, the current structure was the conclusion reached at the end of that process.</p> <p>During the 2025-2029 BGSS process, staff again evaluated a variety of different early season structure alternatives. CPW seriously considered one alternative that suggested shifting the archery deer season to start August 15th. However, shifting to August 15th would put deer, elk, and bear seasons out of alignment, creating enforcement concerns as well as complications with the add-on over-the-counter (OTC) bear licensing strategy (bear seasons can start no earlier than September 2nd). Furthermore, there is concern that shifting the season to mid-August would increase pressure on big game herds (e.g. deer, elk, sheep, and goat), potentially disrupting their distribution on summer ranges and triggering earlier movements to lower elevations and private lands, thereby impacting animal availability during September seasons. CPW does not support shifting early seasons to mid-August, though we determined that an optional stand-alone limited archery antlered deer season that starts August 15th could alleviate some hunter pressure in September, reduce overlap with high-country rifle buck hunts, and create what would likely be a highly-desirable opportunity.</p> <p>After taking into account the biological and social considerations associated with each alternative, staff determined that the status quo best meets our management needs and aligns with the majority of public opinion to maintain the existing early season structures. However, CPW is recommending the option for managers to add a stand-alone limited archery antlered deer season that opens August 15th and closes September 1st, annually. This optional antlered deer season would not replace the existing antlered, either-sex, and</p> |   |

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<sup>1</sup> 60% of responses received through the Stage One comment form favored the current structure, and 67% of responses received through the Stage Two worksheets preferred the current structure.



antlerless deer archery seasons that run September 2nd - 30th. Proposals to add an additional stand-alone, limited archery antlered deer season would be reviewed by the Commission on a case-by-case (DAU/GMU) basis prior to their approval or denial, allowing for regional flexibility. Add-on bear OTC licenses would not be available for this stand-alone archery deer season. Deer licenses in the August season would not necessarily be in addition to the quota for the regular September season; licenses may be shifted from the September season to the August season, with quotas set in accordance with Herd Management Plans.

In regards to the safety concerns raised with the overlap of archery and muzzleloader seasons, CPW acknowledges there are some concerns over safety issues. However, according to the 2022 BGAS results, concern over safety issues with the overlap is not substantial enough to make a change. Additionally, most hunters engaged in CPW’s 2023 public outreach efforts are content with the current structure for early seasons and feel that no changes are needed. CPW currently has various measures in place to promote safety and awareness while hunting.<sup>2</sup> Archery hunters also have the option of not hunting the overlapping seasons.

**5) Season Structure for Regular Deer/Elk Rifle Seasons**

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| <b><i>Why is this topic included in the 2025-2029 BGSS process?</i></b>   |   |
| Staff included this topic to evaluate whether to maintain the status quo with the current 2020-2024 regular rifle season structure, revert back to the previous 2015-2019 regular rifle season structure, or implement a new regular rifle season structure. Additionally, staff included this topic to consider public and staff preferences and concerns raised over the current season structure dates and timing. |   |
| <b><i>What are the alternatives proposed for the Commission’s consideration?</i></b>  |   |
| <b>Alternative 1 (Staff Preferred Alternative)</b>  | Change the season structure for regular rifle seasons to the previous (2015-2019) season structure, 5-9-9-5 (number of days in first rifle-second rifle-third rifle-fourth rifle). The second and third rifle seasons each are nine days and include two full weekends. The fourth season ends before the Thanksgiving holiday. |
| <b>Status Quo</b>   | No change, maintain the current season structure (2020 - 2024) for regular rifle seasons as 5-9-7-5.  |
| <b><i>What is our recommendation and why?</i></b>   |   |

<sup>2</sup> Colorado law requires that anyone born on or after January 1, 1949, complete an approved hunter education course before applying for or buying a Colorado hunting license; all muzzleloader hunters are required to wear 500 square inches of solid daylight fluorescent orange or pink material, and archery hunters are encouraged to wear fluorescent orange or pink during the overlapping archery and muzzleloader season.

**Staff recommends Alternative 1.**

During the 2023 public outreach process, staff evaluated a variety of regular rifle season structure alternatives. Overall, there was a fairly even split between public support for the current 2020-2024 season structure and the “previous” 2015-2019 season structure (this previous 2015-2019 season structure was the same structure adopted for the previous four season structure cycles and was in place from 2001 to 2019). Based on the all-staff outreach results, a slight majority of staff prefer the current 2020-2024 season structure, while about 25% of staff prefer the previous 2015-2019 season structure. While both season structures have benefits, CPW recommends reverting back to the previous 2015-2019 season structure for the following reasons.

The current 2020-2024 season structure is fundamentally designed to increase deer and elk harvest during the regular seasons based on the overall length of the season, the potential for weather to increase vulnerability to harvest, the timing of migration to winter ranges where animals are more vulnerable, and expanded hunting opportunity across the mule deer breeding season.

In addition, the current structure extended the breaks between the regular rifle seasons, lengthening the overall season (compared to the previous 2015-2019 structure). One overarching goal behind these longer breaks was to allow animals to move off private/refuge lands and spend more time on public lands, resulting in higher quality hunting experiences for public land hunters and increased success rates. While CPW has not yet conducted a robust movement analysis for deer and elk to determine whether these season breaks are working as intended, staff anticipate that private land refuging issues will not be alleviated to a large degree based on the current number of days between the seasons due to the various factors that influence animal distribution and annual harvest success (e.g., weather, drought, habitual movements, etc.). However, deer and elk vulnerability is generally considered to be higher in the current season structure due to later season dates, which is raising management concerns in several areas.

At a statewide level, the number of elk herds that are over population objective has continued to decrease, which has led to an accompanying decrease in limited licenses to reduce harvest. In addition, the 2022-2023 severe winter experienced in the Northwest Region resulted in unprecedented license reductions and a desire to expedite future population growth. Furthermore, despite continuing to manage for sex ratios prescribed in Herd Management Plans, the increased vulnerability and harvest of mature mule deer bucks within the current season structure framework continues to be a source of debate and discussion across many mule deer DAUs. Therefore, staff believes that the previous 2015-2019 BGSS is more congruent with the current population management goals for elk and mule deer, and is more aligned with the Commission’s desire to rebuild big game herds and address long-term biological concerns. Consequently, staff are proposing to revert to the previous 2015-2019 season structure to shift the seasons earlier in the year. Under this

alternative, CPW would continue to offer quality hunting opportunities and experiences while prescribing license quotas to meet local management objectives.

Additionally, reverting to the previous 2015-2019 season structure would help alleviate hunter and outfitter access concerns during the regular rifle seasons. By moving up the seasons earlier in the year, physical access to hunting areas would likely be less limited by snow and road closures, providing increased hunting opportunities. Staff have indicated that a number of County and Forest Service roads across the state close to vehicular traffic during the late seasons. As an example, starting November 23rd annually, some Forest Service areas limit access to snowmobiles only, regardless of snow conditions, to accommodate commercial snowmobile operators. Outfitters with backcountry camps have also expressed concern about safely accessing their permitted areas within the framework of the current BGSS, as well as the availability of big game animals based on snow conditions and the timing of migration.

Lastly, this alternative would add a second weekend back to the third rifle season, creating additional hunting opportunity, and would remove the overlap with Thanksgiving during the fourth season. A second weekend in the third season would benefit hunters who can only hunt on weekends because they cannot take off work, hunt with youth who are in school, or want to skip the opening weekend and hunt later in the season. To some extent, the second weekend will reduce hunter crowding in the first half of the third rifle season. While some hunters and staff preferred the fourth season Thanksgiving overlap, staff ultimately believe removing the overlap has more benefits than drawbacks.

## **6) Over-the-Counter (OTC) Limitations**

### ***Why is this topic included in the 2025-2029 BGSS process?***

Staff included this topic primarily to address hunter concerns of overcrowding in OTC elk units and to reassess the current BGSS framework related to OTC elk license distribution.

The current BGSS framework states that either-sex and sex-specified archery elk licenses can be limited geographically to meet biological or social management objectives on a case-by-case basis through CPW's regulatory process. This optional approach has been implemented for five elk herds since 2020, which includes 20 GMUs. While crowding during the archery seasons has improved in these recently limited elk units, hunter pressure has shifted to neighboring units that still have OTC archery elk licenses, exacerbating crowding in those units. These evolving field conditions support the need to include OTC license distribution in this BGSS process to assess public, staff, and Commission support for full OTC license limitation.

Additionally, the 2022 BGAS results indicated that both archery and rifle hunters are concerned about overcrowding; therefore, CPW recommended inclusion of both methods of

take when reviewing OTC licensing. Refer to **Appendix B** of this memo for a detailed list of some of the OTC alternatives analyzed during internal staff outreach and external public engagement efforts that were not brought forth to the Commission for consideration.

Refer to **Appendix C** of this memo for a detailed analysis of the financial implications associated with each of the alternatives proposed for the Commission’s consideration listed below.

***What are the alternatives proposed for the Commission’s consideration?***

**6a) OTC Archery Limitation Alternatives**

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| <p><b>Alternative 1<br/>(Staff Preferred Alternative)</b></p> | <p>Limit all <b>resident and nonresident</b> archery licenses - limited licenses available through the <b>draw by management area</b> (DAU or GMU).</p> <p>All existing OTC PLO hunt codes would be eliminated; optional limited PLO hunt codes could be created.</p> <p>CPW anticipates making incremental reductions of archery elk licenses over time in order to start reducing hunter crowding while also adjusting to incremental losses in revenue. Initial quota reductions will be based on recent OTC license sales and are expected to be around 10%; however, with consideration to CPW finances and license demand, reductions may continue if crowding or elk herd performance and distribution continue to be of concern. Quotas will align with elk Herd Management Plan objectives.</p> <p>This alternative was labeled as Alternative A6 in the OTC survey.</p>                               |
| <p><b>Alternative 2</b></p>                                   | <p>Limit <b>nonresident</b> archery licenses - limited licenses available through the <b>draw by management area</b> (DAU or GMU); status quo OTC for residents (only in current OTC units).</p> <p>All existing OTC PLO hunt codes would be eliminated; resident OTC licenses would be valid on both public and private land. Optional nonresident limited PLO hunt codes could be created. <i>[This alternative would create differences between currently limited and OTC DAUs for PLO licenses. In a currently limited DAU, PLO licenses could be available for both residents and nonresidents. In current OTC DAUs, limited PLO hunt codes could be created for nonresidents only (OTC licenses are valid on private land for residents)].</i></p> <p>CPW anticipates making incremental reductions of archery elk licenses over time in order to start reducing hunter crowding while also adjusting</p> |

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|                          | <p>to incremental losses in revenue. Initial quota reductions will be based on recent OTC license sales and are expected to be around 10%; however, with consideration to CPW finances and license demand, reductions may continue if crowding or elk herd performance and distribution continue to be of concern. Quota reductions would only affect nonresidents, as residents remain status quo for OTC licenses (unlimited).</p> <p>This alternative was labeled as Alternative A5 in the OTC survey.</p> |
| <p><b>Status Quo</b></p> | <p>No change. Unlimited either-sex, antlered, and antlerless archery elk licenses are available in certain units. Either-sex and sex-specified archery elk licenses can be limited on an individual DAU-by-DAU basis to meet biological or social management objectives. OTC List B archery elk antlerless licenses are only valid in units that also have List B rifle elk antlerless licenses.</p> <p>This alternative was labeled as Alternative A1 in the OTC survey.</p>                                 |

***What is our recommendation and why?***

**Staff recommends Alternative 1.**

Based on the results from the 2023 public and staff outreach efforts, as well as the 2023-2024 public OTC survey, both the public and staff are in favor of some form of limitation for OTC archery elk licenses. While we acknowledge that a full limitation of both resident and nonresident OTC licenses is one of the least favored options for OTC limitation based on the results of the public OTC survey, CPW is proposing this alternative for several key reasons.

The primary rationales for this staff preferred alternative are to 1) increase the quality of the archery elk hunting experience in Colorado by addressing concerns of overcrowding in OTC elk units, 2) standardize the management of archery elk hunting in a manner that is congruent with the current limited licensing model in Colorado, 3) provide CPW with the tools needed to strive to better manage elk distribution on public land, and 4) enhance management control to address local elk Herd Management Plan considerations.

One of the major concerns brought up repeatedly during our public outreach efforts over the last five to ten years is the overcrowding of OTC archery elk units. By fully limiting OTC archery via the draw, CPW would have the tool needed to control archery hunting pressure across all DAUs/GMUs. CPW is proposing to limit both resident and nonresident OTC elk archery licenses to remain consistent with the license limitation model that CPW employs for other species such as deer. Further, we anticipate that if we only limit nonresidents, crowding issues may persist over time without the management ability to mitigate. While it

is important to note that hunter perception of overcrowding is highly variable, this alternative would help to alleviate the crowding issues that currently exist under the status quo.

During the previous BGSS, the Commission agreed to consider limitations for both residents and nonresidents on a case-by-case basis. Over the past few years, CPW has already fully limited resident and nonresident either-sex and sex-specified archery elk licenses on an individual DAU basis in five DAUs to meet biological or social management objectives. As expected, with each DAU that has been fully limited, a domino effect has ensued, whereby some archery OTC hunters have been displaced to the remaining OTC units, exacerbating crowding and hunter pressure on animals in those units. CPW believes we have reached a tipping point to where we need to fully limit OTC archery elk statewide. Should the status quo be maintained, CPW anticipates ongoing requests to fully limit OTC archery hunting in additional DAUs, and we do not support adding OTC back to elk units that have already been fully limited. Staff's preferred alternative would stop the domino effect of ad hoc limitations, and prevent crowding from getting worse in the remaining OTC units.

Additionally, staff's preferred alternative would standardize the management of archery elk hunting in a manner that is congruent with the current limited licensing model in Colorado. This alternative would allow for consistent management between historic and recently limited OTC units, and would be consistent with how Colorado currently manages deer, which avoids the added regulatory complexity of having multiple types of limited elk hunting. From a law enforcement and public education standpoint, transitioning to a similar model as deer is likely to be more translatable to our constituents and reduce law enforcement concerns. Furthermore, under a totally limited scenario, the existing license allocation policy would take effect (currently 75/25 or 80/20 resident/nonresident), providing a first-choice draw advantage to resident applicants if resident demand exists. From a nonresident standpoint, this alternative would maintain a "soft cap" for license allocation, maximizing opportunity for nonresidents if resident demand is below the allocation threshold.

Lastly, of the proposed alternatives, this alternative provides enhanced ability to manage elk distributions at the local level. Elk frequently move to private land refuges in response to archery and other early season hunting pressure. Therefore, eliminating OTC and moving to a draw only system for archery elk would provide CPW with the tools needed to manage hunter pressure, and strive to better manage elk distribution on public land.

Staff believe that we have conducted a sufficient amount of outreach and analysis on the financial implications of limiting OTC elk archery licenses to recommend this alternative. While staff acknowledge that limiting OTC elk archery licenses for both residents and nonresidents would have a financial impact on CPW and some hunting-related businesses and local businesses that financially benefit from hunting, staff believe that reducing archery elk licenses around 10% initially is appropriate for addressing concerns of

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| <p>overcrowding in OTC elk units and enhancing local management ability, while remaining cognizant of the financial impacts.</p> |  |
| <p><b>6b) OTC Rifle Limitation Alternatives</b></p>  |  |
| <p><b>Status Quo (Staff Preferred Alternative)</b></p>   | <p>No change. Unlimited licenses available for antlered elk during the second and third general rifle seasons in OTC units. Limited either-sex or limited antlered elk licenses available in remaining limited units. All antlerless elk licenses are limited. Limited licenses issued by GMU/DAU.</p> <p>This was labeled as Alternative R1 in the OTC survey.</p>  |
| <p><b>Alternative 1</b></p>  | <p>Limit <b>nonresident</b> rifle licenses - limited licenses available through the <b>draw by management area</b> (DAU or GMU); status quo OTC for residents (only in current OTC units).</p> <p>Resident OTC licenses would remain valid on both public and private land. Optional nonresident limited PLO hunt codes could be created. <i>[This alternative would create differences between currently limited and OTC DAUs for PLO licenses. In a currently limited DAU, PLO licenses could be available for both residents and nonresidents. In current OTC DAUs, limited PLO hunt codes could be created for nonresidents only (OTC licenses are valid on private land for residents)].</i></p> <p>CPW anticipates making incremental reductions of rifle elk licenses over time to start reducing hunter crowding while also adjusting to incremental losses in revenue. Initial quota reductions will be based on recent OTC license sales and are expected to be around 10%; however, with consideration to CPW finances and license demand, reductions may continue if crowding or elk herd performance and distribution continue to be of concern. Quota reductions would only affect nonresidents, as residents remain status quo for OTC licenses (unlimited).</p> <p>This alternative was labeled as Alternative R5 in the OTC survey.</p> |
| <p><b>Alternative 2</b></p>  | <p><b>Phased limitation of all resident and nonresident rifle licenses</b> - limited licenses available through the <b>draw by management area</b> (DAU or GMU).</p> <p>This alternative was labeled as Alternative R6 in the OTC survey; however, this alternative would now include a phased limitation approach, described in further detail below.</p>   |

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|  | <p>The approach would be to implement limitations slowly over the next five-year season structure cycle (2025-2029), though the timeline is flexible. Implementation could potentially begin with the installation of limited license hunt codes, but no license reductions would occur during the first few years. Concurrently, CPW’s focus would be on educating elk hunters and transitioning customers to the new licensing model, collecting data to learn more about how limitation impacts other aspects of the draw, such as preference points, and adjusting to potential economic changes. This transition could be followed by small-scale reductions in total elk license quotas during year three to begin addressing crowding concerns, and then potentially ramping up license reductions during years four and five based on local management issues and as CPW’s finances allow. A phased approach would allow businesses that depend on hunting the time to adjust to the OTC rifle limitations, while also allowing hunters some decision space to slowly transition to a new licensing model.</p> |
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***What is our recommendation and why?***

**Staff recommends maintaining the status quo.**

Limiting OTC archery has been a topic under consideration for at least ten years over the previous BGSS cycles, and CPW staff believe that there has been adequate outreach conducted to propose limiting OTC archery. However, this is the first season structure in which CPW has considered limiting OTC rifle statewide. Based on the results from the 2023 public and staff outreach efforts, as well as the 2023 public OTC survey and BGAS survey, there is interest in limiting OTC elk rifle licenses. While we acknowledge that the status quo is generally one of the least favored options for OTC limitation based on the results of the public OTC survey, CPW is proposing to maintain the status quo for OTC rifle. Multiple recent data points indicate that there is an increasing desire to transition away from OTC rifle licenses in Colorado. Because of the magnitude of that potential change, staff feel that CPW and our constituents need more time to fully examine the social, biological, and financial implications of transitioning to a non-OTC model of elk management for rifle elk seasons.

**Potential advantages to maintaining the status quo for OTC rifle elk licenses over the next BGSS:**

- Would preserve an opportunity for hunters to hunt elk without having to purchase a qualifying license or resort to the leftover and reissue license processes.
- Would provide time for CPW to possibly conduct further outreach to constituents and continue planning for budget modifications, including the ongoing assessment of alternative funding sources.



- Would allow CPW to make decisions on how the draws will be changed in accordance with the Draw Working Group recommendations, and properly evaluate those changes in relation to OTC licensing.
- Would provide an opportunity to evaluate the outcomes of limiting OTC archery elk licenses statewide and changes in hunter behavior and perceptions.
- Would maintain opportunity while not having a substantial impact to productivity; elk populations are somewhat safeguarded based on bull-only licenses and four-point antler restrictions.

Potential disadvantages to maintaining the status quo for OTC rifle elk licenses over the next BGSS:

- Would not address crowding concerns during OTC rifle seasons.
- Would continue to limit managers' ability to intervene in local management issues such as severe winter events, drought, and elk refuging.
- Would potentially shift hunter participation from archery to rifle seasons following limitations of OTC archery.
- May encourage an ad hoc method of limiting DAUs for OTC rifle similar to what has happened with archery limitations over time; a large group of units in the Northwest Region has already been limited for 2024, which is likely to shock the OTC rifle system to an unknown degree in terms of shifting hunter participation to other units.
- Does not help mitigate preference point creep for limited elk hunts.
- Bull harvest and herd sex ratios will continue to largely be regulated by the second and third season participation and success rates.

**Timeline and Next Steps for Decision-making and Public Comment**

Staff will present these preliminary alternatives and recommendations for discussion and consideration with the Commission during the March 2024 Commission meeting. CPW requests that the Commission provide staff with clear direction on which preliminary recommendations to bring back as draft recommendations for additional consideration during the May 2024 Commission meeting, and proposed final recommendations for approval during the June 2024 Commission meeting. Thank you for your time and consideration.

## Appendix A: Public Engagement Summary for the 2025-2029 BGSS Process

CPW officially launched public outreach efforts in the spring of 2023 to inform the public and interested stakeholders about the upcoming BGSS and to collect input from the public on the discussion topics listed approved at the [January 2023 Commission meeting](#).

The BGSS public outreach process was divided into two stages. Stage One focused on 1) gathering public input on the BGSS via our [Engage CPW BGSS webpage](#)<sup>1</sup> and 2) targeted stakeholder briefings. CPW staff discussed the BGSS process at several stakeholder meetings, including at the Colorado Sportsperson's Roundtable and regional sportsperson's caucuses. Stage Two focused on hosting 17 in-person and 2 virtual public meetings from May to late June 2023 to gather feedback on hunters' perspectives on the current BGSS and opinions on possible changes for the 2025-2029 BGSS.<sup>2</sup> In August 2023, CPW released a [summary report of public involvement](#) for the 2025-2029 BGSS process. Staff presented their public input findings to the Parks and Wildlife Commission at its [August 2023 Commission meeting](#).

Before settling on preliminary BGSS alternatives and recommendations to bring to the Commission in March 2024 for consideration and input, our BGSS Working Group staff conducted two additional outreach efforts:

- 1) Staff conducted an all-staff outreach effort to collect more extensive and detailed information on staff's preferences for all of the BGSS topics via a survey.
- 2) Staff sent out a random sample survey to archery and rifle elk hunters to understand their preferences specifically on limitation alternatives for over-the-counter (OTC) rifle and archery elk licenses. More detail on this survey is included below.

### ***Winter 2023 Public OTC Survey - Overview***

CPW sent an online random sample survey to ~6,000 hunters who received an elk license in 2018 or 2022. Following the Commission's resident/nonresident license allocation rule, 75% of the sampled hunters were residents and 25% were nonresidents. The survey was sent to an equal number of archery and firearm (rifle and/or muzzleloader) elk hunters.

This survey was available from November 29, 2023 through January 10, 2024 for a total of 6 weeks. CPW staff advertised this survey through a statewide press release and an Engage CPW newsletter to members of the public who had previously participated in big game topics through Engage CPW. Staff also discussed the survey at the November and January Commission meetings, as well as at the December Sportsperson's Roundtable. Lastly, we posted about the survey on our [Engage CPW BGSS webpage](#) and shared information through our Regional representatives to local communities.

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<sup>1</sup> CPW received 1,035 completed comment forms from members of the public through Engage CPW during Stage One.

<sup>2</sup> In total, staff received input from over 640 members of the public during Stage 2 of the public outreach period.

As a result of these efforts, CPW received 1,741 survey submissions (~29% response rate). Of these, 1,568 included levels of support or opposition to the limitation alternatives for OTC rifle and archery elk licenses. Members of the public who were not selected to participate in the survey could provide their input on our Engage CPW BGSS webpage; we received 133 responses through this avenue.

The public OTC survey was aimed at understanding preferences on limitation alternatives for OTC rifle and archery elk licenses. Hunters were asked about their:

- 1) level of support for each OTC rifle elk and OTC archery elk alternative offered (the survey included detailed graphics for each alternative that outlined a description of the alternative, the potential benefits and drawbacks associated with the alternative, and the financial implications anticipated from the alternative).
- 2) influences on preferences for OTC archery and rifle elk alternatives.
- 3) anticipated changes in hunting behavior based on OTC limitations.
- 4) general demographic information (resident status, preferred method of take, etc.).

The OTC limitation alternatives proposed for consideration included the following:

- **A1/R1.** Status Quo - unlimited OTC licenses valid in certain management areas for BOTH residents and nonresidents
- **A2/R2.** Cap nonresident OTC licenses with a statewide cap; status quo for residents
- **A3/R3.** Cap nonresident OTC licenses with a cap for each management area; status quo for residents
- **A4/R4.** Limit all nonresident licenses and add a nonresident statewide hunt code that is available through the draws; status quo for residents
- **A5/R5.** Limit all nonresident licenses - limited licenses available through the draws only with hunt codes by management area; status quo for residents
- **A6/R6.** Eliminate OTC for BOTH residents and nonresidents - limited licenses available through the draws only with hunt codes by management area

### ***Winter 2023 Public OTC Survey - Results***

During preliminary analysis of the OTC survey data, a few key trends began to emerge. First, the approach to managing nonresident OTC licenses appeared to be more of a determining factor in support or opposition of the alternatives than the method of license limitation (cap or draw) or the method of take (archery or rifle). To illustrate this concept, note the findings below:

- Alternatives A3/R3 and A5/R5 (which would allocate nonresident OTC licenses by a management area hunt code) had the most support from survey respondents.
- Alternatives A2/R2 and A4/R4 (which would allocate nonresident OTC licenses by a statewide hunt code) fell in the middle of support from survey respondents.
- Alternatives A1/R1 and A6/R6, which lie at opposite ends of the spectrum (A1/R1 call for unlimited OTC licenses for all, while A6/R6 call for the complete elimination of OTC licenses for all) had the least support from survey respondents.

In analyzing the survey data, staff also found that resident and nonresident opinions on the alternatives were almost entirely opposed, which confirmed staff hypotheses about how residency status affects attitudes toward OTC license management.

Regarding potential behavioral changes, as with the OTC limitation responses above, resident and nonresident respondent opinions were opposed. For the nonresident hunters that reported they would change their hunting behavior, around 50% responded that they would likely stop hunting in Colorado if OTC restrictions were only applied to nonresidents. If OTC restrictions were applied to both residents and nonresidents, the percentage is slightly lower (roughly 41%). Based on the survey results, resident hunters would be somewhat less likely to participate in hunting in Colorado if OTC restrictions were applied to both residents and nonresidents.

Ultimately, CPW believes a more robust study of behavioral changes and economic impacts should be conducted to better understand the impacts that various OTC limitation options could have on resident/nonresident hunting behaviors.

#### ***Winter 2023 Engage CPW Page Public Feedback***

CPW staff also provided information about the OTC public survey and alternatives under consideration on our interactive [BGSS Engage CPW webpage](#). Over 6,000 people visited the [BGSS Engage CPW webpage](#) to read about the OTC alternatives under consideration, as well as the benefits, drawbacks, and financial implications associated with each alternative.

Individuals who were not selected to participate in the OTC survey could submit their feedback through the Engage CPW webpage for a total of 7 weeks (from November 29th, 2023 through January 17th, 2024). CPW received 133 total comments (109 of these comments specified preferences for OTC alternatives). The majority of comments received (87%) were from resident hunters.

Of the 109 comments that specified support or opposition to specific OTC alternatives:

- A slight majority of these comments (60%) preferred Alternatives A5 and R5, which call for the limitation of all nonresident rifle/archery OTC licenses; limited licenses would be available through the draws only with hunt codes by management area; status quo for residents.
- The second most supported alternatives by public commenters were Alternatives A6 (30%) and R6 (28%), which call for the elimination of OTC rifle/archery for both residents and nonresidents - limited licenses available through the draws only with hunt codes by management area.
- Engage CPW commenters' least preferred alternatives were Alternatives A1 and R1 (status quo) and Alternatives A2 and R2 (capping nonresident licenses with a statewide cap).

## Appendix B: Alternatives Analyzed but Not Brought to the Commission for Consideration

### *Season Structure for Early Seasons (Archery/Muzzleloader) for Deer and Elk West of I-25 and Game Management Unit (GMU) 140*

| Alternative Analyzed  | Rationale for Dismissal  |
|---|--|
| <p>Move the 30-day archery deer season west of I-25 to August 15 - September 13. This season would no longer align with archery bear and elk seasons. This season would instead align with the archery pronghorn season start date.</p> | <p>Data gathered during the 2023 public involvement process indicates that the current early season structure is preferred by hunters more than other alternatives presented.</p> <p>Staff do not support this alternative as shifting to August 15th would put deer, elk, and bear seasons out of alignment, creating enforcement concerns as well as complications with the add-on over-the-counter (OTC) bear licensing strategy (bear seasons can start no earlier than September 2nd). This alternative does not address a major concern we have heard from the hunting community about simplifying hunting seasons and having consistency across seasons.</p> <p>In addition, there is concern that shifting the archery season into mid-August would shift pressure on big game herds earlier in the year (e.g. deer, elk, sheep, and goat), potentially disrupting their distribution on summer ranges and triggering earlier movements to lower elevations and private lands, thereby impacting animal availability during September seasons.</p> |

### *Season Structure for Regular Deer/Elk Rifle Seasons*

| Alternative Analyzed  | Rationale for Dismissal  |
|---|--|
| <p>5-9-9-5. Current BGSS Date Structure, but returning to a 9-day third rifle season that includes two weekends (shortens the break between the third and fourth rifle seasons from 4 days to 2 days)</p> | <p>This alternative did not receive significant support from either the public or internal staff. Despite adding a second weekend to the third rifle season, this alternative would maintain the current late season dates and perpetuate management issues that are not supported by staff. This alternative also does not address winter access concerns (i.e., winter closures on federal lands during the later season dates under the</p> |

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|  | current season structure) or issues with the Thanksgiving overlap.  |
| 5-9-5-5. This alternative was suggested by a Commissioner in August 2023 and intends to shift the seasons earlier. This proposal shortens the third rifle season by 2 days, from 7 days to 5 days. The first season would open on a Wednesday and continue to be elk only. The fourth rifle season would be deer only. | <p>This alternative did not receive significant support from either the public or internal staff due to the shortened third season, which would limit third season deer and elk hunting opportunities, as well as the deer only fourth rifle season.</p> <p>Members of the public and staff noted that removing elk from the fourth season would reduce hunter opportunity, and may not be necessary because fourth season licenses are currently limited and quotas may be adjusted based on management objectives and local issues.</p> |

***Over-the-Counter (OTC) Limitations***

| <b>Alternative Analyzed</b>   | <b>Rationale for Dismissal</b>   |
|---|--|
| Cap nonresident OTC licenses with a statewide cap; status quo OTC for residents | <p>There was little support from either the public or internal staff for this alternative, as it would create a “first come, first served” system, which could result in equity issues. In other states that have a nonresident OTC cap, these limited licenses sell out very quickly.</p> <p>This method would not allow CPW to manage hunter pressure in targeted herds, as hunters could still use licenses in a broad selection of areas. Additional control is preferred following stochastic events, such as severe winters, wildfires, and drought. In addition, by limiting only nonresidents, this alternative does not truly address overcrowding concerns, as resident licenses would remain OTC and residents may replace nonresident hunters.</p> <p>OTC with caps is an alternative way to limit licenses than limiting through the draw, but it allows hunters to build preference points.</p> <p>CPW’s mission includes considerations for residents and nonresidents equally, and this alternative is not consistent with that mission.</p> |

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|---|---|
| <p>Cap nonresident OTC licenses with a cap for each management area; status quo OTC for residents</p>   | <p>There was little support from either the public or internal staff for this alternative for the same reasons listed for the alternative above. Additionally, this method could also lead to confusion and add considerable complexity, as nonresident hunters would need to know which management areas their OTC tags are valid for, while residents maintain the ability to hunt any OTC unit. The difficulty of communicating this difference will likely create law enforcement challenges.</p> |
| <p>Limit all nonresident licenses and add a nonresident statewide hunt code that is available through the draws; status quo OTC for residents</p> | <p>This method would not allow CPW to manage hunter pressure in targeted herds, as hunters could still use licenses in a broad selection of areas and may still cause hunter crowding issues at the GMU/DAU level.</p>  |

## Appendix C: OTC Limitation Financial Analysis

CPW conducted an analysis to estimate the financial implications of the following OTC alternatives being presented to the Commission:

6a1: Limiting resident and non-resident **archery** hunters and applying the 75/25 resident/non-resident license allocation (Archery R/NR Limitation).

6a2: Limiting non-resident **archery** hunters only and allowing **archery** residents to have unlimited licenses (Archery NR Only Limitation).

6b1: Limiting resident and non-resident **rifle** hunters and applying the 75/25 resident/non-resident license allocation (Rifle R/NR Limitation).

6b2: Limiting non-resident **rifle** hunters only and allowing **rifle** residents to have unlimited licenses (Rifle NR Only Limitation).

Each of these alternatives proposes limiting licenses that are currently unlimited. In other words, quotas would need to be created for the newly limited hunts. In this analysis, we considered four quota scenarios for each of the above alternatives. In the first scenario, quotas were set to meet current demand. The result would be 0% license reductions. In the second, third, and fourth scenarios, license quotas were reduced by 10%, 25% and 50%, respectively, from current demand to simulate what would happen if CPW needed to reduce quotas by those amounts to address crowding concerns. Table 1 and Table 2 in this Appendix display these scenarios.

We defined current demand as the average number of licenses sold during the 2021 and 2022 license years (2020 and 2023 license sales were not used in the average because licenses sales were abnormal in 2020 due to the COVID-19 pandemic and license were reduced in 2023 to counteract the 2022-2023 severe winter). We assumed that demand would stay the same as it was on average in 2021 and 2022.

For each alternative, under the first scenario (no license reductions), even though licenses would be limited, quotas would be set at current demand. There would be no change in license sales and therefore no financial losses due to reduced license sales. However, in order for hunters to be able to apply for limited licenses through the draw, they would be required to purchase a qualifying license. There would be financial gains from this increase in qualifying license sales. To determine the financial implications of increased qualifying license sales, we determined the proportion of OTC hunters on average in 2021 and 2022 by hunt code and residency that did not have a qualifying license. We applied those proportions to the estimated number of resident and non-resident hunters under each scenario that would be required to buy a qualifying license.

How the license reduction scenarios affect resident and non-resident license availability relative to each other depends on their relative demand for licenses and plays out at the individual hunt code level. For the R/NR Limitation alternatives (6a1 for archery and 6b1 for rifle), under the second and third scenarios (10% and 25% reductions), most of the license reductions come from non-resident hunters. This is due to the fact that current non-resident demand generally exceeds the 25% of licenses that would be allocated under the 75/25 resident/non-resident allocation applied in the draw. Under the fourth scenario (50% license reductions), resident hunter licenses are substantially reduced along with non-resident licenses; revenue loss is substantial.



For the NR Only Limitation alternatives (6a2 for archery and 6b2 for rifle), the financial impacts are very similar to those from the R/NR limitation alternatives (6a1 and 6b1). For the archery NR Only Limitation alternative (6a2), under the fourth scenario, non-resident licenses were severely reduced down to 7% of total license (compared to 93% resident). Whereas, a 50% reduction in total licenses is not achievable for the Rifle NR Only Limitation alternative (6b2). Even when non-resident licenses were reduced to 0, we could only achieve a 43% reduction in total licenses.

For alternatives 6a1 and 6b1, under the fourth scenario, quota was set at 50% below current demand. This scenario was run because quotas may need to be reduced by half to fully address crowding concerns. At this level of license reduction, resident hunter licenses are substantially reduced along with non-resident licenses; revenue loss is substantial.

For alternatives 6a2 and 6b2, only non-resident licenses would be limited. To achieve a 10% and 25% reduction in total licenses, without limiting residents, the non-resident reductions would have to be higher than in alternatives 6a1 and 6b1. The financial losses resulting from these alternatives are therefore higher than from alternatives 6a2 and 6b2. For alternative 6a2, under the fourth scenario, non-resident licenses were severely reduced down to 7% of total license (compared to 93% resident). For alternative 6b2, under the fourth scenario, even when non-resident licenses were reduced to 0, we could only achieve a 43% reduction in total licenses. It would not be possible to achieve 50% reduction in license sales without limiting resident hunters

Table 1. Estimated license and revenue changes associated with limitation of OTC archery elk licenses and quota reduction scenarios.

| ARCHERY OTC Limitation (EE000U1A & EF000U1A) Alternatives      | Total Licenses | Resident      | Non-resident  | % NR       | Projected 2025 Revenue (Millions) | Difference from Status Quo (Millions) | Cost of Additional Qualifying Licenses (Millions) | Elk+ Qualifying License Revenue |
|--|----------------|---------------|---------------|------------|-----------------------------------|---------------------------------------|---|---------------------------------|
| <b>Average License Sales 2021/2022 (Status Quo)</b>            | <b>33,640</b>  | <b>15,621</b> | <b>18,019</b> | <b>54%</b> |                                   |                                       |   |                                 |
| 6a1: R/NR Limited (75R:25NR allocation) , Total Reduced by 0%  | 33,640         | 15,621        | 18,019        | 54%        | \$16.1                            | \$0.0                                 | \$1.3   | \$1.3                           |
| 6a1: R/NR Limited (75R:25NR allocation) , Total Reduced by 10% | 30,276         | 15,394        | 14,882        | 49%        | \$13.4                            | -\$2.6                                | \$1.1   | -\$1.6                          |
| 6a1: R/NR Limited (75R:25NR allocation) , Total Reduced by 25% | 25,230         | 15,053        | 10,177        | 40%        | \$9.5                             | -\$6.6                                | \$0.7   | -\$5.8                          |
| 6a1: R/NR Limited (75R:25NR allocation) , Total Reduced by 50% | 16,820         | 12,615        | 4,205         | 25%        | \$4.3                             | -\$11.7                               | \$0.3   | -\$11.4                         |
| 6a2: R Status Quo, NR Limited, Total Licenses Reduced by 0%    | 33,640         | 15,621        | 18,019        | 54%        | \$16.1                            | \$0.0                                 | \$1.2   | \$1.2                           |
| 6a2: R Status Quo, NR Limited, Total Licenses Reduced by 10%   | 30,276         | 15,621        | 14,655        | 48%        | \$13.3                            | -\$2.8                                | \$1.0   | -\$1.8                          |
| 6a2: R Status Quo, NR Limited, Total Licenses Reduced by 25%   | 25,230         | 15,621        | 9,609         | 38%        | \$9.0                             | -\$7.0                                | \$0.6   | -\$6.4                          |
| 6a2: R Status Quo, NR Limited, Total Licenses Reduced by 50%   | 16,820         | 15,621        | 1,199         | 7%         | \$2.0                             | -\$14.0                               | \$0.1   | -\$13.9                         |

Table 2. Estimated license and revenue changes associated with limitation of OTC rifle elk licenses and quota reduction scenarios.

| RIFLE OTC Limitation (EM000U2R & EM000U3R) Alternatives   | Total Licenses | Resident      | Non-resident  | % NR       | Projected 2025 Revenue (Millions) | Difference from Status Quo (Millions) | Cost of Additional Qualifying Licenses (Millions) | Elk+ Qualifying License Revenue |
|---|----------------|---------------|---------------|------------|-----------------------------------|---------------------------------------|---|---------------------------------|
| <b>Average License Sales 2021/2022 (Status Quo)</b>   | <b>54,810</b>  | <b>31,298</b> | <b>23,513</b> | <b>43%</b> |                                   |                                       |   |                                 |
| 6b1: R/NR Limited (75R:25NR allocation) , Total Reduced by 0%                                       | 54,810         | 31,298        | 23,513        | 43%        | \$21.1                            | \$0.0                                 | \$1.6   | \$1.6                           |
| 6b1: R/NR Limited (75R:25NR allocation) , Total Reduced by 10%                                      | 49,329         | 31,298        | 18,032        | 37%        | \$16.6                            | -\$4.4                                | \$1.3   | -\$3.2                          |
| 6b1: R/NR Limited (75R:25NR allocation) , Total Reduced by 25%                                      | 41,108         | 29,757        | 11,351        | 28%        | \$11.1                            | -\$10.0                               | \$0.9   | -\$9.1                          |
| 6b1: R/NR Limited (75R:25NR allocation) , Total Reduced by 50%                                      | 27,405         | 20,554        | 6,851         | 25%        | \$6.9                             | -\$14.2                               | \$0.5   | -\$13.7                         |
| 6b2: R Status Quo, NR Limited, Total Licenses Reduced by 0%   | 54,810         | 31,298        | 23,513        | 43%        | \$21.1                            | \$0.0                                 | \$1.3   | \$1.3                           |
| 6b2: R Status Quo, NR Limited, Total Licenses Reduced by 10%  | 49,329         | 31,298        | 18,032        | 37%        | \$16.6                            | -\$4.4                                | \$1.0   | -\$3.4                          |
| 6b2: R Status Quo, NR Limited, Total Licenses Reduced by 25%  | 41,108         | 31,298        | 9,810         | 24%        | \$10.0                            | -\$11.1                               | \$0.6   | -\$10.6                         |
| 6b2: R Status Quo, NR Limited, Total Licenses Reduced by 43%<br><b>(50% Reduction Not Possible)</b> | 31,298         | 31,298        | 0             | 0%         | \$2.0                             | -\$19.1                               | \$0.0   | -\$19.1                         |

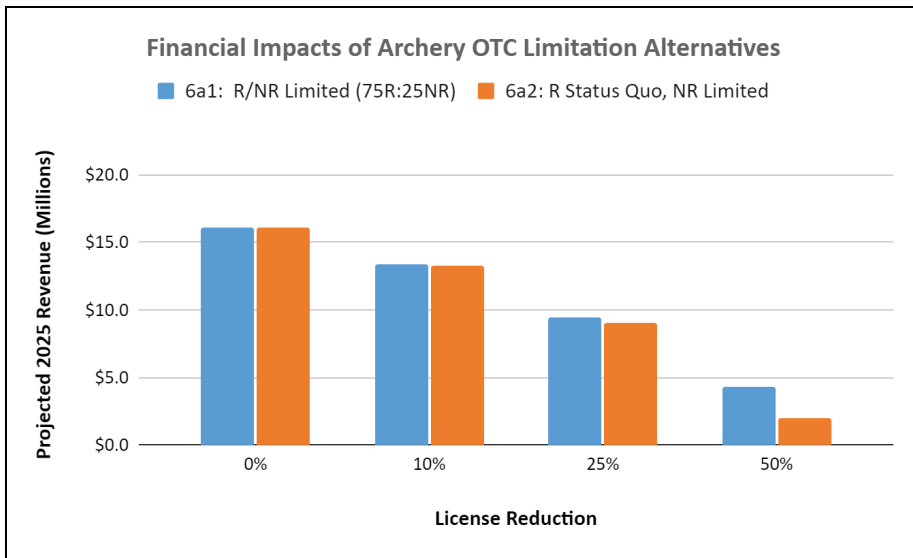


Figure 1.

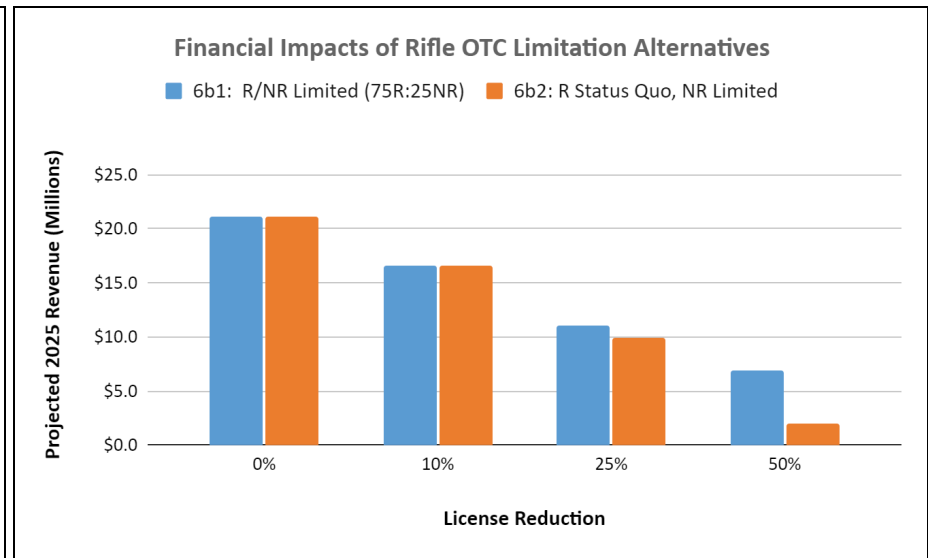


Figure 2.

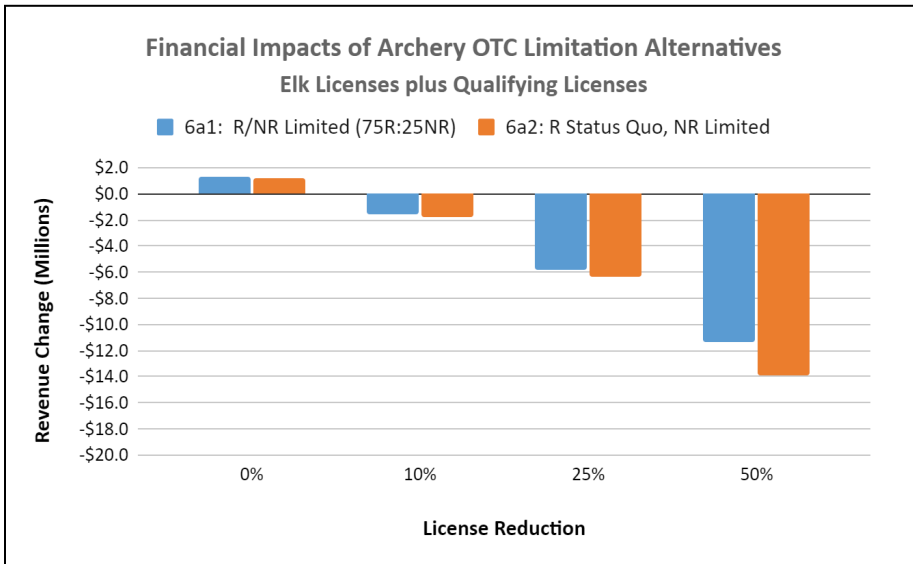


Figure 3.

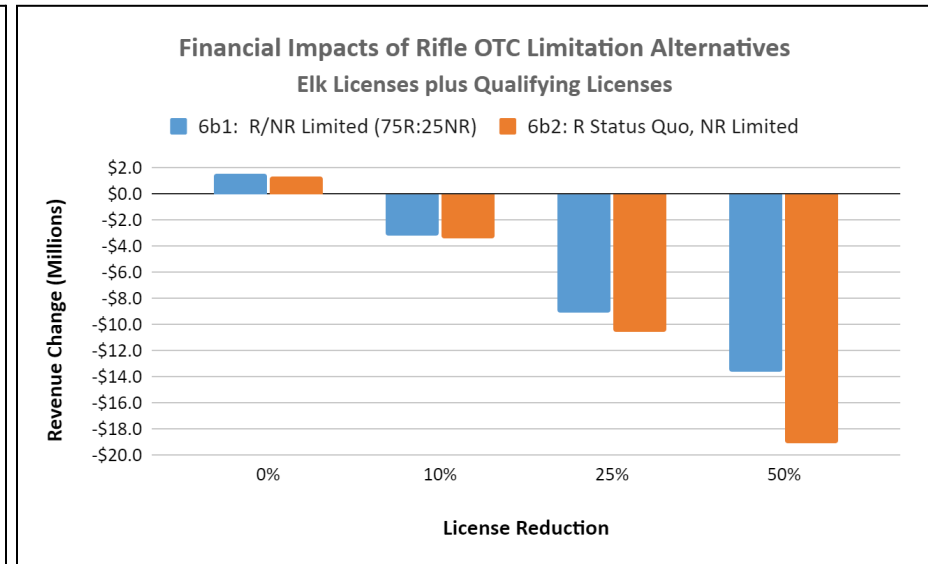


Figure 4.