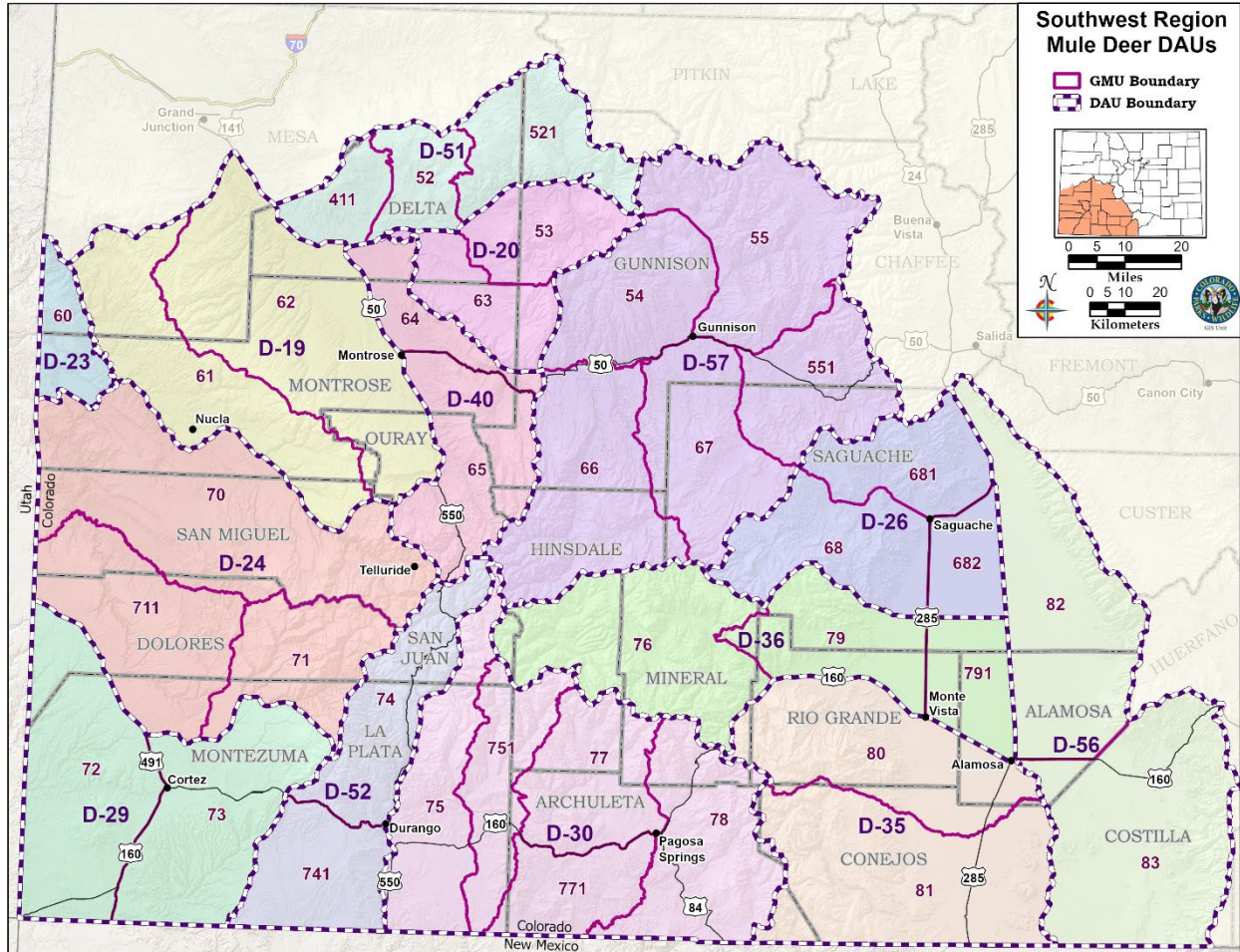


# Mule Deer Herd Management Plans

## Colorado Parks and Wildlife

### Southwest Region



PREPARED FOR  
COLORADO PARKS AND WILDLIFE



BY  
SOUTHWEST REGION WILDLIFE BIOLOGISTS

*This plan was approved by the Colorado Parks and Wildlife Commission on March 13, 2024*

## Executive Summary

Colorado's mule deer populations are iconic and known throughout the United States and the world. Today, Colorado maintains a herd of approximately 390,000 mule deer, the largest population in North America. However, mule deer populations in Colorado and throughout the western United States have steadily declined since the 1960s and 1970s, likely numbering less than half of historic highs. As recently as 2006, Colorado is estimated to have sustained a mule deer population of approximately 600,000 animals. Wildlife biologists, researchers, landowners and land management agencies, hunters, and wildlife watchers have put considerable resources and effort into maintaining mule deer populations in recent decades in an effort to mitigate growing and increasing threats to healthy mule deer populations and wildlife habitat in Colorado and across the western United States.

Hunting and angling, and other wildlife-related recreation, contribute over \$5 billion annually to Colorado's economy. Funds generated by big game hunting license sales are used in the conservation of Colorado's wildlife in numerous ways, including habitat improvement and conservation projects that benefit a diversity of species. However, mule deer populations face significant ongoing and often growing threats, including habitat loss and fragmentation to development on public and private lands, increasing recreation pressure and recreational development, traditional and renewable energy development and production, highways and fencing bisecting migration routes, conflict with agricultural interests, disease, and decline in habitat quality related to invasive weeds replacing preferred forage plants, persistent drought, and climate change. All of these threats are compounded by booming human population growth across Colorado. These challenges present mule deer and wildlife managers with an uncertain future as we work to manage and conserve mule deer populations, other wildlife, minimally fragmented and secure wildlife habitats, and naturally functioning ecosystems for generations to come.

Mule deer have been widely studied in Colorado and elsewhere. CPW has taken numerous measures to attempt to understand and slow down population declines and has implemented long-term mule deer monitoring studies in five herds across the state (including the D-19 Uncompahgre Plateau and D-57 Gunnison Basin herds in southwest Colorado) to monitor annual adult doe survival and over-winter fawn survival annually since 1997. The state has conducted numerous studies to understand the relationship between habitat and predators on mule deer populations. We have completed thousands of acres of conservation easements to protect private lands from development. The state also developed a West Slope Mule Deer Strategy in 2014, which incorporated public input to guide the stabilization and recovery of deer populations that would, in turn, increase hunting and other wildlife-related recreation opportunities in the state. Following the guidance of the mule deer strategy, funds have also been made available and matched, to improve habitat across large parts of western Colorado. All of the efforts have contributed significantly to mule deer conservation and management and to the benefit of other species using similar habitat types. Through all of the monitoring efforts, research, and public input, CPW staff have identified issues impacting deer populations and herd health in southwest Colorado. In addition, CPW and partnering organizations have initiated thousands of conservation easements to protect private lands from future development. CPW and partner organizations are also continually engaged with federal and state land management agencies and private landowners to promote habitat improvement projects that benefit deer and other wildlife species. These ongoing efforts help

ensure a future for deer and other wildlife in Colorado. Conservation of Colorado's big game herds and overall wildlife habitat protection are among CPW's highest priorities<sup>1</sup>.

The Herd Management Plans (HMPs) contained in this document will guide the management of 14 mule deer herds occurring in the Southwest Region for a 10-year period through 2034. In sum, these 14 deer herds contain an estimated 130,000 animals, representing 33% of the statewide total population estimate of 390,000 deer. Of the 14 draft HMPs contained herein, CPW staff are proposing extensions of recently approved management objectives for six of them. HMP extensions are recommended when CPW staff believe a continuation of the previous objectives, course of management actions, and strategies are supported for a given herd. Therefore, we are not proposing any changes to the objectives or management approach for six of these HMPs, all approved by the Parks and Wildlife Commission within the last few years. Extensions have reduced public levels of involvement compared to full HMP revisions, as those processes were recently completed. CPW proposes revising HMPs for the remaining eight herds, which include new management objective alternatives, whose current management objectives are generally more than 10 years old (Table 1). Revisions include public involvement and may result in changes to any aspect of the plan including the numerical objectives (such as population and sex ratio objective ranges) and management approach (increasing, maintaining, or reducing). Therefore, CPW may modify the population objectives or management strategies.

Management objectives established in these plans must abide by statutes and policies set forth by CPW's Big Game Season Structure, CPW's Strategic Plan, the Parks and Wildlife Commission, and the Colorado State Legislature. The primary purpose of HMPs is to establish management objectives for each herd in terms of a desired population size range and observed sex ratio (bucks:100 does) range. The management alternatives selected in these plans will drive annual deer license-setting decisions. License-setting and the resultant annual harvest modulate deer population numbers to meet population and sex ratio objectives. Each plan also describes additional strategies and techniques that will be used to achieve the desired herd objectives. The goal for the 10-year term of these plans is to manage to the most appropriate population level within the objective range based on climatic patterns, habitat conditions, forage availability, and public desires. CPW may consider revisiting an HMP prior to the end of the 10-year term of the plan if outstanding circumstances arise and a revision is deemed necessary.

Local CPW staff have conducted extensive public and stakeholder outreach to inform the various proposed management objective alternatives for each HMP. Evaluation of newly available optional hunter satisfaction data from annual hunter harvest surveys, as well as meetings with the public, local governments and organizations, and other stakeholders, have guided the development of these plans and management alternatives. In addition, the draft plan was posted on the CPW website and advertised with press releases from November 1, 2023 - December 15, 2023, for another public comment period to evaluate the proposed objective alternatives. The draft plan was presented to the Parks and Wildlife Commission on January 11, 2024, for final review and comment, and was formally approved on March 13, 2024.

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<sup>1</sup> <https://cpw.state.co.us/Documents/About/StrategicPlan/CPWStrategicPlan.pdf>

Table 1. Population and management status of 14 mule deer herds occurring in SW Colorado.

DAU	Mule Deer Herd	Current Herd Management Plan Approved	Current Population Objective	2022 Post-hunt Population Estimate	Current Buck Ratio Objective	3-Yr Avg Observed Buck Ratio	Buck CWD Prevalence	Proposed Population Objective	Proposed Buck Ratio Objective
D-19	Uncompahgre Plateau	2006	36,000-38,000	10,300	34-36	33	13.8%	12,000-15,000	30-35
D-20	North Fork Gunnison River	2018	7,500-9,500	8,700	33-38	34	0%	Extension	Extension
D-23	La Sal	2008	2,500-3,000	1,500	25-30	33	21.0%	1,500-1,800	20-25
D-24	Groundhog	2014	15,000-19,000	18,300	23-28	27	3.1%	19,000-23,000	23-28
D-26	Saguache	2019	5,500-6,500	5,500	26-29	29	0%	Extension	Extension
D-29	Mesa Verde	2014	5,500-7,000	9,300	23-28	30	2.3%	9,000-12,000	23-28
D-30	San Juan Basin	2020	23,000-27,000	22,700	25-30	31	<1%	Extension	Extension
D-35	Lower Rio Grande	2018	5,500-6,500	6,800	23-25	30	0%	6,000-8,000	25-30
D-36	Upper Rio Grande	2022	2,200-2,800	2,600	23-28	29	0%	Extension	Extension
D-40	Cimarron	2022	6,500-8,500	5,900	25-30	19	3.7%	Extension	22-27
D-51	South Grand Mesa	2018	8,000-10,000	9,100	25-30	26	7.0%	Extension	Extension
D-52	Hermosa	2010	4,000-6,000	4,500	25-30	31	0%	Extension	Extension
D-56	Sand Dunes	2010	4,300-5,500	3,400	25-40	35	0%	4,300-5,500	30-35
D-57	Gunnison Basin	2013	15,400-16,900	18,900	35-40	45	0%	17,000-20,000	35-40

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## Introduction and Purpose

Colorado Parks and Wildlife (CPW) manages big game for the use, benefit, and enjoyment of the people of the State following CPW's Strategic Plan (2015). Deer management is also determined by mandates from the Colorado Parks and Wildlife Commission (PWC) and the Colorado Legislature. Colorado's wildlife species require careful and increasingly intensive management to accommodate the many varied public demands and growing human impacts. CPW uses a "Management by Objective" approach to managing the State's big game populations (Figure 1).



Figure 1. Management by Objective process used by Colorado Parks and Wildlife to manage big game populations by Data Analysis Unit (DAU).

The Management by Objective approach provides a data-driven process to achieve population objectives established for each Data Analysis Unit (DAU) established by the Herd Management Plan (HMP). A DAU is a geographic area that includes the year-round range of a big game herd. The DAU includes the area where most animals in a herd are born, live, and die. DAU boundaries are delineated to minimize the interchange of animals between adjacent DAUs. The geographic area may be divided into several Game Management Units (GMUs) to distribute hunters and harvest within a DAU.

The primary purpose of HMPs is to establish population size and buck ratio (i.e., the number of males per 100 females) objectives for each DAU. The HMP also describes the strategies and techniques that will be used to reach these objectives. During the HMP planning process, CPW solicits and collects public input through questionnaires, public meetings, and comments to CPW staff and the PWC. CPW's mission as wildlife stewards is integrated with the concerns and ideas of various stakeholders, including the State Land Board (SLB), the Bureau of Land Management (BLM), the United States Forest Service (USFS), the Habitat Partnership Program (HPP), agricultural producers, city and county governments, hunters, guides and outfitters, private landowners, local chambers of commerce, the Southern Ute Indian Tribe (SUIT), the Ute Mountain Tribe (UMT), and the public. In preparing an HMP, agency personnel attempt to balance the biological capabilities of the herd and its habitat with the public's demand for

wildlife recreational opportunities. HMPs are approved by the PWC and are reviewed and updated approximately every 10 years.

The purpose of these HMPs is to set estimated population and observed buck ratio objectives for mule deer herds in southwest Colorado from 2024-2034, with the expectation that they will be reviewed and updated in 2034.

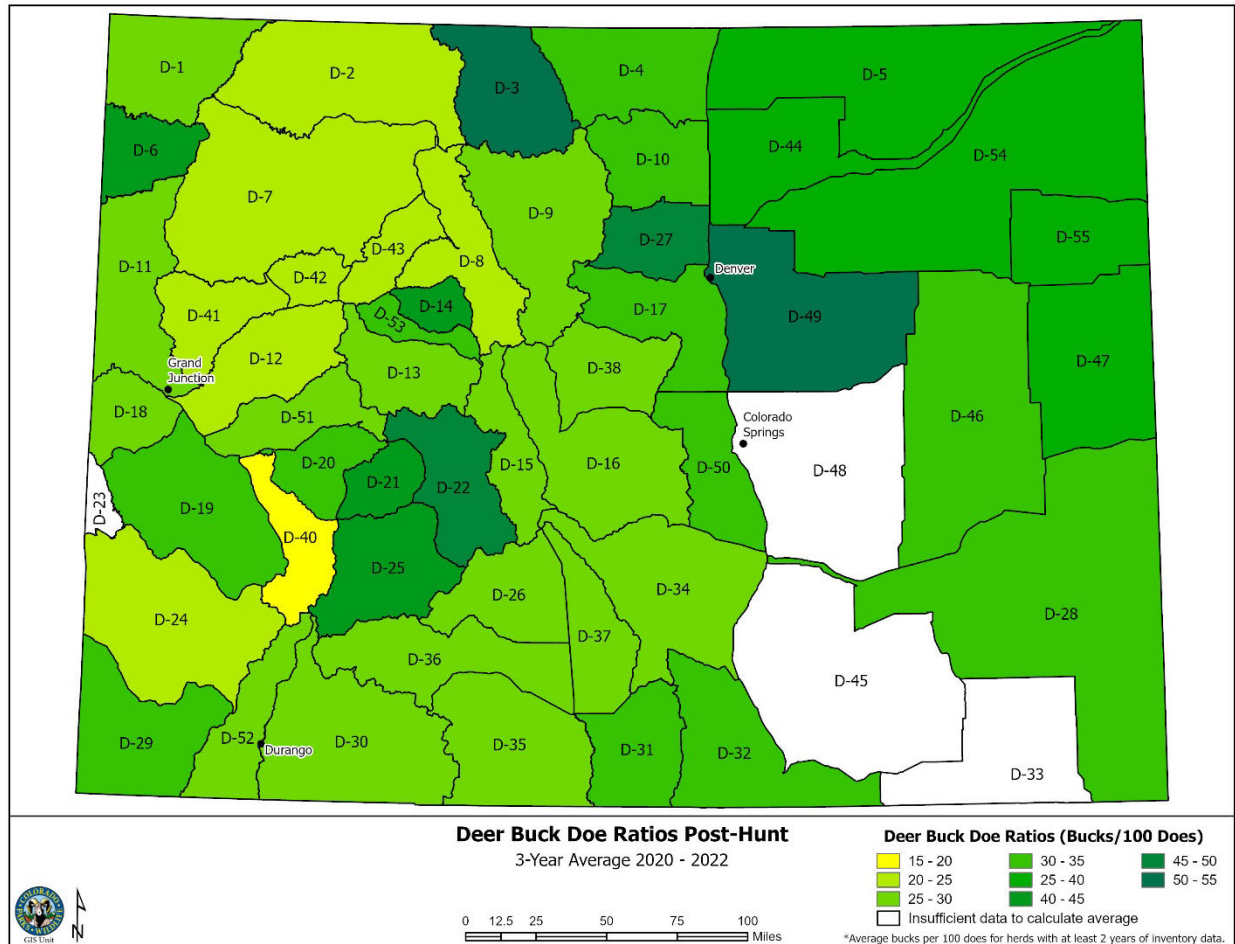


Figure 2. Average post-hunt (winter) buck:doe ratios for Colorado deer herds, 2018-2022.

### Common Management Issues and Strategies

Mule deer populations peaked most recently in the 1940s through the 1960s, sustained by irrigated agricultural fields and expansive landscapes, and have slowly but steadily declined since then. Historic populations in Colorado were likely more than double the current population estimate of 390,000 animals statewide. As recently as 2006, Colorado’s mule deer population estimate was approximately 600,000 animals. These declining trends have generally occurred throughout the 14 deer herds existing in Colorado’s Southwest Region. As one example, the D-19 Uncompahgre Plateau mule deer population has declined from approximately 60,000 deer in 1980 to an estimated 10,000 deer currently. The current combined population estimate for the southwest deer herds is 130,000 deer. Mule deer



declines in Colorado and across the western United States have been exacerbated by habitat loss due to anthropogenic changes to the landscape, including housing and energy development, increasing recreation pressure, and loss of connectivity and movement corridors. Noxious weed invasion replacing natural forage, pinyon and juniper encroachment into shrub communities, drought, disease, competition with livestock and elk, and predation, are other important factors impacting mule deer populations. Wildlife enthusiasts, landowners, and hunters often support increases in population objectives. However, how many deer Colorado can support in the future, given current and expanding levels of anthropogenic disturbance and influence, is currently in question. In 2014, Colorado Parks and Wildlife completed the West Slope Mule Deer Strategy, which guides management decisions to help rebuild our mule deer populations. The Strategy states: Together with the public and stakeholders, CPW will work to stabilize, sustain, and increase mule deer populations in Western Colorado and, in turn, increase hunting and wildlife-related recreational opportunities. The West Slope Mule Deer Strategy outlined seven strategic priorities to address the many threats facing mule deer populations. To learn more, read Colorado's Mule Deer Story and Colorado's West Slope Mule Deer Strategy at:

<https://cpw.state.co.us/learn/Pages/CO-WestSlopeMuleDeerStrategySummit.aspx>

CPW also has a long history of mule deer research in Western Colorado. For publications and more information, visit

<https://cpw.state.co.us/learn/Pages/ResearchMammalsPubs.aspx>

#### Habitat Availability and Quality

Mule deer abundance is ultimately limited by the availability and quality of habitat. The habitat available to mule deer in Colorado has changed significantly over the last century. However, the rate at which habitat loss has occurred within the last 50 years has accelerated considerably compared to the homesteading days of the late 1800s - early 1900s. Settlement of the West resulted in intensive livestock grazing through the 1930s that increased the size, density, and vigor of shrub communities in Colorado and increased the amount of habitat available to mule deer. These increases in habitat contrast greatly with the losses of mule deer habitat within the last 50 years. Changes in climate and weather patterns and the direct and indirect losses of mule deer habitat due to the growth of Colorado's human population have been driving factors in mule deer population trends.

Factors influencing habitat quality include extreme weather conditions, invasive noxious weeds, fire, shrub eradication, overgrazing, and fragmentation. Quality habitat allows an animal to physically access the biological components for survival, including nutritious vegetation for growth and sustenance and security cover for thermal protection and predator avoidance. Mule deer are selective feeders with a diverse diet. Functionally, a mule deer's digestive system depends upon high-quality forage and low consumption rates when compared to more generalist grazers, such as cattle and elk. Nutritional requirements for mule deer require various plant types, including shrubs, forbs, and grasses, which vary across seasonal ranges.

Colorado's population increased from 1.3 million people in 1950 to 4.3 million in 2000 to 5.8 million in 2021. The human population on Colorado's western slope is projected to grow by another 67% between 2020 and 2050 (US Census Bureau, 2021), presenting increasing pressures on wildlife and the habitats they rely on. Increased housing developments, infrastructure, traffic, and recreation activities, come with a growing human population. Factors such as competition with livestock, fences, vehicle collisions, disease, and predation

all contribute to deer population declines; however, habitat loss and fragmentation stemming from residential, recreational, and industrial development - compounded by the long-term effects of human population growth and climate change, particularly in the form of drought - present the greatest risks to Colorado's deer population.

Mule deer habitat quantity has further been reduced by traditional and renewable energy exploitation in Colorado. There are currently over 37,000 producing natural gas wells in Colorado, compared to 5,125 in 1989. There are also three surface coal mines in Colorado. Oil shale exploration and oil wells are also expected to increase in the future. These activities reduce the amount of available habitat through pads, roads, pipelines, and open mine pits. Proposed renewable energy projects have increased significantly in the past several years, with a focus on utility-scale photovoltaic (PV) solar projects in Western Colorado. Of particular concern for big game species, the National Electric Code (NEC) requires that solar energy facilities be fenced for security purposes. This exclusionary fencing requirement results in a complete loss of habitat for big game and frequently creates a significant barrier to daily and/or seasonal movement patterns. When siting locations for utility-scale solar projects, developers typically seek areas close to existing electrical transmission lines and substations, flat topography, southern exposures, and limited forest canopy cover. Frequently, these landscape characteristics also represent high-quality winter range areas for big game in Western Colorado. Additionally, to avoid lengthy federal permitting processes, most of these proposed projects have been located on privately owned lands with 20 to 30-year lease agreements.

CPW intensively monitors annual adult doe survival and winter fawn survival in five Intensive Mule Deer Monitoring Areas (Figure 3). We also monitor buck survival in two of these herds. CPW annually monitors well over 1,000 radio-collared mule deer in the five monitoring areas, and annual survival rates from these herds are used in deer population models for the rest of the herds west of I-25. CPW conducts winter herd classification inventories with helicopters to estimate the sex ratios of males/100 females and the age ratios of young/100 females (Figure 4). Ratios of fawns/100 does are an index of annual fawn production and survival to December, which indicates the "fitness" of an individual herd. The ratio of mule deer fawns/100 does has declined slowly but steadily since the early 1970s. CPW continues to monitor and evaluate the factors influencing fawn and adult deer survival rates in Colorado; these factors include declining quality and availability of winter ranges due to human development and fragmentation, increasing recreation pressure on public-lands, noxious weed invasion replacing native forage, persistent drought that influences forage quality and hiding cover for fawns, disease, and predation.

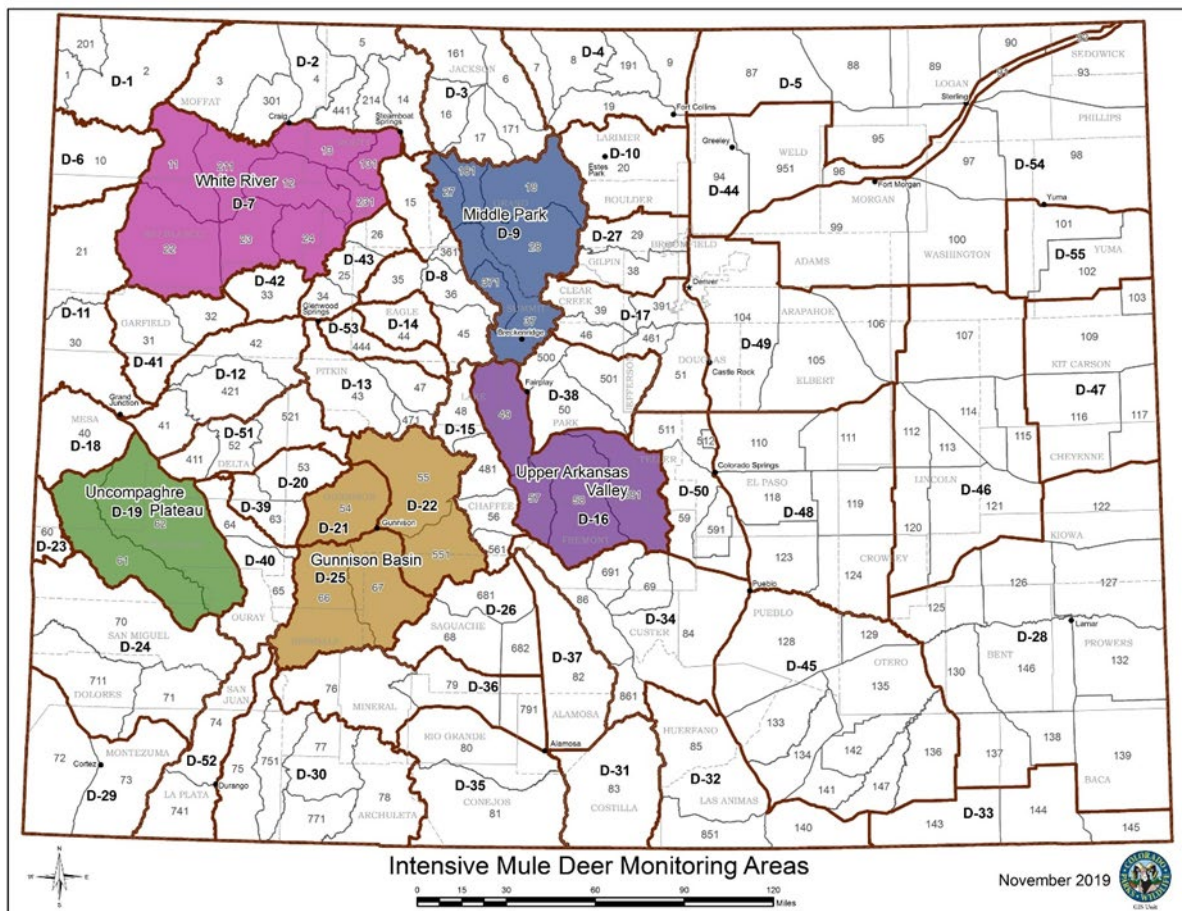


Figure 3. Colorado's five intensive mule deer monitoring areas.

Altering habitat quality and quantity through land use activities can have significant and long-term impacts (both positive and negative) on big game habitats and populations (Johnson et al. 2016). Examples of habitat alteration include, but are not limited to, land use conversion from agriculture to residential, habitat type change by natural causes such as wildfires, habitat quality change as a result of domestic grazing practices, habitat fragmentation, and climate change. Recreation and energy development, occurring at unprecedented levels in Colorado, are two examples of human uses on the landscape that increasingly overlap with, fragment, and negatively impact big game habitats. Colorado has a network of roads that total approximately 90,000 miles. Road construction directly removes available habitat, results in population loss from road kill, and indirectly affects ungulate migration patterns and behavior. Roads are continually expanding into deer range from housing, energy development, and recreation.

Converting rural and agricultural lands that once functioned as wildlife habitat to homes amounts to a permanent loss of habitat. Real estate values have increased exorbitantly, so the financial incentive for ranch owners to subdivide and sell their properties has been immense. The cost to deer and other wildlife is the likely irreversible loss of habitat and, therefore, decreased carrying capacity across the landscape for many wildlife species. Conservation of private lands should be a priority in order to protect and maintain connectivity of the remaining undeveloped lands for wildlife use. The Colorado Wildlife

Habitat Program (“Habitat Stamp”) and Great Outdoors Colorado (GOCO), as well as federal programs and non-governmental organizations such as land trusts, provide funding and mechanisms to help private landowners set up conservation easements. The challenge, however, is that conservation easement efforts must compete with the region’s extremely high real estate prices.

The above impacts have cumulatively resulted in the direct loss of habitat available to deer and other wildlife. Furthermore, the direct loss of wildlife habitat is often amplified by the indirect losses that occur due to noise pollution, disturbance, and the overall fragmentation of remaining habitat. Habitat fragmentation and reduced connectivity are increasingly concerning as Colorado’s deer attempt to navigate through their annual cycles between seasonal ranges. The connectivity between the available habitat that is left is fractured, impacting the quality of habitat deer use through their life cycle from summer to winter ranges. Ultimately, these impacts and ongoing habitat loss will continue to reduce Colorado’s carrying capacity for the renowned deer populations we presently support.

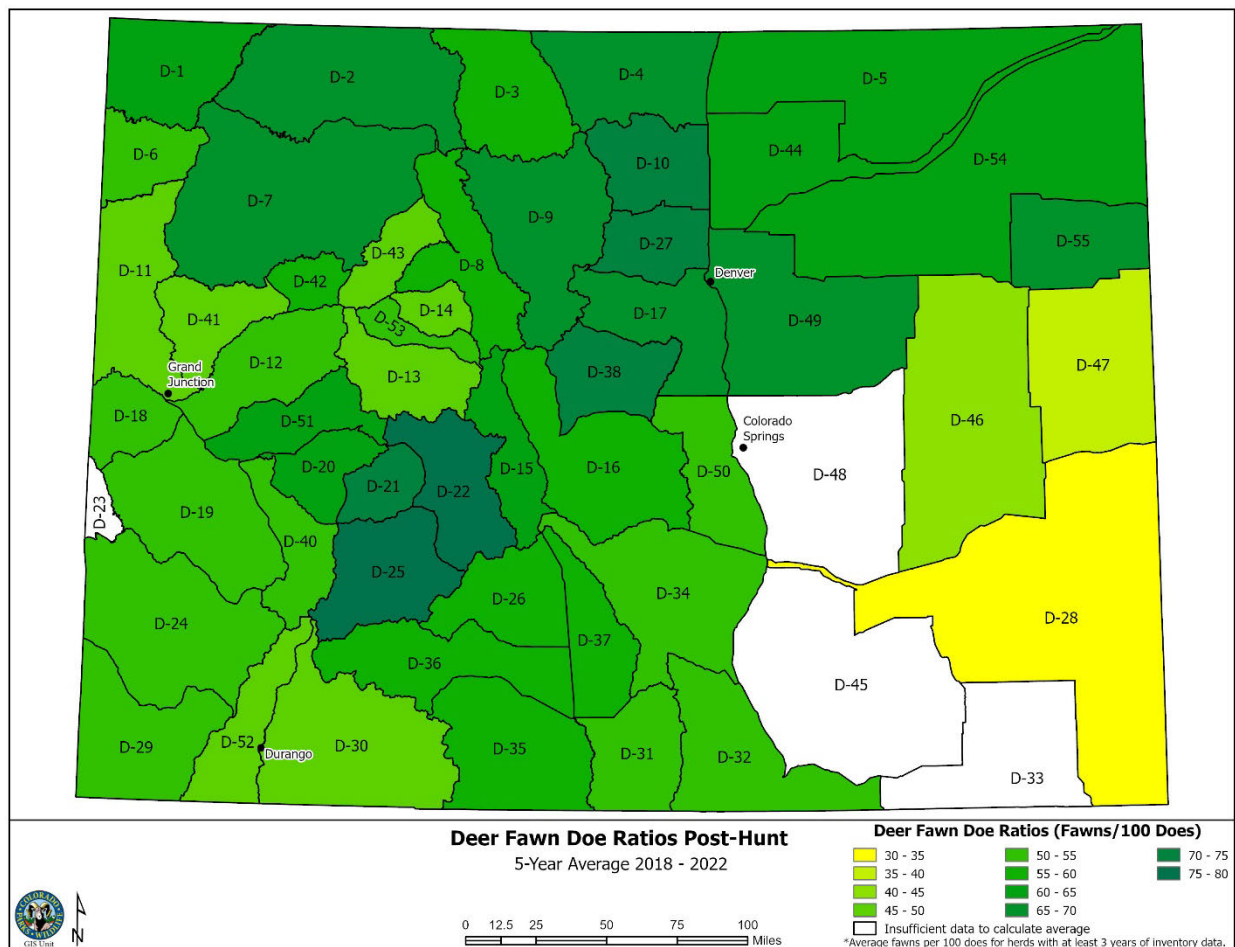


Figure 4. Average post-hunt (winter) fawn:doe ratios for Colorado deer herds, 2018-2022.

Recreation

Human recreation causes both direct loss of habitat from the development of infrastructure (roads, trails, parking areas, etc.) and indirect loss of habitat through the behavioral avoidance of these areas by wildlife. Human presence on the landscape in the form of

recreation evokes a physiological stress response for mule deer that impacts habitat usage, activity times, competition, foraging, reproduction, and body condition. Wild animals minimize energy expenditure by reducing their spatial and temporal activity, but human disturbance disrupts this energy-saving behavior by causing extra movement to escape or find cover. Deer react to the presence and activity of humans either by fleeing or by being vigilant, both of which detract from the animal's ability to feed and rest. These disturbances on the scale of individual encounters between an animal and a human recreationist may seem minor in isolation, but when translated to the lifetime of the animal or even to the scale of the whole deer population, the cumulative effects of year-round disturbance will lead to lower recruitment of fawns, higher mortality, and overall decline in population fitness over time. Disturbance from human activity can make what would otherwise be suitable habitat from a forage standpoint into poor quality habitat from a behavioral standpoint.

Avoidance of recreationists effectively decreases the carrying capacity of an area, as mule deer and elk generally do not habituate to hiking or mountain biking. Distances from roads and trails are an essential habitat feature for wildlife, and large-scale patches of land that remain un-fragmented by routes in Colorado are becoming increasingly rare, even in protected areas such as Wilderness. When route densities increase to the point that the predicted behavioral avoidance zone overlaps or intersects with another route, habitat effectiveness is severely reduced or eliminated and can result in a barrier to movement and seasonal migrations for ungulates. Often, the indirect impacts associated with noise and avoidance buffers greatly outweigh the direct habitat loss associated with recreation trails. Increased recreational activity associated with increased density of routes (roads and trails) leads to both immediate and long-term impacts on individual animals and populations by displacing wildlife into less-optimal habitats. The result is a decrease in available energy for winter survival, growth and reproduction, and ultimately reduced fitness of a population.

Winter range forage and habitat for mule deer are becoming increasingly limited in Colorado due to recreation, roads, and residential development. Mule deer are highly vulnerable to disturbance during the winter and early spring when they struggle to maintain body condition and have limited energy reserves. Snow depths restrict animals to lower elevations where higher densities of roads and trails exist and subsequently have greater human use. The combination of deep snow, cold temperatures, and limited forage requires animals to expend higher amounts of energy for thermal regulation, daily movement, and feeding. Recreation on winter ranges, including hiking, snowshoeing, snow/fat-biking, skiing, snowmobiling, and shed antler gathering, can negatively impact ungulate behavior by causing them to flee and altering their feeding, resting, and travel patterns. When a deer is disturbed, it forgoes foraging in favor of hiding until the disturbance has ended. Even low levels of disturbance from human recreation can negatively impact mule deer during winter months and decrease survival. While some animals show no apparent behavioral response, ungulates may still experience physiological stress and elevated heart rates, resulting in relatively high energy expenditures. CPW established a shed antler gathering season, an activity which CPW can regulate, prohibiting shed antler gathering on public lands from January 1st to May 1st annually. The presence of dogs accompanying recreationists increases the zone of influence, flushing distances, and temporal displacement for ungulates. Dogs are efficient at chasing deer, causing extreme energy expenditure and potential mortality, particularly for fawns. Deer concentrated on winter ranges are especially vulnerable to harassment and predation by dogs. Avoidance behavior can be critically impactful during the winter if deer spend time and energy evading dogs when they need to be foraging for food and expending as little energy as possible.

To ensure that essential habitats remain connected and usable for elk and other big game animals, CPW recommends the following when planning for recreation infrastructure:

- Federal land management agencies should consult the 2021 Trails with Wildlife in Mind Guide (Trails with Wildlife in Mind Task Force 2021) to aid in management decisions when planning new trails or trail improvements.
- Avoid the highest-priority deer habitats when planning recreation infrastructure, wherever possible.
- Limit the density of motorized and non-motorized roads and trails in important wildlife habitats.
- Seasonal closures should be considered to benefit deer and other wildlife in the winter months and during calving when they are most vulnerable.
- Strategic seasonal closures of motorized routes should be considered during annual hunting seasons to promote big game use and fidelity to public lands where they are available for harvest.

Preserving contiguous swaths of the sagebrush, grassland, mountain shrub, and forest landscapes that deer rely on for habitat, and facilitating safe passage along migration and movement routes - within and between seasonal ranges - are priorities for wildlife and land managers in Colorado as well as other western states. CPW relies heavily on federal land management agencies as well as private property owners to conserve and enhance habitats for elk and other wildlife species. In 2017 and 2018, several secretarial orders issued by the U.S. Department of Interior (DOI) directed federal land managers to work with states to protect big game species and their habitat within the region. Secretarial Order (SO) 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories, and SO 3362: Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors, respectively, provided direction to federal land managers for improving access to lands for recreational activities, particularly hunting and fishing. SO 3362 also directed DOI agencies to improve habitat quality to ensure the long-term viability of big game and other wildlife populations, particularly migration corridors and sensitive winter ranges for elk, deer, and pronghorn. Various solutions are being considered at all levels of government and by private sector stakeholders to enhance the protection of big game winter range and migration and movement routes. These policies aim to foster collaboration, expand data collection and research, incentivize participation in habitat connectivity programs, and implement targeted infrastructure solutions.

#### Chronic Wasting Disease

University scientists studying captive mule deer in facilities west of Fort Collins, CO, first recognized Chronic Wasting Disease (CWD) in the 1960s. Within a few years thereafter, symptomatic CWD cases were diagnosed in free-ranging deer and elk in northcentral Colorado and southeastern Wyoming. By the early 1990s, the growing number of documented cases compelled early attempts to estimate infection rates (prevalence) by sampling harvested and vehicle-killed deer and elk. Applying diagnostic advances that afforded more accurate detection of infected animals, surveys in the late 1990s revealed that CWD was already well-established in much of northeastern Colorado and southeastern Wyoming. This disease occurs in deer, elk, and moose. Infections are much less common in elk and moose than in deer. CWD is an infectious prion (misfolded protein) disease that affects the nervous system over approximately three years (Miller and Fischer, 2016). CWD can spread from the host by direct contact or through resources shared with an infected individual. To add to the complexity,

prions can last for many years in the environment, further challenging management. This disease is 100% fatal, and a treatment has not yet been developed.

CPW developed a CWD Response Plan in December 2018 to address growing concerns of increasing spread throughout the state (CPW, 2018). This plan contains management actions and recommendations to control CWD prevalence while managing towards population and sex ratio objectives. The plan established a schedule to monitor deer herds every five years for prevalence rates. In addition, if prevalence is determined to be at 5% or greater in the two-year-old and older adult male segment of the population, management actions should be taken to reduce that prevalence to below the 5% benchmark. The primary recommendations to manage CWD prevalence in deer herds are: 1) Reduce population and density, 2) Reduce male/female ratios, 3) Change age structure, 4) Maximize ability to remove diseased animals at the smallest scale possible (hot spot management), 5) Remove motivations that cause animals to congregate, 6) Minimize prion point sources, and 7) Incorporate CWD management actions and prevalence threshold into herd management plans. The Southwest deer management plan objectives have been developed to reflect the recommendations from the CWD response plan and attempt to reduce prevalence rates to or below the 5% benchmark. The primary tool for CWD management at the herd level is to manage for lower buck:doe ratios, as bucks carry CWD at approximately twice the rate of females. Furthermore, managing for lower population densities can also help reduce the prevalence of CWD. When possible, license allocation will be directed to later seasons and locations to best address hot spots of higher CWD prevalence. When harvest is sufficient and sustained, it can be a tool for attenuating CWD prevalence in adult male mule deer, especially early in the course of an epidemic (Miller et al. 2020 and Conner et al. 2021). Increasing male harvest reduces male and overall deer abundance and density, male age structure, and the number of infected deer, all of which appear to reduce disease. Likewise, timing hunting seasons closer to the breeding season when mature males are more vulnerable to harvest is another strategy to reduce CWD prevalence (Miller et al. 2020 and Conner et al. 2021).

As of April 2022, CWD has been detected in 40 of Colorado's 54 deer herds, 17 of 42 elk herds, and 2 of 9 moose herds (Figures 5 and 6). Disease prevalence is highest in deer and lowest in moose. Prevalence appears to be rising in many affected Colorado herds.

For more information on Chronic Wasting Disease in Colorado, visit: <https://cpw.state.co.us/learn/Pages/About-CWD-in-Colorado.aspx>

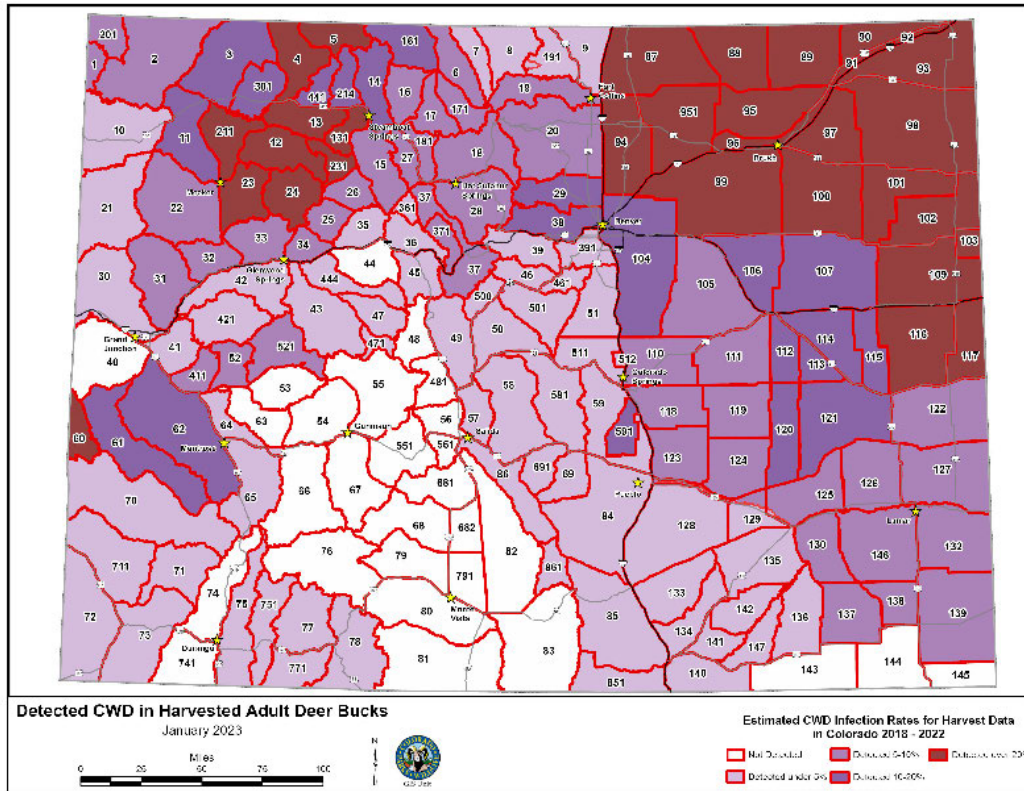


Figure 5. Chronic Wasting Disease infection rates in Colorado deer herds.

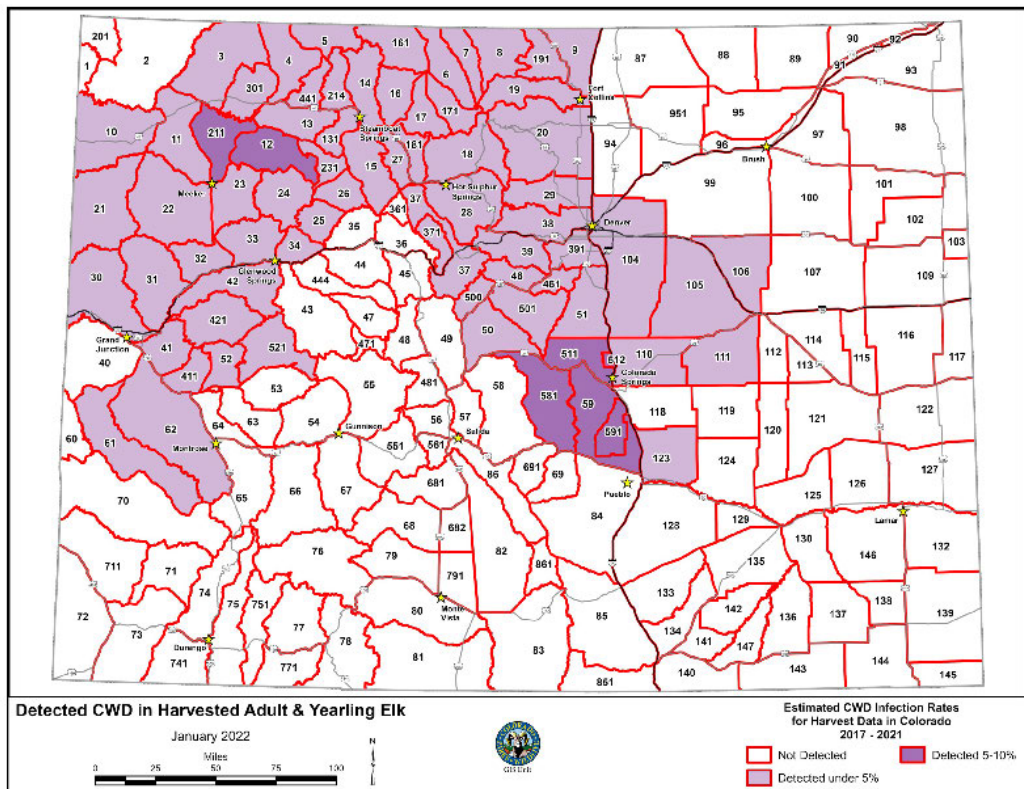


Figure 6. Chronic Wasting Disease infection rates in Colorado elk herds.



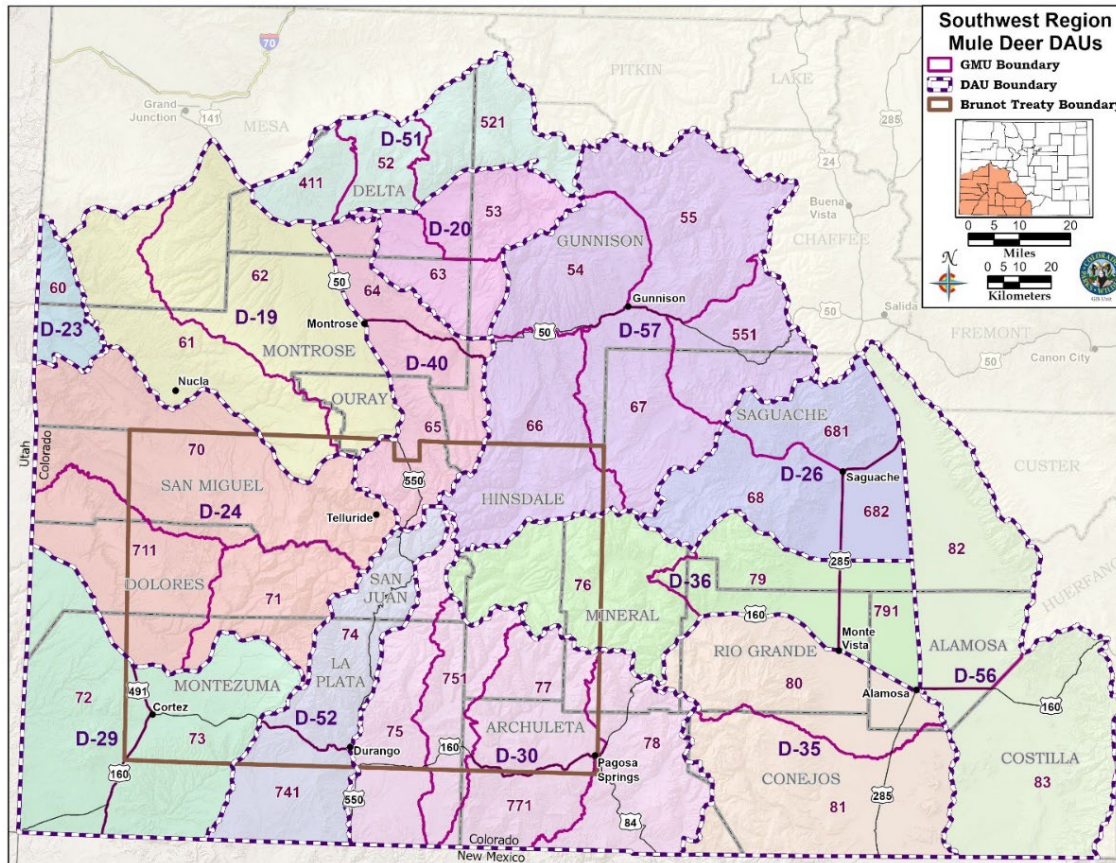
### Collaboration with Stakeholders

Wildlife management is affected by many environmental and external anthropogenic factors, often with no easy solutions, and requires collaboration and compromise. CPW will remain engaged with various stakeholders, including local and Tribal governments, federal land management agencies, private landowners, local land conservancies, conservation organizations, hunters and wildlife enthusiasts, and others, to proactively manage Colorado's natural resources and wildlife habitats. These relationships and collaborations ensure big game and other wildlife remain across Colorado's landscapes for generations to come. Colorado would not be the same without its iconic big game herds, and it is incumbent upon the citizens of Colorado to altruistically work together to promote the continued existence of big game and other wildlife. By protecting and enhancing big game habitats, we ensure a future for many other wildlife species and maintain some of the wild places and spaces that make Colorado unique.

### **The Brunot Agreement of 1873**

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the "Brunot Agreement." This ceded area - or "Brunot Area" - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure 7). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to "hunt upon said land so long as the game lasts and the Indians are at peace with the white people." Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe's exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe's long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

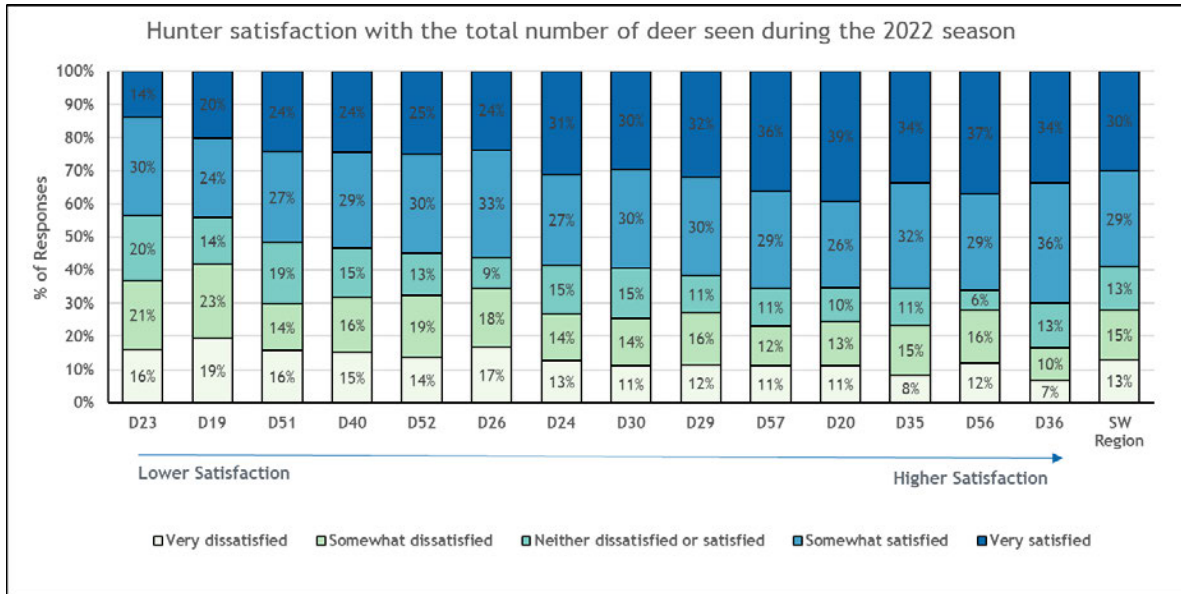
Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado (see Appendix A: Southern Ute Indian Tribe Comment Letter, on page 132, and Appendix B: Ute Mountain Ute Indian Tribe Comment Letter, on page 134).



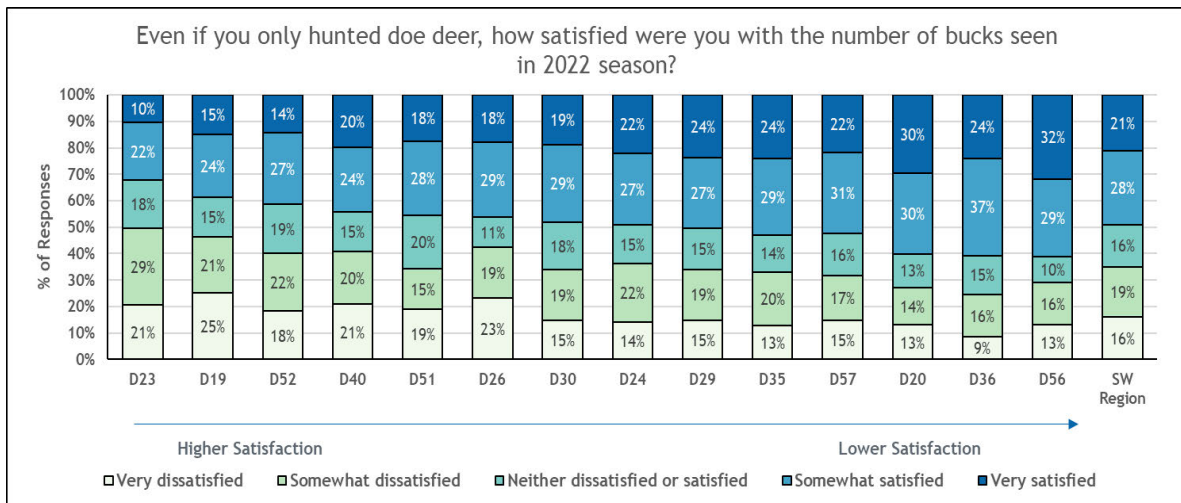
**Figure 7.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

Public Involvement

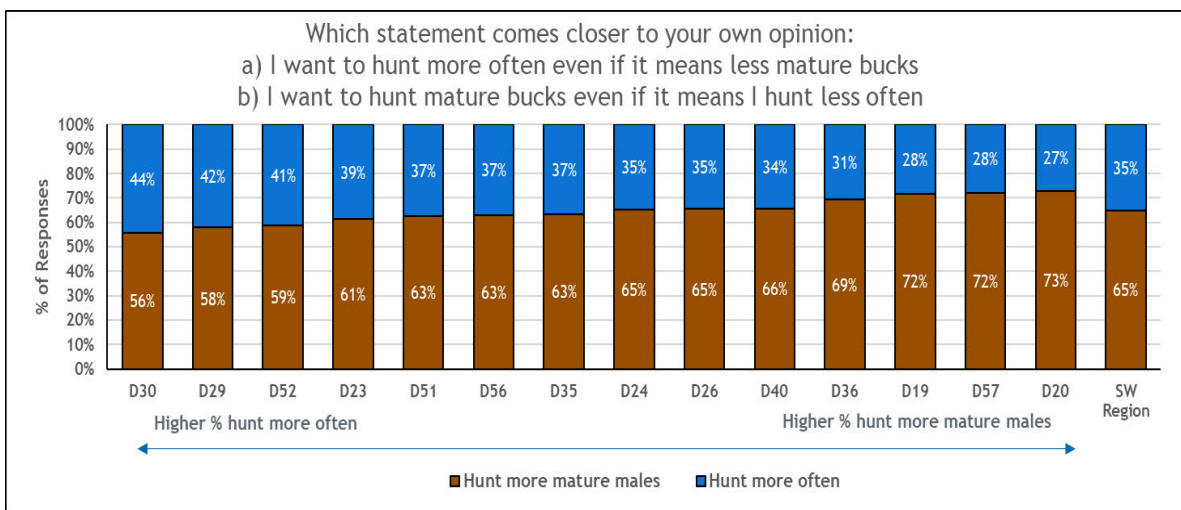
There are 14 deer DAUs in southwest Colorado. The following section comprises the 14 individual deer HMPs with proposed objectives and justification. Seven of the 14 deer herd management plans have been approved within the last three years, and the objectives for those will be extended as status quo. The other seven HMPs have proposed population and sex ratio objectives. Meetings and stakeholder outreach have occurred throughout southwest Colorado to collect input on the status of local deer populations and management concerns and provide direction for future management. The plan has been presented to county commissioners, local Habitat Partnership Program (HPP) committees, and federal agencies for additional input. All input is collected and provided in the following Appendices. In addition, CPW staff have reviewed the optional hunter-harvest attitude survey data to capture feedback from hunters on their experience during the 2022 hunting season. Of the 19,548 deer license holders in southwest Colorado in 2022, 5,505 hunters opted in for the additional hunter harvest attitude survey. The seven graphs below depict the hunters' responses to seven questions relating to their hunting experience and observations in the 14 different DAUs in southwest Colorado. The DAUs in each graph are ranked from least satisfied to most satisfied. The draft plan was posted and accompanied with press releases for the public to provide additional comments on the proposed objectives for each DAU from October 26 to December 15, 2023 (Appendix C). The final draft plan was presented to the Colorado Parks and Wildlife Commission in January, 2024 and formally approval in March, 2024.



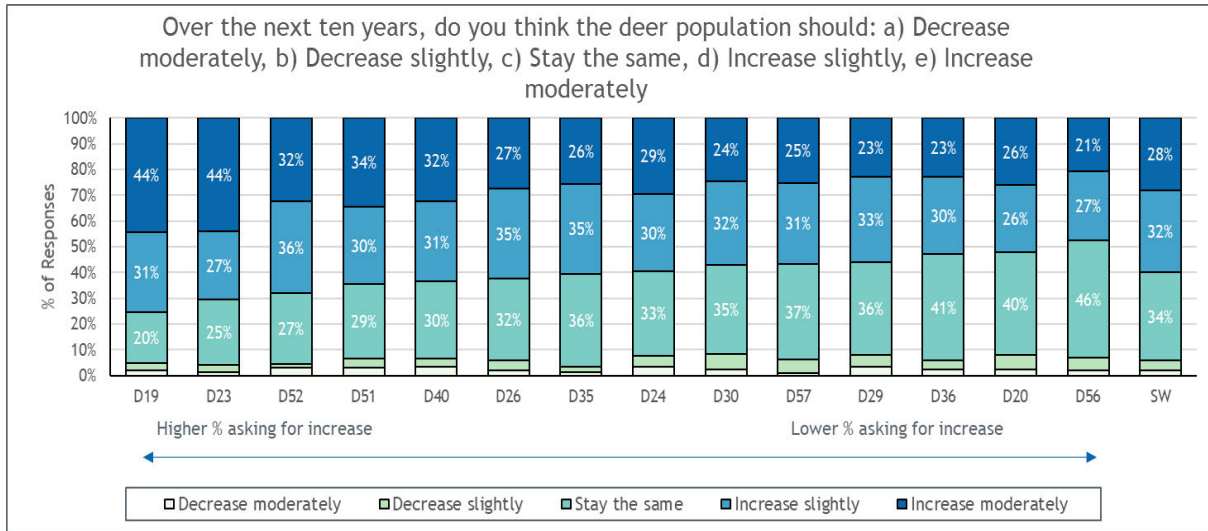
a.



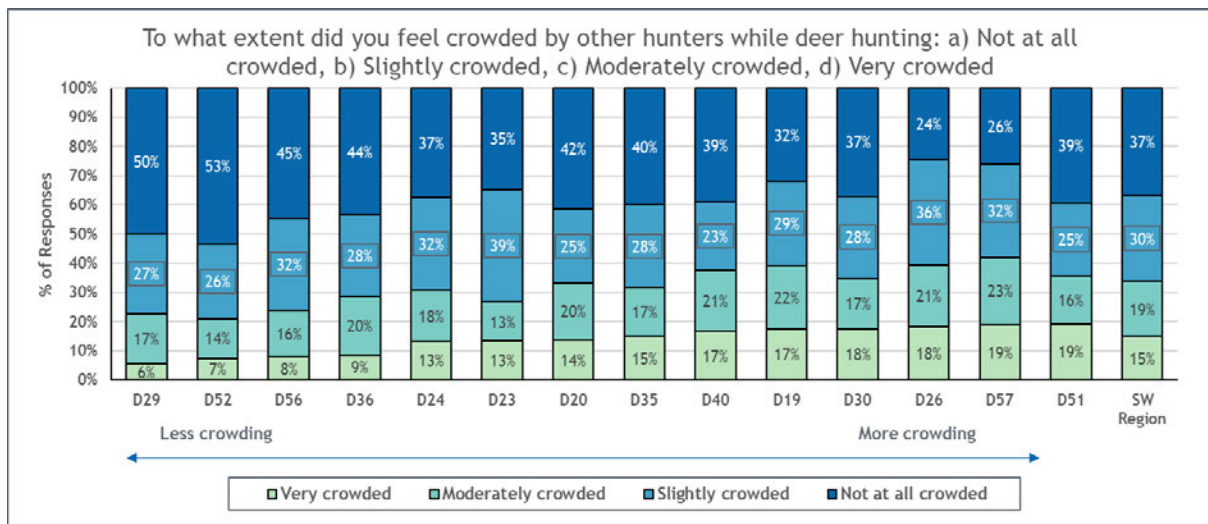
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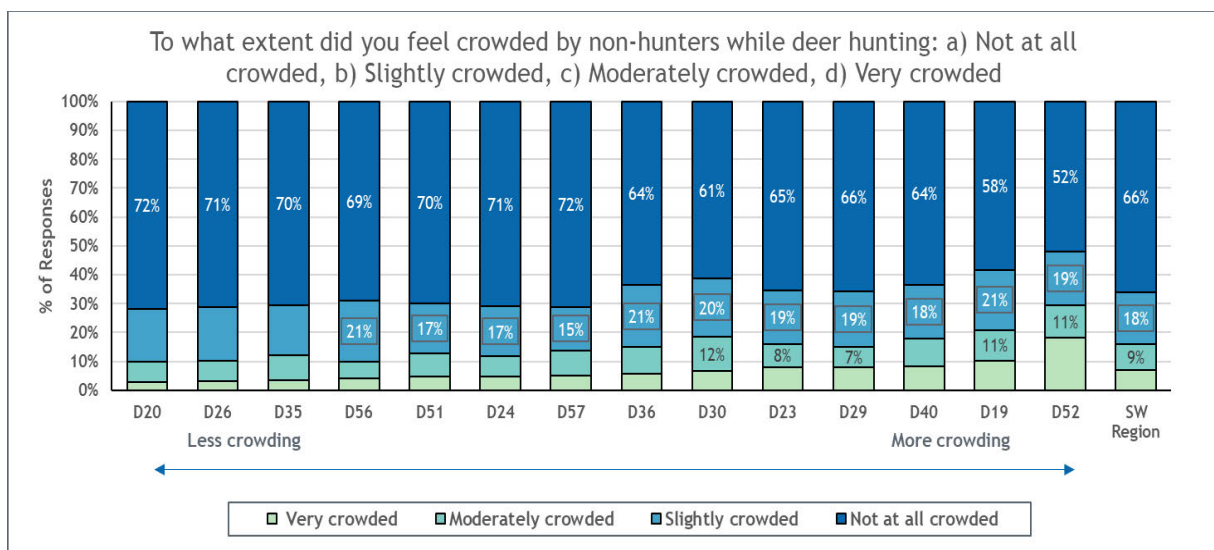
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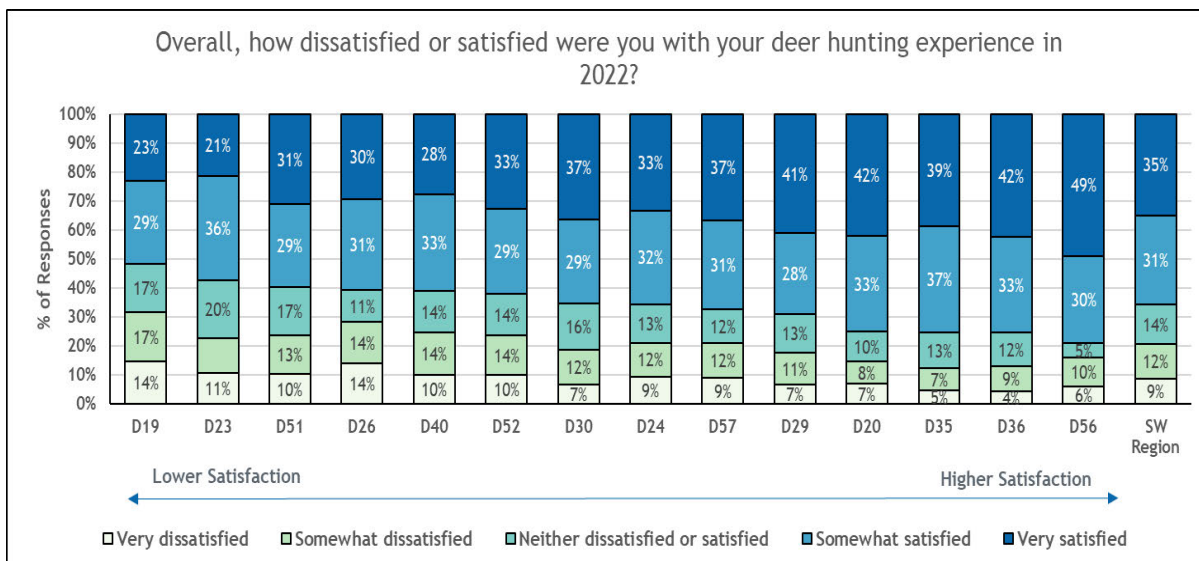


Figure 8 (a-g). Hunter-harvest attitude survey questions and results for the 14 southwest region mule deer DAUs ranked from low DAU to high DAU (left to right) in relation to the specific question.

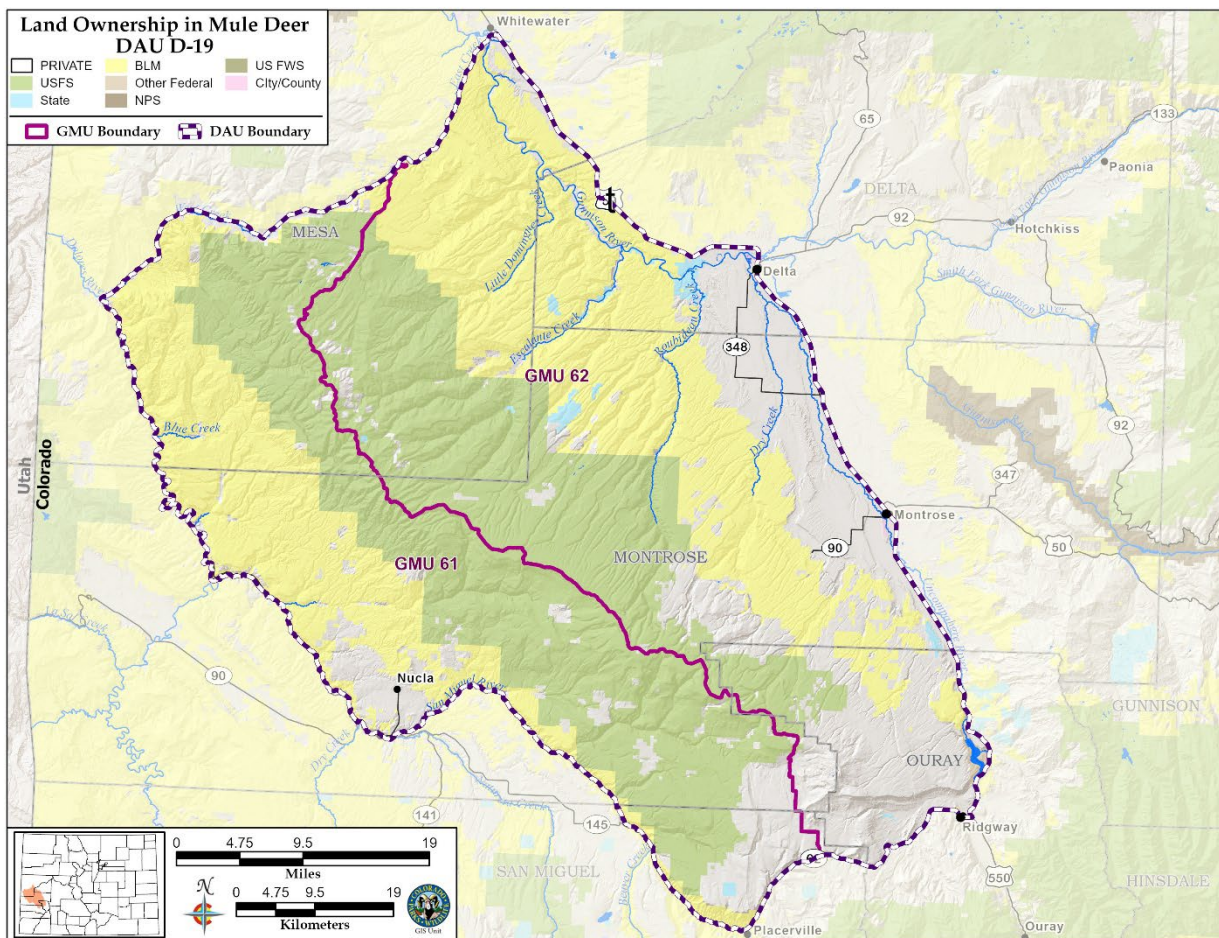
# UNCOMPAHGRE PLATEAU DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-19

Alyssa Kircher, Wildlife Biologist, Montrose

GMUs: 61 and 62  
Last HMP Approval Year: 2006

Post-hunt Population: Previous Objective: 36,000-38,000; 2022 Estimate: 10,300.  
Preferred Alternative: Decrease the current population objective to 12,000-15,000 deer

Post-hunt Observed Sex Ratio (bucks:100 does): Previous Objective: 34-36;  
2022 observed: 31; modeled: 33.  
Preferred Alternative: Amend the current sex ratio objective to 30-35 bucks:100 does



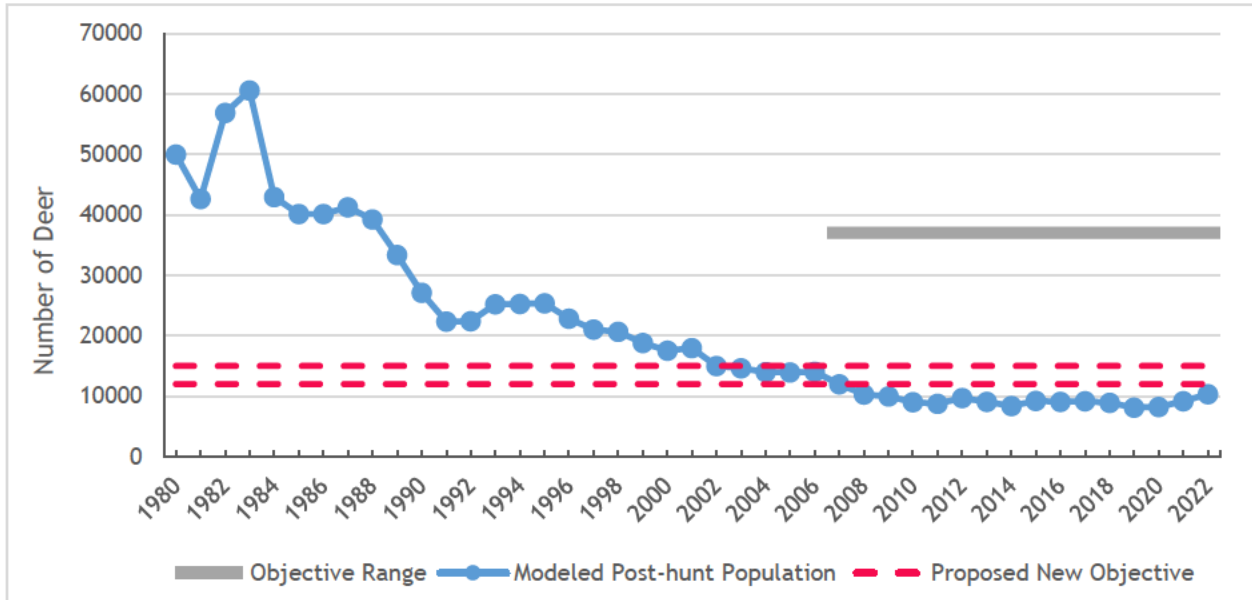


Figure D19-1. Deer DAU D-19 modeled post-hunt population and objective range, years 1980-2022.

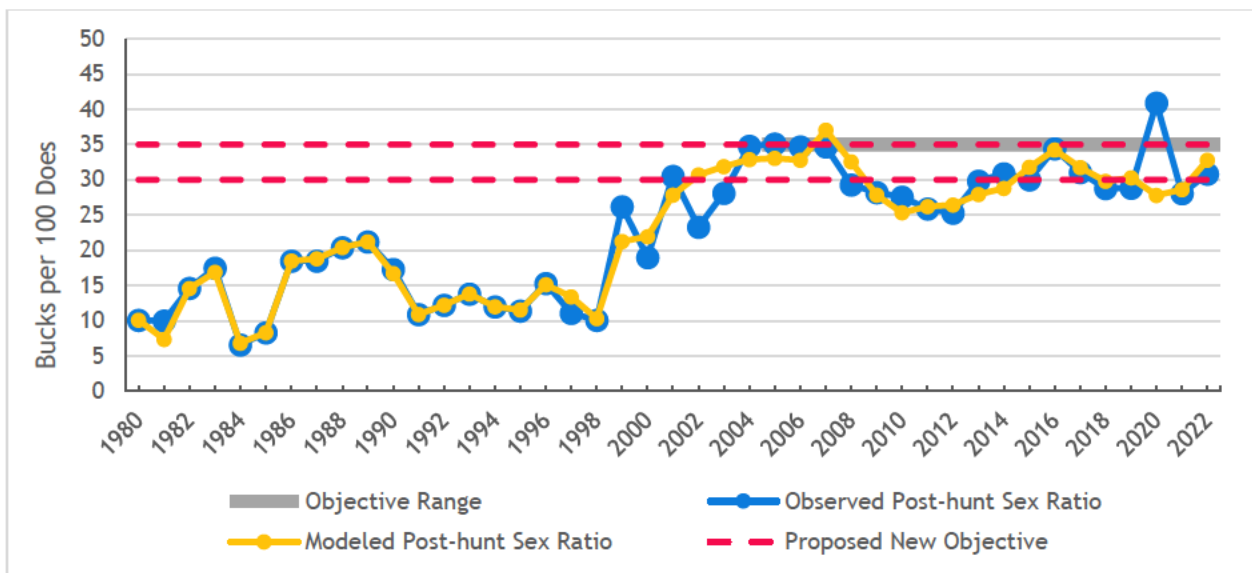


Figure D19-2. Deer DAU D-19 observed and modeled post-hunt sex ratio (bucks:100 does), years 1980-2022.

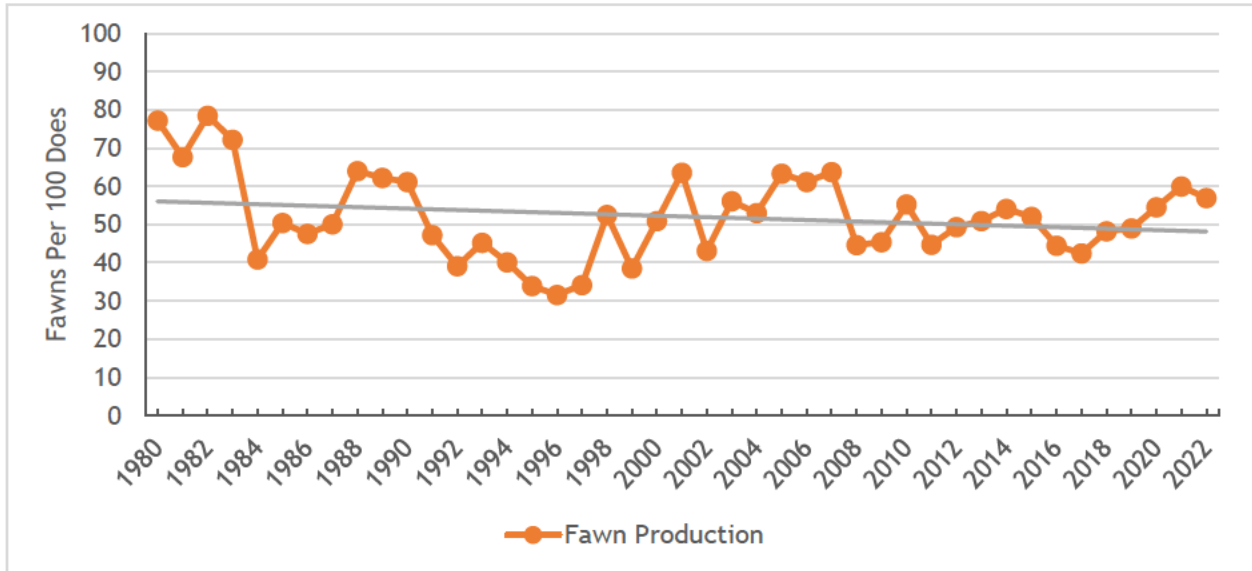


Figure D19-3. Deer DAU D-19 fawn production (observed post-hunt fawns:100 does ratio, years 1980-2022).

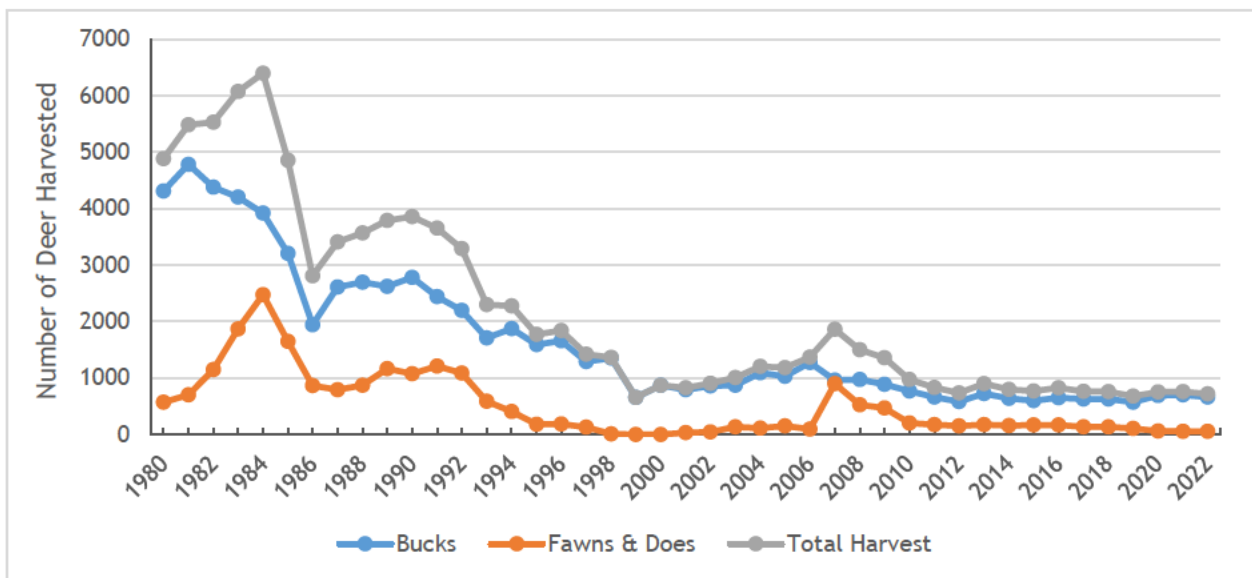


Figure D19-4. Deer harvest estimates in D-19, years 1980-2022.



## Background Information

Deer Data Analysis Unit (DAU) D-19 encompasses 2,301 square miles of the Uncompahgre Plateau in southwestern Colorado, including parts of Delta, Mesa, Montrose, Ouray, and San Miguel Counties. DAU D-19 consists of Game Management Units (GMUs) 61 (923 mi<sup>2</sup>) and 62 (1,378 mi<sup>2</sup>). The Uncompahgre Plateau consists of a relatively flat summit that runs northwest from Ridgway to the Unaweep Canyon. The terrain is steeper on the western unit 61 side than on the eastern unit 62 side. Elevations range from 4,570 feet along the Dolores River near Gateway to 10,338 feet at the summit of Horsefly Peak on the southeast end of the Plateau. Landownership in the unit consists of 37% U.S. Forest Service, 38% Bureau of Land Management, 24% private land, and 1% state land. Vegetative communities in D-19 range from pinyon-juniper woodlands, ponderosa/mountain shrub, and aspen and mixed spruce-fir forests at the highest elevations on the Plateau. Agricultural use in D-19 includes cultivated crop production and orchards on irrigated private lands below 6,000 feet in the Uncompahgre Valley and Nucla area, alfalfa and grass hay production primarily on irrigated private lands below 7,500 feet, and livestock grazing throughout most of the DAU on private and public lands. Additional land use includes recreation, mining reclamation, and timber harvest.

Deer are found throughout the DAU, but occur in the summer months in their highest densities in higher elevations comprised of aspens, spruce, Douglas fir, and Gambel's oak. In the winter months, deer use the lower elevations and more arid environments of the DAU with pinyon-juniper forests and agricultural fields where the climate is milder. Important wintering areas for deer in GMU 61 include Tenderfoot Mesa, Blue Mesa, Atkinson Mesa, Third Park, and Pinto Mesa. Deer from GMU 61 occasionally winter on Mailbox Park in GMU 70. In GMU 62, important wintering areas include Steamboat Mesa, Shavano Valley, Dry Creek Mesa, Government Springs, and Sims Mesa. There is a growing population of deer in GMU 62 occupying agricultural fields and residential areas in the Uncompahgre Valley near Delta and Montrose year-round. There is also a growing residential population in Nucla and Gateway on the GMU 61 side. The deer in D-19 tend to stay within the boundaries of the DAU, but there is occasional movement to Piñon Mesa in GMU 40 and over to the higher elevations surrounding Telluride (GMU 70) and Ouray (GMU 65).

DAU D-19 has been on a large declining trend since the early 1980s. Populations have started stabilizing over the last few years, but current population estimates are far below the historic high of 60,000 deer in 1983. Additionally, current population estimates are far below the 2006 DAU plan population objective. The 2006 DAU plan population objective was 36,000-38,000, with an estimated 35,800 deer.

The 2022 population estimate is 10,300 deer. Based on surveys in 2021 and 2022, CPW staff and public stakeholders desire an increase in deer populations. CPW acknowledges that the previous objective range of 36,000-38,000 deer does not seem feasible based on the changes in herd dynamics and landscape conditions over the last 15+ years. Therefore, CPW proposes a new objective range of 12,000-15,000. This population objective is higher than the 2022 population estimate and reflects the agency and stakeholder goal of increasing the number of deer on the landscape in this DAU.

The five-year average observed post-hunt buck ratio is 32 bucks:100 does. The five-year average modeled post-hunt buck ratio is 30 bucks:100 does. The 2006 DAU plan buck:doe ratio objective is 34-36 bucks:100 does. The buck ratio objective CPW prefers for this updated 2023

plan is a decreased objective ratio of 30-35 bucks:100 does. CPW stakeholders have stated a desire for a higher buck ratio; however, this desire must be considered against the threat of Chronic Wasting Disease (CWD), which is present in the DAU. The highest CWD prevalence is in the Uncompahgre Valley where deer concentrate year-round in the agricultural lands and residential areas. The proposed buck:doe ratio of 30-35 bucks: 100 does would balance the public desire for a higher buck ratio, but also allow for management flexibility.

The five-year average observed post-hunt fawn ratio is 54 fawns:100 does. Fawn-to-doe ratios have been increasing slightly since 2016. There was a slight drop from 60 fawns:100 does in 2021 to 57 fawns:100 does in 2022.

Harvest in DAU D-19 has remained stable over the last 10 years, averaging approximately 770 deer per year. This is a significant decrease compared to about 4,500 deer harvested per year from 1980-1990 when this population peaked and deer licenses were not yet limited statewide. Preference point minimums for licenses for residents in D-19 are drawn out at five points or less. Preference point minimums for nonresident licenses range from 0-15 points, with some licenses drawn as second choice or in the leftover draw. Antlerless licenses are only available as private-land-only and game damage licenses to control resident deer populations and minimize game damage in the Uncompahgre Valley. In 2022, 661 bucks, 57 does, and one fawn were harvested by 1,474 hunters with a success rate of 49%.

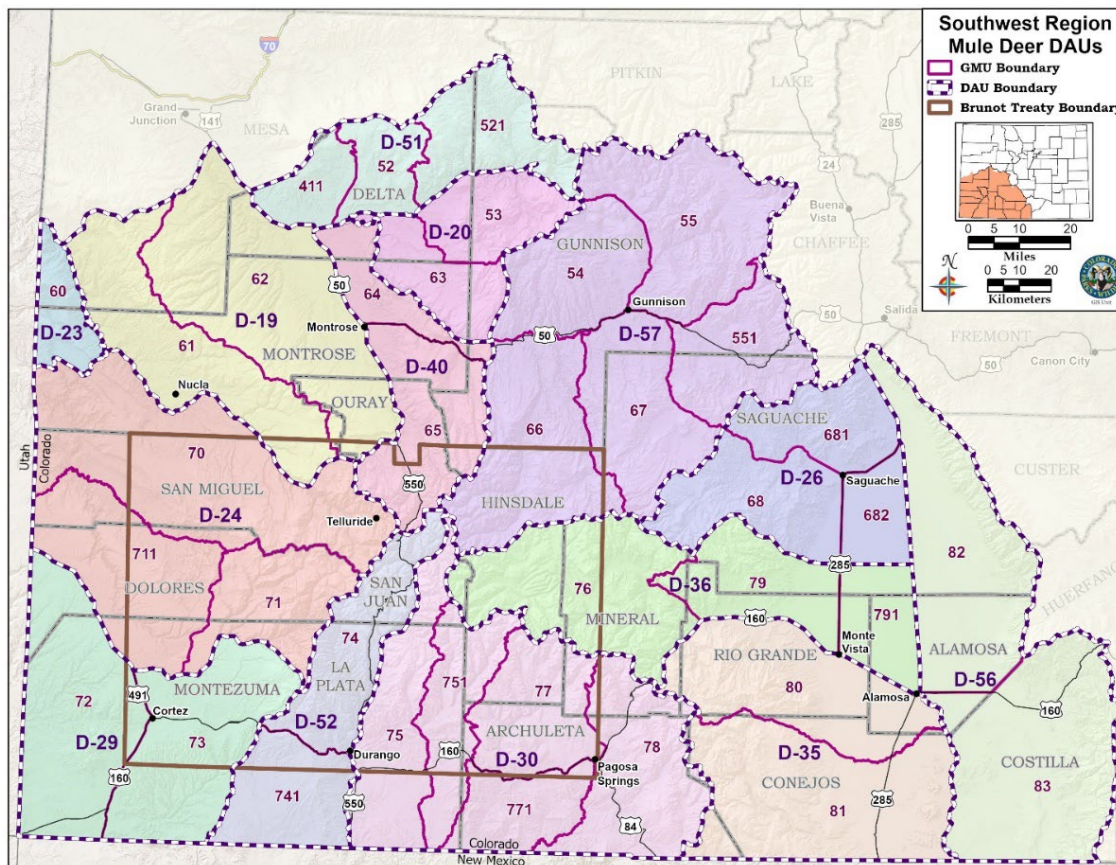
As a result of persistently declining deer populations on the Uncompahgre Plateau and across the west, CPW and other agencies and organizations have searched for solutions. CPW limited license numbers and established the Uncompahgre Plateau (D-19) as an intense deer study area beginning in 1997 to monitor winter fawn survival and annual doe survival to better inform management of deer populations on the Plateau and in similar habitats across southwestern Colorado. Additional studies have also been completed on the Plateau to investigate declining deer populations, including a summer fawn mortality study, a research project to assess the effects of habitat improvement projects on overall doe and fawn survival, and a mountain lion project that looked at the predator/prey dynamics between mountain lions and mule deer.

### **The Brunot Agreement of 1873**

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D19-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-

held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Five percent (5%; 111 square miles) of the D-19 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D19-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

### Significant Issues

The long-term population decline of this deer herd and low fawn recruitment (survival of a fawn from birth to one year of age) over the previous 30-40 years is likely attributed to an overall decrease in carrying capacity across the landscape for various reasons. Suitable winter range habitat has diminished due to land conversions and human development. Additionally, outdoor recreation has increased dramatically over the last decade. Recreation can have many impacts, including loss of adequate habitat (including changes in land use and decline in

agricultural lands), changes in seasonal migration patterns, and potentially lower survival rates. Historical and current overgrazing by domestic livestock, persistent drought, and competition with elk have all contributed to decreased habitat quality across the landscape.

Crop damage by deer is a major concern in the Uncompahgre Valley due to an increasing non-migratory deer herd residing year-round on agricultural land. Frequently, prevention materials and game damage distribution management hunts are requested and given to landowners to proactively deal with damage before a claim is made. These methods also increase landowner tolerance for wildlife on private properties. Additionally, a recent influx of new homeownership in the Loughill Village subdivision has decreased social tolerance for the high concentration of deer in the southern portion of the DAU.

Additionally, Chronic Wasting Disease (CWD) is present in D-19. This disease occurs in deer, elk, and moose. CWD is an infectious prion (misfolded protein) disease that affects the nervous system over approximately three years. CWD can spread from the host by direct contact or through resources shared with an infected individual. To add to the complexity, prions can last for many years in the environment, further challenging management. This disease is 100% fatal and a treatment has not yet been developed. CWD was first detected in D-19 in 2017 and the current estimated prevalence rate is 13.8%. CPW created an August private land disease management hunt in portions of 62, 64, and 65 when only resident deer are located in the Uncompahgre Valley. This hunt allows hunters to target deer that are more likely to be infected with CWD and to transmit CWD to high elevation deer when they migrate to the valley during the winter months. Additionally, this hunt helps focus on residential and agricultural areas where prevalence is greatest locally. Out of all harvested deer that tested positive for CWD in the 2020 mandatory testing period in D19, 55% came from the private land disease management hunt boundary, with several other CWD-positive harvests just to the outside of the designated border. Moreover, CPW has increased buck licenses to decrease CWD spread since adult male deer are more likely to contract CWD. Proactive CWD management will be a crucial part of the D-19 Herd Management Plan.

**Management Alternatives**

Post-hunt population and buck ratio objective alternatives considered for the 2024 D-19 HMP:

Table D19-1. Proposed population and buck ratio objective ranges for the 2024 D-19 HMP.

Population Objective Alternatives:		Buck Ratio Objective Alternatives:	
8,000 to 10,000 (midpoint 9,000)	(1) 13% decrease in the current population estimate to the middle of the proposed objective range.	25 to 30 bucks per 100 does	(1)
12,000 to 15,000 (midpoint 13,500)	(2) Preferred- 31% increase in the current population estimate to the middle of the proposed objective range.	30 to 35 bucks per 100 does	(2) Preferred
36,000 to 38,000 (midpoint 37,000)	(3) Status Quo- Approximately 259% increase in the current population estimate to the middle of the proposed objective range.	34 to 36 bucks per 100 does	(3) status quo from 2006 HMP

**Management Objectives**

CPW is attempting to reverse population declines and increase deer populations to meet stakeholder and CPW staff desires. Overall, the DAU’s carrying capacity has decreased compared to historic plans and it is likely that current habitat could not support historic deer

numbers. Increasing this herd slightly would be beneficial to the habitat and stakeholders (alternative 2). Because CWD is concentrated to the lower elevations in this DAU and primarily exists in residential herds, increasing the overall herd population slightly should not change CWD prevalence dramatically. Decreasing this deer population would increase opportunity and potentially increase antlerless licenses in the short term, but this would not consider CPW and stakeholders desires (Alternative 1). It would also make encountering animals on public lands more difficult since increased pressure could cause deer to move onto private lands that do not allow hunting. Based on the challenges described above, the status quo population objective is likely not possible for this herd (Alternative 3). To achieve a population estimate of 36,000-38,000 deer would require a 259% increase over the current population estimate. CPW feels this objective range is not attainable with the current population without large-scale habitat management projects, reduced predator populations, or increased social tolerance. Higher deer densities may also not be desirable, as increased deer densities could potentially increase CWD prevalence.

CPW would like to decrease the buck ratio slightly to better reflect how current buck ratios are trending, despite stakeholders' desires for more mature bucks on the landscape (Alternative 2). The preferred objective overlaps the current objective range and would allow for a slight increase in the number of bucks:100 does from current observed and modeled ratios. This objective still allows for a balance of opportunity for hunters, while simultaneously allowing CPW to keep CWD prevalence in check. The current buck ratio has not been achieved since 2020 (41:100) and the 10-year average has hovered around 31 bucks per 100 does. Keeping the buck:doe ratio to 34-36 bucks:100 does would be difficult to achieve since the buck ratio has been below this objective range for a decade and population growth has been slow (alternative 3). Increased buck ratios could potentially increase CWD prevalence (since mature bucks are more likely to have CWD), so it would not be a preferred alternative. Decreasing the buck ratio to 25-30 bucks:100 does would help reduce CWD prevalence and increase hunting opportunities (Alternative 1).

### **Strategies for addressing management issues and achieving objectives**

The population in D-19 has low fawn recruitment and faces reduced habitat availability from an increase in development and recreation, an increase in agricultural land conversions developed areas, a decline in habitat quality due to drought, and competition with livestock and elk. These impacts have contributed to slow population growth for the last decade.

CPW manages for sex ratios and population objectives by increasing or decreasing licenses by total quota, by season, and by sex, depending on the objectives for each herd. This herd has historically been managed to balance hunting opportunity and population growth, and CPW would like to continue this management strategy. Additionally, the last several years have been managed proactively to limit CWD spread and staff sees this as an important strategy to continue into the future. Antlerless game damage licenses would still be available for landowners to deter deer from causing more damage and to increase landowner tolerance, but antlerless licenses are not anticipated to be available in the draw for the near future until populations recover to at least the bottom of the objective range. Buck licenses will continue to be offered to manage CWD concerns and allow for moderate hunting opportunities. Additionally, predator and competing ungulate management will continue.

In addition to license management, CPW recognizes the importance of habitat conservation and habitat quality improvement. CPW regularly communicates with land management

agencies such as the USFS and BLM, landowners, county governments, CDOT, and NGOs and will continue to collaborate with these government agencies and organizations to achieve management goals. These agencies can help with large-scale habitat management projects to improve carrying capacity and regulate recreation and grazing on public lands, which could bolster struggling deer populations such as D-19.

### **Stakeholder Outreach**

Hunters were randomly selected to complete the 2022 Deer Hunter Attitude Survey after the completion of their hunting seasons. There were 373-439 respondents (depending on the question) who answered the opt-in questions for D-19. Overall, hunters desire a slight to moderate increase in the deer population and were generally satisfied with their hunting experience. Hunters also preferred hunting bigger bucks (higher buck ratio) than hunting more often (lower buck ratio). The majority of respondents also did not feel crowded while deer hunting.

The draft HMP for D-19 was sent to local county commissioners in Delta, Montrose, Mesa, San Miguel, and Ouray Counties. CPW had in person discussions with Delta, Montrose, and Ouray Counties about the plans. The draft plan was also sent to the HPP, USFS, the BLM, and Backcountry Hunter and Anglers (BHA). Support letters were received by the BLM, the USFS, and HPP. The HMP was posted on the CPW website for 30 days, allowing stakeholders to comment on the alternatives in the plan.

### **CPW Commission Approved Objectives:**

*Post-hunt Population: 12,000 - 15,000 deer*

*Post-hunt buck ratio: 30 - 35 bucks:100 does*

APPENDIX D19-A: Deer Survival Study

In 1997, CPW began a deer survival study investigating doe and 6-month fawn survival rates as a result of persistently declining deer populations. The study began with Uncompahgre Plateau (D-19) and Red Feather (D-4) mule deer populations and later expanded to the White River (D-7), Middle Park (D-9), Upper Arkansas Valley (D-16), and the Gunnison Basin (D-25) herds. D-4 was removed from the study because it was thought that CWD prevalence was skewing survival rates. A sample size of 70-90 does and 60 fawns are maintained each year to obtain accurate estimates. Survival for does is measured annually, while over-winter fawn survival is only monitored from December 15<sup>th</sup> to June 15<sup>th</sup>. Shortly after the six-month fawn survival period ends, the tubing holding the collars together rots off so the collar can be used again the following year. These estimates are used as a parameter in population models and help inform license-setting decisions annually. In addition to survival estimates, location data and cause-specific mortality information are collected to be used in further analyses. This long-term data set will continue to prove invaluable for mule deer management in Colorado.

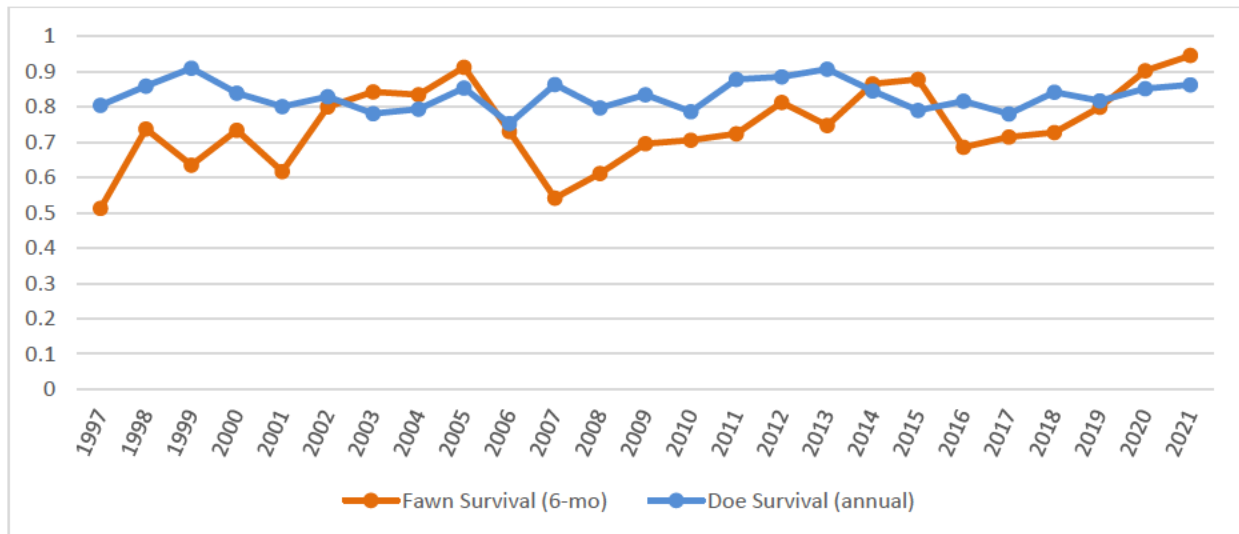


Figure D19-5. Survival rates for 6-month-old fawns and does on the Uncompahgre Plateau (D-19) from 1997 to 2021.

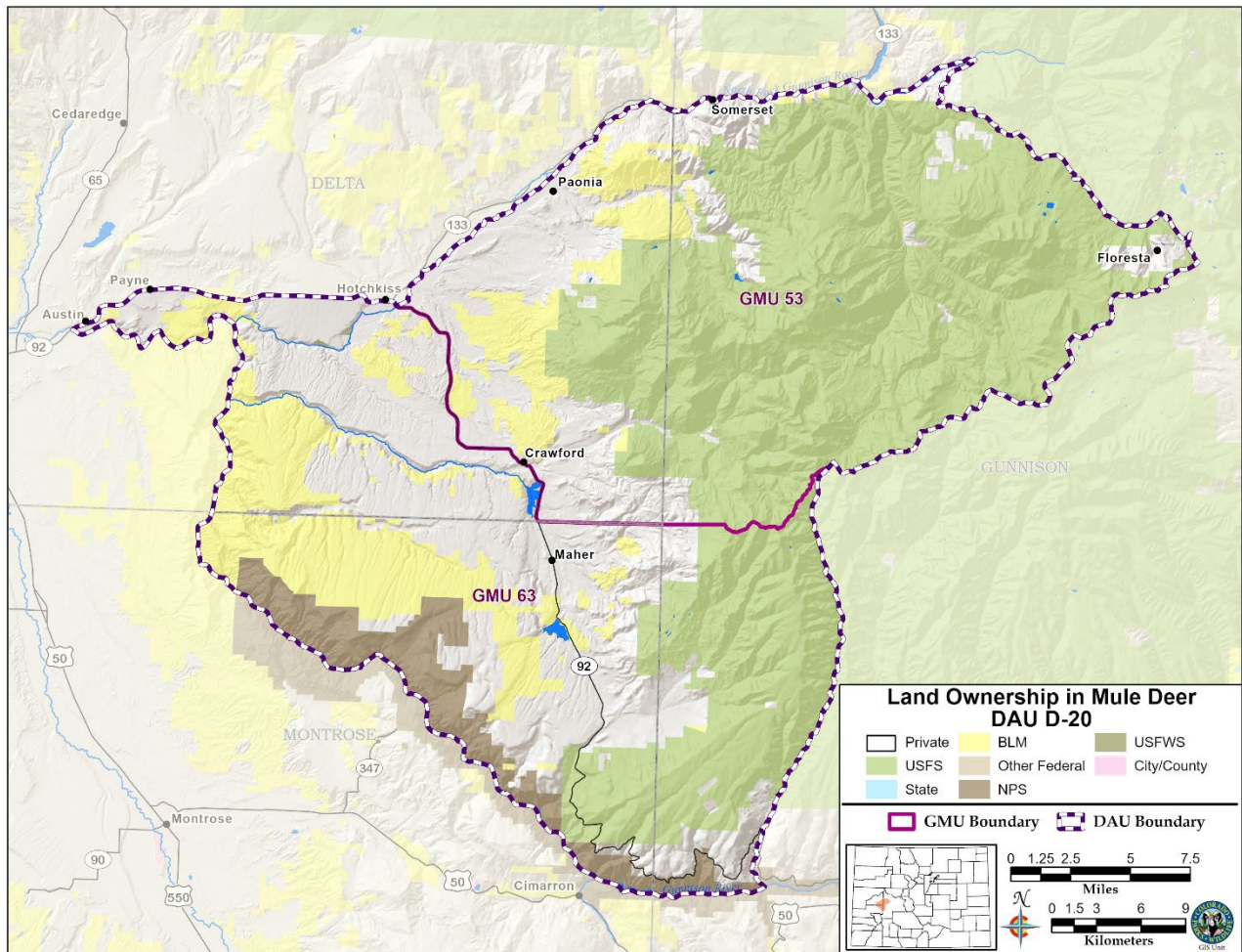
# NORTH FORK GUNNISON RIVER DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-20

Evan Phillips, Wildlife Biologist, Montrose

GMUs: 53, 63  
Last HMP Approval Year: 2018

Post-hunt Population: 7,500 - 9,500; 2022 Estimate: 8,700.  
**Preferred Alternative: Extend the current population objective of 7,500 - 9,500 Deer**

Post-hunt Observed Sex Ratio (bucks:100 does): Previous Objective: 33-38;  
2022 observed: 39; modeled: 41  
**Preferred Alternative: Extend the current sex ratio objective of 33-38 bucks:100 does**





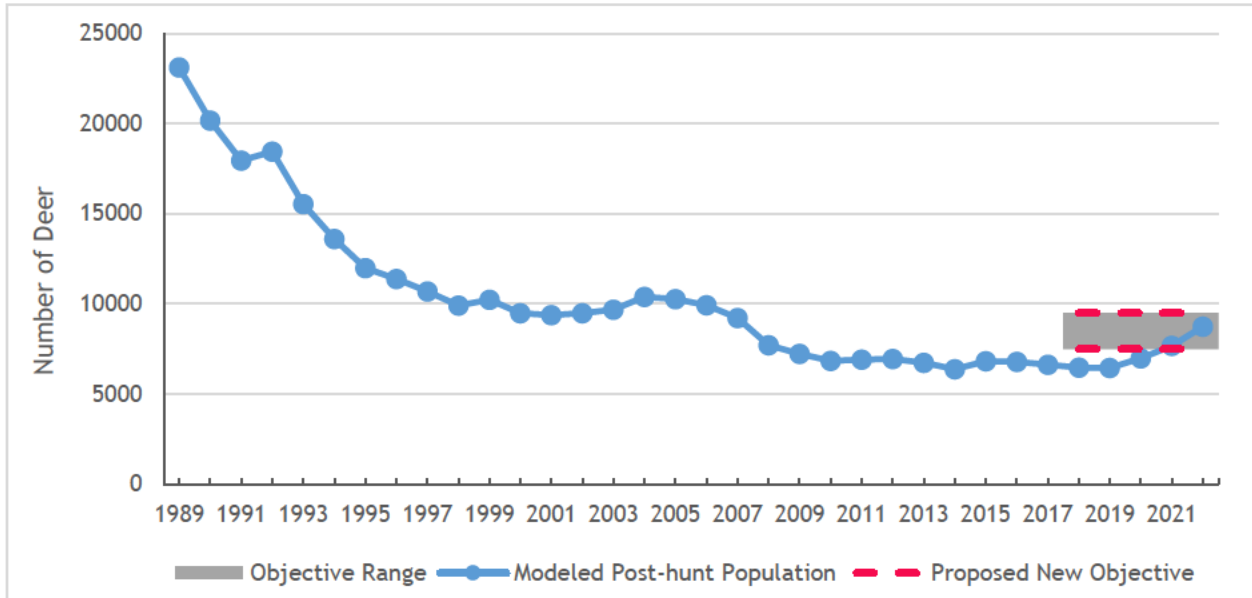


Figure D20-1. Deer DAU D-20 modeled post-hunt population and objective range, years 1989-2022.

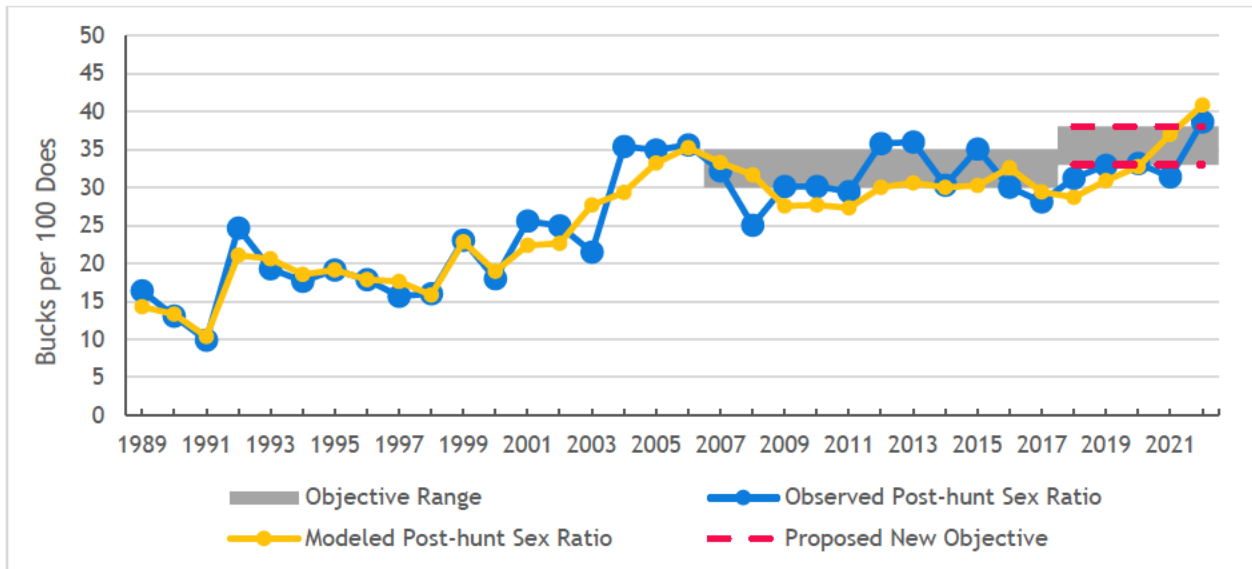


Figure D20-2. Deer DAU D-20 observed and modeled post-hunt sex ratio (bucks:100 does), years 1989-2022.

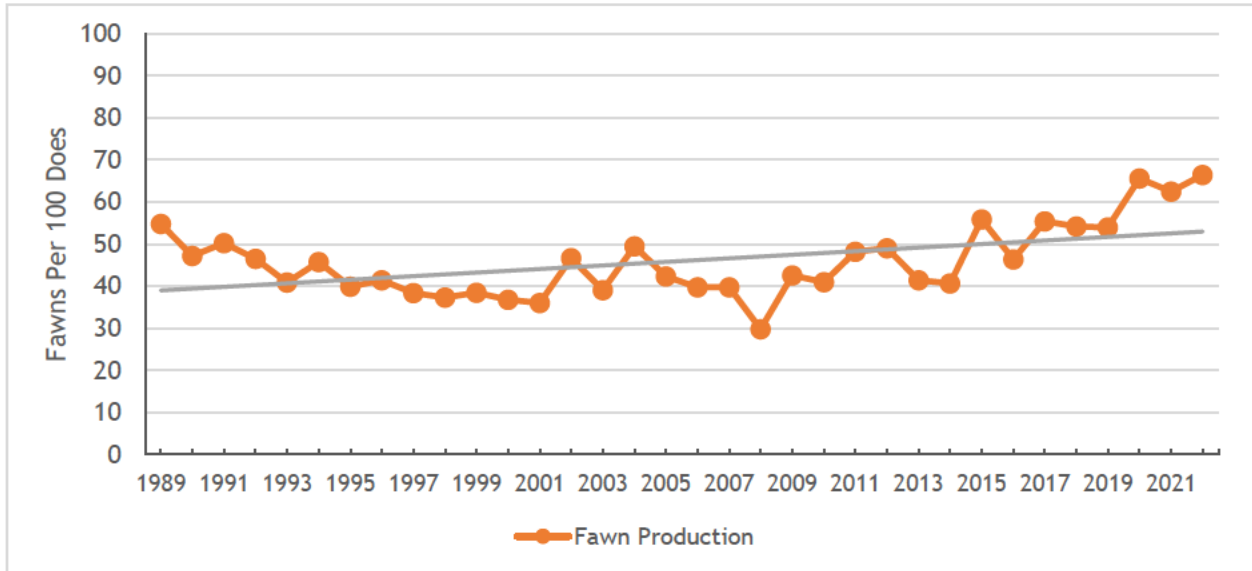


Figure D20-3. Deer DAU D-20 fawn production (observed post-hunt fawns:100 does ratio), years 1989-2022.

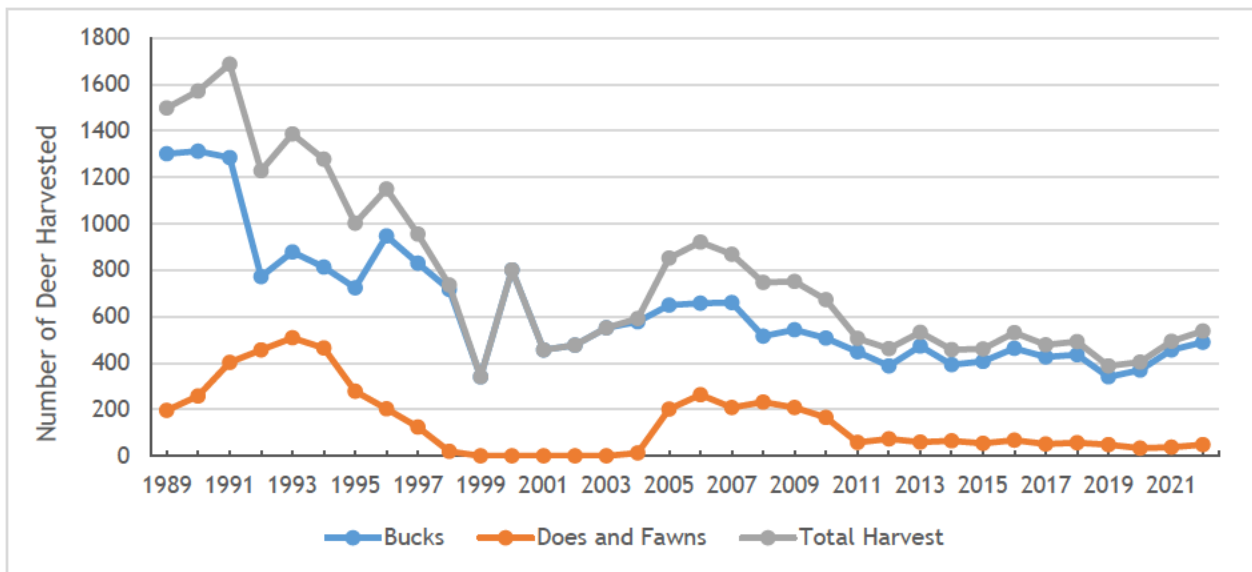


Figure D20-4. Deer harvest estimates in D-20, years 1989-2022.

### Background Information

Data Analysis Unit (DAU) D-20 is 766 square miles in southwestern Colorado and includes parts of Gunnison, Delta, and Montrose Counties. DAU D-20 consists of Game Management Units (GMUs) 53 and 63. The DAU is bounded on the north by State Highway 92, the North Fork Gunnison River, and Gunnison County road 12; on the east by the divide between the North Fork Gunnison River and Gunnison River, and Curecanti Creek and on the south and west by the Gunnison River. Communities in or adjacent to D-20 are Crawford, Hotchkiss and Paonia. Land ownership in DAU D-20 is 47%, US Forest Service, 32% private, 15% Bureau of Land Management, 5% National Park, and less than 1% is managed by CPW. There are three

wilderness areas within the DAU: West Elk Wilderness, Black Canyon of the Gunnison Wilderness, and Gunnison Gorge Wilderness.

Prior to 2018, GMU 53 and 63 were managed as separate herds with similar management objectives. The herd management plans were revised and combined in 2018 and the population objective was set to 7,500 to 9,500, which targeted increasing the population from the estimated population at that time. It is well documented that overall, the population of mule deer in the North Fork Gunnison River Valley, and most of Colorado, has seen significant declines since the 1980s (Gill et al. 2001). From 2008 to 2019, the North Fork Gunnison River deer herd population was estimated to be relatively stable at an average of 6,700 deer (Figure D20-1). The estimated population has increased slightly in the last few years; the 2022 post-hunt population was 8,700 deer, which is within the population objective range.

The average observed post-hunt sex ratio between 1989 and 2022 was 26 bucks:100 does. The average observed post-hunt sex ratio from 2018 to 2022 was 34 bucks:100 does (Figure D20-2), within the current sex ratio objective of 33-38 bucks:100 does. The 2018 - 2022 fawn: doe ratio was 61 fawns per 100 does. This fawn: doe ratio has increased by approximately 15 fawns per 100 does in a 10-year period; the 2007-2017 average was 46 fawns per 100 does (Figure D20-3).

Deer harvest since 1999, when deer licenses in GMUs 53 and 63 were changed from unlimited to limited, is a function primarily of license allocation and season structure. Weather also plays a role in harvest by affecting success rates. From 2018 to 2022 an average of 418 bucks were harvested annually in D-20 (Figure D20-4). Antlerless deer licenses are issued for both GMU 53 and 63 with private-land-only restrictions to help landowners alleviate agricultural and private land damage due to deer. From 2018 to 2022 an average of 45 antlerless deer were harvested annually in D-20.

### **Significant Issues**

Habitat loss, degradation, and fragmentation is occurring in D-20 due to increased pressures of human population growth and development. Outdoor recreation is also increasing significantly and is a major concern for the deer herd, similar to the rest of the southwest Colorado. Ongoing drought and climate change is also negatively impacting the quality of deer habitat that remains.

Diseases are an issue in the North Fork Valley deer herd. Epizootic Hemorrhagic Disease Virus (EHDV) has been documented in this area and although mule deer are relatively more resistant than other species, it can negatively affect the population in some cases. Chronic wasting disease (CWD) has not been documented in GMU 53 or 63 so far, but has been documented in the neighboring GMUs in close proximity.

### Management Alternatives

Three post-hunt population objective alternatives and three post-hunt sex ratio objectives were considered for D-20:

Table D20-1. Proposed population objective ranges considered for the D-20 2024 HMP plan extension.

Post-hunt Population Objective Alternatives:	
8,500 to 10,500(midpoint 9,500)	(1) Slight increase the population objective range
7,500 to 9,500 (midpoint 8,500)	(2) Maintain current population objective range(STAFF PREFERRED)
6,500 to 8,500 (midpoint 7,500)	(3) Slight decrease the population objective range

Table D20-2. Proposed sex ratio (bucks:100 does) objectives ranges considered for the D-20HMP 2024 extension.

Post-hunt Sex Ratio Objective Alternatives:	
35-40 bucks:100 does	(2) Increase the sex ratio objective range
33-38 bucks:100 does	(3) Maintain the current sex ratio objective (STAFF PREFERRED)
30-35 bucks:100 does	(4) Decrease the sex ratio objective range

### Management Objectives

CPW’s staff-preferred objective is to extend the D-20 management objectives approved in the 2018 HMP. When the current population objective range was approved in 2018, the deer population was estimated to have been below 7,000 for approximately 10 years and holding relatively static despite minimal private-land-only doe harvest. The objective range of 7,500 to 9,500 deer was designed to manage for an increase in the population that was realistic given the lowered carrying capacity due to anthropogenic impacts and ongoing drought conditions, acknowledging that historic deer populations of several decades ago are not likely attainable in the near term. The objective range allowed for growth in the deer population if conditions allowed, corresponding with the public’s preferences. In the meantime, the D-20 deer population did experience a few years in 2020-2022 with higher than average fawn recruitment, likely due to several years with well-timed precipitation, leading to an increase in the estimated population to within the objective range. CPW recommends maintaining the current population objects for this 2024 HMP. Continuing to manage for the current deer population objectives should not significantly increase conflicts with agriculture producers.

### Strategies for Achieving the Preferred Objectives

CPW will continue to collect post-hunt classification data on this herd on an annual basis to determine age and sex ratios which are used to estimate population size. Antlered and antlerless deer licenses will be reviewed annually and adjusted as needed across the hunting seasons to influence harvest in order to manage the D-51 deer population within the

objectives approved in this plan. CPW will continue to look for opportunities to conserve habitat and conduct habitat improvement projects.

### **Stakeholder Outreach**

An extensive stakeholder outreach process was conducted in 2017, which included input from County Commissions, Federal Agencies, and the local Habitat Partnership Program committee, a public scoping meeting, a public input survey, a survey of landowners and randomly selected license holders from 2015-2017. The draft plan was also posted on the CPW website and sent out to stakeholders for a 30-day open comment period (Appendix D20-A). In 2021 and 2022, hunters that were selected for the harvest survey had the option to answer questions as part of the hunter attitude survey. Results of the public meetings, surveys and the hunter attitude opt in survey indicated that the majority of respondents are generally satisfied with deer populations and hunting in D20, however, they would like to see the deer population increase and would like to hunt for more mature bucks even if it meant hunting less often. This draft plan was discussed at the Local Habitat Partnership Program committee and reviewed by federal agencies.

### **CPW Commission Approved Objectives:**

*Post-hunt Population: 7,500 - 9,500 deer*

*Post-hunt buck: doe ratio: 33 - 38 bucks:100 does*

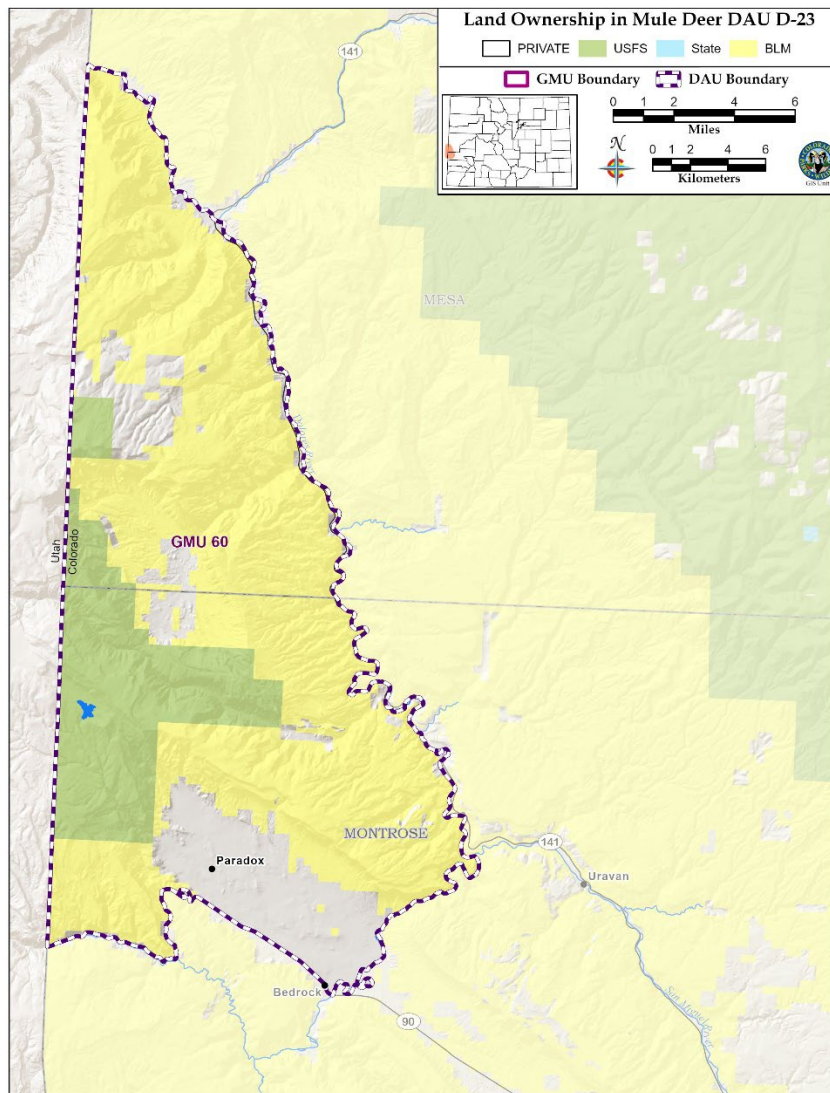
# LA SAL DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-23

Alyssa Kircher, Wildlife Biologist, Montrose

GMUs: 60  
Last HMP Approval Year: 2008

Post-hunt Population: Previous Objective: 2,500-3,000; 2022 Estimate: 1,500.  
Preferred Alternative: Decrease the current population objective to 1,500-1,800 deer

Post-hunt Observed Sex Ratio (bucks:100 does): Previous Objective: 25-30;  
2022 observed: 31; modeled: 32.  
Preferred Alternative: Decrease the current sex ratio objective to 20-25 bucks:100 does



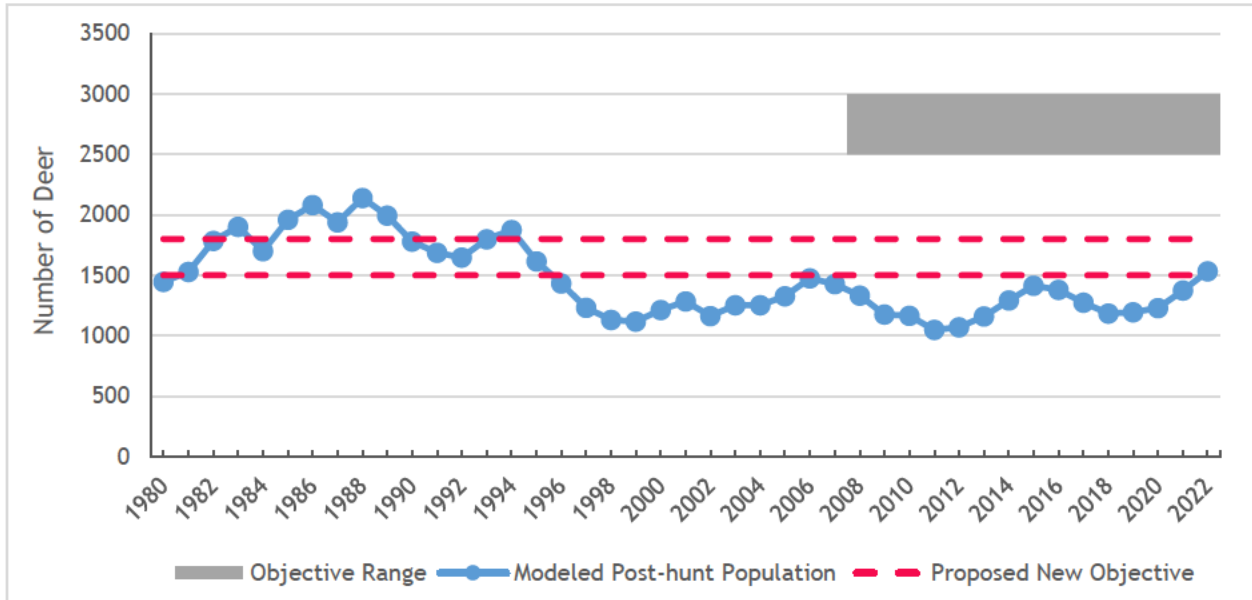


Figure D23-1. Deer DAU D-23 modeled post-hunt population and objective range, years 1980-2022.

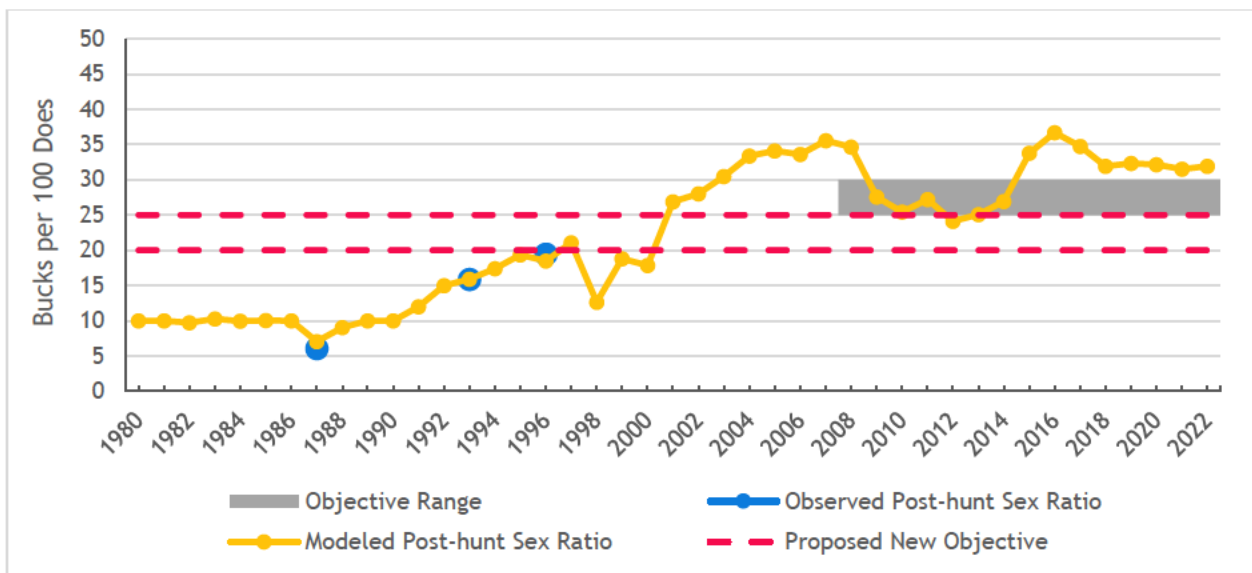


Figure D23-2. Deer DAU D-23 observed and modeled post-hunt sex ratio (bucks:100 does), years 1980-2022 (note: this herd is not classified every year).

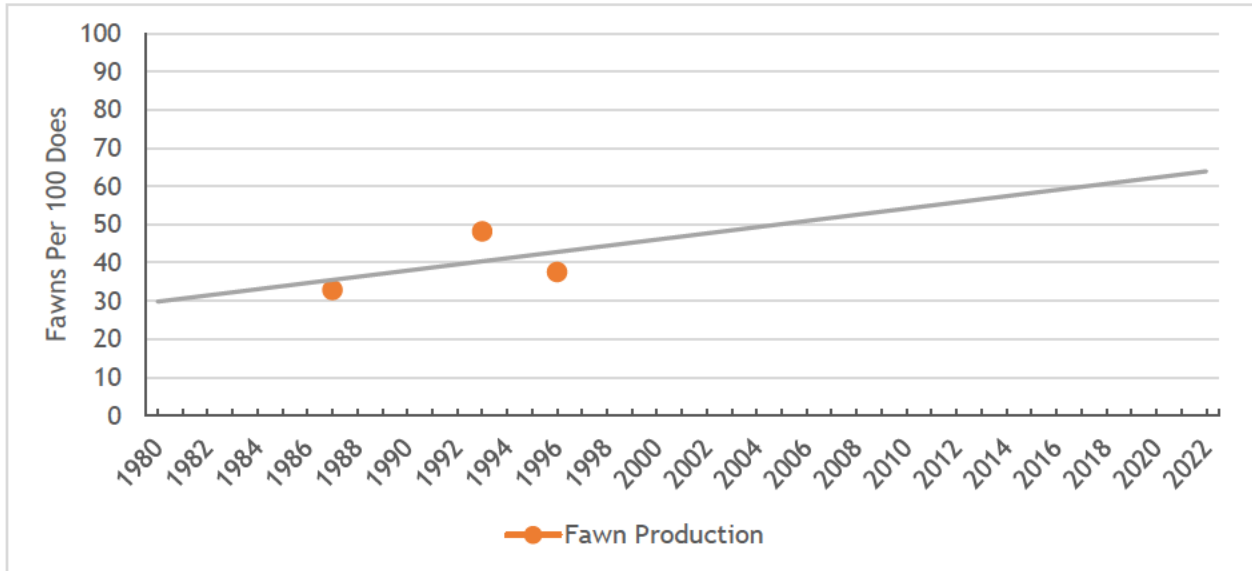


Figure D23-3. Deer DAU D-23 fawn production (observed post-hunt fawns:100 does ratio, years 1980-2022; note: this herd is not classified every year).

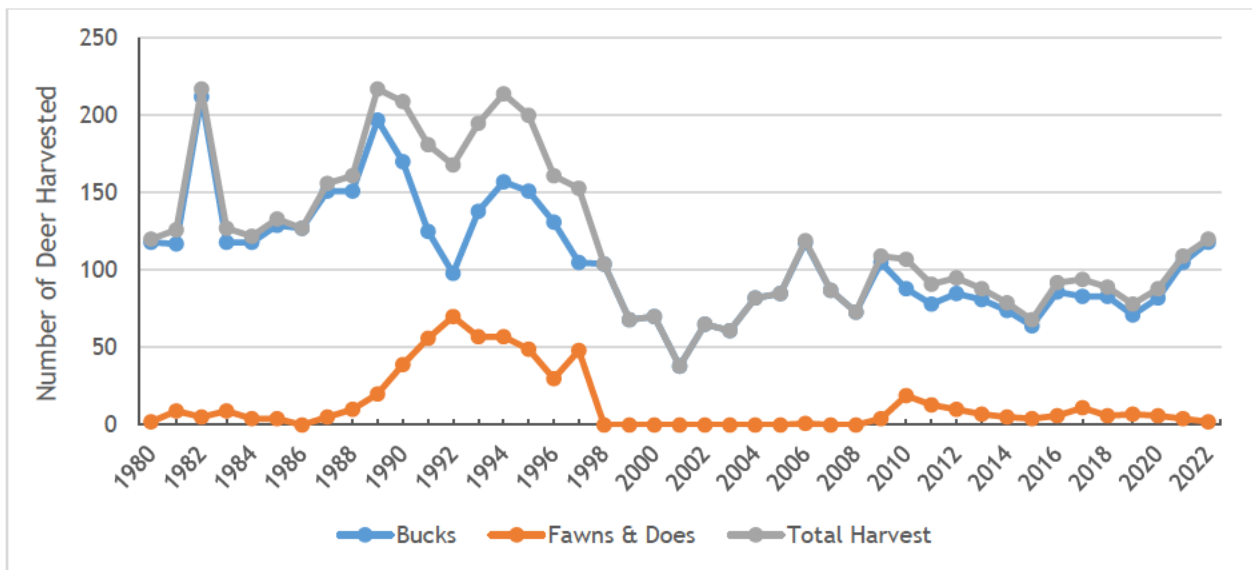


Figure D23-4. Deer harvest estimates in D-23, years 1980-2022.



## Background Information

Data Analysis Unit (DAU) D-23, the La Sal deer herd, consists of Game Management Unit (GMU) 60 along the Utah state line and includes parts of Montrose and Mesa Counties. The landownership in this unit consists of 65% Bureau of Land Management, 18% U.S. Forest Service, and 18% privately owned.

Plant communities are diverse within the DAU, based on the changes in elevation from 4,500 feet in the desert shrub communities around Gateway and the Dolores River to the Ponderosa pine and mountain shrub areas in the upper elevations above 8,000 feet on the west end of the DAU. Agricultural areas and cultivated croplands within the DAU occur primarily in the Paradox Valley, Sinbad Valley, Gateway area, and along the Dolores River.

D-23 consists mostly of winter ranges, with summer ranges occurring primarily in the La Sal Mountains in Utah. In the spring and summer, most of the D-23 deer migrate to higher-elevation aspen and oak brush habitats in the La Sal Mountains. By fall, large numbers of deer move to lower elevations into the pinyon/juniper, sagebrush, and agricultural lands for winter. Snow levels in the La Sals primarily determine how many deer migrate into Colorado for the winter; however, a growing residential population of deer is associated with the agricultural valleys near Paradox and Gateway.

Historic DAU D-23 population estimates have fluctuated based on winter conditions. The last few years (2020-2022) have been on an increasing trend. The 2008 herd population objective was 2,500-3,000, with an estimated 2,400 deer (2006 estimate).

The 2022 population was estimated at 1,500 deer. In response to outreach and surveys in 2021 and 2022, CPW staff and public stakeholders stated a desired slight increase in deer populations in this herd. CPW proposes a new objective range of 1,500-1,800 to capture the estimated population number and to better reflect the current herd dynamics and recent population trend. This objective range will also balance the public's desire for more deer with CPW's responsibility to manage Chronic Wasting Disease (CWD) prevalence in the agricultural regions of this unit. Increasing deer densities could result in greater CWD prevalence.

Since D-23 has a population that is more greatly impacted by climatic conditions than by hunter harvest (like most herds), limited effort has been invested in monitoring this population, making fine-scale herd management difficult. The population has only been classified by helicopter for age and sex ratios four times since 1980. GMU 60 was last classified in 2021, but CPW did not observe enough deer to use the estimates in the population model. The population model uses estimated survival rates and post-hunt observed age and sex ratios from the adjacent DAU D-19 (Uncompahgre Plateau). Observations of herd status from the local district wildlife manager, local residents, and hunters are evaluated to monitor observed trends and anecdotal verification of modeled estimates and trends for the population.

The five-year average observed post-hunt buck ratio for D-19 is 32 bucks:100 does and the five-year average modeled post-hunt buck ratio for D-23 is 32 bucks:100 does. The buck ratio objective CPW prefers for the 2023 plan is to lower the objective range (20-25 bucks:100 does). Utah's Division of Wildlife Resources and CPW both agreed that decreasing the buck:doe ratio because of high CWD prevalence and seasonal interstate movements between Utah's Unit 13 and D-23 would be best for long-term herd health. The public would like a higher buck ratio,

but with CWD prevalence estimated at 21% (based on a small sample size), CPW must manage this growing threat to mule deer populations. This ratio would balance hunting opportunity and CWD management flexibility since this herd has a high CWD prevalence.

The five-year average observed post-hunt fawn ratios in D-19 averaged 54 fawns:100 does. Fawn-to-doe ratios in D-19 have been increasing slightly since 2016. In 2022, there was a slight decline from 60 fawns:100 does to 57 fawns:100 does.

Harvest in DAU D-23 has fluctuated historically from as few as 38 deer to as many as 217 deer. Harvest has averaged approximately 91 deer per year over the last ten years. In 2022, 118 bucks, one doe, and one fawn were harvested by 186 hunters with a success rate of 65%. Preference point minimums for resident licenses in D-23 range from 0-2 points. Preference point minimums for nonresident licenses range from 0-9 points, with some licenses drawn as second choice or in the leftover draw. Antlerless licenses are only available as private-land-only and game damage licenses to control resident deer populations and minimize game damage. There have always been very few limited licenses and limited demand for licenses in this DAU, often making herd management difficult.

### **Significant Issues**

The majority of deer habitat within D-23 is winter range, and extended drought has resulted in poor winter forage conditions for deer throughout much of southwestern Colorado. Annual snow levels determine the population size in Colorado and Utah, meaning poor forage conditions in Colorado impact local deer populations and interstate populations.

Although claims for deer damage in D-23 are not excessive, complaints from landowners about crop damage occur, primarily in the Paradox valley where deer are utilizing alfalfa fields. Damage to corn is expected in the future as residential deer populations increase in Gateway. Limited demand for private-land-only (PLO) licenses impedes CPW's ability to manage game damage through harvest.

One of the critical issues affecting D-23 is Chronic Wasting Disease (CWD). This disease occurs in deer, elk, and moose. CWD is an infectious prion (misfolded protein) disease that affects the nervous system over approximately three years. CWD can spread from the host by direct contact or through resources shared with an infected individual. To add to the complexity, prions can last for many years in the environment, further challenging management. This disease is 100% fatal and a treatment has not yet been developed. CWD was first detected in D-23 in 2018, and the current estimated prevalence rate is 21%; however, the accuracy of this prevalence rate is unknown because only 19 samples were collected during mandatory testing in 2020. The majority of the CWD prevalence is in the agricultural areas around Paradox. Utah's neighboring La Sal Unit 13 has the highest CWD prevalence in the state, which further compounds the issue with interstate deer movements. To mitigate the issue, CPW has increased buck licenses to decrease CWD spread since adult male deer are more likely to contract CWD. Proactive CWD management will be a crucial part of the D-23 Herd Management Plan.

### Management Alternatives

Post-hunt population and buck ratio objective alternatives considered for the 2024 D-23 HMP:

Table D23-1. Proposed population and buck ratio objective ranges for the 2024 D-23 HMP.

Population Objective Alternatives:		Buck Ratio Objective Alternatives:	
1,200 to 1,500 (midpoint 1,350)	(1) 10% decrease in the current population estimate to the middle of the proposed objective range.	20 to 25 bucks per 100 does	(2)
1,500 to 1,800 (midpoint 1,650)	(2) Preferred- 10% increase in the current population estimate to the middle of the proposed objective range. The current population estimate is within this range.	25 to 30 bucks per 100 does	(2) status quo
2,500 to 3,000 (midpoint 2,750)	(3) Status Quo- Approximately 83% increase in the current population estimate to the middle of the proposed objective range.	30 to 35 bucks per 100 does	(3)

### Management Objectives

CPW intends to increase this deer population slightly above the current population estimate of 1,500 (within the preferred lower population objective range) to balance stakeholder and CPW staff desires for an increased population, but also stabilize CWD prevalence (Alternative 2). Since CWD is concentrated around the town of Paradox, increasing the population slightly should not change CWD prevalence dramatically. Utah also plans to increase the bordering herd numbers in Unit 13. Decreasing this herd (Alternative 1) would be difficult because there is already limited desire for the licenses currently available and this would not reflect CPW and stakeholders desires for an increased population. An 83% population increase over 2022 estimates (alternative 3, status quo) is not attainable with the current population without very large-scale habitat management adjustments, reduced predator populations, or an increased social tolerance. The variable deer movement between both states would also make it difficult to maintain such a significant increase. A large increase in deer numbers could also be problematic for CWD management, as increased deer densities could increase CWD prevalence.

CPW intends to decrease the buck ratio, despite stakeholder desires for more mature bucks in the population. Stakeholders have stated a preference for hunting mature bucks rather than the opportunity to hunt every year (Alternative 3). Unfortunately, mature bucks tend to have a greater probability of carrying CWD; therefore, managing for more mature bucks would be counter-productive to CPW’s CWD management strategies. The status quo objective range of 25-30 bucks:100 does allows for hunting opportunity for all age classes of bucks, but would not manage unit 60’s high CWD prevalence effectively (Alternative 2). Decreasing the buck ratio to 20-25 bucks:100 does (alternative 1) would help decrease CWD prevalence and potentially increase hunting opportunity in the short term. This objective does not align with stakeholder desires for increased buck ratios in the population, but the long-term health of this herd must be considered. This proposed objective would align more closely to Utah’s La Sal Mountains herd buck ratio objective of 15-17 bucks:100 does.

## Strategies for addressing management issues and achieving objectives

D-23 has unique management issues because of the varied seasonal movement between Utah and Colorado. This variability leads to limited population monitoring. This population is also small, so limited numbers of licenses are offered and demand is low for many of the licenses, compounding herd management complexities.

CPW manages sex ratios and population objectives by increasing or decreasing licenses by total quota, by season, and by sex, depending on the objectives for each herd. This herd has historically been managed for a balance of opportunity and slight population growth. CPW would like to continue this management strategy. Additionally, the last several years have been managed proactively to limit CWD spread, and staff sees this as an important strategy to continue into the future. Antlerless game damage licenses would still be available for landowners to deter deer from causing more damage and to increase landowner tolerance. Buck licenses will continue to be offered to manage CWD concerns and allow for moderate hunting opportunity. Additionally, predator and competing ungulate management will continue.

In addition to license management, CPW recognizes the importance of habitat protection and habitat quality improvement. CPW regularly communicates with land management agencies such as the USFS and BLM, landowners, county governments, CDOT, Utah Division of Wildlife Resources, and NGOs and will continue collaborating with these government agencies and organizations to achieve management goals. These agencies can help with large-scale habitat management projects to improve carrying capacity and regulate recreation and grazing on public lands, which could bolster deer populations.

## Stakeholder Outreach

Hunters were randomly selected to complete the 2022 Deer Hunter Attitude Survey after the completion of their hunting seasons. There were 75-87 respondents (depending on the question) who answered the opt-in questions for D-23. Overall, hunters desire a slight to moderate increase in the deer population and are generally satisfied with their hunting experience. Hunters also prefer pursuing more mature bucks (higher buck ratio) to hunting more often (lower buck ratio). The majority of respondents also did not feel crowded while deer hunting.

The draft HMP for D-23 was sent to local county commissioners in Montrose and Mesa Counties. The draft plan was sent to the HPP, USFS, the BLM, and Backcountry Hunter and Anglers (BHA). Support letters were received by the BLM, the USFS, and HPP. Additionally, CPW met with Utah's Division of Wildlife Resources to discuss future management between both states and we incorporated their comments into the plan. The HMP was posted on the CPW website for 30 days, allowing stakeholders to comment on the alternatives in the plan.

## CPW Commission Approved Objectives:

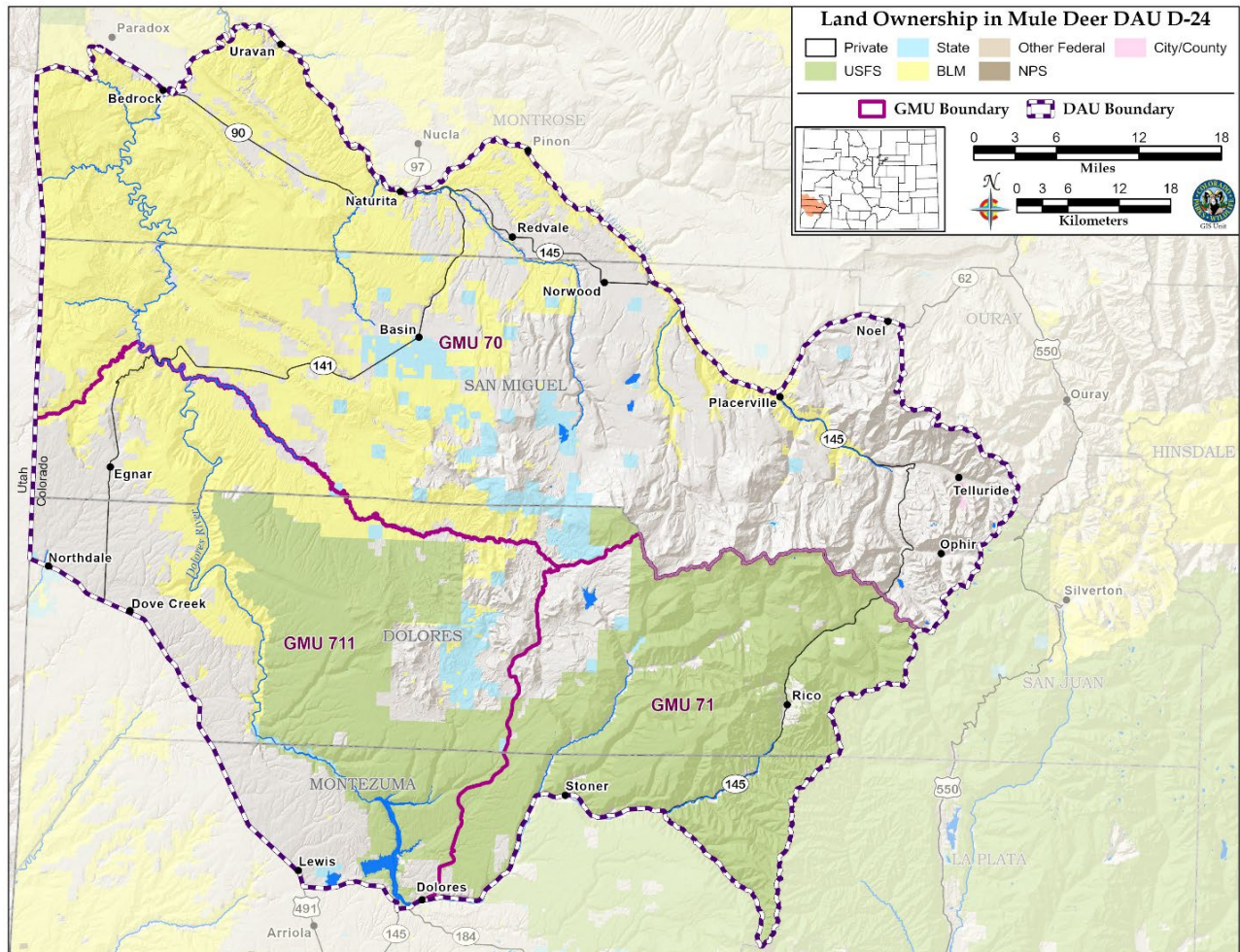
*Post-hunt Population: 1,500 - 1,800 deer*

*Post-hunt buck ratio: 20 - 25 bucks:100 does*

## GROUNDHOG DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-24

Brad Weinmeister, Wildlife Biologist, Durango

<b>Groundhog Deer Herd (DAU D-24)</b> <b>Last HMP Approval Year: 2014</b>	<b>GMUs: 70, 71 and 711</b>
Post-hunt Population: Previous Objective: 15,000-19,000 2022 Estimate: 18,300 <b>Preferred Alternative: <u>19,000-23,000 deer</u></b>	
<u>Post-hunt Sex Ratio (bucks:100 does):</u> Previous Objective: 23-28 2022 observed: 25; modeled: 23 <b>Preferred Alternative: <u>23-28</u></b>	



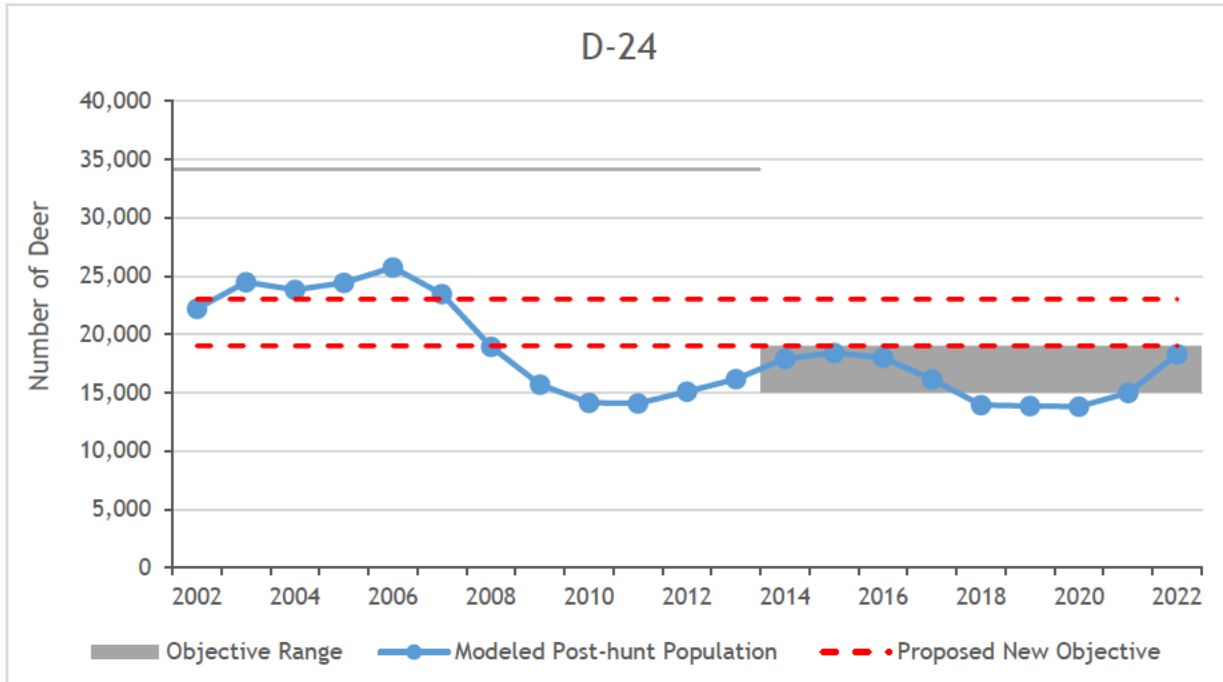


Figure D24-1. Deer DAU D-24 modeled post-hunt population estimate and objective range, years 2002-2022.

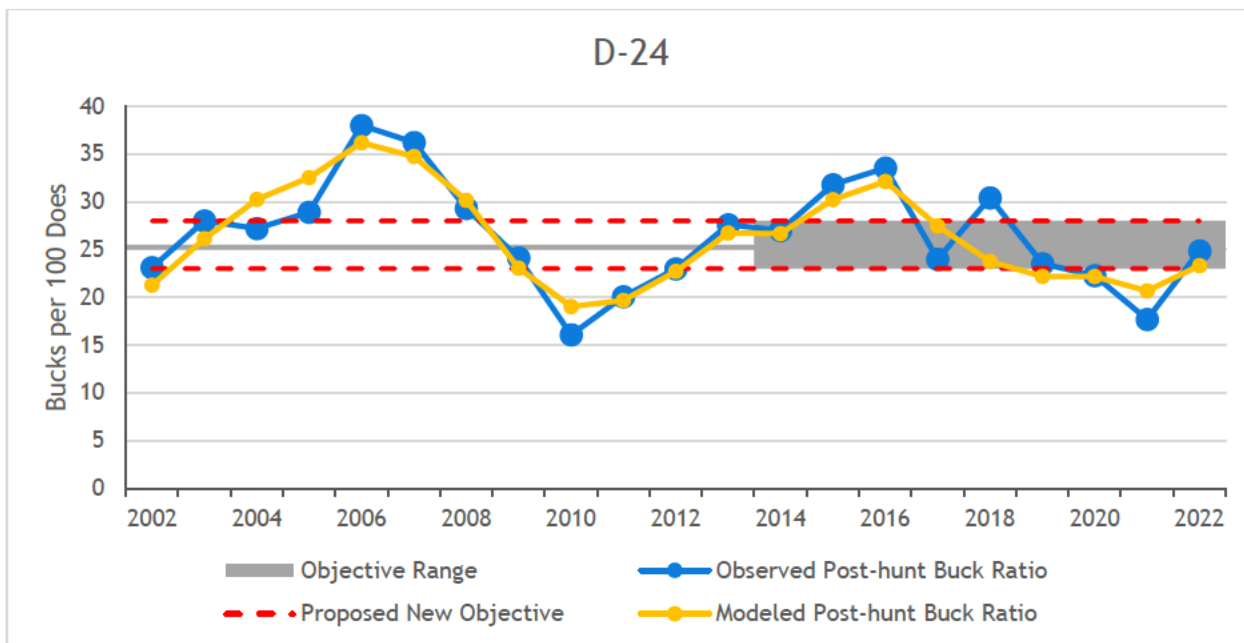


Figure D24-2. Deer DAU D-24 observed and modeled post-hunt sex ratio (bucks:100 does), years 2002-2022.

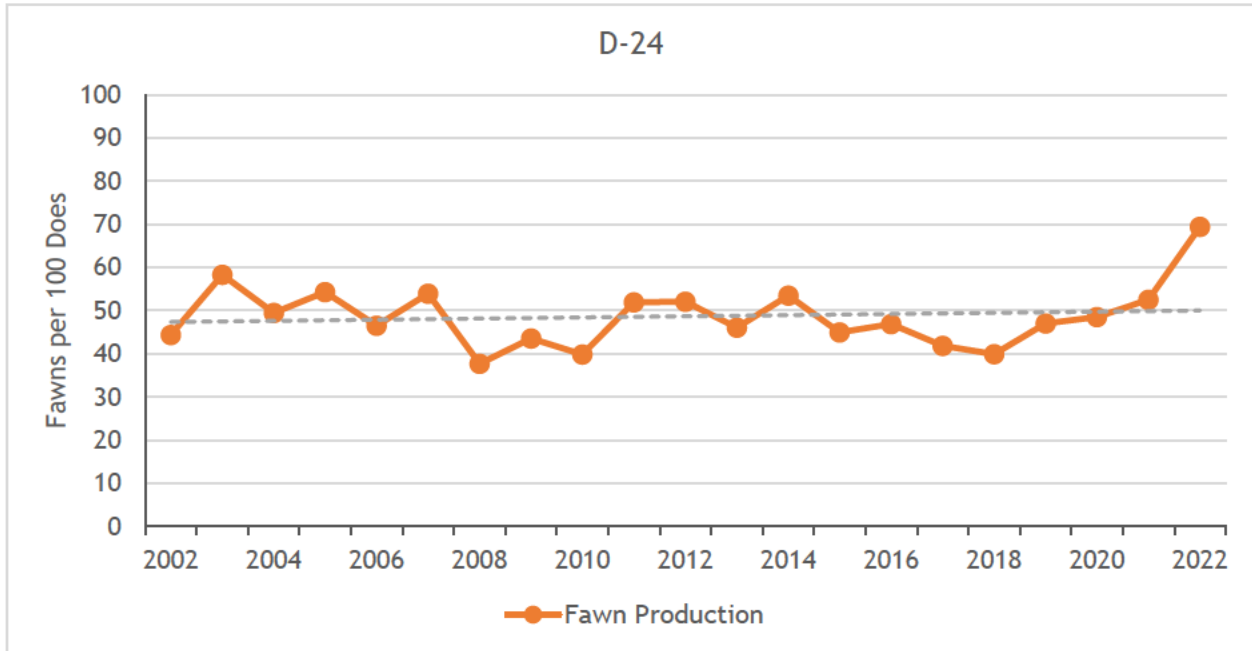


Figure D24-3. Deer DAU D-24 fawn production (observed post-hunt fawns:100 does ratio, years 2002-2022).

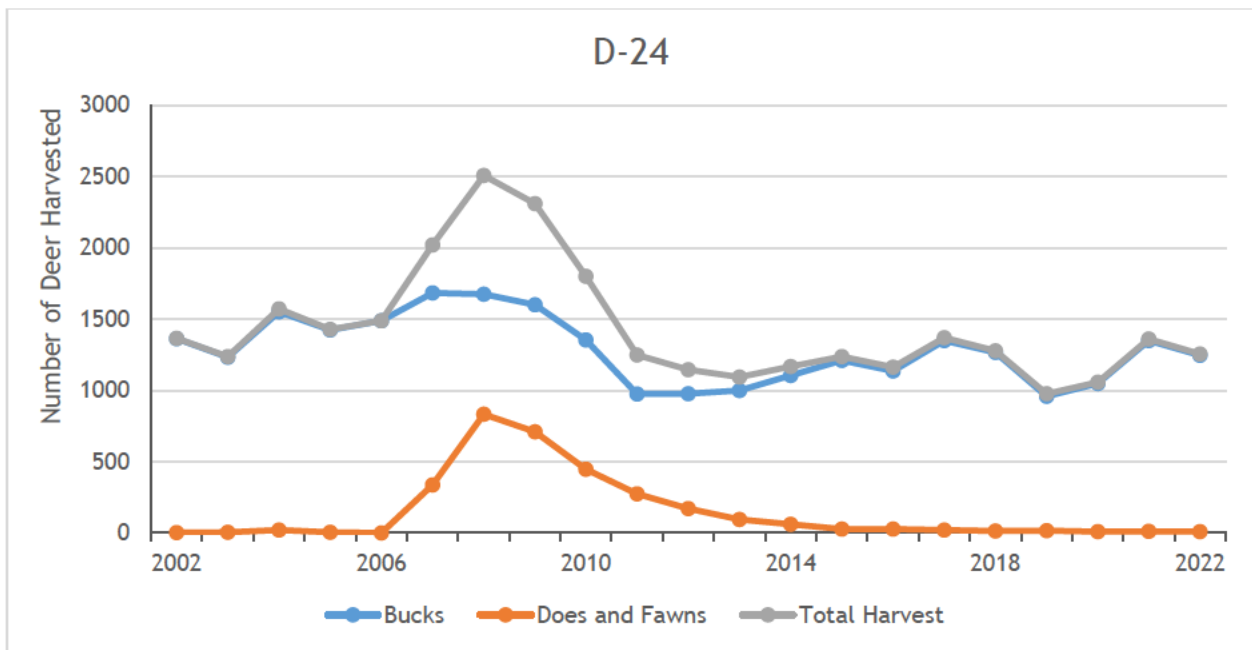


Figure D24-4. Deer harvest estimates in D-24, years 2002-2022.

## Background Information

The Groundhog Deer Population consists of Data Analysis Unit (DAU) D-24. It is located in the southwest corner of Colorado and contains Game Management Units (GMUs) 70, 71, and 711. The DAU is 2,852 square miles and includes portions of Dolores, Montezuma, Montrose, and San Miguel counties. The DAU is bounded on the north by the Dolores and San Miguel Rivers, State Highways 90 and 62, on the east by the Ouray/San Miguel, San Juan/San Miguel, Dolores/San Juan, Montezuma/La Plata County lines, on the south by Bear Creek, State Highways 145 and 184, and on the west by US Highway 491 and Utah. The towns of Rico, Norwood, and Telluride occur within the DAU, while Dove Creek and Dolores are on the southern boundary. Land ownership in the DAU is 34% U.S. Forest Service, 32% BLM, 30% private, and 2% CPW and State Land Board each.

The current post-hunt population objective of 15,000-19,000 deer was set in 2014. The deer population overall has been stable for the past 15 years following a previous decline. It was estimated between 13,800 (2020) and 25,700 (2006) and in 2022 the estimate was 18,300 deer (Figure D24-1).

The average observed post-hunt buck ratio from 2002 to 2022 was 27 bucks:100 does, with a range of 16-38 (Figure D24-2). The observed three-year (2020-2022) average of 22 bucks:100 does was below the post-hunt buck ratio management objective. Observed post-hunt fawn ratios averaged 49 fawns:100 does (range 38-69) between 2002 and 2022 (Figure D24-3). The three-year and five-year averages in 2022 were 57:100 and 52:100, respectively.

Buck harvest has varied over the last 20 years with a low of 959 bucks harvested (2019) to a high of 1,684 (2007), and has averaged 1,285 annually (Figure D24-4). Success rates for hunters do not vary much, and the number of bucks harvested is driven more by the number of licenses available. Doe harvest is on private land through Private Land Only (PLO) licenses or game damage permits. In the past 20 years, doe harvest has ranged from zero (2006) to 776 (2008) with an average of 142 (Figure D24-4). An estimated nine does were harvested in 2022.

When the previous management objectives were determined for this population in 2014, deer populations statewide were on a long-term decreasing trend. At the time the HMP was being written for D-24, the deer herd had reached its lowest recorded population level. The deer population has fluctuated since, but has remained essentially stable. Based on the herd performance over the past ten years, minimal game damage issues, and the desire for more deer on public lands, CPW recommends increasing the population objective.

Buck licenses were limited in the DAU in 1999 when all over-the-counter buck licenses in Colorado were made limited. A fourth-season buck hunt is available in the DAU with limited opportunity. CPW proposes keeping the same buck ratio objective from the previous plan.

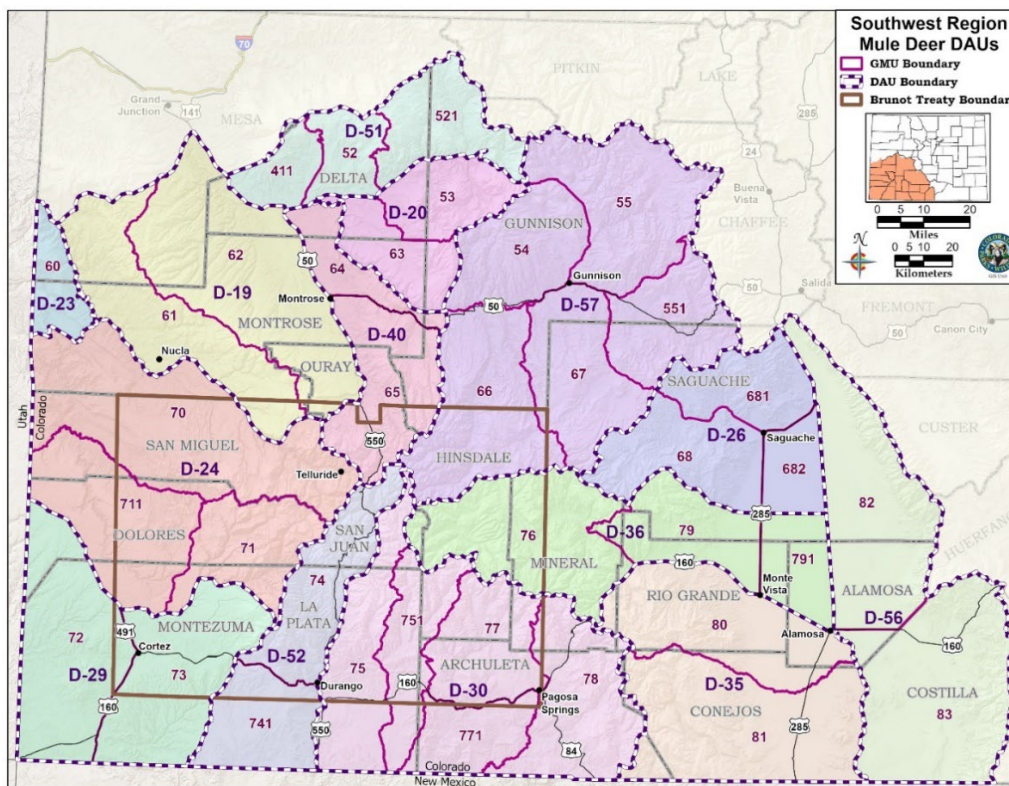
## The Brunot Agreement of 1873

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D24-5). Contained within the 1873 Agreement was an important provision



reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Sixty-three percent (63%; 1802 square miles) of the D-24 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D24-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

## Significant Issues

Due to human population growth, a significant concern in the DAU is the cumulative impacts to critical habitat, including winter ranges, migration corridors, production areas, and high-elevation summer ranges. Exurban development is occurring in the DAU and homes are replacing open lands that currently support deer. Energy development has also increased in deer habitat on private and public lands, resulting in direct and indirect habitat loss. Lastly, outdoor recreation continues growing, placing more people in important deer habitat. The increase in recreational trails and recreation use is decreasing the amount of adequate habitat. Managers and the public are concerned over the cumulative and prolonged impacts of development and recreation, which is disrupting migration and decreasing the quality and quantity of habitat. Actions to enhance and protect important deer habitat will be essential to increase the deer population.

Drought has been present in southwest Colorado for more than two decades, negatively impacting deer habitat and decreasing the amount and quality of forage. Quality habitat provides food, shelter, space, and water and are important to producing robust mule deer populations.

Game damage caused by deer is present but minimal in the DAU. However, there are concerns about the distribution and harvest of deer. Portions of the deer population are more robust on agricultural fields and less so on public lands. To address this managers would like to continue current harvest on those animals in agricultural areas and non-migratory deer and have reduced harvest pressure on migratory deer and those using public lands.

Chronic Wasting Disease (CWD) was detected in the DAU in 2020 with a prevalence rate of 2.6%. Guidelines in CPW's CWD Response Plan (December 2018) will be used to address the spread of the disease. Hemorrhagic disease is also present in D-24. Within the DAU, the disease can cause die-offs of mule deer in the driest years. However, infection and sometimes death of individual animals are more common, with minimal impacts to the overall population.

**Management Alternatives**

Three post-hunt population objective alternatives were considered for D-24:

**Table D24-1.** Proposed and recommended population objective ranges for the 2024 D-24 revised HMP.

Population Objective Alternatives:	
19,000 to 23,000 (midpoint 21,000)	(1) Approximately 25% increase in the proposed objective range midpoint
15,000 to 19,000 (midpoint 17,000)	(2) Status Quo (Maintain current population)
11,000 to 15,000 (midpoint 13,000)	(3) Approximately 25% decrease in the proposed objective range midpoint

Three post-hunt sex ratio objective alternatives were considered for D-24:

**Table D24-2.** Proposed and recommended sex ratio objective ranges for the 2024 D-24 revised HMP.

Sex Ratio Objective Alternatives:	
25-30	(1) Approximately 10% increase in the proposed objective range midpoint
23-28	(2) Status Quo (Maintain current sex ratio)
20-25	(3) Approximately 10% decrease in the proposed objective range midpoint

**Management Objectives and Strategies**

CPW staff recommends increasing the population management objective from the previous objective. The population has increased and stakeholders have indicated that they would like to see more animals in the population. Game damage is minimal in the DAU and would continue to be addressed as needed through game damage permits and PLO licenses. Management would allow the population to grow on public lands and the migratory herd while maintaining the resident populations of deer occurring on and around agriculture fields. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they would like to see a slight or moderate increase in the population, supporting CPW’s proposed alternative.

The current sex ratio objective for D-24 is 23-28 bucks per 100 does. CPW proposes to keep the same objective. The majority of hunters who responded to a CPW survey in 2021 and 2022 were generally satisfied with the number of bucks in the population. The sex ratio is generally managed through the issuance of buck licenses. More licenses are made available to decrease the ratio while licenses would become more limited to increase the ratio. This is done annually to reach and maintain a ratio within the management objective.

Enhancement and protection of habitat are important regarding the health of this deer population. CPW works with Federal land management agencies, private organizations, landowners, local governments, non-profit organizations, and others, as well as managing State Wildlife Areas, to provide the best habitat for mule deer and other wildlife. New habitat is not being created so it is necessary to get the most out of existing habitats and protect them from additional loss.

## Stakeholder Outreach

Hunters were randomly selected in 2021 and 2022 to complete the Deer Hunter Attitude Survey after the completion of their hunting seasons. The results of these surveys were used to guide CPWs management objective recommendations included in the draft of the HMP. In addition, a copy of the draft plan was available for public comment for 45 days on the CPW webpage. During that time period the draft HMP was presented to Dolores County Commissioners, Montezuma County Commissioners, Montrose Habitat Partnership Committee, and the Montelores Habitat Partnership Committee. Copies of the draft HMPs, requesting written comments, were sent to the Forest Service biologist in the Dolores District, the BLM biologist in the Tres Rios Field Office, and the Southern Ute and Ute Mountain Ute wildlife biologists.

### **CPW Commission Approved Objectives:**

*Post-hunt Population:* 19,000 - 23,000 deer

*Post-hunt Buck Ratio:* 23 - 28 bucks:100 does

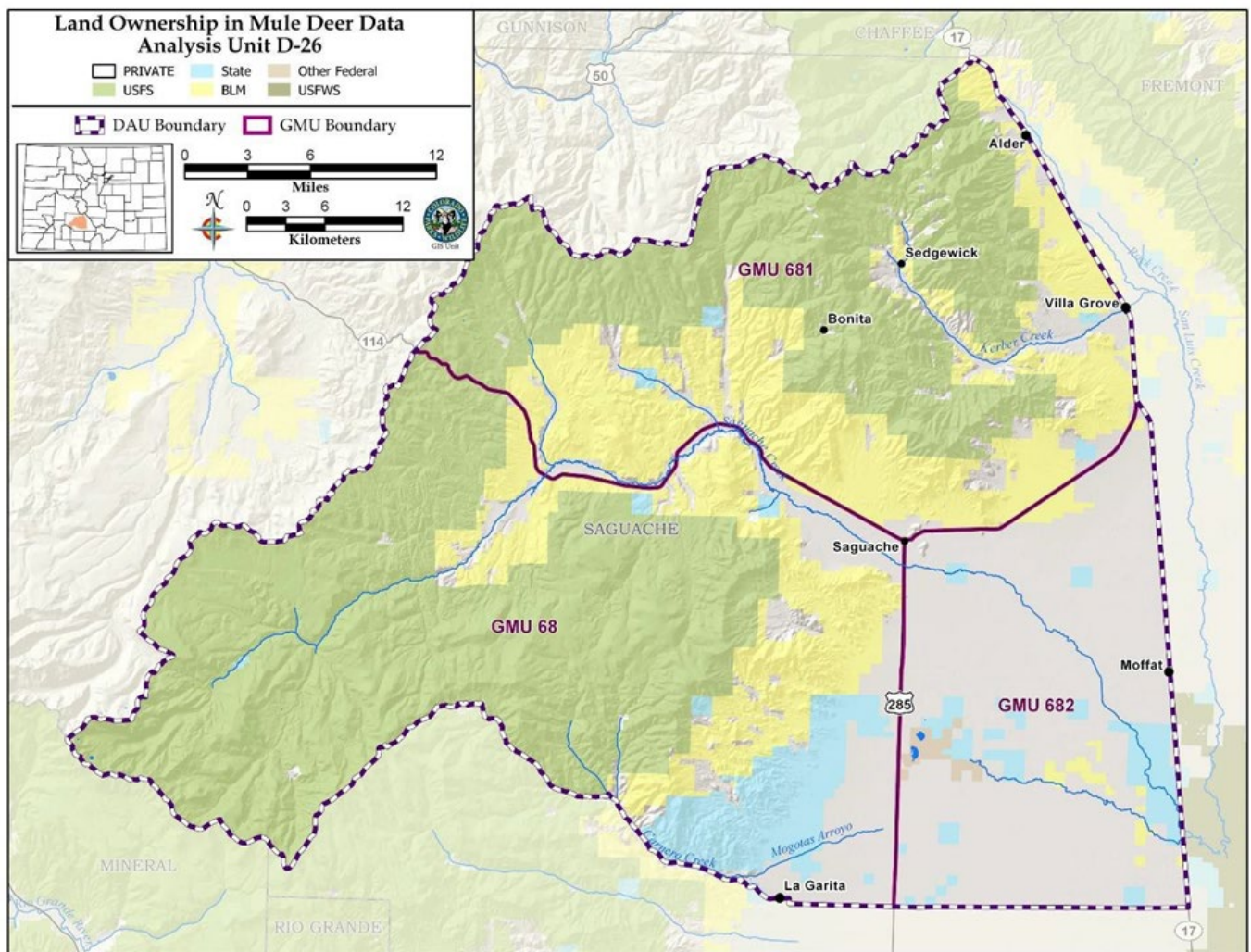
## SAGUACHE DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-26

Brent Frankland, Wildlife Biologist, Monte Vista

**GMUs: 68, 681, and 682**  
**Last HMP Approved Year: 2019**

Post-hunt Population: Previous Objective: 5,500-6,500; 2022 Estimate: 5,500 deer.  
**Preferred Alternative: Maintain population objective at 5,500-6,500 deer.**

Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 26-29;  
2022 observed: 29; 3-yr average modeled: 29.  
**Preferred Alternative: Status Quo at 26-29 bucks:100 does.**



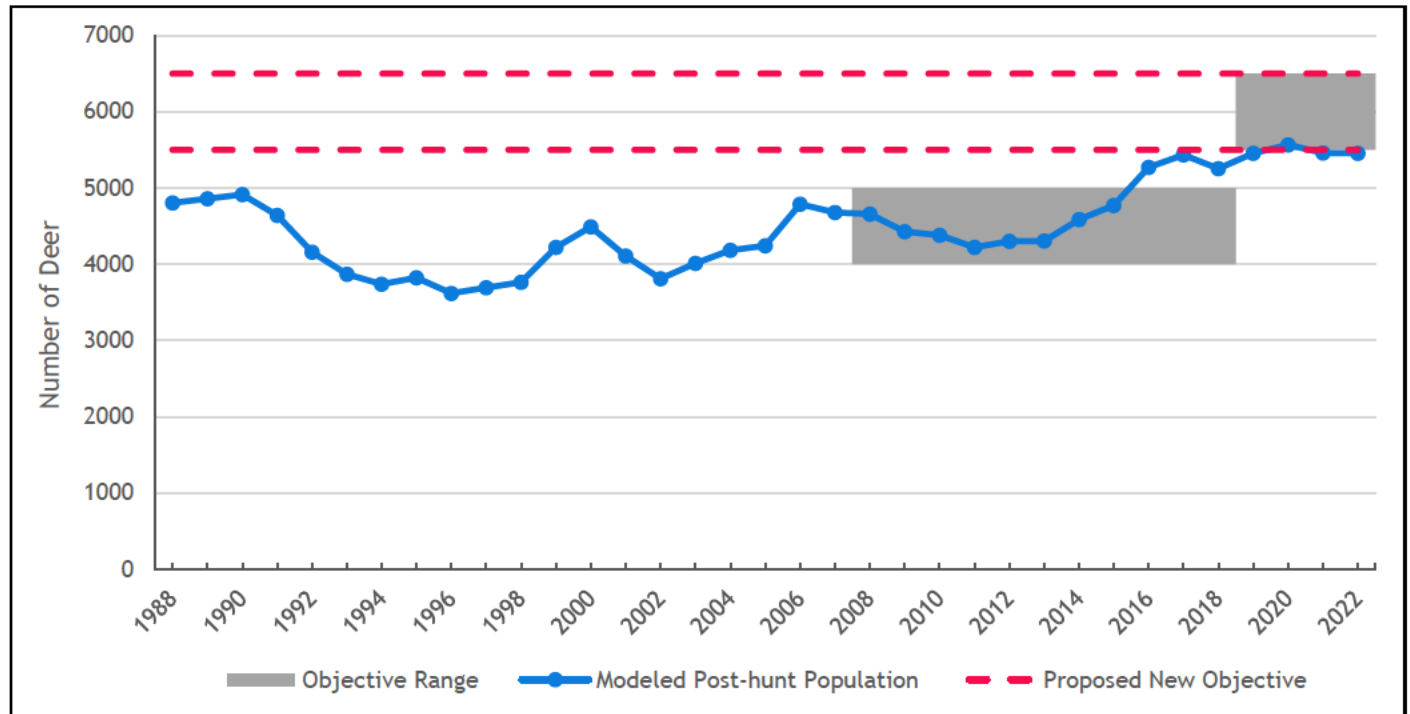


Figure D26-1. Deer DAU D-26 modeled post-hunt population and objective range, 1988-2022.

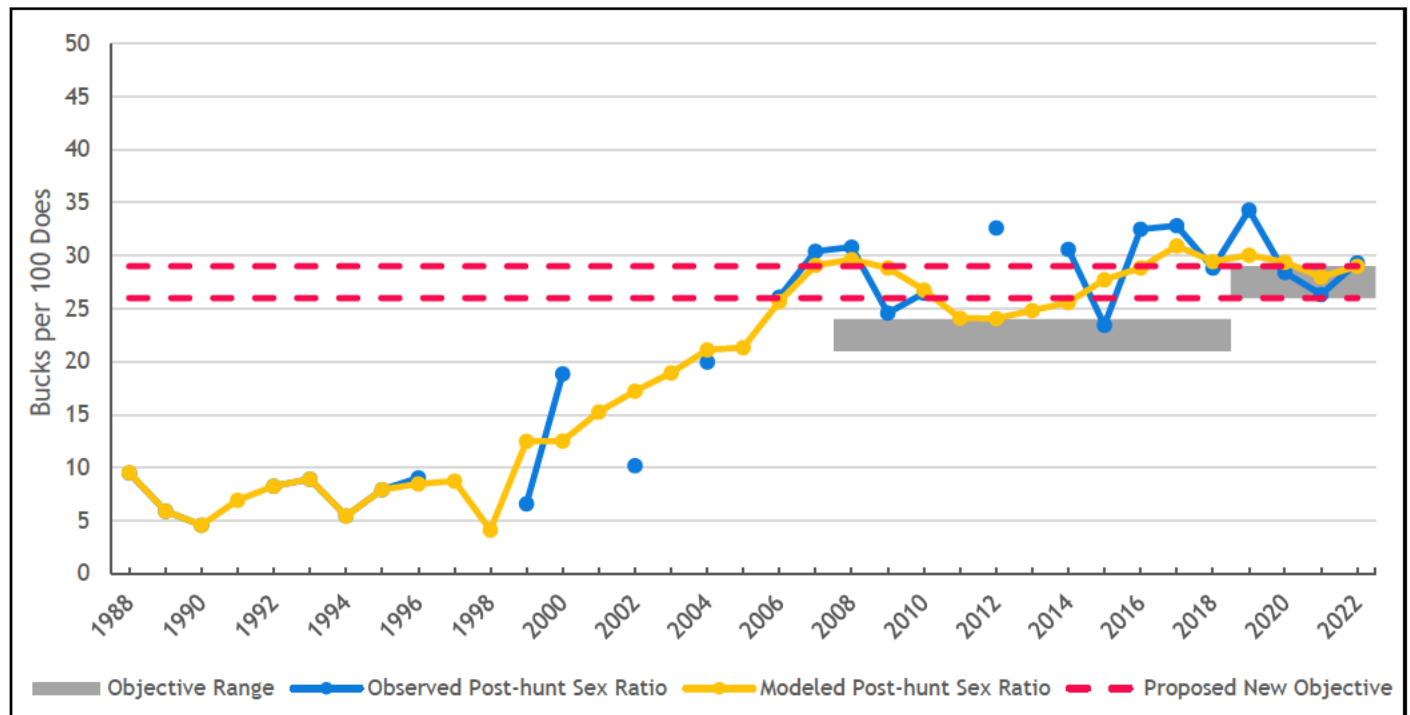


Figure D26-2. Deer DAU D-26 observed and modeled post-hunt sex ratio (bucks:100 does), 1988-2022.

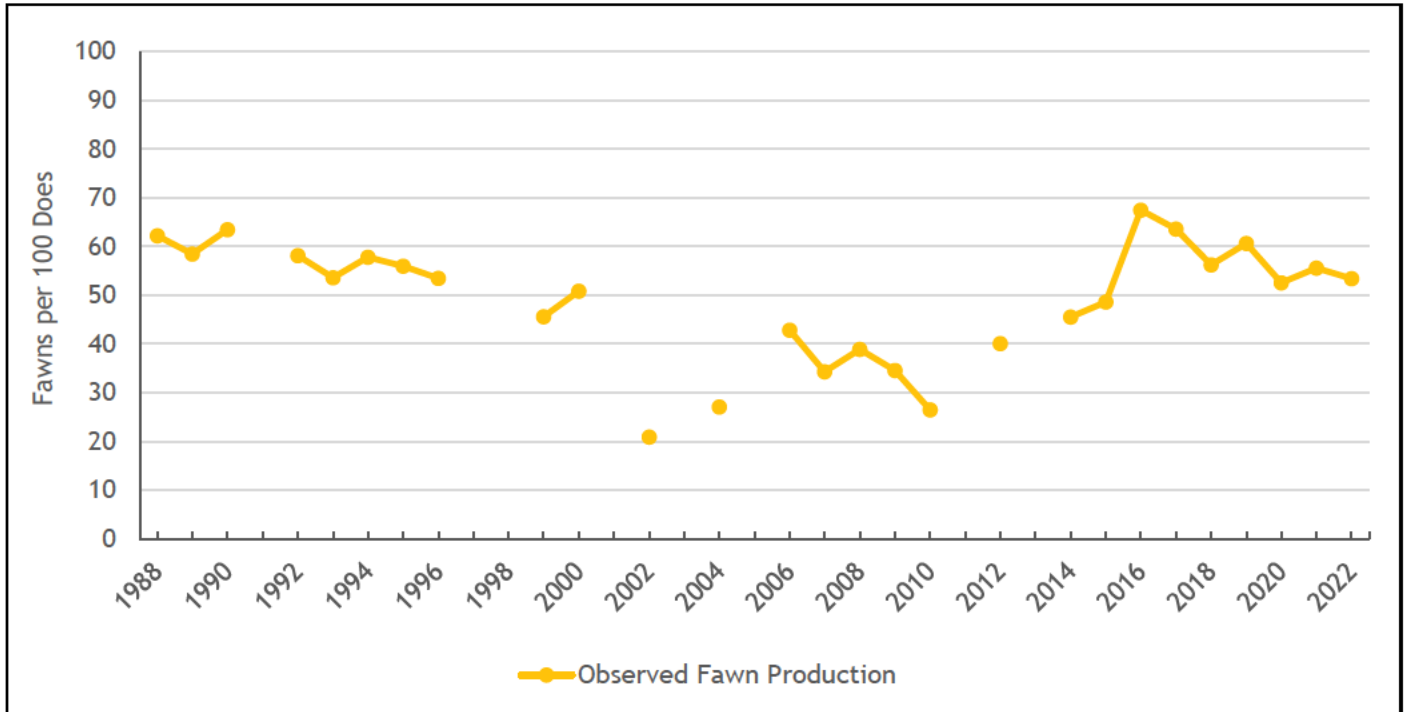


Figure D26-3. Deer DAU D-26 fawn production (observed post-hunt fawns:100 does ratio, 1988-2022).

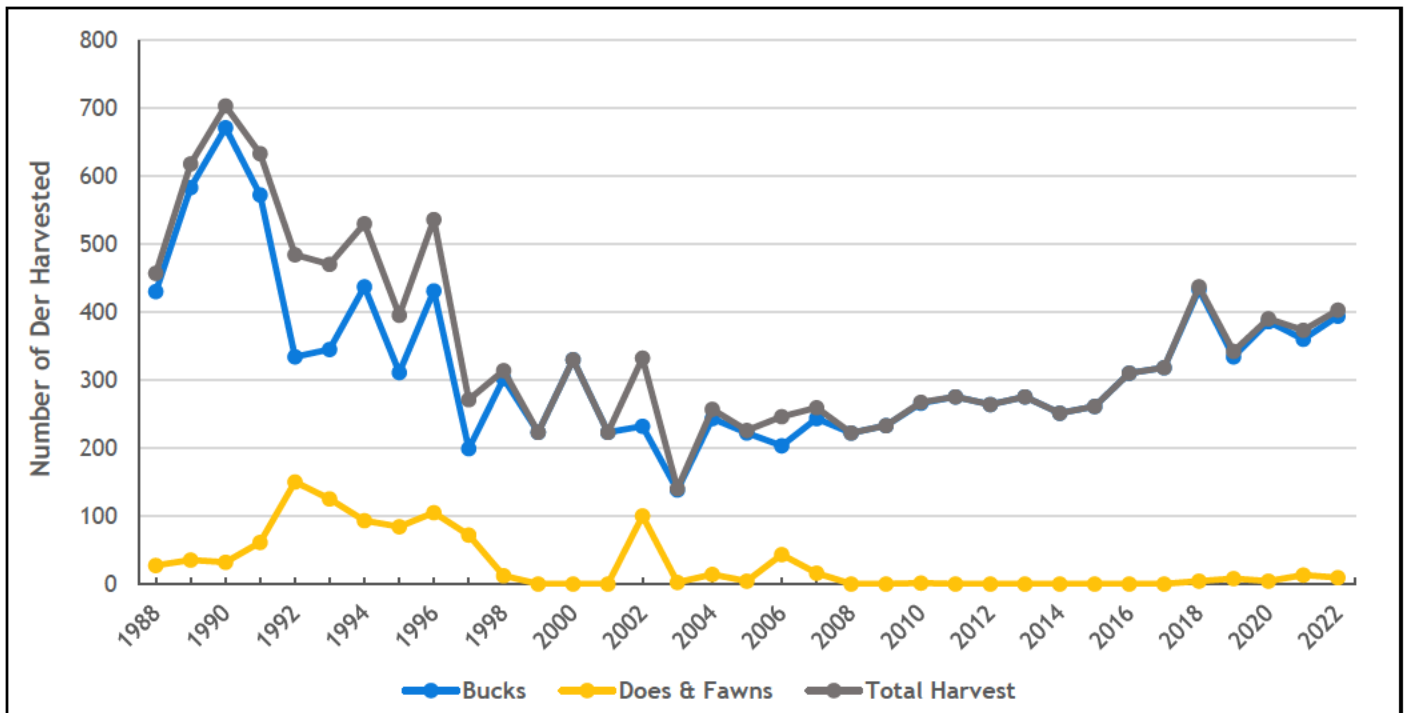


Figure D26-4. Deer harvest estimates in D-26, 1988-2022.

## Background Information

The D-26 mule deer herd is in the western region of the San Luis Valley. The DAU (geographic area) comprises Game Management Units (GMUs) 68, 681, and 682, approximately 1,302 square miles. The mule deer winter range within the DAU includes roughly 483 square miles, whereas the summer range encompasses about 963 square miles. The DAU is entirely within Saguache County. Public land constitutes about seventy-four percent of the DAU, while the private sector owns more than twenty-six percent.

The D-26 population began to decrease steadily in the late 1980s. To address the decrease, CPW eliminated doe licenses, and buck licenses, which had been unlimited, became limited in 1999. The herd dropped to less than 3,500 animals in 2002 and has gained traction since then, increasing in numbers to within the boundaries of the 2008 objectives of 4,000 to 5,000 animals. The population remained within the 2008 objectives until 2015. Since then, the population estimate increased above the upper end of the 2008 population objectives. In 2019, CPW updated the population objectives to 5,500 to 6,500 deer to manage the deer herd more accurately within biological and social constraints.

The D-26 observed post-hunt sex ratios have increased since CPW limited antlered licenses in 1999. Before the implementation of limited licenses, the observed sex ratio averaged less than ten bucks per 100 does. From 1999 to 2008, the average observed sex ratio rose to 20 bucks per 100 does; since 2008, it has increased to 29 bucks per 100 does. Alternatively, the modeled sex ratio has been trending relatively close to the observed sex ratio, and it has been hovering around the upper end of the 2019 objective range since 2018.

Before CPW limited buck licenses in 1999, the annual buck harvest averaged approximately 420 animals in the DAU. Since the limitation, the average buck harvest has been almost 277 animals, which has increased to 332 animals over the past ten years. With the rising observed sex ratio, CPW increased buck licenses in 2017 and 2018 and provided minor increases in 2020 and 2021 throughout the DAU to curb the upward trend and reduce it to the upper end of the objective range. Harvest from the additional licenses has leveled further sex ratio increases.

Doe harvest fluctuated from 1988 to 2007, averaging roughly 47 animals annually. Thereafter, the doe harvest was negligible until 2017. From 2018 to the present, the doe harvest has occurred at a minor scale, averaging approximately seven animals, many of which were in the Saguache town. Most of the doe harvest resulted from depredation licenses. CPW will continue to provide the depredation licenses as needed.

Over the past ten years, the combined hunting-season success rates have averaged approximately forty-five percent. However, harvest success rates are skewed between the archery, muzzleloader, and rifle seasons. The average archery success since 2013 is around twenty-eight percent. Comparatively, the second and third rifle seasons have averaged roughly fifty-six to fifty-eight percent, and the fourth rifle season's success has averaged about eighty-four percent over the past ten years. Since 2013, the muzzleloader season's success has fallen between the rifle and archery seasons, averaging almost forty-one percent.



## Management Concerns

Significant factors that may limit the D-26 population are the quantity and quality of winter range habitat. The winter range continues to diminish slowly, with increased development on private land and competition with domestic livestock. Similarly, summer recreational activities continue to expand throughout the DAU. The various anthropogenic impacts may affect distribution, reproduction, and fawning efforts restricting population growth. Deer numbers decreased beginning in the mid-1990s. The cause of the decline is unknown, but CPW attributed the cause to one or more of the following: 1) interspecific competition with an increasing elk herd for limited resources, 2) habitat succession limiting the amount of quality habitat and forage available, 3) record droughts from 1999 through 2004. Nonetheless, this population rose during the early 2000s and mid-2010s and is currently relatively stable. Mule deer are not a significant problem on agricultural land in the DAU, and depredation concerns are minimal. CPW continues to provide game damage and dispersal licenses to private landowners to address issues. Localized problems may result from restricted mule deer distribution during the winter months. Private landowners who experience mule deer depredation issues can access various management tools CPW offers.

## Management Alternatives

In 2019, CPW considered three alternatives for the post-hunt population size and post-hunt sex ratio objectives in Data Analysis Unit D-26:

**Table D26-1. Proposed population objective ranges for the 2024 D-26 HMP.**

Post-hunt Population Objective Alternatives:	
3,500 to 4,500	(1) Approximately 10% decrease in objectives
4,500 to 5,500	(2) Approximately 10% increase in objectives
5,500 to 6,500	(3) Approximately 20% increase in objectives - APPROVED

**Table D26-2. Proposed buck ratio objective ranges for the 2024 D-26 HMP.**

Post-hunt Buck Ratio Objective Alternatives:	
21 to 24 Bucks per 100 does	(1) Status Quo
24 to 26 Bucks per 100 does	(2) Increase buck ratio objective by approximately 3 bucks per 100 does
26 to 29 Bucks per 100 does	(3) Increase buck ratio objective by approximately 5 bucks per 100 does - APPROVED

## Public Involvement

In the summer of 2018, CPW held a local public meeting in Saguache, CO. Local constituents representing different community stakeholder groups attended the meeting. The overall view from the attendees was that they were somewhat pleased with deer management in the DAU. At the time, the deer population estimate was above the objective range, and most

participants supported keeping it at its current level, which entailed managing towards a 20% increased deer population objective. CPW also provided a draft document online to the public for 30 days, and the agency sent the draft to the BLM, local county commissioners, the local Habitat Partnership Program (HPP) committee, and the U.S. Forest Service for commentary and feedback. The draft allowed all constituents to participate in the public process, including non-consumptive recreationists, hunters, landowners, local stores, or business owners. CPW has re-examined and considered biological herd capabilities and social-political tolerance for this updated HMP. CPW will provide a draft of this HMP online for 30 days for public comment but proposes no changes to the objectives.

### **Preferred Management Objectives:**

#### *Post-hunt Population*

The preferred management objective for D-26 is a post-hunt **population of 5,500 to 6,500 mule deer**, aiming to maintain management and sustain the herd at its current estimated population level, allowing for a slight increase. This objective range provides the best balance for managing the deer herd, hunting recreational opportunities, minimizing agricultural conflicts, and maintaining acceptable habitat carrying capacity.

#### *Post-hunt Sex Ratio*

The preferred post-hunt sex ratio objective range for the D-26 mule deer herd is increasing the objective to **26-29 bucks per 100 does**. The range supports most stakeholders' desires, preferring a slightly higher sex ratio objective in the DAU. A higher objective would reduce the need for additional harvest from what CPW has observed. However, the higher sex ratios could potentially increase CWD risk. Nonetheless, the preferred range allows for the best balance between satisfactory hunting experiences and the desired hunting opportunities.

### **Strategies for Achieving the Preferred Objectives:**

*Post-hunt Population* - CPW will continue collecting annual inventory data and managing to the preferred mule deer population objectives. The population should persist as long as fawn recruitment remains strong without public land doe hunting licenses. Tools to control private land depredation issues will remain in place. CPW will consider doe harvest opportunities once the population estimate reaches the upper region of the preferred objective range or a significant deterioration in habitat conditions occurs.

*Post-hunt Sex Ratio* - CPW will maintain current buck-hunting opportunities until the observed sex ratio falls comfortably within the preferred objective range. After that, CPW will monitor the herd to balance buck-hunting opportunities and the mature buck level relevant to the objective range. Expected harvest from the buck licenses should sustain an acceptable adult buck population and stakeholder satisfaction. The preferred objective would reduce the risk of CWD from the sex ratio levels CPW has observed in recent years.

### **CPW Commission Approved Objectives:**

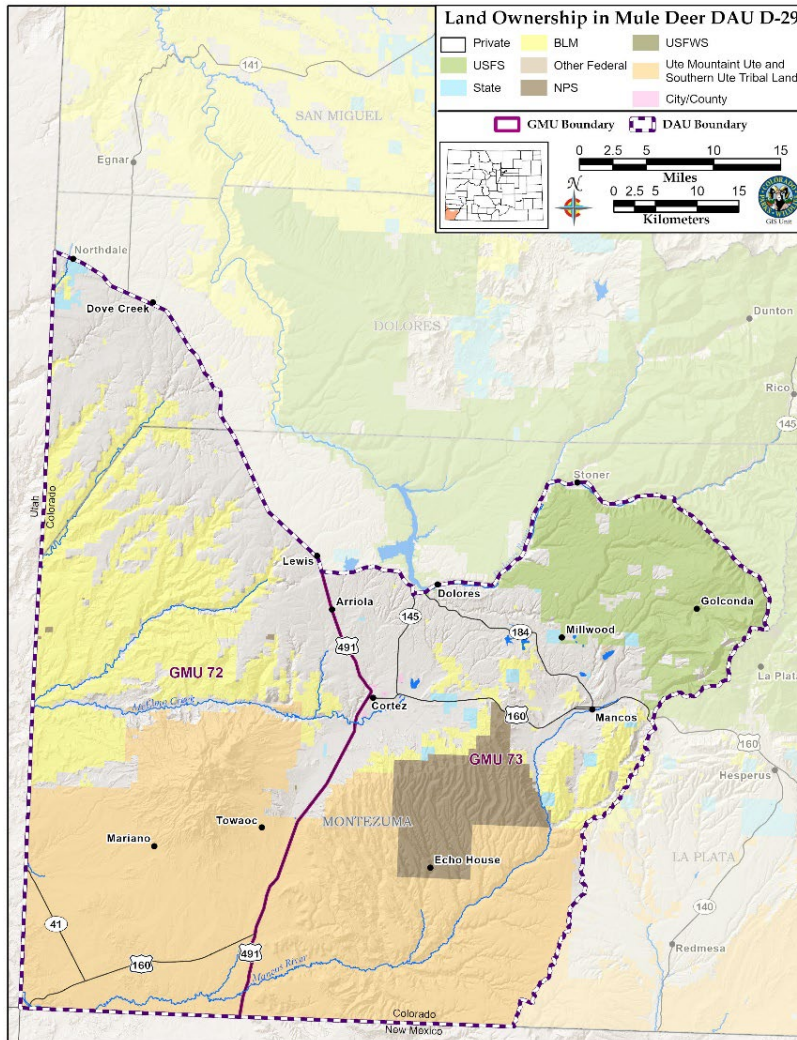
*Post-hunt Population: 5,500 - 6,500 deer*

*Post-hunt buck ratio: 26 - 29 bucks:100 does*

## MESA VERDE DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-29

Brad Weinmeister, Wildlife Biologist, Durango

<b>Mesa Verde Deer Herd (DAU D-29)</b> Last HMP Approval Year: 2014	<b>GMUs: 72 and 73</b>
Post-hunt Population: Previous Objective: 5,500-7,000 2022 Estimate: 9,300 <b>Preferred Alternative: <u>9,000-12,000 deer</u></b>	
Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 23-28 2022 observed: 27; modeled: 31 <b>Preferred Alternative: <u>23-28</u></b>	



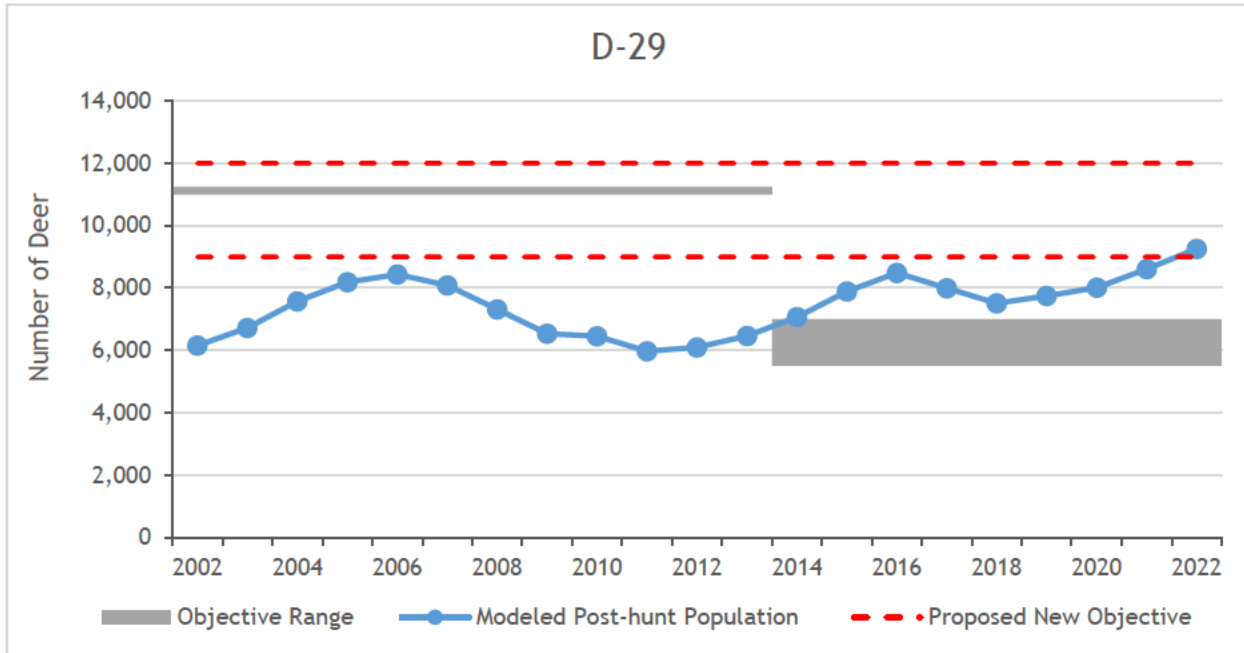


Figure D29-1. Deer DAU D-29 modeled post-hunt population estimate and objective range, years 2002-2022.

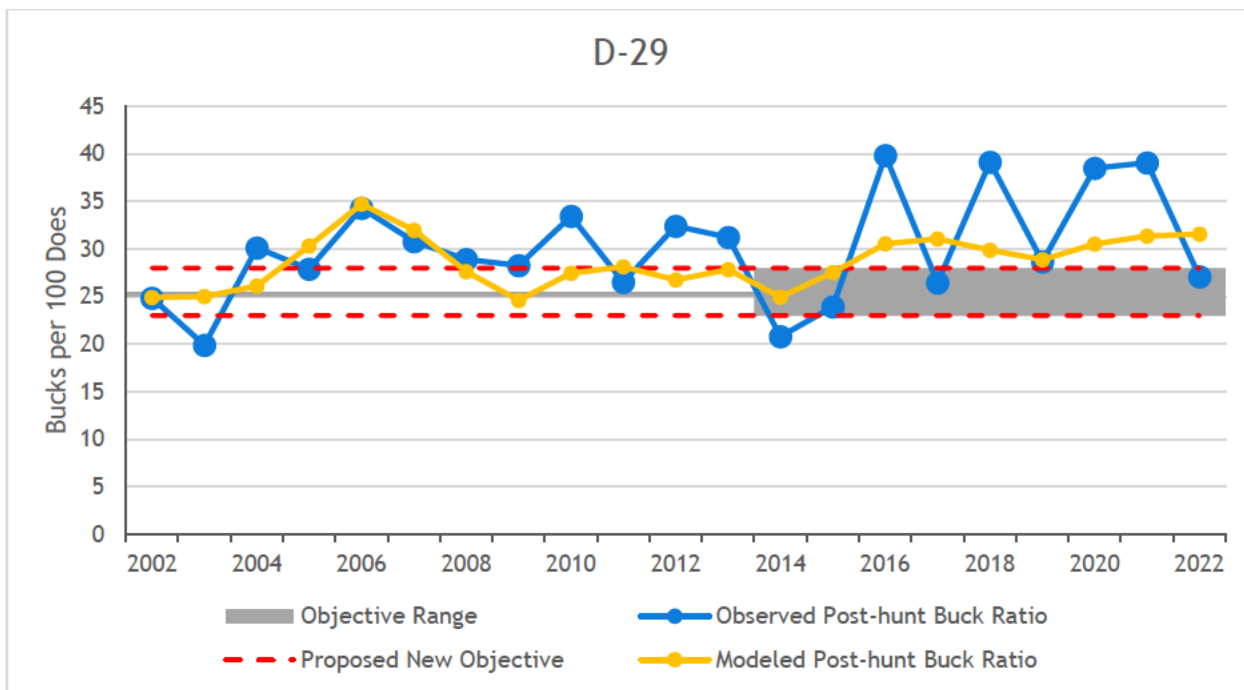


Figure D29-2. Deer DAU D-29 observed and modeled post-hunt sex ratio (bucks:100 does), years 2002-2022.

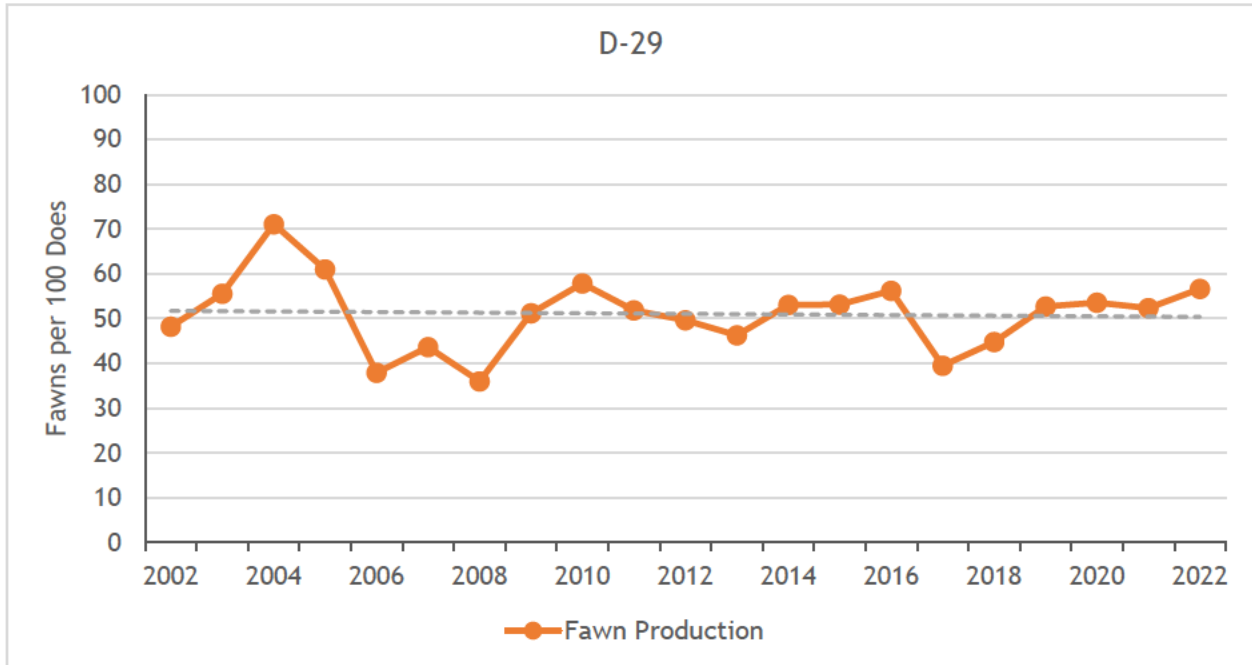


Figure D29-3. Deer DAU D-29 fawn production (observed post-hunt fawns:100 does ratio, years 2002-2022).

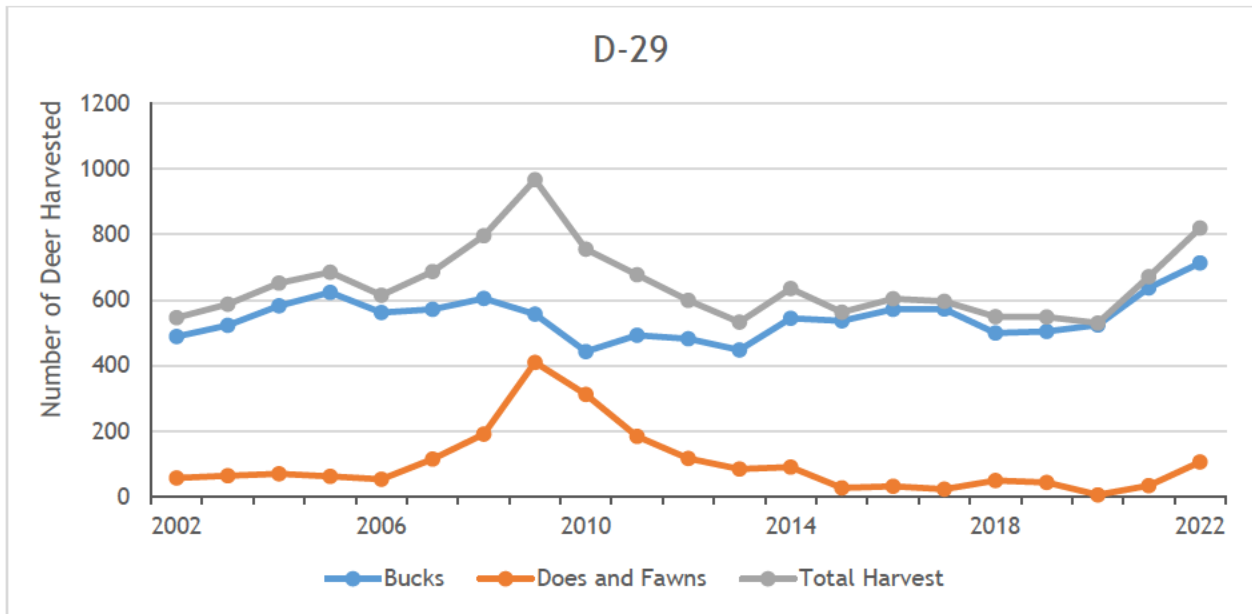


Figure D29-4. Deer harvest estimates in D-29, years 2002-2022.

## Background Information

The Mesa Verde Deer Population consists of Data Analysis Unit (DAU) D-29. It is located in the southwest corner of Colorado and contains Game Management Units (GMUs) 72 and 73. The DAU is 1,871 square miles and includes portions of Montezuma and Dolores counties. The DAU is bounded on the north by Highways 491, 184, and 145, and Bear Creek, on the east by the Montezuma/La Plata County line, on the south by New Mexico, and on the west by Utah. The towns of Cortez and Mancos occur within the DAU, while Dove Creek and Dolores are on the northern boundary. Land ownership in the DAU is 37% Ute Mountain Ute tribal land, 31% private, 18% BLM, 9% U.S. Forest Service, 4% National Park, and less than 1% CPW and State Land Board.

The current post-hunt population objective of 5,500-7,000 deer was set in 2014. Over the past 20 years, the deer population has been on an increasing trend and has been estimated between 6,000 (2011) and 9,250 (2022) (Figure D29-1).

The average observed post-hunt buck ratio from 2002 to 2022 was 30 bucks:100 does with a range of 19-39 (Figure D29-2). The observed three-year (2020-2022) average of 34 bucks:100 does is above the post-hunt buck ratio management objective. The observed buck ratio has fluctuated a lot and is most likely from observer bias or error rather than from changes in buck numbers. In years of high sample size the buck ratio is often the lowest. Observed post-hunt fawn ratios averaged 51 fawns:100 does (range 36-71) between 2002 and 2022 (Figure D29-3). In 2022 the three-year and five-year averages were 51:100 and 49:100, respectively.

Buck harvest has varied over the last 20 years with a low of 443 bucks harvested (2010) to a high of 713 (2022), averaging 546 annually (Figure D29-4). Success rates for hunters do not vary much and the number of bucks harvested is driven more by the number of licenses available. Doe harvest is on private land through Private Land Only (PLO) licenses or game damage permits. In the past 20 years, doe harvest has ranged from six (2021) to 405 (2009) with an average of 100 (Figure D29-4). An estimated 106 does were harvested in 2022.

When the last management objectives were determined for this population in 2014, deer populations statewide were on a long-term decreasing trend. At the time the HMP was written, the D-29 deer herd had reached its lowest population level on record. At that time, the 1998 objective seemed unrealistic given current herd performance. In the past ten years, the population has grown and the old 1998 objective of 11,000 is not unrealistic. The majority of growth in the population has occurred on private lands, especially around the towns of Pleasant View and Cahone. The portion of the population that use public lands hasn't experienced the same increasing trend. Based on the herd performance over the past ten years, minimal game damage issues, and the desire to see more animals on public lands, CPW recommends increasing the population objective.

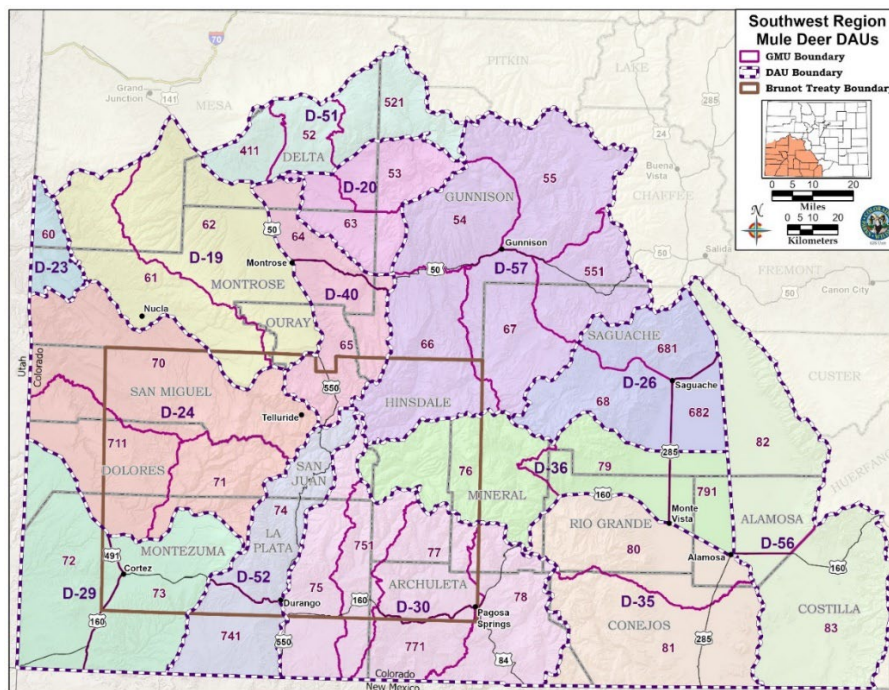
Buck licenses were limited in the DAU in 1999 when all over-the-counter buck licenses changed to limited. A fourth-season buck hunt is available in the DAU with limited opportunity. It is proposed to keep the same sex ratio objective from the previous plan.

## The Brunot Agreement of 1873

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the "Brunot Agreement." This ceded

area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D29-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Thirty-three (33%; 614 square miles) of the D-29 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D29-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

## Significant Issues

Due to human population growth, a significant concern in the DAU is the cumulative impacts to critical habitat, including winter ranges, migration corridors, production areas, and high-elevation summer ranges. Exurban development is occurring in Montezuma and Dolores Counties and homes are replacing open lands that currently support wintering deer. Energy development has also increased in deer habitat on private and public lands resulting in direct and indirect habitat loss. Lastly, outdoor recreation continues to expand, placing more people in areas important to deer. Increases in recreation trails and recreation use is decreasing the amount of effective deer habitat. Managers and the public are concerned over the cumulative and prolonged impacts of development and recreation, which is disrupting migration and decreasing quality and quantity of habitat. Actions to enhance and protect important deer habitat will be essential to increase the deer population.

Drought has been present in southwest Colorado for more than two decades, negatively impacting deer habitat and decreasing the amount and quality of forage. Quality habitat provides food, shelter, space, and water and are important to produce robust mule deer populations.

Game damage caused by deer is present but minimal in the DAU. However, there are concerns about the distribution and harvest of deer. Portions of the deer population are more robust on agricultural fields and less so on public lands. To address this, managers would like to apply more harvest pressure on animals in agricultural areas and non-migratory deer, while reducing harvest pressure on migratory deer and those occurring on public lands.

Chronic Wasting Disease (CWD) was detected in the DAU in 2020 with a prevalence rate of 2.1%. Guidelines in CPW's CWD Response Plan (December 2018) will be used to address the spread of the disease. Hemorrhagic disease is also present in D-29. Within the DAU, the disease can cause die-offs of mule deer in the driest years. However, infection and sometimes death of individual animals are more common, with minimal impacts to on the overall population.



**Management Alternatives**

Three post-hunt population objective alternatives were considered for D-29:

**Table D29-1.** Proposed and recommended population objective ranges for the 2024 D-29 revised HMP.

Population Objective Alternatives:	
9,000 to 12,000 (midpoint 10,500)	(1) Approximately 50% increase in the proposed objective range midpoint
5,500 to 7,000 (midpoint 6,250)	(2) Status Quo (Maintain current population)
3,000 to 5,000 (midpoint 4,000)	(3) Approximately 40% decrease in the proposed objective range midpoint

Three post-hunt sex ratio objective alternatives were considered for D-29:

**Table D29-2.** Proposed and recommended sex ratio objective ranges for the 2024 D-29 revised HMP.

Sex Ratio Objective Alternatives:	
25-30	(1) Approximately 10% increase in the proposed objective range midpoint
23-28	(2) Status Quo (Maintain current sex ratio)
20-25	(3) Approximately 10% decrease in the proposed objective range midpoint

**Management Objectives and Strategies**

CPW staff recommends increasing the population management objective from the previous objective. The population has increased and stakeholders have indicated that they would like to see more animals in the population. Game damage is minimal in the DAU and would continue to be addressed as needed through game damage permits and PLO licenses. Management would allow the population to grow on public lands and the migratory herd while maintaining the resident populations of deer occurring on and around agriculture fields. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they would like to see a slight or moderate increase in the population, supporting CPW’s proposed alternative.

The current sex ratio objective for D-29 is 23-28 bucks per 100 does. CPW proposes to keep the same objective. The majority of hunters who responded to a CPW survey in 2021 and 2022 were generally satisfied with the number of bucks in the population. The sex ratio is generally managed through the issuance of buck licenses. More licenses are made available to decrease the ratio while licenses would become more limited to increase the ratio. This is done annually to reach and maintain a ratio within the management objective.

Enhancement and protection of habitat are important regarding the health of this deer population. CPW works with Federal land management agencies, private organizations, landowners, local governments, non-profit organizations, and others, as well as managing State Wildlife Areas, to provide the best habitat for mule deer and other wildlife. New habitat is not being created so it is necessary to get the most out of existing habitats and protect them from additional loss.

## Stakeholder Outreach

Hunters were randomly selected in 2021 and 2022 to complete the Deer Hunter Attitude Survey after the completion of their hunting seasons. The results of these surveys were used to guide CPWs management objective recommendations included in the draft of the HMP. In addition, a copy of the draft plan was available for public comment for 45 days on CPWs webpage. During that time period the draft HMP was presented to Dolores County Commissioners, Montezuma County Commissioners, and the Montelores Habitat Partnership Committee. Copies of the draft HMPs, requesting written comments, were sent to the Forest Service biologist in the Dolores District, the BLM biologist in the Tres Rios Field Office, and the Southern Ute and Ute Mountain Ute wildlife biologists.

### **CPW Commission Approved Objectives:**

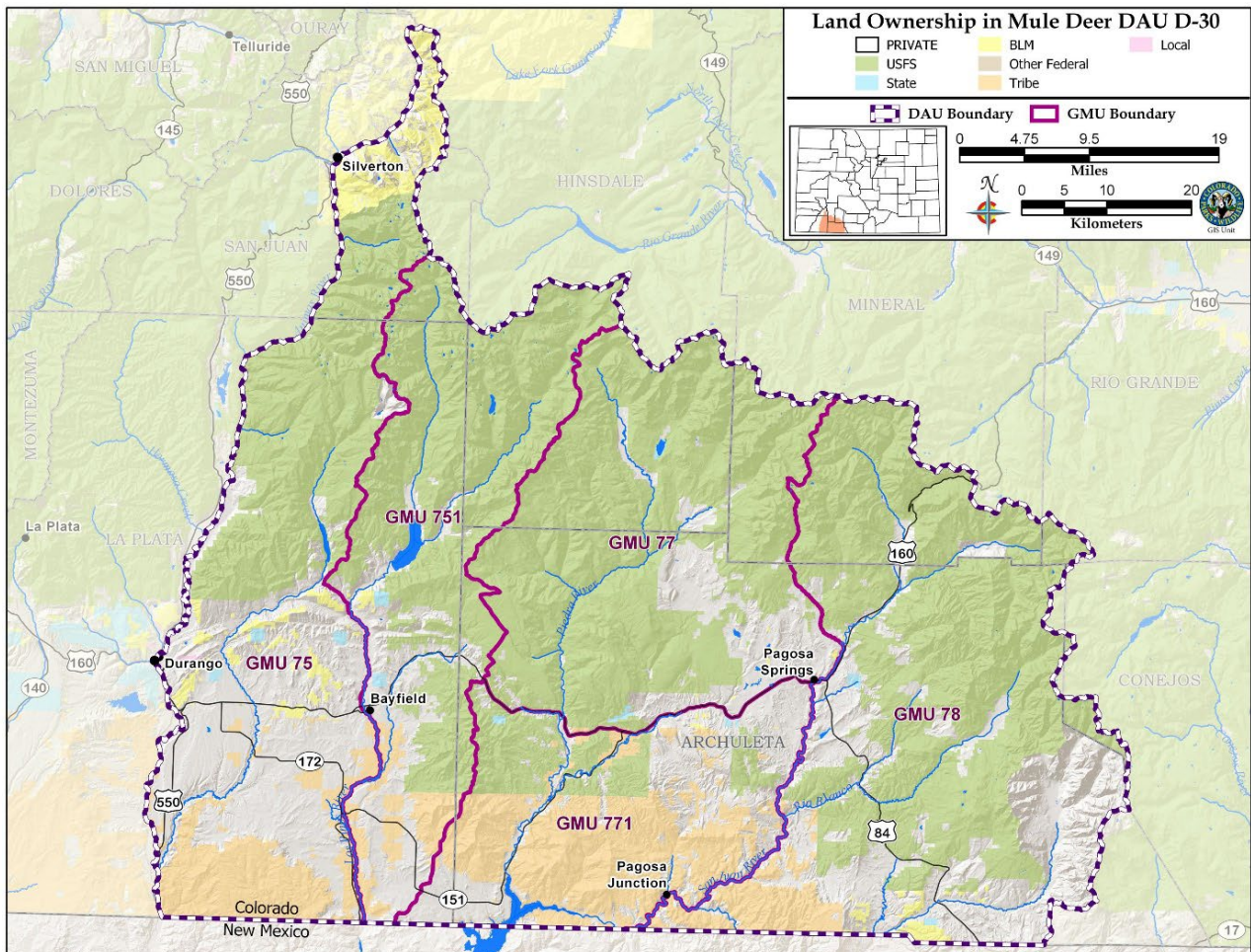
*Post-hunt Population: 9,000 - 12,000 deer*

*Post-hunt Buck Ratio: 23 - 28 bucks:100 does*

## SAN JUAN BASIN DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-30

Brad Weinmeister, Wildlife Biologist, Durango

<b>San Juan Basin Deer Herd (DAU D-30)</b> <b>Last HMP Approval Year: 2020</b>	<b>GMUs: 75, 77, 78, 751, and 771</b>
Post-hunt Population: Previous Objective: 23,000-27,000 2022 Estimate: 22,700 <b>Preferred Alternative: <u>23,000-27,000 deer</u></b>	
Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 26-30 2022 observed: 29; modeled: 32 <b>Preferred Alternative: <u>25-30</u></b>	



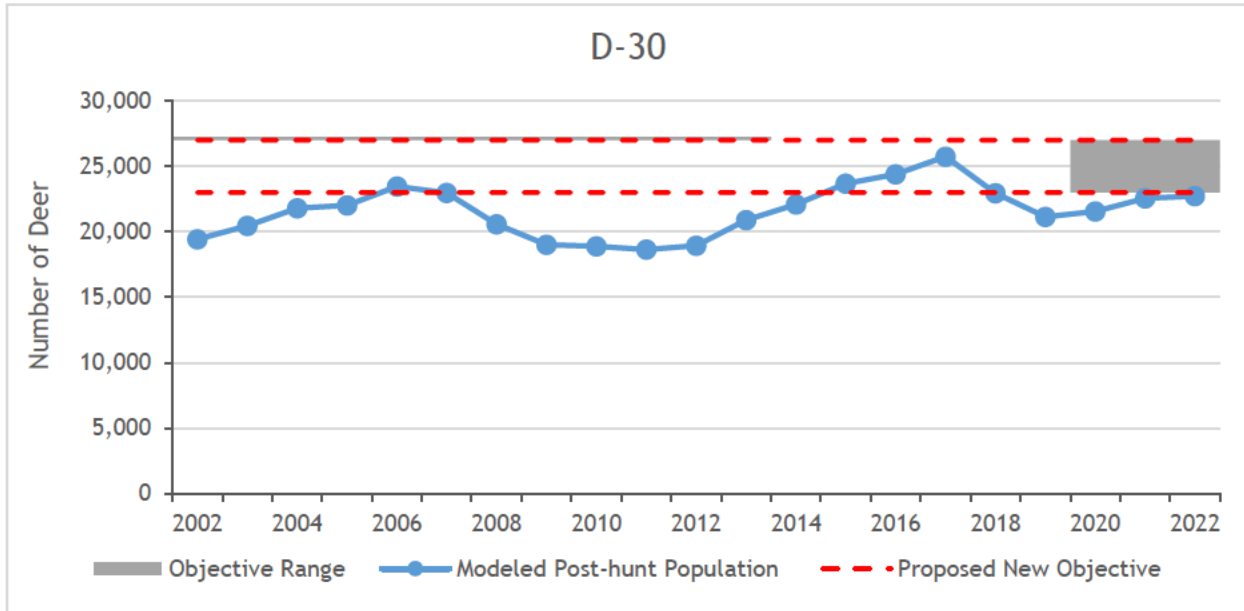


Figure D30-1. Deer DAU D-30 modeled post-hunt population estimate and objective range, years 2002-2022.

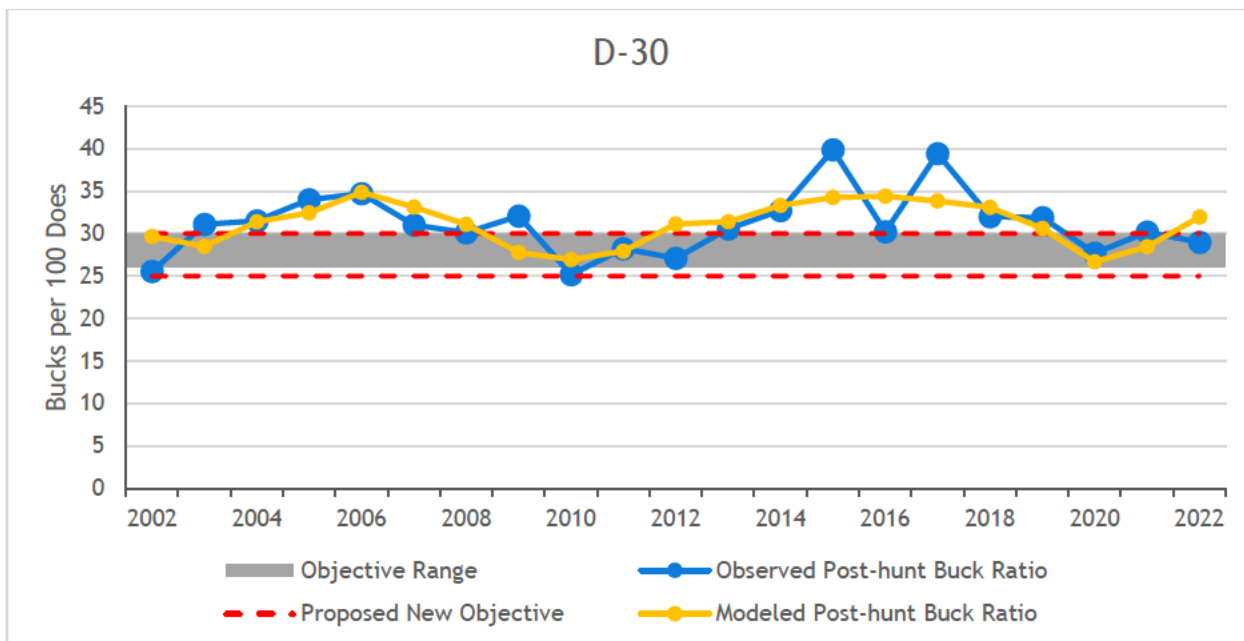


Figure D30-2. Deer DAU D-30 observed and modeled post-hunt sex ratio (bucks:100 does), years 2002-2022.

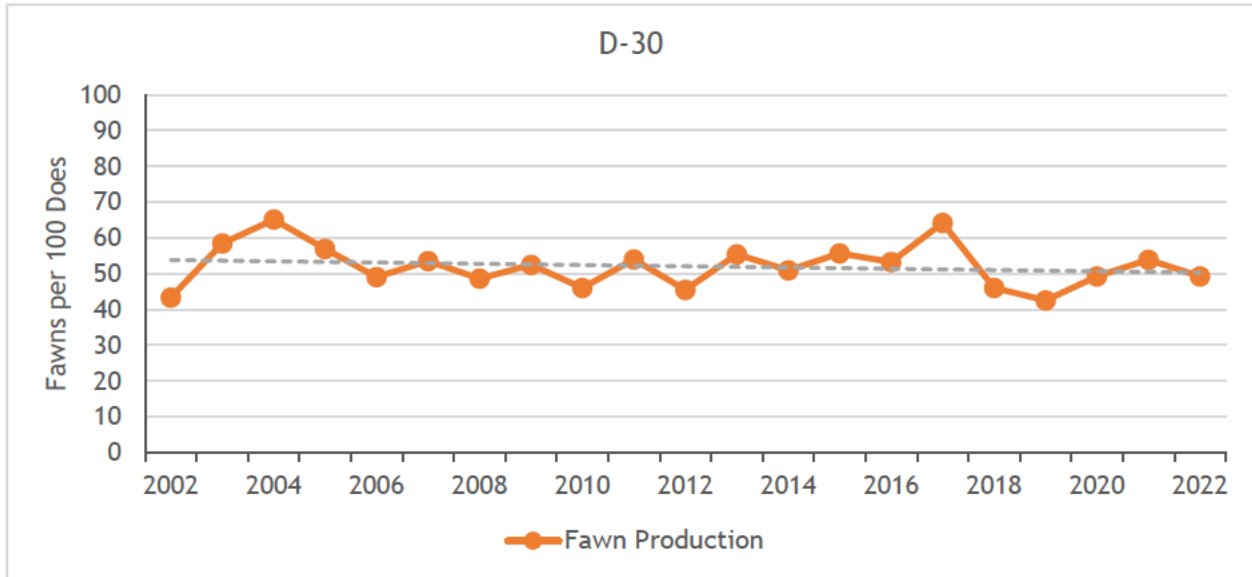


Figure D30-3. Deer DAU D-30 fawn production (observed post-hunt fawns:100 does ratio, years 2002-2022).

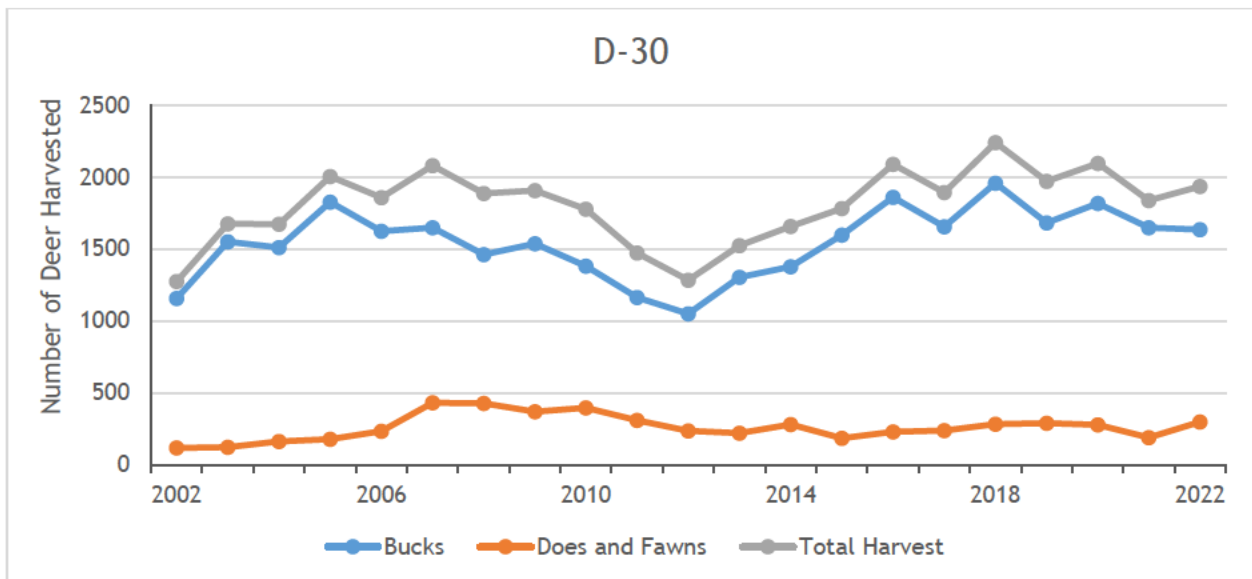


Figure D30-4. Deer harvest estimates in D-30, years 2002-2022.

## Background Information

The San Juan Basin Deer Population consists of Data Analysis Unit (DAU) D-30. It is located in the southwest corner of Colorado and contains Game Management Units (GMUs) 75, 77, 78, 751, and 771. The DAU is 2,800 square miles and includes portions of La Plata, San Juan, Hinsdale, Mineral, and Archuleta counties. D-30 is bounded on the north and east by the Continental Divide, on the south by the New Mexico state line, and on the west by the Animas River and contains the towns of Durango, Bayfield, Ignacio, Allison, and Pagosa Springs. Land ownership is composed of U.S. Forest Service (55%), Bureau of Land Management (2%), private land (30%), and Southern Ute Tribal lands (12%).

The current post-hunt population objective of 23,000-27,000 deer was set in 2020. Over the past 20 years, the deer population has fluctuated between 18,000 (2011) and 26,000 (2017) (Figure D30-1). The population has been increasing over the past three years and the 2022 population was estimated at 22,700 deer.

The average observed post-hunt buck ratio from 2002 to 2022 was 31 bucks:100 does (Figure D30-2). The observed three-year (2020-2022) average of 29 bucks:100 does is at the upper end of the post-hunt buck ratio management objective. Buck numbers were high and over objective from 2013 to 2019, averaging 34:100 during that time period. Hunting licenses for bucks were increased, and since then, the ratio has dropped to an observed ratio of 29:100 in 2022. Observed post-hunt fawn ratios averaged 52 fawns:100 does (range 43-65) between 2002 and 2022 (Figure D30-3). The three-year and five-year averages were 51:100 and 48:100, respectively.

Buck harvest has varied over the last 20 years, with a low of 1050 bucks harvested (2012) to a high of 1959 (2018), averaging 1545 annually. In 2022 an estimated 1636 bucks were harvested in the DAU (Figure D30-4). Success rates for hunters do not vary much and the number of bucks harvested is primarily a factor of the number of licenses available. The years with the highest harvest were 2016-2020, and this was done to bring down the buck ratio as mentioned previously. Doe harvest is primarily on private land through Private Land Only (PLO) licenses or game damage permits, although there are a limited number of general licenses too. In the past 20 years, doe harvest has ranged from 111 (2002) to 422 (2008) with an average of 251 (Figure D30-4). An estimated 292 does were harvested in 2022.

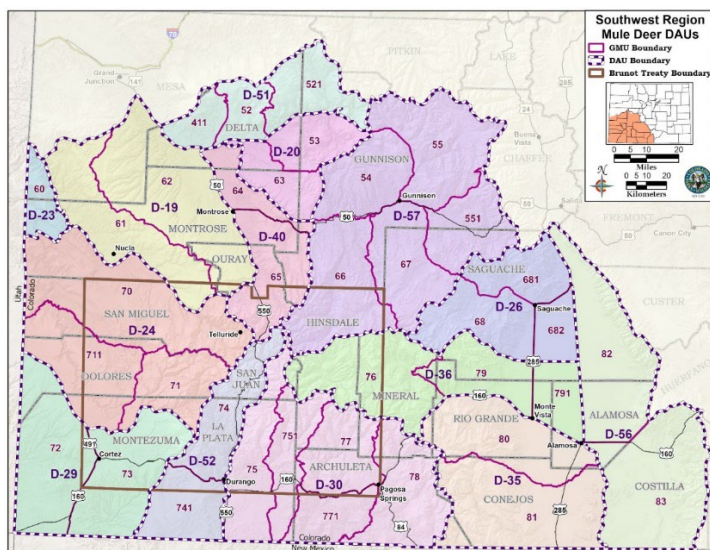
A revision of the D-30 herd management plan was completed in 2020. At that time Colorado Parks and Wildlife staff and stakeholders felt that the previous objective worked well for this population. The only change made at that time was to add a range to the population objective and the Colorado Parks and Wildlife Commission (Commission) approved the recommendations. The proposed objectives for this plan maintains the current objectives recently approved by the Commission in 2020.

Buck licenses were limited in the DAU in 1999 when all over-the-counter buck licenses in Colorado were made limited. A fourth-season buck hunt is available in the DAU with limited opportunity. The sex ratio objective approved by the Commission in 2020 is the same as what is proposed for this plan update.

## The Brunot Agreement of 1873

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D30-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Fifty percent (50%; 1402 square miles) of the D-30 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D30-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

## Significant Issues

Due to human population growth, a significant concern in the DAU is the accumulative impacts to critical habitat, including winter ranges, migration corridors, production areas, and high-elevation summer ranges. Exurban development is occurring in La Plata and Archuleta Counties and homes are replacing open lands that support wintering deer. Energy development has also increased in deer habitat on private and public lands resulting in direct and indirect habitat loss. Lastly, outdoor recreation continues to expand in La Plata and Archuleta Counties, placing more people in areas important to deer. Increased recreational trails and recreation use is decreasing the amount of effective habitat. Managers and the public are concerned over the cumulative and prolonged impacts of development and recreation, which is disrupting migration and decreasing the quality and quantity of habitat. Actions to enhance and protect important deer habitat will be essential to maintain a healthy deer population.

Drought has been present in southwest Colorado for more than two decades. This has negatively impacted deer habitat and has decreased the amount and quality of forage. Quality habitat provides food, shelter, space, and water and are important for producing robust mule deer populations.

Chronic Wasting Disease (CWD) was detected in the DAU in 2020 with a prevalence rate of less than 1%. Guidelines in CPW's CWD Response Plan (December 2018) will be used to address the spread and increase in prevalence rates. Hemorrhagic disease is also present in D-30. Within the DAU, the disease can cause die-offs of mule deer in the driest years. More common though are infections and sometimes death of individual animals, with minimal impacts to the overall population.



### Management Alternatives

Three post-hunt population objective alternatives were considered for D-30:

Table D30-1. Proposed and recommended population objective ranges for the 2024 D-30 revised HMP.

Population Objective Alternatives:	
27,000 to 31,000 (midpoint 29,000)	(1) Approximately 15% increase in the proposed objective range midpoint
23,000 to 27,000 (midpoint 25,000)	(2) Status Quo (Maintain current population)
19,000 to 23,000 (midpoint 21,000)	(3) Approximately 15% decrease in the proposed objective range midpoint

Three post-hunt sex ratio objective alternatives were considered for D-30:

Table D30-2. Proposed and recommended sex ratio objective ranges for the 2024 D-30 revised HMP.

Sex Ratio Objective Alternatives:	
30-35	(1) Approximately 15% increase in the proposed objective range midpoint
25-30	(2) Status Quo (Maintain current sex ratio)
20-25	(3) Approximately 15% decrease in the proposed objective range midpoint

### Management Objectives

CPW staff recommends maintaining the current population objective to meet stakeholder and CPW staff desires. There is overall satisfaction with the current management of this population. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they are generally satisfied with the number of deer in the population, supporting CPW’s current and proposed alternative.

The current sex ratio objective for D-30 is 26-30 bucks per 100 does. CPW proposes maintaining this sex ratio objective, with a minor change of changing the lower end from 26 to 25. This will make the objective consistent with other nearby herds. The majority of hunters who responded to a CPW survey in 2021 and 2022 were generally satisfied with the number of bucks in the population. The sex ratio is generally managed through the issuance of buck licenses. More licenses are made available to decrease the ratio while licenses would become more limited to increase the ratio. This is done annually to reach and maintain a ratio within the management objective.

Enhancement and protection of habitat are important regarding the health of this deer population. CPW works with Federal land management agencies, private organizations, landowners, local governments, non-profit organizations, and others, as well as managing State Wildlife Areas, to provide the best habitat for mule deer and other wildlife. New habitat is not being created so it is necessary to get the most out of existing habitats and protect them from additional loss.

## Stakeholder Outreach

Hunters were randomly selected in 2021 and 2022 to complete the Deer Hunter Attitude Survey after the completion of their hunting seasons. The results of these surveys were used to guide CPWs management objective recommendations included in the draft of the HMP. In addition, a copy of the draft plan was available for public comment for 45 days on CPWs webpage. During that time period the draft HMP was sent to La Plata County Commissioners, Archuleta County Commissioners, and presented to the San Juan Basin Habitat Partnership Committee. Copies of the draft HMPs, requested written comments, were sent to the Forest Service biologist in the Columbine and Pagosa Districts, the BLM biologist in the Tres Rios Field Office, and Southern Ute and Ute Mountain Ute wildlife biologists.

### **CPW Commission Approved Objectives:**

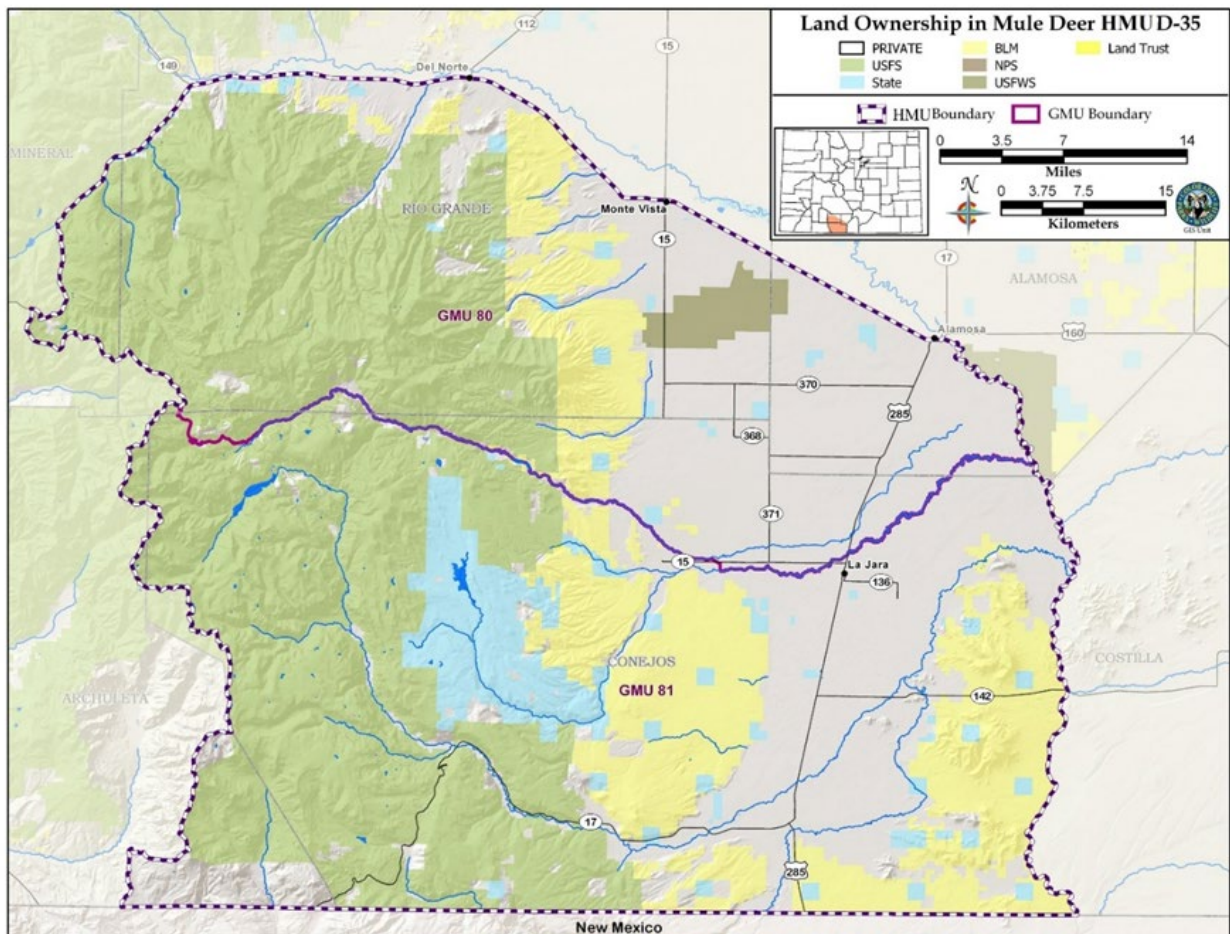
*Post-hunt Population:* 23,000 - 27,000 deer

*Post-hunt Buck Ratio:* 25 - 30 bucks:100 does

## LOWER RIO GRANDE DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-35

Brent Frankland, Wildlife Biologist, Monte Vista

<p><b>GMUs: 80 and 81</b>  <b>Last HMP Approved Year: 2018</b></p>
<p>Post-hunt Population: Previous Objective: 5,500-6,500; 2022 Estimate: 6,800 deer  <b>Preferred Alternative: <u>Increase the population objective to 6,000-8,000 deer</u></b></p>
<p>Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 23-25;                  2022 observed: 31; 3-yr average modeled: 30.  <b>Preferred Alternative: <u>Increase to 25-30 bucks:100 does</u></b></p>



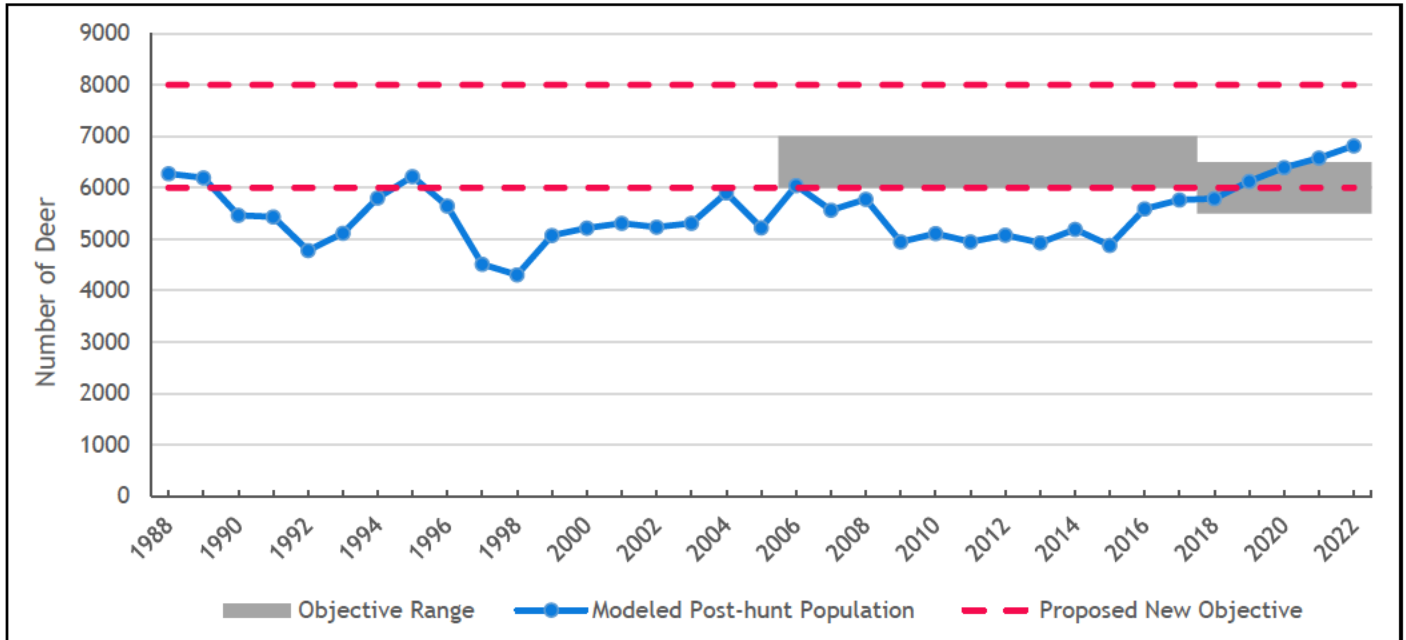


Figure D35-1. Deer DAU D-35 modeled post-hunt population and objective range, 1988-2022.

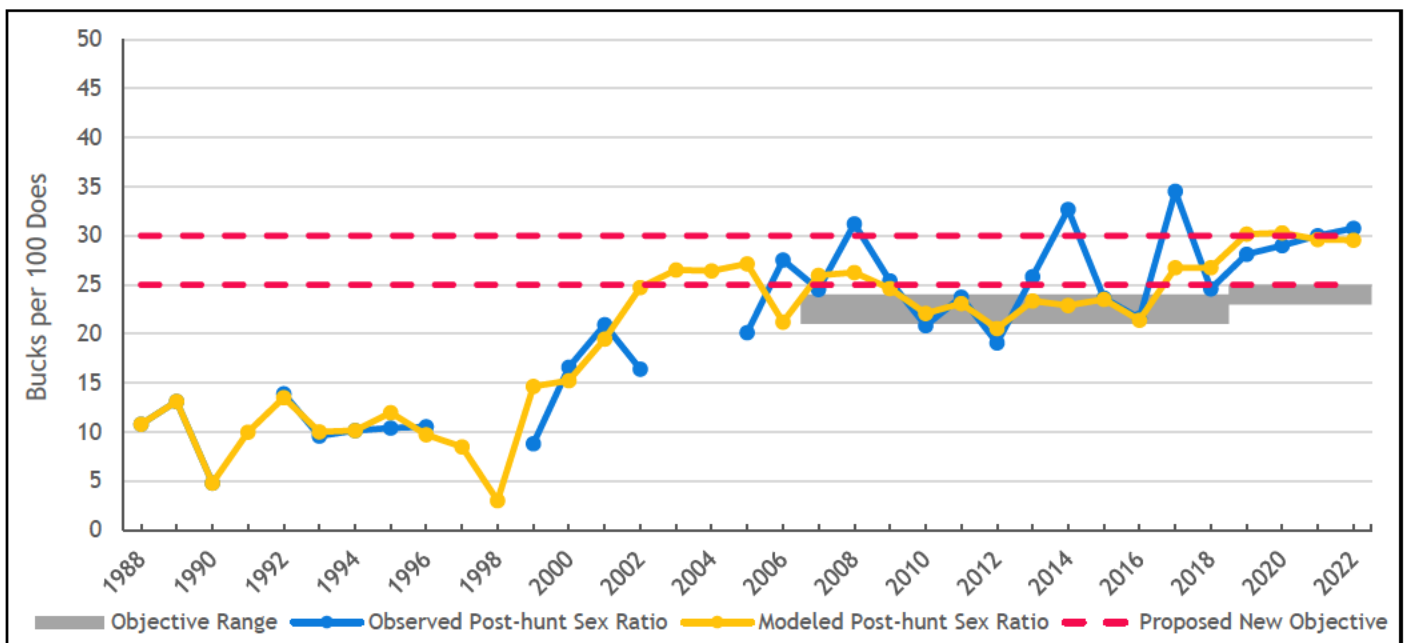


Figure D35-2. Deer DAU D-35 observed and modeled post-hunt sex ratio (bucks:100 does), 1988-2022.

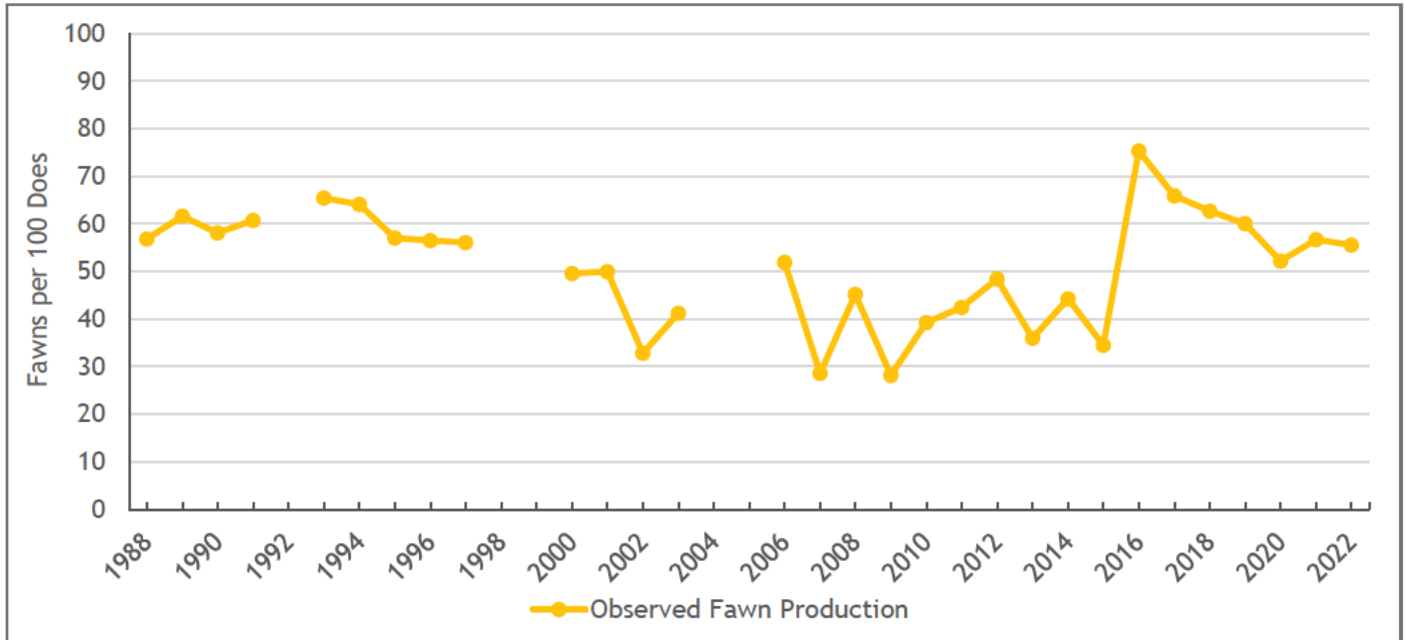


Figure D35-3. Deer DAU D-35 fawn production (observed post-hunt fawns:100 does ratio), 1988-2022.

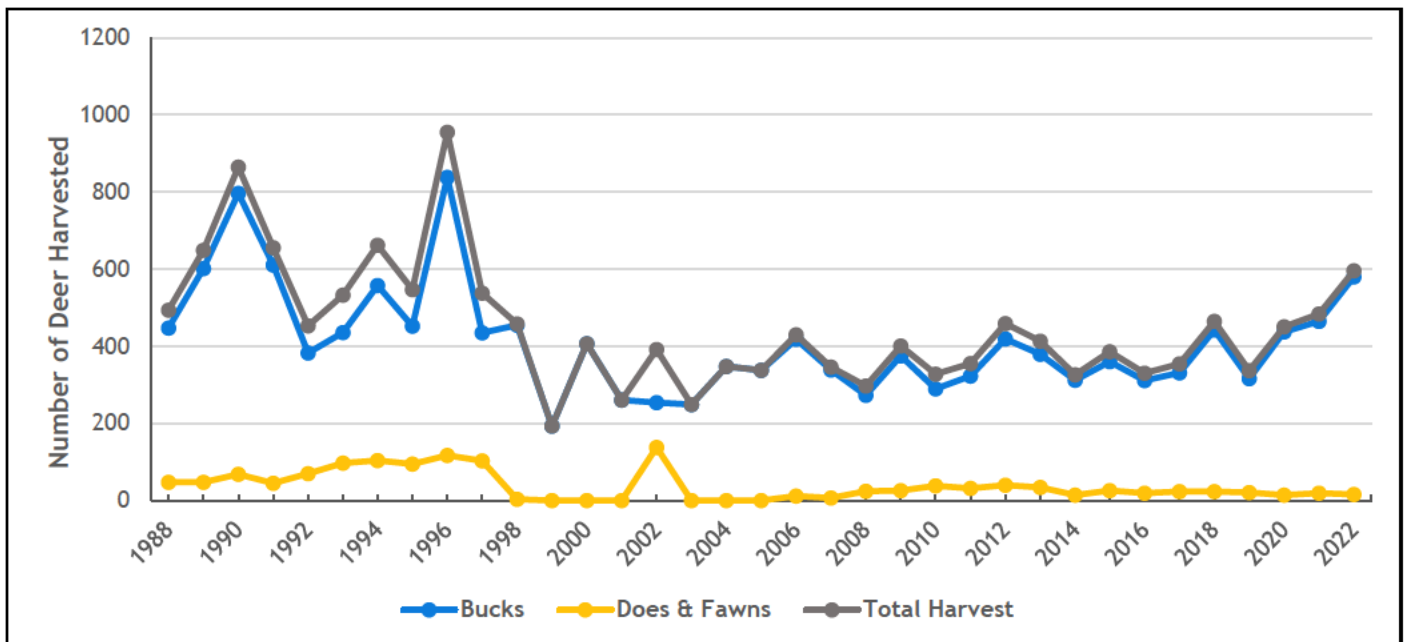


Figure D35-4. Deer harvest estimates in D-35, 1988-2022.

## Background Information

The D-35 mule deer herd is in the southwestern region of the San Luis Valley. The geographic area of the Data Analysis Unit (DAU) comprises Game Management Units (GMUs) 80 and 81, totaling approximately 2,100 square miles. The mule deer winter range within the DAU includes roughly 692 square miles, whereas the summer range encompasses about 1,214 square miles. Portions of Alamosa, Archuleta, Conejos, Mineral, and Rio Grande counties make up the entire area. Public land constitutes about sixty-five percent of the DAU, while almost thirty-five percent is privately owned.

The objectives for the post-hunt population for D-35 were last revised in 2018 and set at 5,500-6,500 mule deer. At the time, the objectives were adjusted slightly to account for the perceived stability of the herd population over the preceding 20 years, allowing for a modest level of growth. From 1999 to 2018, the estimated population fluctuated between 5,000 and 6,000 animals. However, since 2018, the estimated population has continued on an upward trend, rising above the objective range to roughly 6,800 animals in 2022. The last time the herd was estimated to be greater than 6,000 animals was in the late 1980s and mid-1990s, with relatively sharp declines after both periods, the lowest estimate being at almost 4,000 mule deer in 1998. In 2023, CPW proposed antlerless licenses on public land to help address the growing population trend and stabilize the population within the proposed objective range. CPW has recently reassessed the population objective range and suggests broadening it to accommodate the upward trend within management goals.

The D-35 observed post-hunt sex ratios have increased since CPW limited antlered licenses in 1999. Before the implementation of limited licenses, the observed sex ratio averaged less than ten bucks per 100 does. From 1999 to 2008, the average observed sex ratio rose to almost 21 bucks per 100 does. However, since 2008, the observed sex ratio has fluctuated considerably, averaging 27 bucks per 100 does. The modeled sex ratio has also fluctuated but appears to have leveled off over the past few years.

Before CPW limited buck licenses in 1999, the annual buck harvest averaged approximately 550 animals in the DAU. Since the limitation, the average buck harvest has been around 350 animals, which has increased to more than 390 animals over the past ten years. With the rising observed sex ratio, CPW shifted the buck licenses between seasons and raised them in 2017, 2018, and 2020 to curb the trend. Nonetheless, the observed and modeled sex ratio continued above the objective range. Harvest in the DAU is primarily affected by the number of licenses, the season structure, and weather conditions during the hunting seasons.

Before 1999, doe harvest averaged about 70 animals annually. However, CPW removed the doe licenses in 1999. Over the past ten years, doe harvest has only occurred as a management tool to mitigate game damage conflicts, averaging approximately 21 animals. The game damage licenses are not used to manage the overall population and thus have minor effects on the population trend. In 2023, CPW proposed an Issue Paper to implement doe licenses on public land. Pending Colorado State Wildlife Commission approval, the doe licenses will be available beginning in 2024. The limited doe licenses provide CPW with more management options. Harvest from these licenses should help sustain the herd population within the proposed objective range more effectively.

Over the past ten years, the combined hunting-season success rates have averaged approximately forty-one percent. However, harvest success rates are skewed between the archery, muzzleloader, and rifle seasons. The average archery success since 2013 is around twenty-eight percent. Comparatively, the 2<sup>nd</sup> and 3<sup>rd</sup> rifle seasons have averaged approximately 50 percent, and the 4<sup>th</sup> rifle season’s success has averaged about 56 percent over the past ten years. Contrastingly, the muzzleloader season has averaged almost 31 percent.

**Management Concerns**

The quantity and quality of winter range habitat may limit the D-35 mule deer population carrying capacity. The winter range continues to diminish slowly, with increased development on private land and competition with domestic livestock. Similarly, summer recreational activities continue to expand throughout the DAU. The various anthropogenic impacts may affect distribution, reproduction, and fawning efforts restricting population growth. Since the previous HMP, CPW continued efforts to increase the population size of the D-35 herd. Although the population increased, it has done so beyond the objective range set at the time. Much of the population growth is likely due to improved fawn recruitment.

Mule deer are not a significant problem on agricultural land in the DAU, and depredation concerns are minimal. CPW continues to provide game damage and dispersal licenses to private landowners to address issues. Localized problems may result from restricted mule deer distribution during the winter months. Private landowners who experience mule deer depredation issues can access various management tools CPW offers.

**Management Alternatives**

For this HMP, CPW considered three alternatives for the post-hunt population size objectives and three alternatives for the post-hunt sex ratio objectives in Data Analysis Unit D35:

Table D35-1. Proposed population objective ranges for the 2024 D-35 HMP.

Post-hunt Population Objective Alternatives:	
5,500 to 6,500	(1) Status Quo
6,000 to 8,000	(2) Approximately 10%-20% increase in objectives - PREFERRED
7,000 to 9,000	(3) Approximately 25%-35% increase in objectives

Table E35-2. Proposed buck ratio objective ranges for the 2024 D-35 HMP.

Post-hunt Buck Ratio Objective Alternatives:	
20 to 25 Bucks per 100 does	(1) Status Quo
25 to 30 Bucks per 100 does	(2) Increase buck ratio objective by approximately 5 bucks per 100 does - PREFERRED
30 to 35 Bucks per 100 does	(3) Increase buck ratio objective by approximately 10 bucks per 100 does

## Public Involvement

In the fall of 2023, CPW will offer an online presentation, which will be available to the public to view at their discretion. In addition, CPW will provide an initial draft document online to the public for 30 days for review and commentary. CPW will also send the draft to the BLM, local county commissioners, the Habitat Partnership Program (HPP) committee, and the U.S. Forest Service for commentary and feedback. The draft will allow all constituents to participate in the public process, including non-consumptive recreationists, hunters, landowners, local stores, or business owners. CPW has examined and considered biological herd capabilities and social-political tolerance for this updated HMP.

## Preferred Management Objectives:

### *Post-hunt Population*

The preferred management objective for D-35 is Alternative 2, a post-hunt **population of 6,000 to 8,000 mule deer**. Alternative 2 aims to curb the population growth steadily, maintain management, and sustain the herd at its current estimated population level, allowing for a slight increase. This objective range provides the best balance for managing the deer herd, hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat-carrying capacity. Conversely, Alternative 1 may result in CPW issuing additional licenses to rapidly reduce population growth, resulting in greater hunter competition and more people in the field during the hunting seasons. In contrast, Alternative 3 may result in CPW reducing licenses for the herd to increase in size; however, resulting in greater competition for the limited licenses and hence potentially increasing preference points requirements.

### *Post-hunt Sex Ratio*

The preferred post-hunt sex ratio objective range for the D-35 mule deer herd is also Alternative 2, by increasing the objective to **25-30 bucks per 100 does**. The range supports most stakeholders' desires, preferring a slightly higher sex ratio objective in the DAU. A higher objective from the previous HMP reduces the need for an aggressive harvest, based on what CPW has observed. However, higher sex ratios may increase CWD risk. The preferred range allows for the best balance between satisfactory hunting experiences and the desired hunting opportunities. With Alternative 1, CPW is likely to increase license numbers, which increases people in the field during the hunting seasons, potentially reducing success rates. Conversely, Alternative 3 may result in CPW reducing buck licenses and potentially increasing preference points, hence, longer wait times to draw. The higher the sex ratio, the greater the risk of the area becoming more exclusive, conceivably increasing demand for licenses and possibly raising preference point requirements.

## Strategies for Achieving the Preferred Objectives:

*Post-hunt Population* - CPW will continue collecting annual inventory data and managing to the preferred mule deer population objectives. The population should persist as long as fawn recruitment remains strong. CPW will provide limited doe licenses to enhance management flexibility while ensuring that the population trend remains within the desired range. Tools to control private land depredation issues will stay in place. CPW will implement additional doe



harvest measures if the population estimate exceeds the preferred objective range or if there is a notable deterioration in habitat conditions.

*Post-hunt Sex Ratio* - CPW may need to increase buck-hunting opportunities until the observed sex ratio falls within the preferred objective range. After that, CPW will monitor the herd to balance buck-hunting opportunities and the mature buck level relevant to the objective range. Expected harvest from the buck licenses should sustain an acceptable adult buck population and stakeholder satisfaction. The preferred objective should also help to reduce the risk of CWD.

### **CPW Commission Approved Objectives:**

*Post-hunt Population: 6,000 - 8000 deer*

*Post-hunt buck ratio: 25 - 30 bucks:100 does*

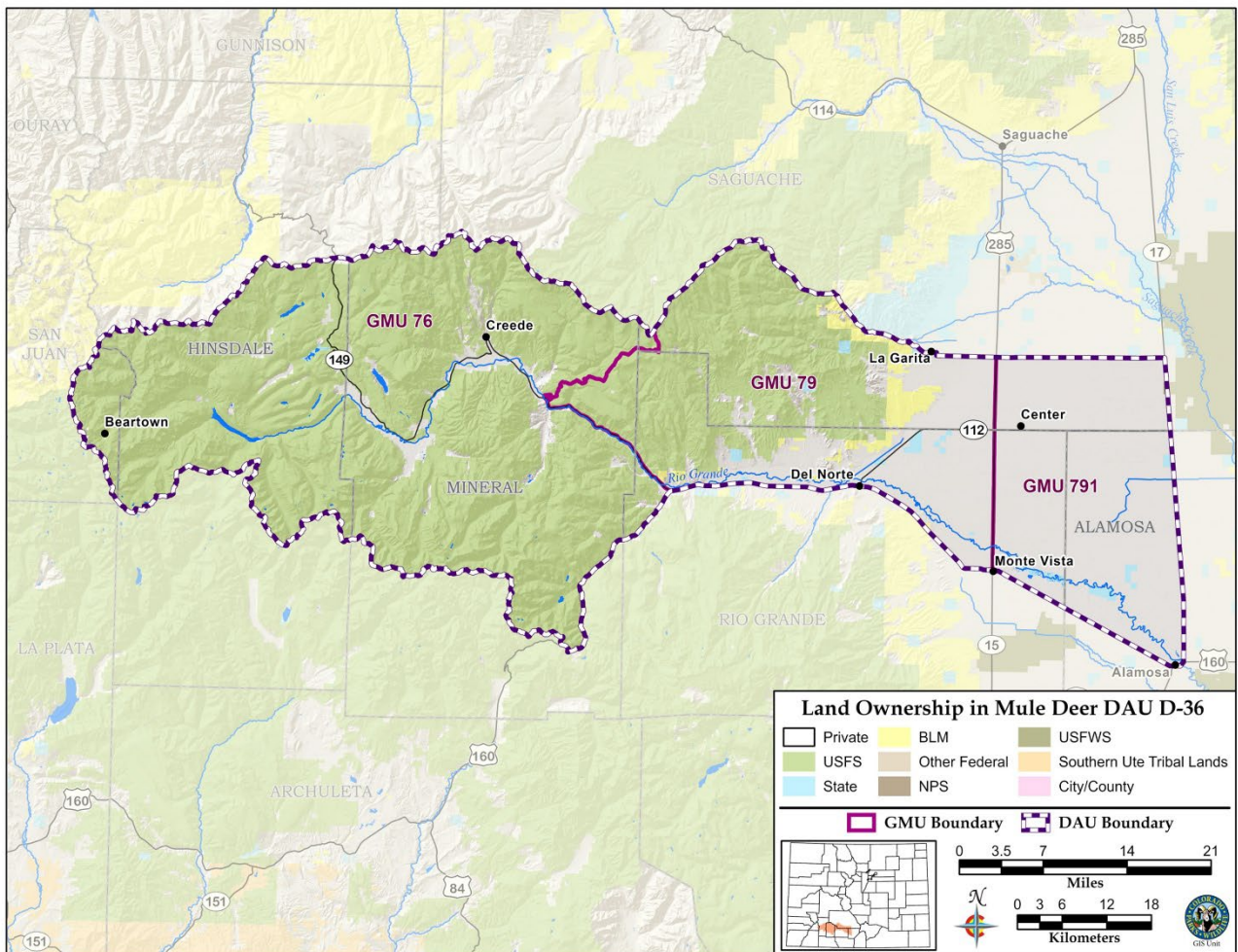
## UPPER RIO GRANDE DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-36

Brent Frankland, Wildlife Biologist, Monte Vista

**GMUs: 76, 79, and 791**  
**Last HMP Approved Year: 2022**

Post-hunt Population: Previous Objective: 2,200-2,800; 2022 Estimate: 2,600 deer.  
**Preferred Alternative: Maintain population objective at 2,200-2,800 deer**

Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 23-28;  
2022 observed: 30; 3-yr average modeled: 29.  
**Preferred Alternative: Status Quo at 23-28 bucks:100 does**



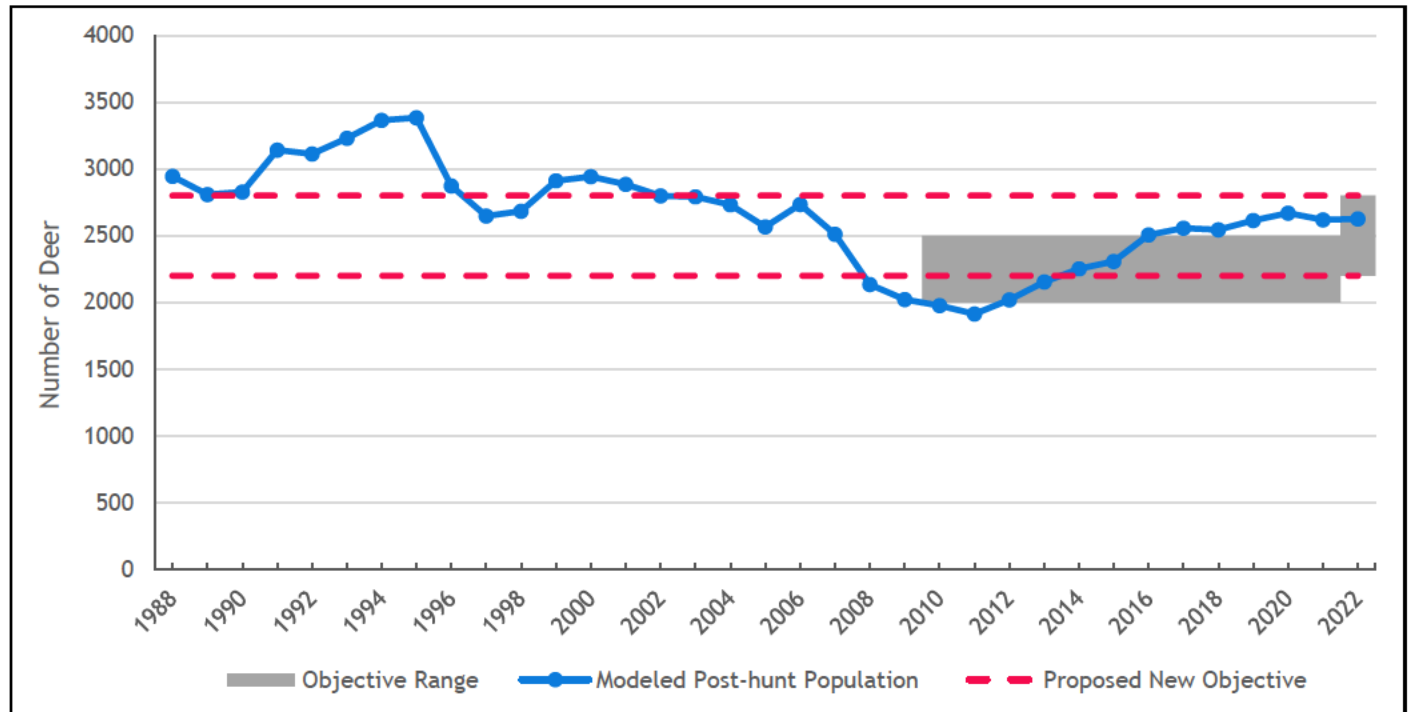


Figure D36-1. Deer DAU D-36 modeled post-hunt population and objective range, 1988-2022.

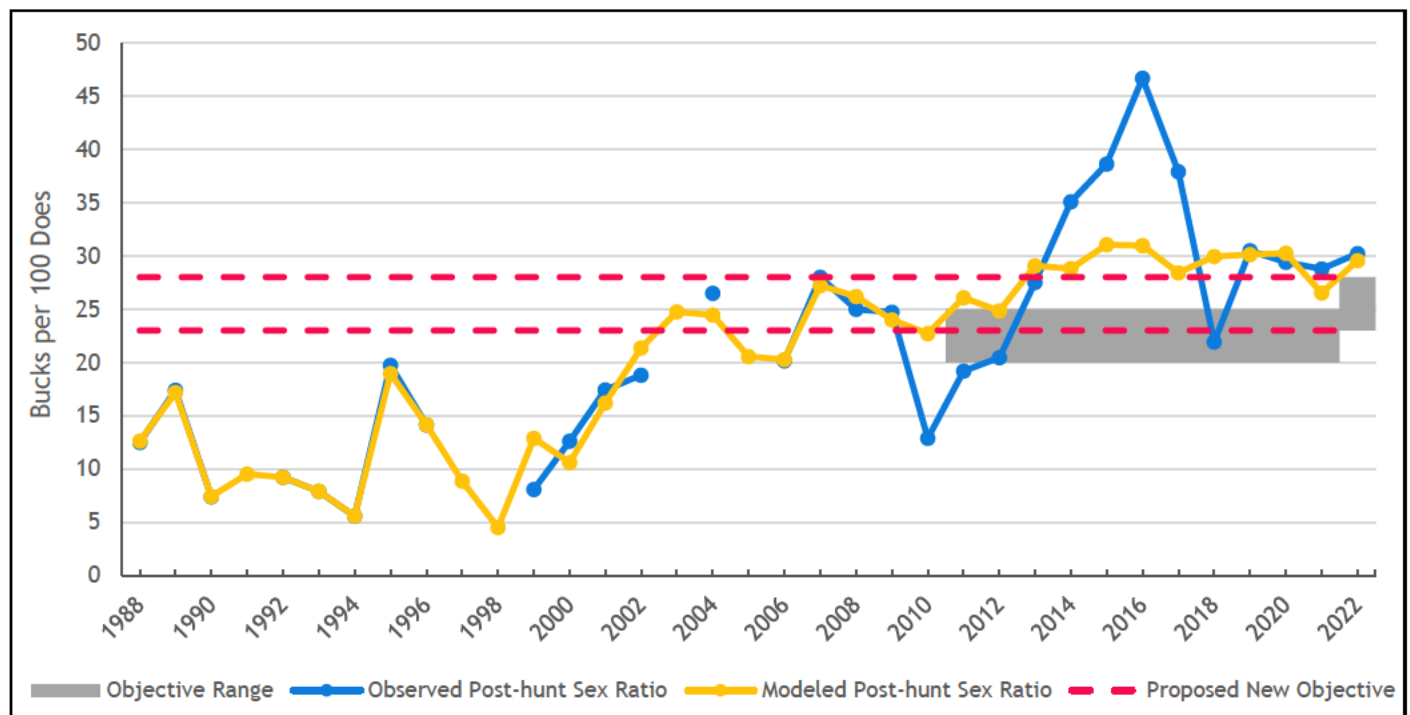


Figure D36-2. Deer DAU D-36 observed and modeled post-hunt sex ratio (bucks:100 does), 1988-2022.

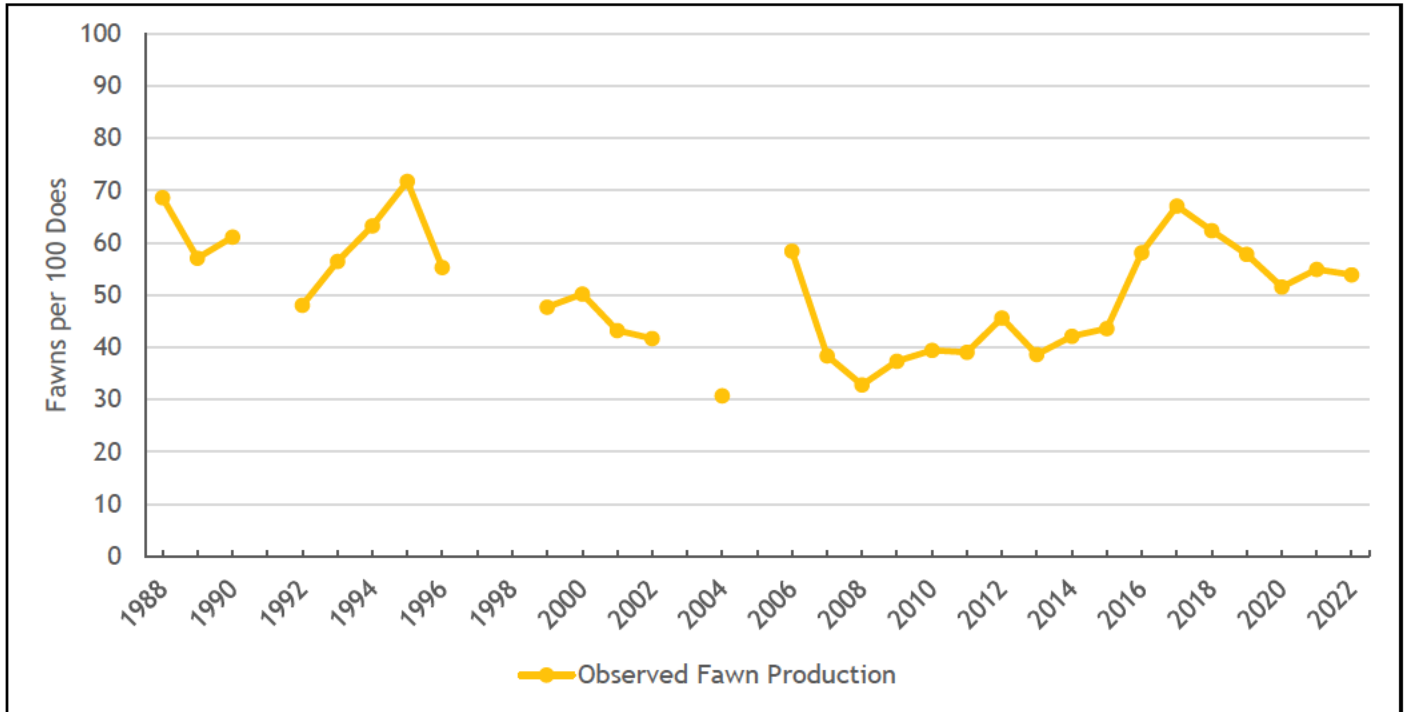


Figure D36-3. Deer DAU D-36 fawn production (observed post-hunt fawns:100 does ratio, 1988-2022).

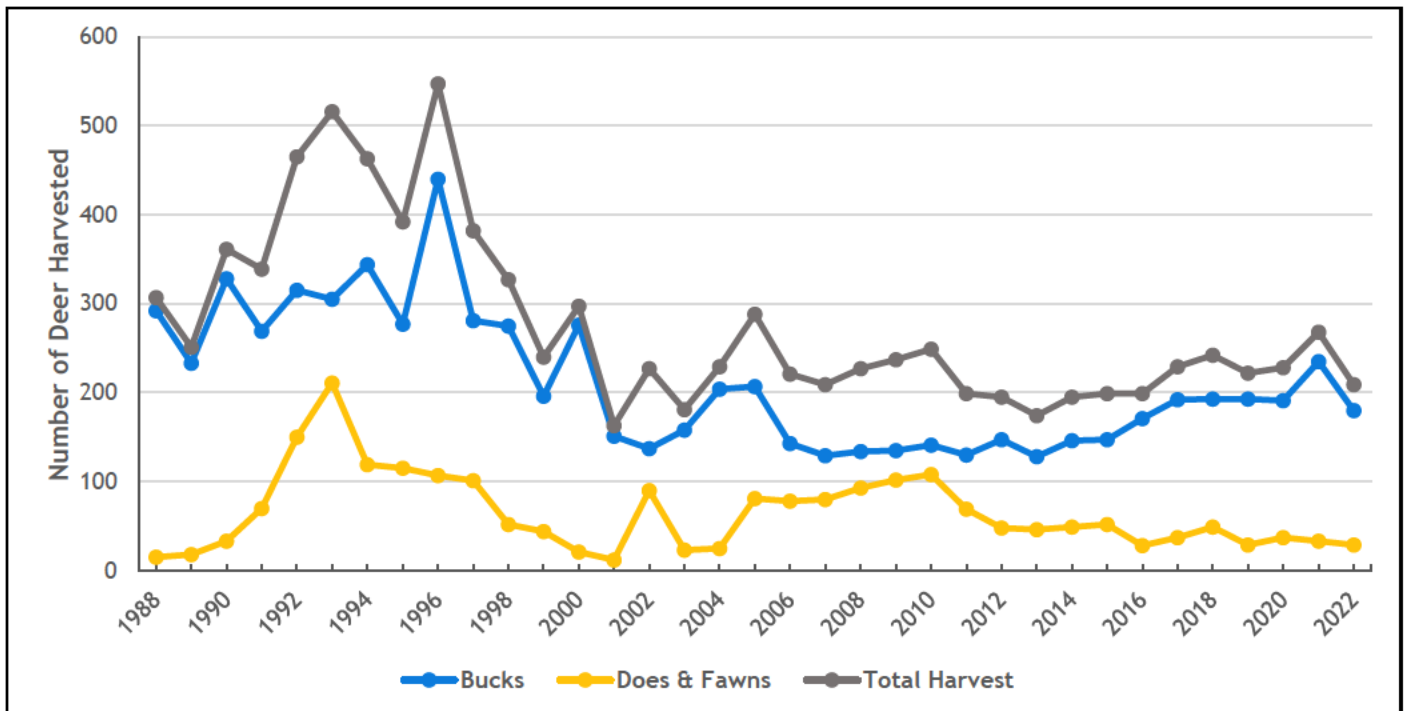


Figure D36-4. Deer harvest estimates in D-36, 1988-2022.

## Background Information

The D-36 mule deer herd is in the western region of the San Luis Valley. The DAU (geographic area) comprises Game Management Units (GMUs) 76, 79, and 791, approximately 1,806 square miles. The mule deer winter range within the DAU includes roughly 352 square miles, whereas the summer range encompasses about 1,469 square miles. Portions of Alamosa, Hinsdale, Mineral, Rio Grande, Saguache, and San Juan counties make up the entire area. Public land constitutes about sixty-eight percent of the DAU, while the private sector owns almost thirty-two percent.

The estimated post-hunt population size for D-36 has been around 2,500 animals for the past five years. The population peaked at approximately 3,500 mule deer in 1995. Thereafter, the population declined for the next few years, ranging between 2,500 and 2,900 animals, until 2007. The population continued falling to its lowest level at roughly 1,900 animals in 2011. However, within the timeframe of the previous HMP, the population climbed to the upper end of the objective range. In 2022, CPW reassessed the population objective range to incorporate the trend more efficiently within management goals.

The D-36 observed sex ratio fluctuated but closely followed the model estimate until 1999, around 12 bucks per 100 does, at which time buck licenses became limited. From 2000, the sex ratio rose until 2009 (approximately 25 bucks per 100 does), then dropped in 2010 to about 13 bucks per 100 does. After that, the observed sex ratio continued rising to its highest level in 2016 (roughly 47 bucks per 100 does), fluctuating annually. In contrast, the model-estimated sex ratio has been trending above the 2010 objective range at around 29 bucks per 100 does. Since 2019, the observed sex ratio has been closer to the estimated value. In 2020, CPW detected a low prevalence of Chronic Wasting Disease (CWD) in the neighboring DAU (D-30), raising concerns about heightened sex ratios. Before CPW limited buck licenses in 1999, the annual buck harvest averaged approximately 294 animals in the DAU. Over the past ten years, buck harvest has averaged about 178 animals yearly. With a rising observed sex ratio, CPW increased the buck licenses slightly in 2017 in GMU 79 and 791 and again in 2018 throughout the DAU to curb the ascent and reduce it to the upper end of the objective range. Harvest from the additional licenses has leveled further increases in the trend. However, in 2022, CPW reassessed the sex ratio objectives, and an updated range was set to comply more accurately with management goals and constituents' desires.

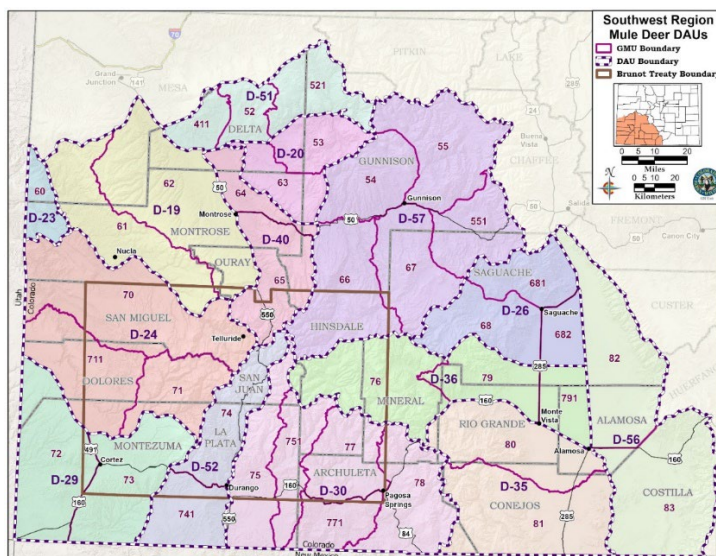
Doe harvest has fluctuated since 1988, averaging roughly 62 animals annually. CPW removed doe licenses in GMU 76 in 2000. Over the previous ten years, the annual doe harvest from GMU 79 and 791 combined has averaged around 43 animals. Private-land-only (PLO) licenses, addressing depredation issues, are the most significant source of doe harvest.

The combined hunting-season success rates from 2013 to 2022 have averaged approximately fifty-five percent. However, harvest success rates are skewed between the archery, muzzleloader, and rifle seasons. The average archery success since 2013 is around twenty-eight percent. Comparatively, the second and third rifle seasons have averaged roughly fifty-six to fifty-eight percent, and the fourth rifle season's success has averaged about eighty-four percent over the past ten years. Since 2013, the muzzleloader season's success has fallen between the rifle and archery seasons, averaging almost forty-one percent.

## The Brunot Agreement of 1873

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D36-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Thirty-one percent (31%; 552 square miles) of the D-36 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D36-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

**Management Concerns**

Significant factors limiting the D-36 population are the quantity and quality of winter range habitat. The winter range continues to diminish, with increased development on private land and competition with domestic livestock. Similarly, summer recreational activities continue to increase throughout the DAU. The various anthropogenic impacts may affect distribution, reproduction, and fawning efforts restricting population growth. Since 2015, CPW field personnel have observed improved fawn recruitment. The increased forage availability resulting from the 2013 West Fork Complex Fires may support a more robust deer herd; however, this results in a lack of cover for deer during significant winter storms.

Mule deer are not a significant problem on agricultural land in the DAU, and depredation concerns are minimal. CPW continues to provide game damage and dispersal licenses to private landowners to address issues. Localized problems may result from restricted mule deer distribution during the winter months. Private landowners who experience mule deer depredation issues can access various management tools CPW offers.

**Management Alternatives**

In 2022, CPW considered four alternatives for the post-hunt population size objectives and three alternatives for the post-hunt sex ratio objectives in Data Analysis Unit D36:

**Table D36-1. Proposed population objective ranges for the 2024 D-36 HMP.**

Post-hunt Population Objective Alternatives:	
1,800 to 2,300	(1) Approximately 10% decrease in objectives
2,000 to 2,500	(2) Status Quo
2,200 to 2,800	(3) Approximately 10% increase in objectives - APPROVED
2,400 to 3,000	(4) Approximately 20% increase in objectives

**Table D36-2. Proposed buck ratio objective ranges for the 2024 D-36 HMP.**

Post-hunt Buck Ratio Objective Alternatives:	
20 to 25 Bucks per 100 does	(1) Status Quo
23 to 28 Bucks per 100 does	(2) Increase buck ratio objective by approximately 3 bucks per 100 does - APPROVED
25 to 30 Bucks per 100 does	(3) Increase buck ratio objective by approximately 5 bucks per 100 does

**Public Involvement**

In the summer of 2021, CPW held a local public meeting in Creede, CO. Local constituents representing different community stakeholder groups attended the meeting. The overall view from the attendees was that they were somewhat pleased with deer management in the DAU. In addition, CPW provided an initial draft document online to the public for 30 days. CPW also sent the draft to the BLM, local county commissioners, the local Habitat Partnership Program (HPP) committee, and the U.S. Forest Service for commentary and feedback. The draft

allowed all constituents to participate in the public process, including non-consumptive recreationists, hunters, landowners, local stores, or business owners. CPW has re-examined and considered biological herd capabilities and social-political tolerance for this updated HMP. CPW will provide a draft of this HMP online for 30 days for public comment but proposes no changes to the objectives.

### **Preferred Management Objectives:**

#### *Post-hunt Population*

The preferred management objective for D-36 is a post-hunt **population of 2,200 to 2,800 mule deer**, aiming to maintain management and sustain the herd at its current estimated population level, allowing for a slight increase. This objective range provides the best balance for managing the deer herd, hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat-carrying capacity.

#### *Post-hunt Sex Ratio*

The preferred post-hunt sex ratio objective range for the D-36 mule deer herd is increasing the objective to **23-28 bucks per 100 does**. The range supports most stakeholders' desires, preferring a slightly higher sex ratio objective in the DAU. A higher objective would reduce the need for an aggressive harvest from what CPW has observed. However, higher sex ratios may increase CWD risk. The preferred range allows for the best balance between satisfactory hunting experiences and the desired hunting opportunities.

### **Strategies for Achieving the Preferred Objectives:**

*Post-hunt Population* - CPW will continue collecting annual inventory data and managing to the preferred mule deer population objectives. The population should persist as long as fawn recruitment remains strong without public land doe hunting licenses. Tools to control private land depredation issues will remain in place. CPW will consider doe harvest opportunities once the population estimate reaches the upper region of the preferred objective range or a significant deterioration in habitat conditions occurs.

*Post-hunt Sex Ratio* - CPW may need to increase buck-hunting opportunities until the observed sex ratio falls within the preferred objective range. After that, CPW will monitor the herd to maintain a balance between buck-hunting opportunities and the mature buck level relevant to the objective range. Expected harvest from the buck licenses should sustain an acceptable adult buck population and stakeholder satisfaction. The preferred objective would reduce the risk of CWD from the sex ratio levels CPW has observed in recent years.

### **CPW Commission Approved Objectives:**

*Post-hunt Population: 2,200 - 2,800 deer*

*Post-hunt buck ratio: 23 - 28 bucks:100 does*



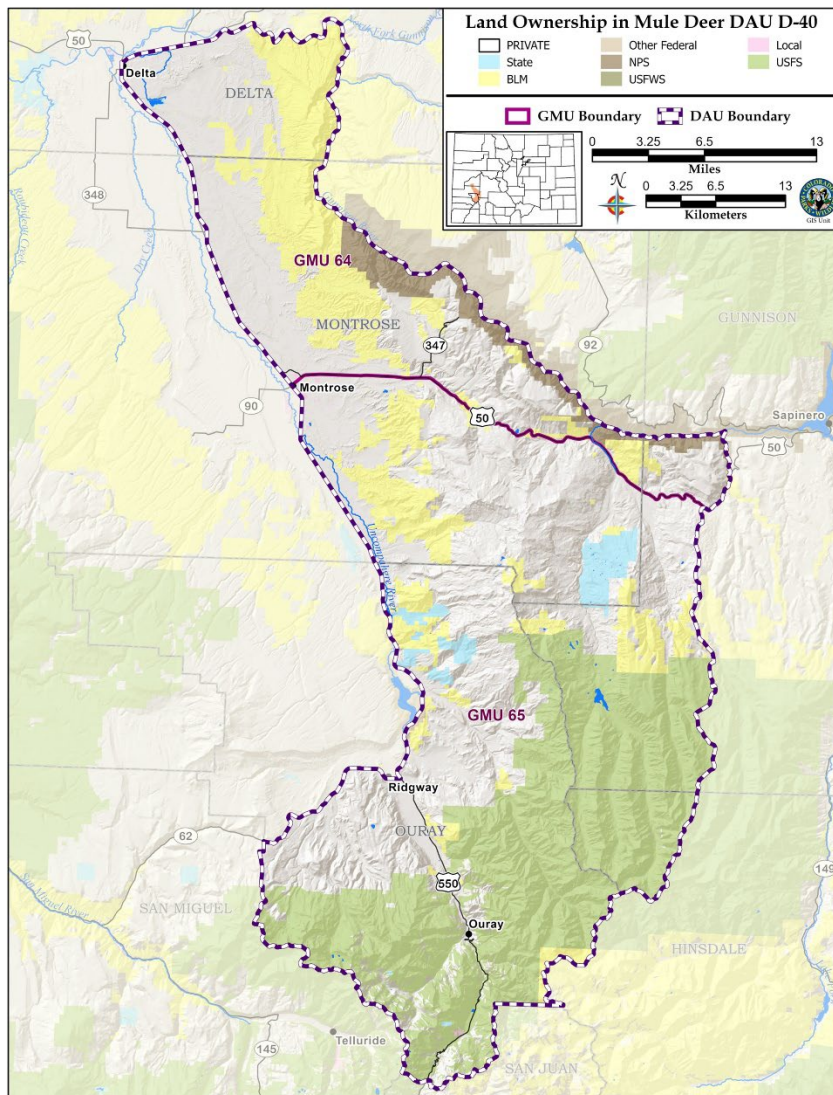
## CIMARRON DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-40

Alyssa Kircher, Wildlife Biologist, Montrose

GMUs: 64 and 65  
Last HMP Approval Year: 2022

Post-hunt Population: Previous Objective: 6,500-8,500; 2022 Estimate: 5,900.  
Preferred Alternative: Extend the current population objective of 6,500-8,500 deer

Post-hunt Observed Sex Ratio (bucks:100 does): Previous Objective: 25-30;  
2022 observed: 23; modeled: 22.  
Preferred Alternative: Amend the current sex ratio objective to 22-27 bucks:100 does



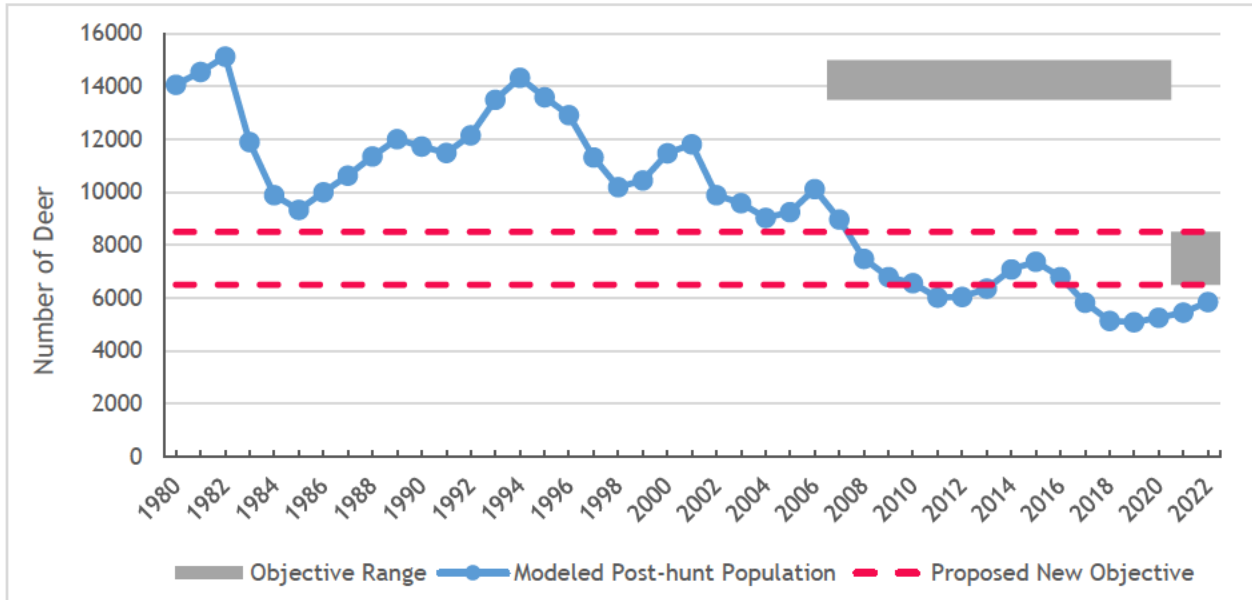


Figure D40-1. Deer DAU D-40 modeled post-hunt population and objective range, years 1980-2022.

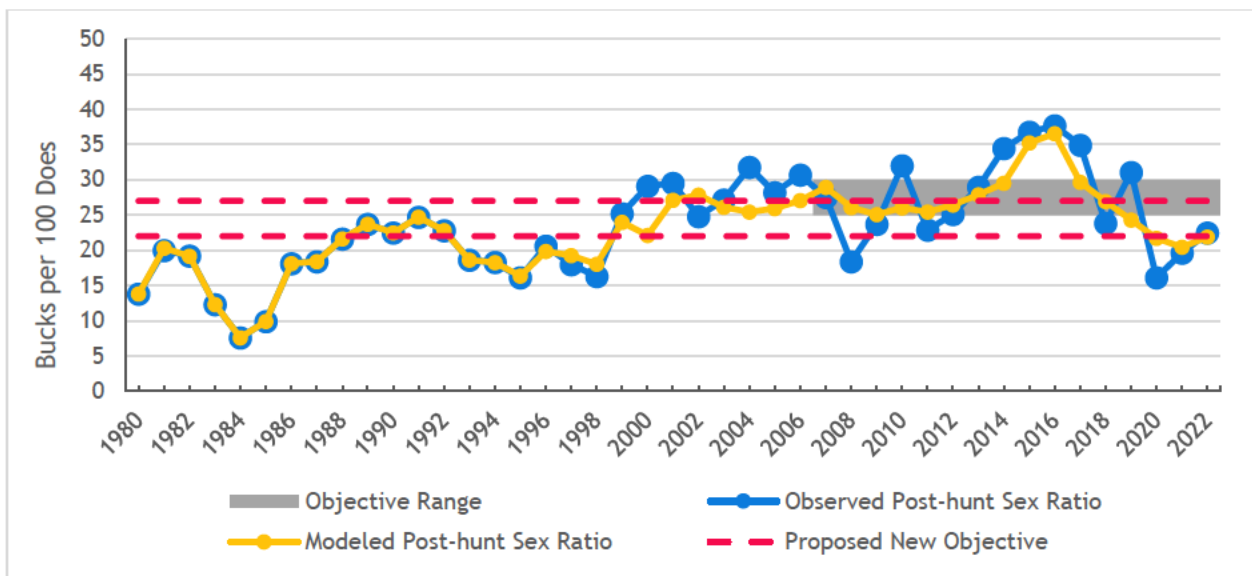


Figure D40-2. Deer DAU D-40 observed and modeled post-hunt sex ratio (bucks:100 does), years 1980-2022.

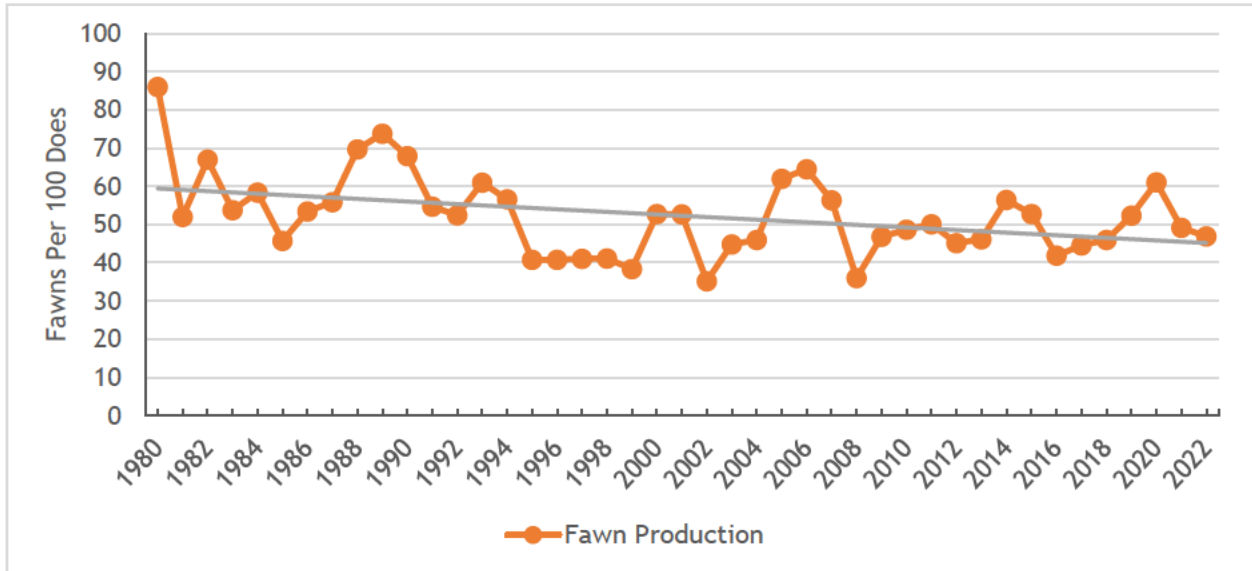


Figure D40-3. Deer DAU D-40 fawn production (observed post-hunt fawns:100 does ratio, years 1980-2022).

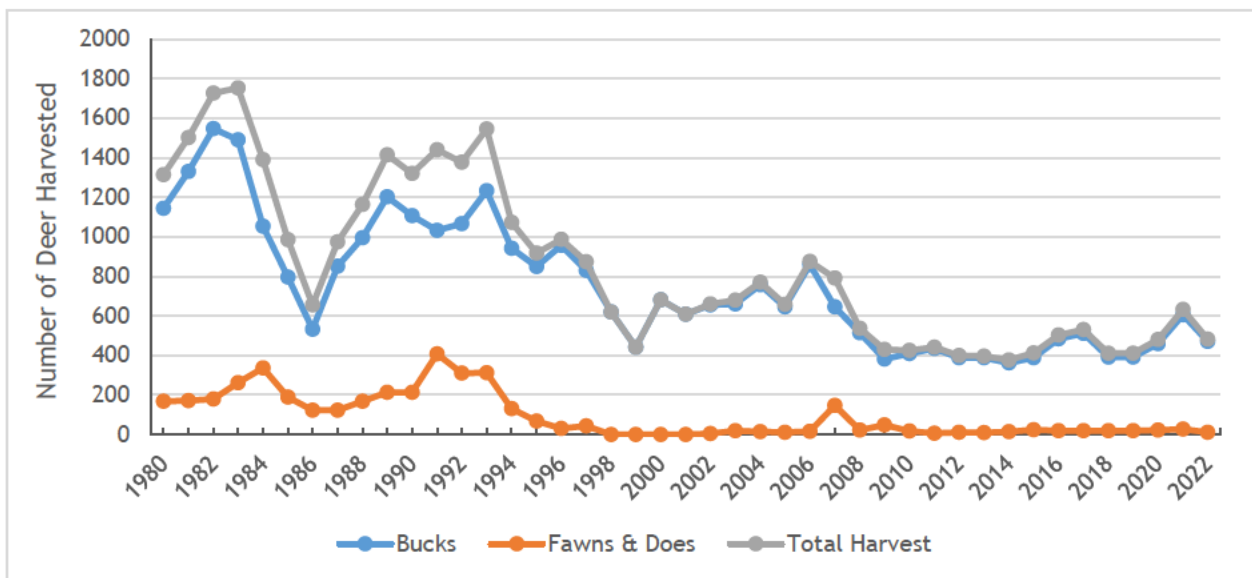


Figure D40-4. Deer harvest estimates in D-40, years 1980-2022.

## Background Information

Data Analysis Unit (DAU) D-40 is 941 square miles in southwestern Colorado and includes parts of Delta, Gunnison, Hinsdale, Montrose, and Ouray Counties. DAU D-40 consists of Game Management Units 64 (GMU; 269 mi<sup>2</sup>) and 65 (672 mi<sup>2</sup>) and includes parts of the Uncompahgre, Gunnison, and Cimarron River drainages. Land ownership in DAU D-40 is 50% private, 29% US Forest Service, 17% Bureau of Land Management, 3% National Park Service, and 2% state-owned property. There are also two wilderness areas within the DAU: the Uncompahgre Wilderness (~99,000 acres of USFS and 3,400 acres of BLM) and Mount Sneffels Wilderness (16,500 acres of USFS).

Deer are found throughout the DAU. Deer occur in their highest densities in the summer months in higher elevations comprised of aspens, spruce, Douglas fir, and Gambel's oak. In the winter months, deer use the lower elevations and more arid environments of the DAU with pinyon-juniper forests and agricultural fields where the climate is milder. Important wintering areas for deer in GMU 64 include Bostwick Park, Jones Draw, the south side of Poverty Mesa, Coffee Pot Ridge, Cimarron Mesa, and Fitzpatrick Mesa. In GMU 65, important wintering areas include the Cimarron and Billy Creek State Wildlife Areas, Shinn Park, the area between Alkali Creek and Cow Creek, and Miller Mesa. A growing population of residential deer occupy agricultural fields in the Uncompahgre Valley paralleling US Highway 550 and US Highway 50.

DAU D-40 has been on an overall declining trend since the early 1990s. There have been a few small increases in the population over the last 30 years, but it has never recovered to its former high of approximately 15,000 deer in the early 1980s. The population has been on a slight increasing trend for the last five years. The 2007 herd population objective was 13,000-15,000 with an estimated 13,500 deer. The 2022 population was estimated at 5,900 deer. During the 2022 update of this HMP, CPW staff and public stakeholders stated a desired increase in deer populations above current modeled estimates. This plan was updated and approved by the Parks and Wildlife Commission (PWC) in 2022 with a new objective range of 6,500-8,500, acknowledging that the 2007 objective range would be difficult to achieve given current population trends.

The average observed and modeled post-hunt buck ratio over the last five years is 23 bucks:100 does. The buck ratio objective set and approved by the PWC in 2022 was 25-30 bucks:100 does. For the 2024 HMP revision, CPW recommends a lower buck ratio of 22-27 bucks:100 does to better reflect current ratio trend within this herd. Observed post-hunt fawn ratios averaged 51 fawns:100 does over the last five years. Fawn to doe ratios have declined slightly over the previous three years.

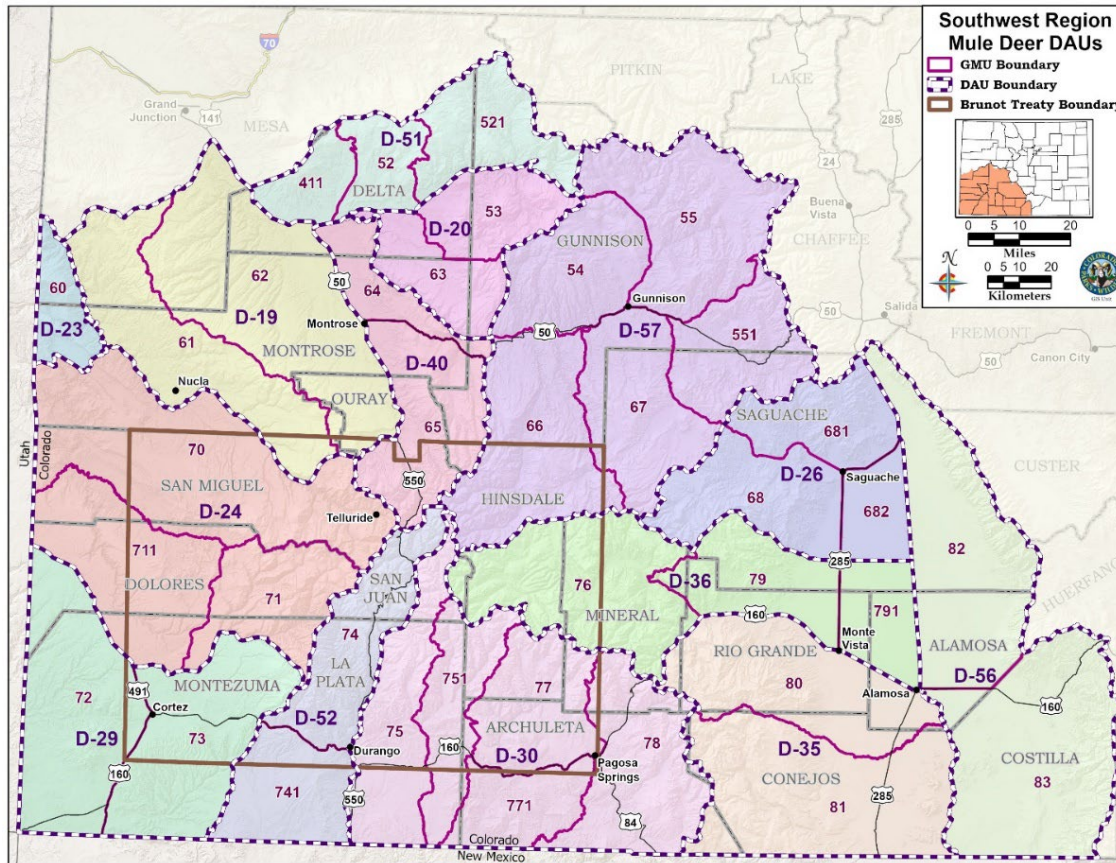
Harvest in DAU D-40 has remained stable over the last 10 years. Harvest averaged approximately 460 deer per year the previous ten years compared to about 1,300 deer from 1980-1990 when this population peaked and deer licenses were not yet limited statewide. Preference point minimums for licenses in D-40 range from 0-5 points, with some licenses drawing out as second choice or leftover (depending on residency). Antlerless licenses are limited to private-land-only and game damage licenses to control resident deer populations and minimize game damage in the Uncompahgre Valley. In 2022, 471 bucks and 11 does were harvested by 1,070 hunters with a success rate of 45%.

As a result of persistently declining deer populations on the Uncompahgre Plateau and across the west, CPW and other agencies and organizations have searched for solutions. CPW limited license numbers and established the Uncompahgre Plateau (D-19), adjacent to D-40, as an intensive deer study area beginning in 1997 to monitor over-winter fawn survival and annual doe survival to better inform management of deer populations on the Plateau and in similar habitats across southwestern Colorado. Additional studies have also been completed on the Plateau to investigate declining deer populations.

### **The Brunot Agreement of 1873**

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D40-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Twenty-seven percent (27%; 255 square miles) of the D-40 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D40-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

**Significant Issues**

The long-term population decline of this deer herd and low fawn recruitment (survival of a fawn from birth to one year of age) over the previous 30-40 years is likely attributed to an overall decrease in carrying capacity across the landscape for various reasons. Suitable winter range habitat has diminished due to land conversions and human development. As human populations rise, vehicle traffic increases, impacting deer survival rates and movement patterns. Roadkill along the US Highway 550 corridor is prevalent, especially for deer. In response to increased wildlife-vehicle collisions, exclusion fencing and jump-outs were added to the highway right-of-way to keep wildlife from entering roadways. Exclusion fencing can inadvertently impact movement within home ranges without adequate crossing structures. CPW, CDOT, and other partners are working to increase permeability on this stretch of highway. Additionally, outdoor recreation has increased dramatically over the last decade. Recreation can have many impacts including loss of effective habitat, changes in seasonal migration patterns, and potentially lower survival rates. Historical and current overgrazing by domestic livestock, persistent drought, and competition with elk have all contributed to decreased habitat quality across the landscape.

Although claims for deer damage are not excessive and are currently lower than historic levels, there are still deer damage claims every year. Game damage outside of the claims

process is increasing in the Montrose County portion (Uncompahgre Valley) of the DAU due to an increasing non-migratory deer herd residing year-round on agricultural land. Game damage complaints have decreased in Ouray and Gunnison County portions of the DAU. Frequently, prevention materials and game damage distribution management hunts are requested and given to landowners to proactively deal with damage before a claim is made. These methods also increase landowner tolerance for wildlife on private properties.

Additionally, Chronic Wasting Disease (CWD) is present in D-40. This disease occurs in deer, elk, and moose. CWD is an infectious prion (misfolded protein) disease that affects the nervous system over approximately three years. CWD can spread from the host by direct contact or through resources shared with an infected individual. To add to the complexity, prions can last for many years in the environment, further challenging management. This disease is 100% fatal and a treatment has not yet been developed. CWD was first detected in D-40 in 2017 and the current estimated prevalence rate is 3.7% in the DAU. Although prevalence is low, CPW is taking preventative management actions to limit the spread of CWD. CPW created an August private land disease management hunt in portions of GMUs 62, 64, and 65 when only resident deer are located in the Uncompahgre Valley. This hunt allows hunters to target deer that are more likely to transmit CWD to higher-elevation deer when they migrate to the valley during the winter months. Moreover, CPW has increased buck licenses to decrease spread since adult male deer are more likely to contract CWD. Proactive CWD management will be a crucial part of the D-40 herd management plan.

**Management Alternatives**

Post-hunt population and buck ratio objective alternatives considered for the 2024 D-40 HMP:

Table D40-1. Proposed population and buck ratio objective ranges for the 2024 D-40 HMP.

Population Objective Alternatives:		Buck Ratio Objective Alternatives:	
6,500 to 8,500 (midpoint 7,500)	(1) Preferred- (Status Quo) 27% increase in the current population estimate to the middle of the proposed objective range.	22 to 27 bucks per 100 does	(3) Preferred
4,000 to 6,000 (midpoint 5,000)	(2) Approximately 15% decrease in the current population estimate to the middle of the proposed objective range. Current population estimate is within this range.	25 to 30 bucks per 100 does	(2) status quo from 2022 HMP
5,000 to 7,000 (midpoint 6,000)	(3) Approximately 2% increase in the current population estimate to the middle of the proposed objective range. Current population estimate is within this range.	30 to 35 bucks per 100 does	(3)

**Management Objectives**

CPW plans to increase populations to meet stakeholder and CPW staff desires. Overall, the DAU’s habitat carrying capacity has likely decreased compared to historic plans, and current habitat likely cannot support historic deer numbers. However, increasing this herd slightly would align with stakeholder desires (Alternative 1). Decreasing this herd is not desired and would be difficult because the demand for limited licenses is already lower than the quota offered for some licenses (Alternative 2). Increasing license numbers would not necessarily increase harvest. It could also make encountering animals on public lands more difficult because increased pressure on public lands could cause deer to move onto private lands that do not allow hunting or only allow limited hunting. A 2% increase is attainable with the current population, but a larger increase is desired by CPW and stakeholders (Alternative 3).

CPW would like to amend the buck ratio slightly to better reflect how current buck ratios are trending. Stakeholders desire more mature bucks on the landscape; however, CPW feels that the buck ratio should be reflective of allowing opportunity to hunt deer with consideration given to management of CWD prevalence. The preferred objective of 22-27 bucks per 100 does overlaps the current objective range and is a decrease from the current ratio objective (Alternative 1). The current plan's buck ratio of 25-30 bucks per 100 does has not been achieved since 2019 (Alternative 2). The current 3-year average is 19 bucks per 100 does. The preferred objective allows for a balance of opportunity for hunters to get a deer license, allows for diverse ages of bucks on the landscape, and allows CPW to work to keep CWD prevalence in check. Increasing the buck:doe ratio to 30-35 bucks:100 does would necessitate a reduction in the current number of deer licenses in this DAU (alternative 3). Increasing the observed buck:doe ratio would be difficult to achieve with so few bucks already on the landscape and slow population growth. Increasing the number of mature bucks on the landscape would have potential to contribute to an increase in CWD prevalence (since mature bucks are more likely to have CWD). For this reason, an increased buck ratio would not be a preferred alternative.

### **Strategies for addressing management issues and achieving objectives**

The population in D-40 has had low fawn recruitment (survival of a fawn from birth to one year of age) in recent years. The population faces reduced habitat availability from increased development and recreation, a decline in habitat quality due to drought and competition with livestock and elk, and a lack of habitat connectivity. These impacts have contributed to reduced population performance for the last decade.

CPW manages sex ratios and population size by increasing or decreasing licenses by total quota, by season, and by sex, depending on the objectives for each herd. This herd has historically been managed for a balance of opportunity and population growth, and staff would like to continue this management strategy. Additionally, the last several years have been managed proactively to limit CWD spread. Although the prevalence is low, this as an important strategy to continue into the future. Antlerless game damage licenses would still be available for landowners to deter deer from causing damage and to increase landowner tolerance, but antlerless licenses are not anticipated to be available in the draw for the near future until populations recover. Buck licenses will continue to be offered to manage CWD concerns and allow for moderate hunting opportunity. Additionally, predator and competing ungulates will continue to be managed.

In addition to license management, CPW recognizes the importance of habitat protection and habitat quality improvement. CPW will continue to support conservation easements that benefit big game habitat and protect habitat connectivity between seasonal ranges. In addition, CPW will continue to support projects that aid in movement across the landscape for wildlife and keep people safe on the roads with structures like underpasses and overpasses. CPW regularly communicates with land management agencies such as the USFS and BLM, landowners, county governments, CDOT, and NGOs and will continue to collaborate with these government agencies and organizations. These agencies can help with large-scale habitat management projects to improve carrying capacity and connectivity and regulate recreation on public lands, which could bolster struggling deer populations, like D-40.



## Stakeholder Outreach

During the stakeholder outreach process for the 2022 Herd Management Plan revision, surveys designed with hunters and landowners in mind were sent on September 17, 2021 with an input period ending on October 29, 2021. Emails with a link to the online survey were sent to 2,578 first-choice applicants and license holders from 2017-2020. An additional 20 survey request emails were sent to landowners and outfitters who have expressed interest in herd management. There were 374 respondents to the survey, providing CPW with a comprehensive view of stakeholder thoughts and opinions. Overall, respondents were evenly split between increasing or decreasing the herd and preferred for the buck ratio to remain status quo.

Additionally, hunters were randomly selected to complete the 2022 Deer Hunter Attitude Survey after the completion of their hunting seasons. There were 274 respondents who answered the opt-in questions for D-40. Overall, hunters wanted to see a slight to moderate increase in the deer population and were satisfied with their overall hunting experience. Hunters also preferred hunting bigger bucks (higher buck ratio) than hunting more often (lower buck ratio). The majority of respondents also did not feel crowded while deer hunting.

The draft HMP for D-40 was sent to local county commissioners in Delta, Gunnison, Montrose, Hinsdale, and Ouray Counties. CPW had in person discussions with Delta, Montrose, and Ouray Counties about the plans. The draft plan was also sent to the HPP, USFS, the BLM, and Backcountry Hunter and Anglers (BHA). Support letters were received from the BLM, the USFS, and HPP. The HMP was posted on the CPW website for 30 days, allowing stakeholders to comment on the alternatives in the plan.

### **CPW Commission Approved Objectives:**

*Post-hunt Population: 6,500 - 8,500 deer*

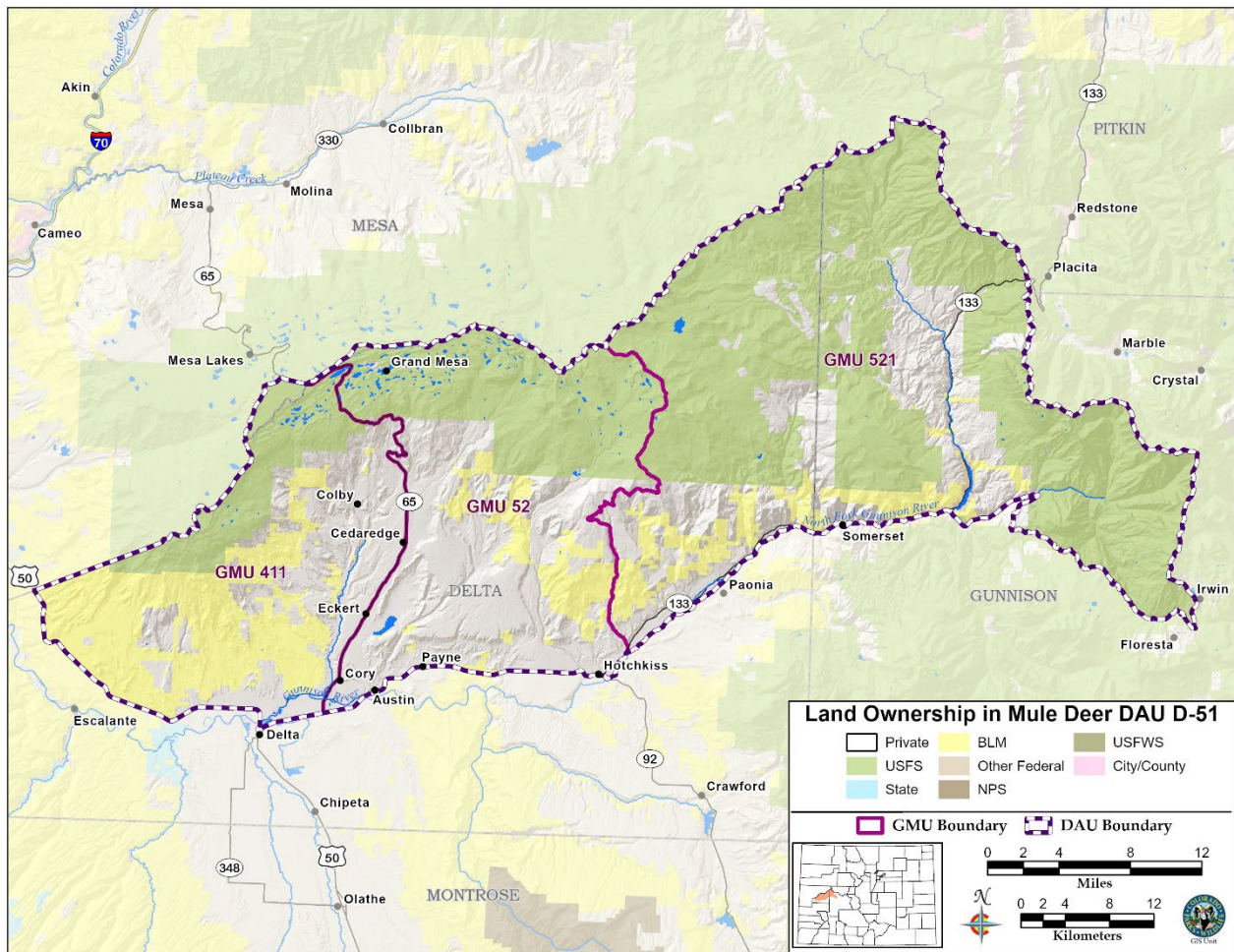
*Post-hunt buck ratio: 22 - 27 bucks:100 does*

## SOUTH GRAND MESA DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-51 Evan Phillips, Wildlife Biologist, Montrose

GMUs: 52, 411, 521  
Last HMP Approval Year: 2018

Post-hunt Population: Previous Objective: 8,000 - 10,000; 2022 Estimate: 9,100.  
**Preferred Alternative: Extend the current population objective of 8,000 - 10,000 Deer**

Post-hunt Observed Sex Ratio (bucks:100 does): Previous Objective: 25-30;  
2022 observed: 24; modeled: 36  
**Preferred Alternative: Extend the current sex ratio objective of 25-30 bucks:100 does**



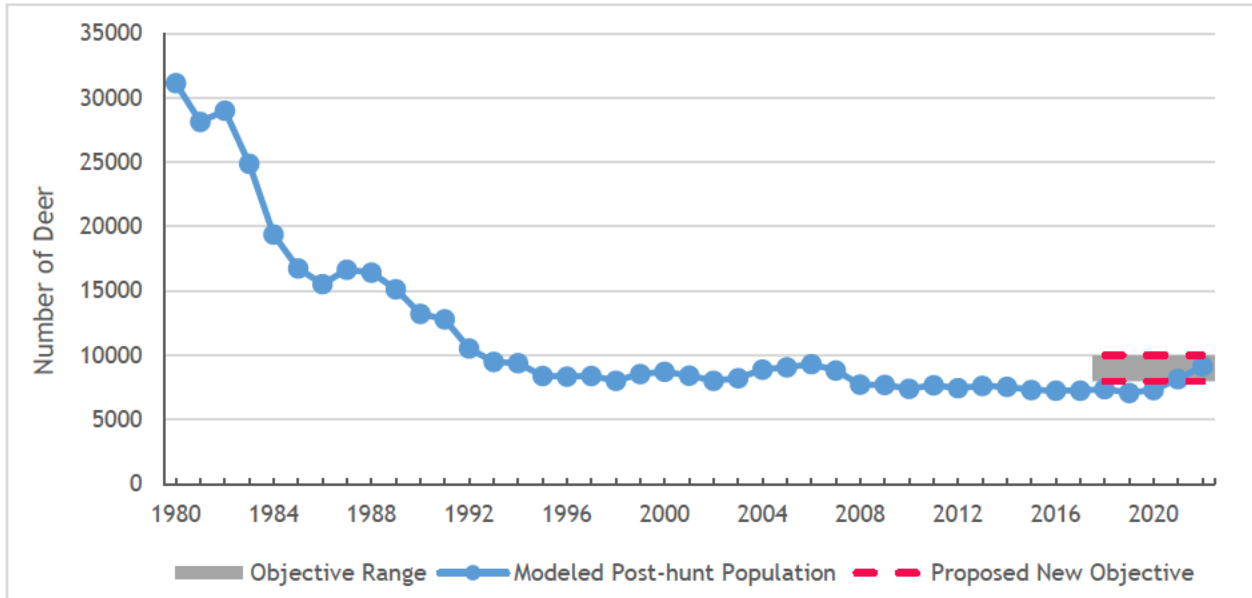


Figure D51-1. Deer DAU D-51 modeled post-hunt population and objective range, years 1980-2022.

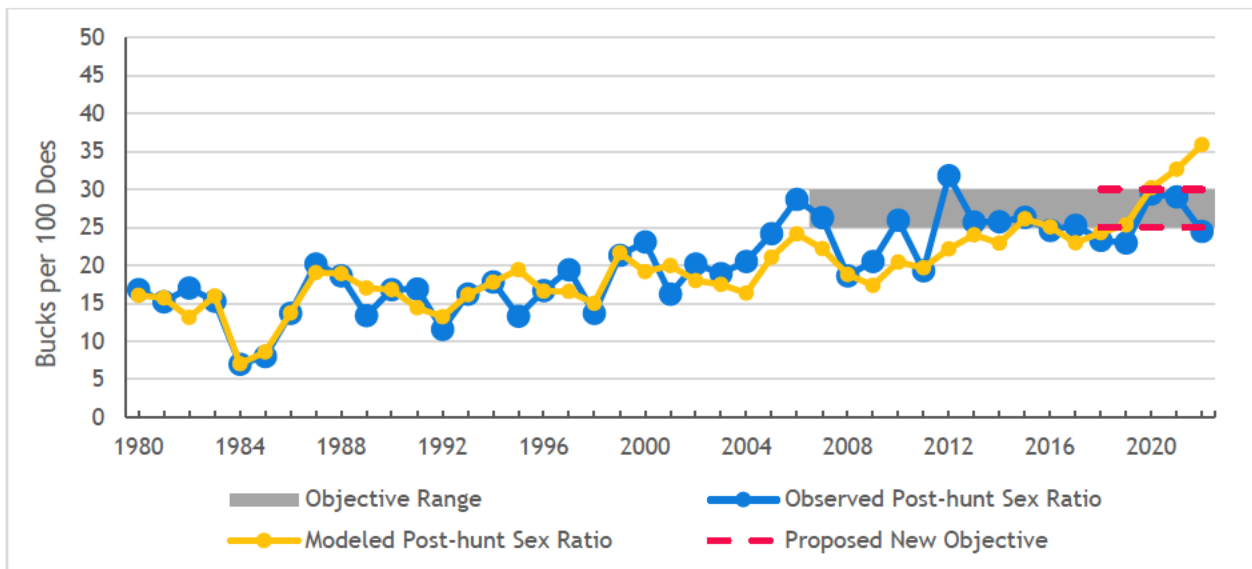


Figure D51-2. Deer DAU D-51 observed and modeled post-hunt sex ratio (bucks:100 does), years 1980-2022.

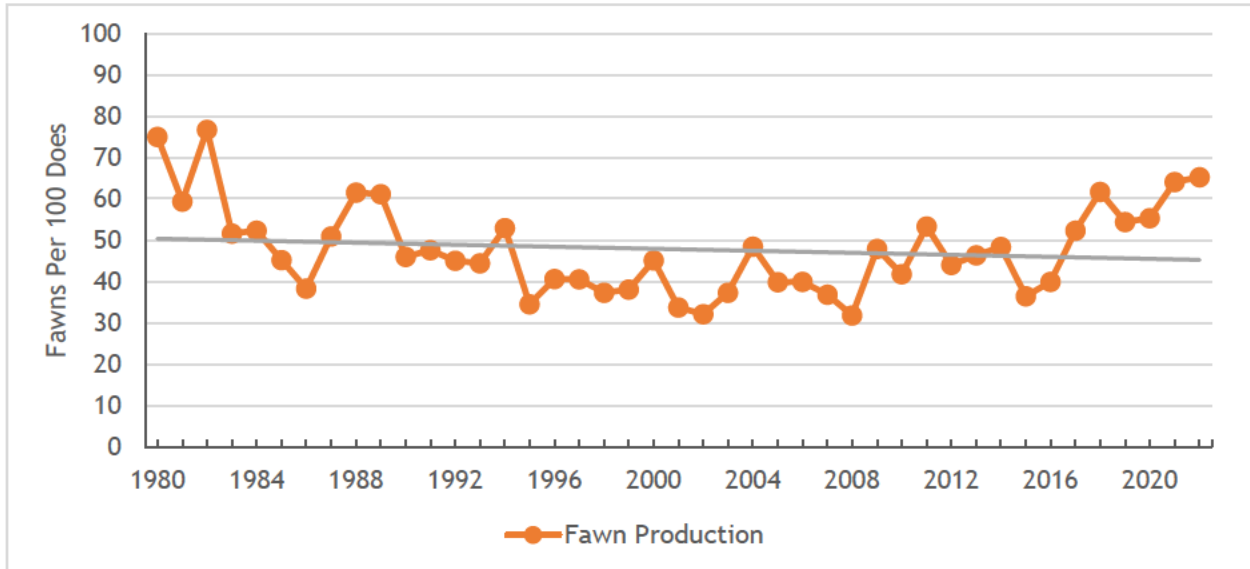


Figure D51-3. Deer DAU D-51 fawn production (observed post-hunt fawns:100 does ratio), years 1980-2022.

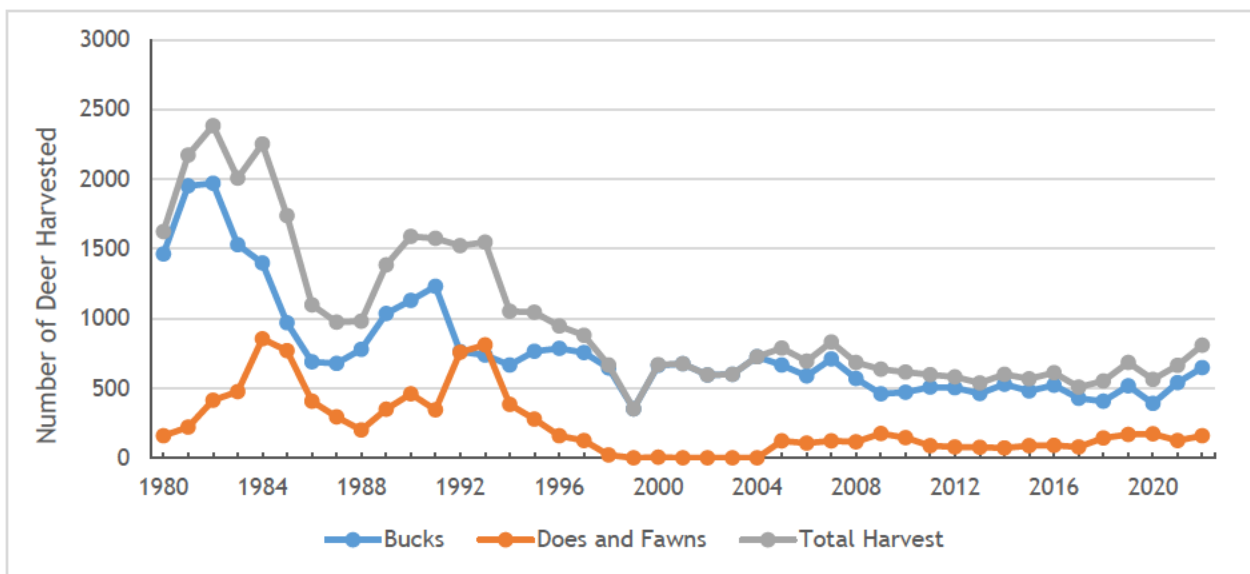


Figure D51-4. Deer harvest estimates in D-51, years 1980-2022.

### Background Information

Data Analysis Unit (DAU) D-51 is 1002 square miles in southwestern Colorado and includes parts of Delta, Gunnison, and Mesa Counties. DAU D-51 consists of Game Management Units (GMUs) 52, 411, and 521. D-51 is bounded on the west and north by the Delta-Mesa County line, Flowing Park Road, Lands End Road, and the Gunnison-Mesa County line; on the east by the Gunnison-Pitkin County line, White River-Gunnison National Forest Boundary, and Ruby Range summit; and on the south by Gunnison County Road 12, North Fork of the Gunnison River, Highway 92, and Highway 50. Communities in and near the D-51 deer herd include Cedaredge, Delta, Hotchkiss, Paonia, and Somerset. The South Grand Mesa Deer herd DAU

consists of a majority of public lands where 49% is managed by the United States Forest Service (USFS), 35% is private lands, 16% is managed by the Bureau of Land Management (BLM), and less than 1% is managed by the State of Colorado

Deer occur throughout GMUs 52, 411, and 521, but migratory behavior determines spatial and temporal density across the units. The Herd Management Plan was last revised in 2018 and the population objective was set to 8,000 to 10,000, which targeted slightly increasing the population from the current population at that time. It is well documented that overall, the population of mule deer on the South Grand Mesa, and most of Colorado, has experienced significant declines since the 1980s (Gill et al. 2001). From 1995 to 2020, the South Grand Mesa deer herd population was estimated to be relatively stable at an average of 8,000 deer (Figure D51-1). The estimated population has increased slightly the last few years; the 2022 post-hunt population was 9,100 deer, which is within the population objective range.

The average observed post-hunt sex ratio between 1980 and 2022 was 20 bucks:100 does. The average observed post-hunt sex ratio from 2018 to 2022 was 26 bucks:100 does (Figure D51-2), within the current sex ratio objective of 25-30 bucks:100 does. The 2018 - 2022 fawn: doe ratio was 60 fawns per 100 does. The fawn: doe ratio has increased by approximately 15 fawns per 100 does in a 10-year period; the 2007-2017 average was 43 fawns per 100 does (Figure D51-3).

Deer harvest since 1999, when deer licenses in GMUs 52, 411, and 521 were changed from unlimited to limited, is a function primarily of license allocation and season structure. Weather also plays a role in harvest by affecting success rates. From 2018 to 2022 an average of 501 bucks were harvested annually in D-51 (Figure D51-4). Antlerless deer licenses are issued in GMU 411 and 52 with private-land-only restrictions to help private landowners alleviate agricultural damage due to deer. From 2018 to 2022 an average of 150 antlerless deer have been harvested annually in D-51.

## Significant Issues

Habitat loss, degradation, and fragmentation is occurring in D-51 due to increased pressures of human population growth and development. Outdoor recreation has is increasing significantly and is a major concern for the deer herd, similar to the rest of southwest Colorado. Ongoing drought and climate change also is negatively impacting the quality of deer habitat that remains. Non-migratory resident deer populations within the developed areas of Cedaredge and the surrounding communities are sometimes in conflict with homeowners and human residents and vehicle collisions and damage to private property do occur.

Diseases are an issue in the South Grand Mesa deer herd. Chronic wasting disease (CWD) has been documented with a prevalence rate of 7% in GMU 52, 411, and 521 during mandatory testing in 2020 and 2021. Testing results also indicated that prevalence of CWD is concentrated in a few hot spots at lower elevations that is predominantly private agricultural land. A new early rifle either-sex private-land-only deer season was implemented to encourage more harvest in specific areas within the DAU to help reduce prevalence and target the lower end of the buck:doe ratio. Epizootic Hemorrhagic Disease Virus (EHDV) has been documented in this area and although mule deer are relatively more resistant than other species, it can negatively impact the population in some cases, especially in exceptionally dry years.

### Management Alternatives

Three post-hunt population objective alternatives were considered for D-51:

**Table D51-1.** Proposed population objective ranges considered for the D-51 2024 HMP extension.

Post-hunt Population Objective Alternatives:	
10,000 to 12,000 (midpoint 11,000)	(1) Slight increase in population objective range
8,000 to 10,000 (midpoint 9,000)	(2) Maintain current population objective range (STAFF PREFERRED)
6,000 to 8,000 (midpoint 7,000)	(3) Slight decrease in population objective range

Three post-hunt sex ratio objective ranges were considered for D-51:

**Table D51-2.** Proposed sex ratio (bucks:100 does) objectives ranges considered for the D-51 2024 HMP extension.

Post-hunt Sex Ratio Objective Alternatives:	
20-25 bucks:100 does	(1) Decrease from the current sex ratio objective range
25-30 bucks:100 does	(2) Maintain the current sex ratio objective range (STAFF PREFERRED)
30-35 bucks:100 does	(3) Increase from the current sex ratio objective

### Management Objectives

CPW’s staff-preferred objective is to extend the D-51 management objectives approved in the 2018 HMP. When the current population objective range was approved in 2018, the D-51 deer population was estimated to have been below 8,000 for approximately 10 years and holding relatively static despite minimal private-land-only doe harvest. The objective range of 8,000 to 10,000 deer was designed to manage for an increase in the population that was realistic given the lowered carrying capacity due to anthropogenic impacts and ongoing drought conditions, acknowledging that historic deer populations of several decades ago are not likely attainable in the near term. The objective range allowed for growth in the deer population if conditions allowed, corresponding with the public’s preferences. In the meantime, the D-51 deer population did experience a few years in 2021-2022 with higher than average fawn recruitment, likely due to several years with well-timed precipitation, leading to an increase in the estimated population to within the objective range. CPW recommends maintaining the current population objectives for this 2024 HMP. Continuing to manage to current deer population objectives should not significantly increase conflicts with agriculture producers.

## Strategies for Achieving the Preferred Objectives

CPW will continue to collect post-hunt classification data on this herd on an annual basis to determine age and sex ratios which are used to estimate population size. Antlered and antlerless licenses will be reviewed annually and adjusted as needed across the various hunting seasons to influence harvest in order to manage the D-51 deer population and sex ratio within the objectives approved in this plan. Special seasons such as the early rifle either-sex private land only deer hunt as well as the other private land only hunt codes will be used to target deer in areas where CWD appears to be concentrated in an effort to reduce CWD prevalence to below 5%. CPW will continue to look for opportunities to conserve habitat and conduct habitat improvement projects.

## Stakeholder Outreach

An extensive stakeholder outreach process was conducted in 2017, which included a public scoping meeting, a public input survey, a survey of landowners and randomly selected license holders from 2015-2017, and a 30-day open comment period of the draft plan (Appendix D51-A). In 2021 and 2022, hunters that were selected for the harvest survey had the option to answer questions as part of the hunter attitude survey. Results of the public meetings, surveys and the hunter attitude opt in survey indicated that the majority of respondents are generally satisfied with deer populations and hunting in D51, however, they would like to see the deer population increase and would like to hunt for more mature bucks even if it meant hunting less often. This draft plan was discussed at the Local Habitat Partnership Program committee and reviewed by federal agencies.

### CPW Commission Approved Objectives:

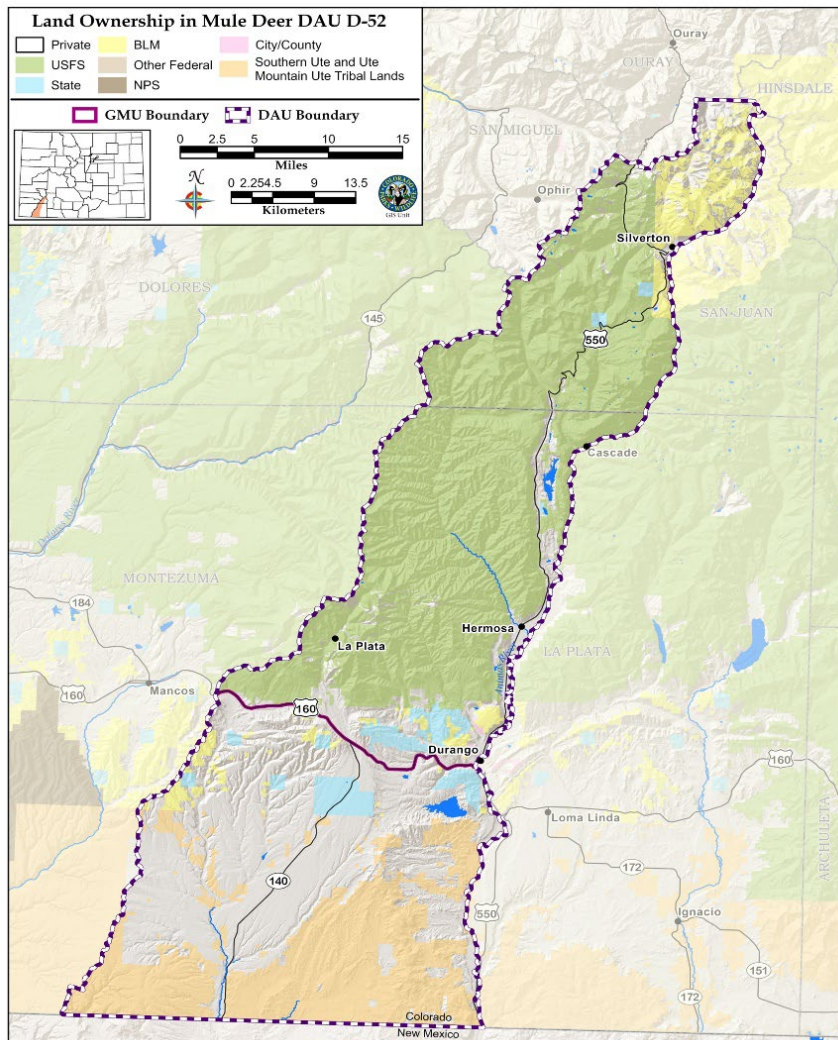
*Post-hunt Population: 8,000 - 10,000 deer*

*Post-hunt buck ratio: 25 - 30 bucks:100 does*

## HERMOSA DEER HERD MANAGEMENT PLAN EXTENSION DATA ANALYSIS UNIT D-52

Brad Weinmeister, Wildlife Biologist, Durango

<b>Hermosa Deer Herd (DAU D-52)</b> <b>Last HMP Approval Year: 2010</b>	<b>GMUs: 74 and 741</b>
Post-hunt Population: Previous Objective: 4,000-6,000 2022 Estimate: 4,500 <b>Preferred Alternative: <u>4,000-6,000 deer</u></b>	
Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 25-30 2022 observed: 36; modeled: 24 <b>Preferred Alternative: <u>25-30</u></b>	





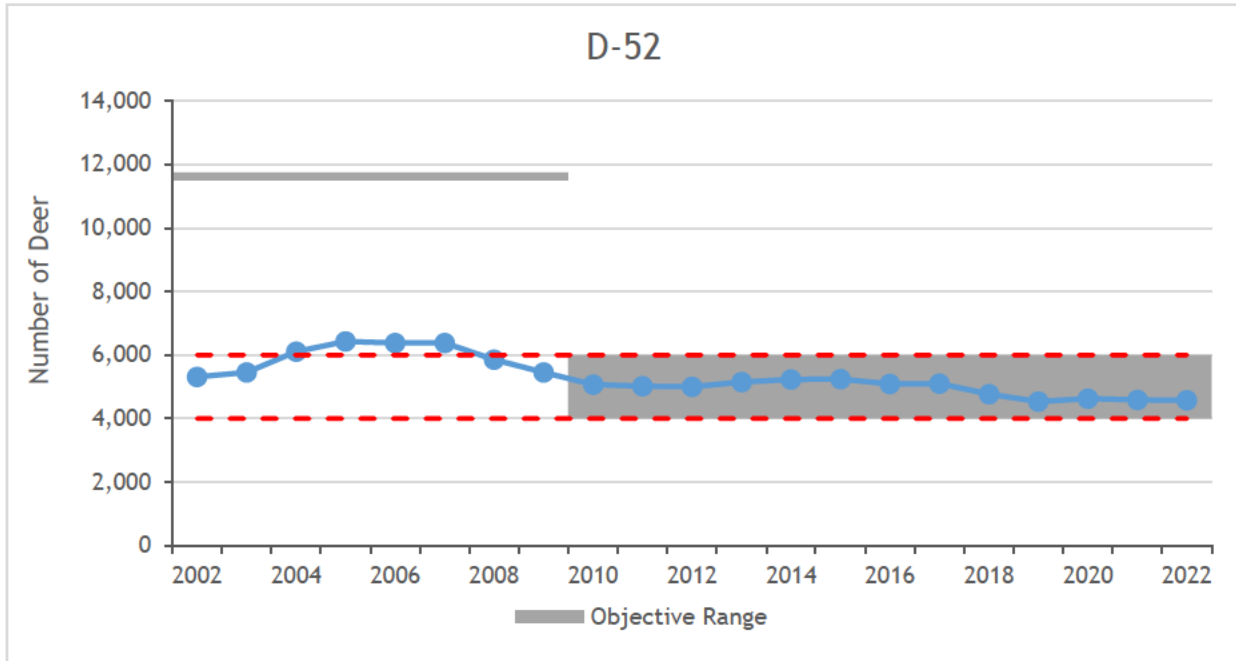


Figure D52-1. Deer DAU D-52 modeled post-hunt population estimate and objective range, years 2002-2022.

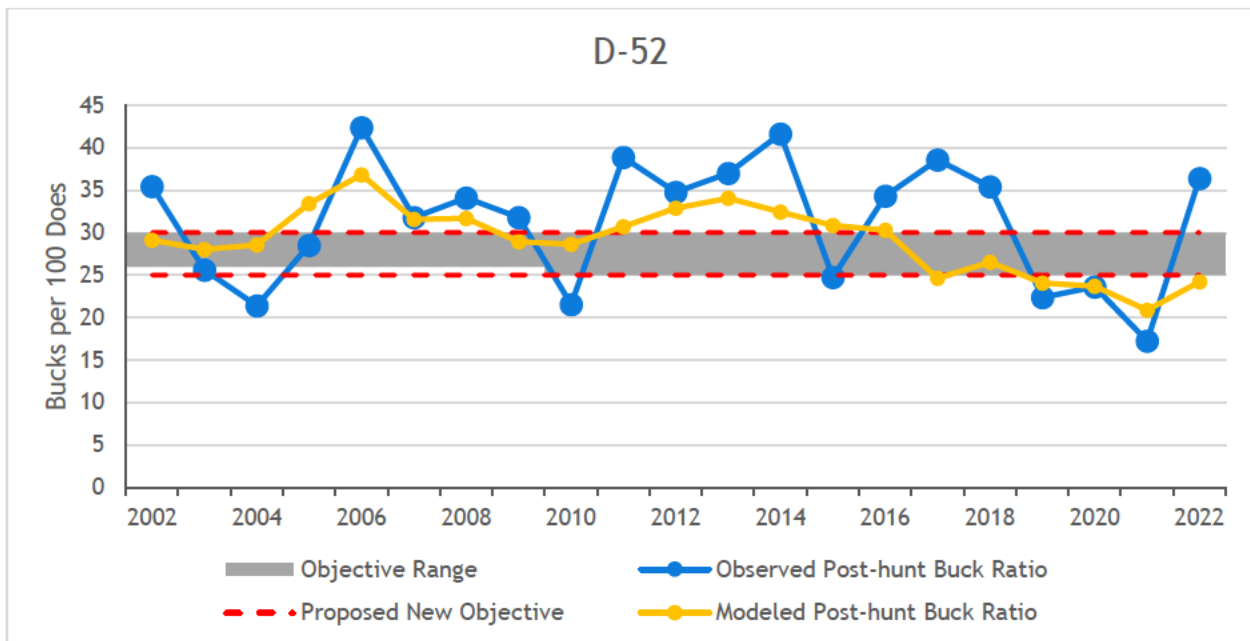


Figure D52-2. Deer DAU D-52 observed and modeled post-hunt sex ratio (bucks:100 does), years 2002-2022.

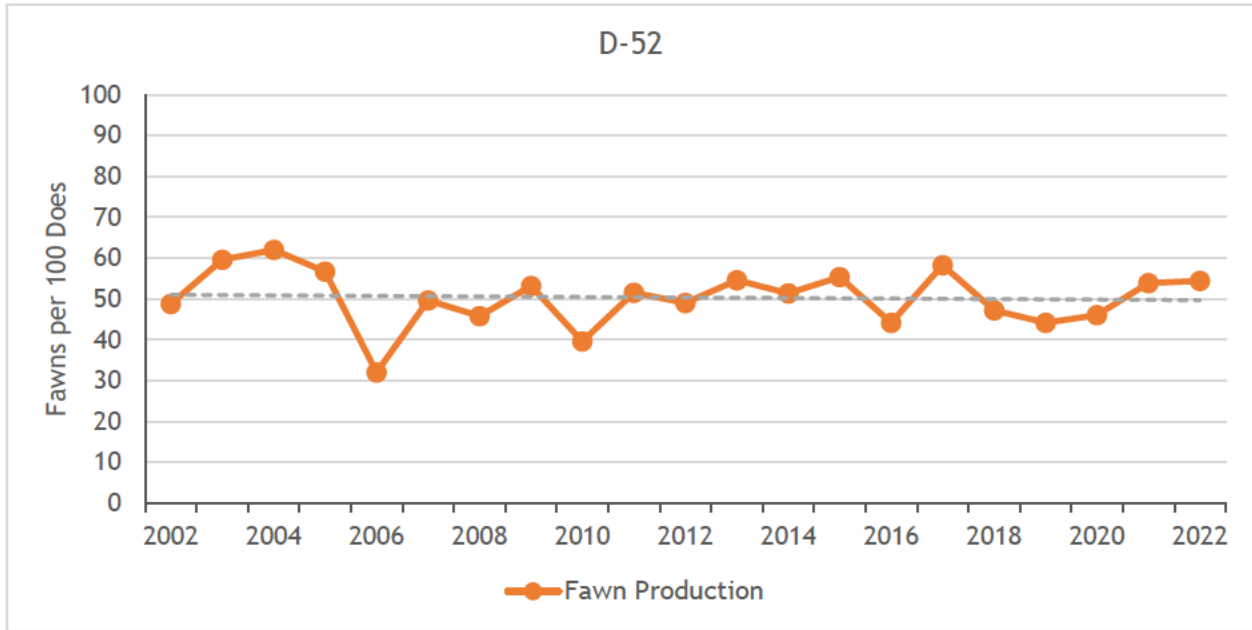


Figure D52-3. Deer DAU D-52 fawn production (observed post-hunt fawns:100 does ratio, years 2002-2022).

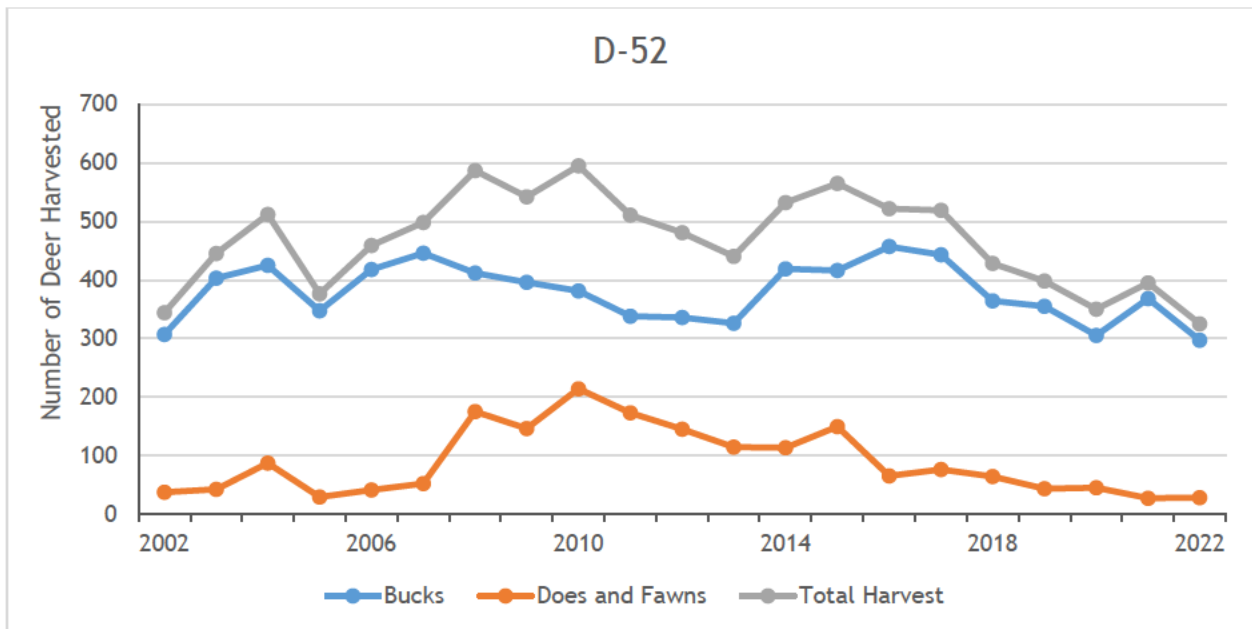


Figure D52-4. Deer harvest estimates in D-52, years 2002-2022.

## Background Information

The Hermosa Deer Population consists of Data Analysis Unit (DAU) D-52. It is located in the southwest corner of Colorado and contains Game Management Units (GMUs) 74 and 741. The DAU is 1,000 square miles and includes portions of La Plata and San Juan counties. D-52 is bounded on the north by the Continental Divide, on the south by the New Mexico state line, on the east by the Animas River, and on the west by the Dolores/Animas watershed divide. The towns of Durango, Silverton, Hesperus, and Breen occur within the DAU. Land ownership is composed of 42% U.S. Forest Service (which includes the Hermosa Creek Special Management Area and Wilderness Area), 5% Bureau of Land Management, 32% private land, and 17% Southern Ute Tribal (SUIT) land.

The current post-hunt population objective of 4,000-6,000 deer was set in 2010. Over the past 20 years the deer population has been on a declining trend and has been estimated between 4,500 (2019) and 6,400 (2005) (Figure D52-1). The population has been stable over the past three years and the 2022 population was estimated at 4,600 deer.

The average observed post-hunt buck ratio from 2002 to 2022 was 31 bucks:100 does (Figure D52-2). The observed three-year average (2020-2022) of 26 bucks:100 does is at the lower end of the post-hunt buck ratio management objective. Observed buck numbers have fluctuated a lot, most likely from observer bias or error rather than from changes in buck numbers. Observed post-hunt fawn ratios averaged 50 fawns:100 does (range 32-62) between 2002 and 2022 (Figure D52-3). The three-year and five-year averages were 51:100 and 49:100, respectively.

Buck harvest has varied over the last 20 years with a low of 297 bucks harvested (2022) to a high of 457 (2016), averaging 379 bucks annually (Figure D52-4). Success rates for hunters do not vary much and the number of bucks harvested is primarily a factor of the number of licenses available. Doe harvest is on private land through Private-Land-Only (PLO) licenses or game damage permits. In the past 20 years, doe harvest has ranged from 26 (2021) to 206 (2010) with an average of 86 (Figure D52-4). An estimated 28 does were harvested in 2022.

The last revision of the D-52 herd management plan was done in 2010. The management objectives have been working well for this population and there was overall satisfaction with this management. Based on this, CPW recommends maintaining the current management strategy in the new HMP.

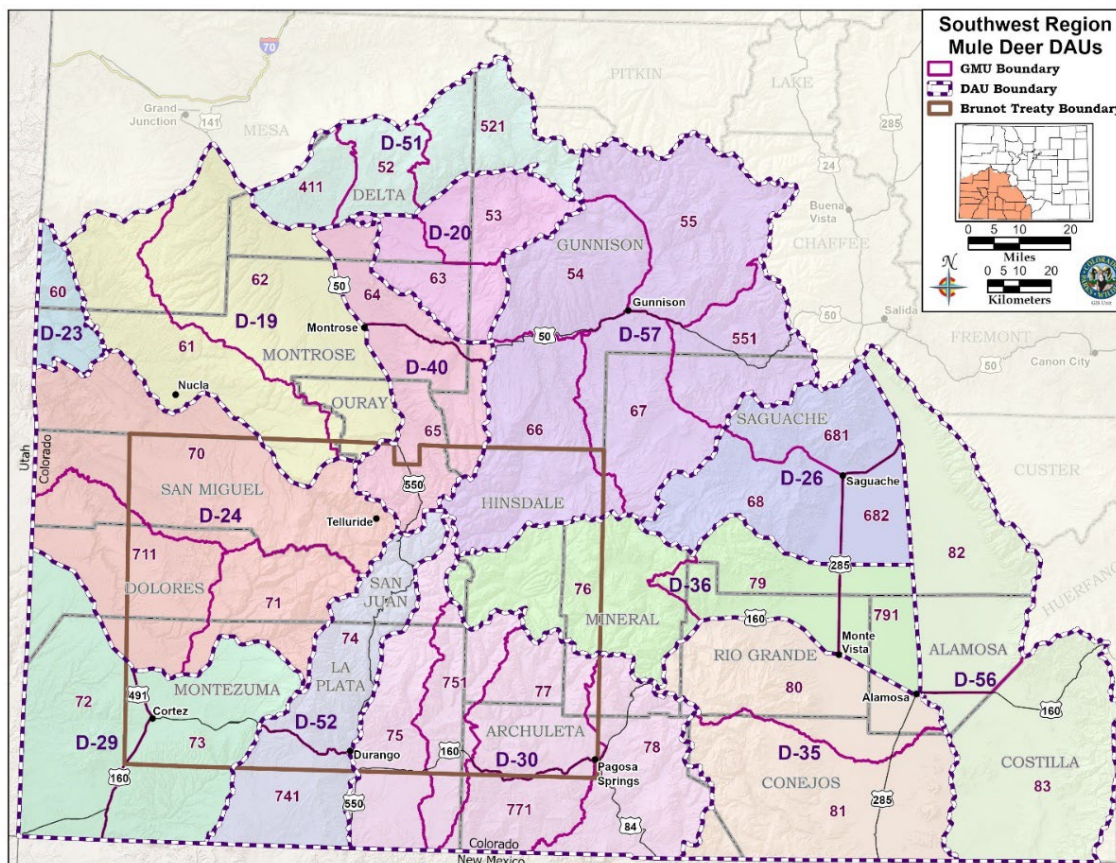
Buck licenses were limited in the DAU in 1999 when all over-the-counter buck licenses changed to limited. A fourth season buck hunt is available in the DAU with limited opportunity. CPW proposes maintaining the same sex ratio objective from the previous plan.

## The Brunot Agreement of 1873

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the “Brunot Agreement.” This ceded area - or “Brunot Area” - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D52-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to “hunt upon said land so long as the game lasts and the Indians are at peace with the white people.” Despite the continued loss of lands, the

corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe’s exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe’s long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Sixty-six percent (66%; 712 square miles) of the D-52 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D52-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

**Significant Issues**

Due to human population growth, a significant concern in the DAU is the cumulative impacts to critical habitat, including winter ranges, migration corridors, production areas, and high-elevation summer ranges. Exurban development is occurring in La Plata and San Juan Counties and homes are replacing open lands currently supporting wintering deer. Energy development has also increased in deer habitat on private and public lands resulting in direct and indirect habitat loss. Lastly, outdoor recreation continues to expand in La Plata and San Juan Counties, placing more people in areas important to deer. Increased recreational trails and recreation use is decreasing the amount of effective deer habitat. Managers and the public are concerned over the cumulative and prolonged impacts of development and recreation, which is disrupting migration and decreasing quality and quantity of habitat. Actions to enhance and protect important deer habitat will be essential to maintain a healthy deer population.

Drought has been present in southwest Colorado for more than two decades. This has negatively impacted deer habitat and has decreased the amount and quality of forage. Quality habitat provides food, shelter, space, and water and is essential to produce robust mule deer populations.

Chronic Wasting Disease (CWD) has not been detected in the DAU, but is in adjacent DAUs to the west, north and east. It can be expected that CWD will arrive in the DAU in the near future. Hemorrhagic disease is present in D-52. Within the DAU, the disease can cause die-offs of mule deer in the driest years. More common though are infection and sometimes death of individual animals with minimal impacts to the overall population.

**Management Alternatives**

Three post-hunt population objective alternatives were considered for D-52:

**Table D52-1.** Proposed and recommended population objective ranges for the 2024 D-52 revised HMP.

Population Objective Alternatives:	
5,000 to 7,000 (midpoint 6,000)	(1) Approximately 20% increase in the proposed objective range midpoint
4,000 to 6,000 (midpoint 5,000)	(2) Status Quo (Maintain current population)
3,000 to 5,000 (midpoint 4,000)	(3) Approximately 20% decrease in the proposed objective range midpoint

Three post-hunt sex ratio objective alternatives were considered for D-52:

**Table D52-2.** Proposed and recommended sex ratio objective ranges for the 2024 D-52 revised HMP.

Sex Ratio Objective Alternatives:	
30-35	(1) Approximately 15% increase in the proposed objective range midpoint
25-30	(2) Status Quo (Maintain current sex ratio)
20-25	(3) Approximately 15% decrease in the proposed objective range midpoint

## Management Objectives and Strategies

CPW staff recommend to maintain the current population objective to meet stakeholder and CPW staff desires. There is overall satisfaction with the current management of this population. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they were somewhat to very satisfied with the number of deer in the population, supporting CPW's current and proposed alternative. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they would like to see a slight or moderate increase in the population, supporting CPW's proposed alternative.

The current sex ratio objective for D-52 is 25-30 bucks per 100 does. It is proposed to keep this objective in the plan revision. Results in the 2021 and 2022 surveys show that hunters were evenly split regarding their satisfaction with the number of bucks in the population. The sex ratio is generally managed through the issuance of buck licenses. More licenses are made available to decrease the ratio while licenses would become more limited to increase the ratio. This is done annually to reach and maintain a ratio within the management objective.

Enhancement and protection of habitat are important regarding the health of this deer population. CPW works with Federal land management agencies, private organizations, landowners, local governments, non-profit organizations, and others, as well as managing State Wildlife Areas, to provide the best habitat for mule deer and other wildlife. New habitat is not being created so it is necessary to get the most out of existing habitats and protect them from additional loss.

## Stakeholder Outreach

Hunters were randomly selected in 2021 and 2022 to complete the Deer Hunter Attitude Survey after the completion of their hunting seasons. The results of these surveys were used to guide CPW's management objective recommendations included in the draft of the HMP. In addition, a copy of the draft plan was available for public comment for 45 days on CPW's webpage. During that time period the draft HMP was sent to La Plata County Commissioners, San Juan County Commissioners, and presented to the San Juan Basin Habitat Partnership Committee. Copies of the draft HMPs, requested written comments, were sent to the Forest Service biologist in the Columbine District, the BLM biologist in the Tres Rios Field Office, and the Southern Ute and Ute Mountain Ute wildlife biologists.

## CPW Commission Approved Objectives:

*Post-hunt Population:* 4,000 - 6,000 deer

*Post-hunt Buck Ratio:* 25 - 30 bucks:100 does

## SAND DUNES DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-56 (Previous D-31 and D-37 combined) Brent Frankland, Wildlife Biologist, Monte Vista

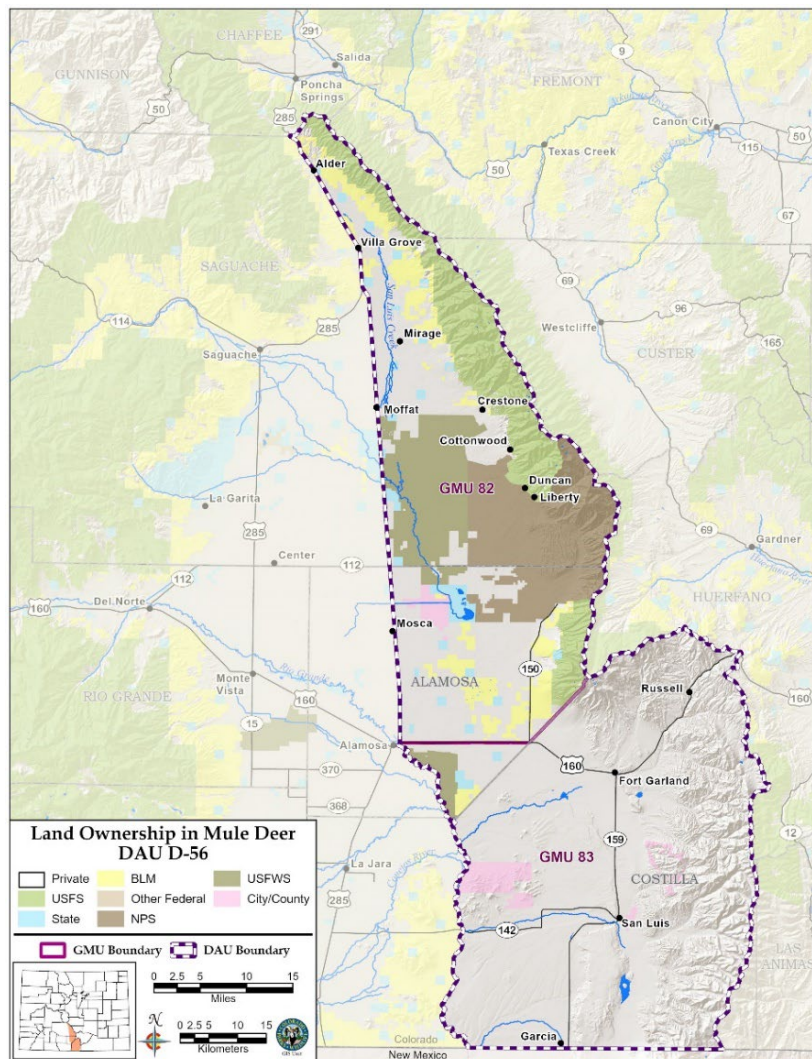
**GMUs: 82 and 83**

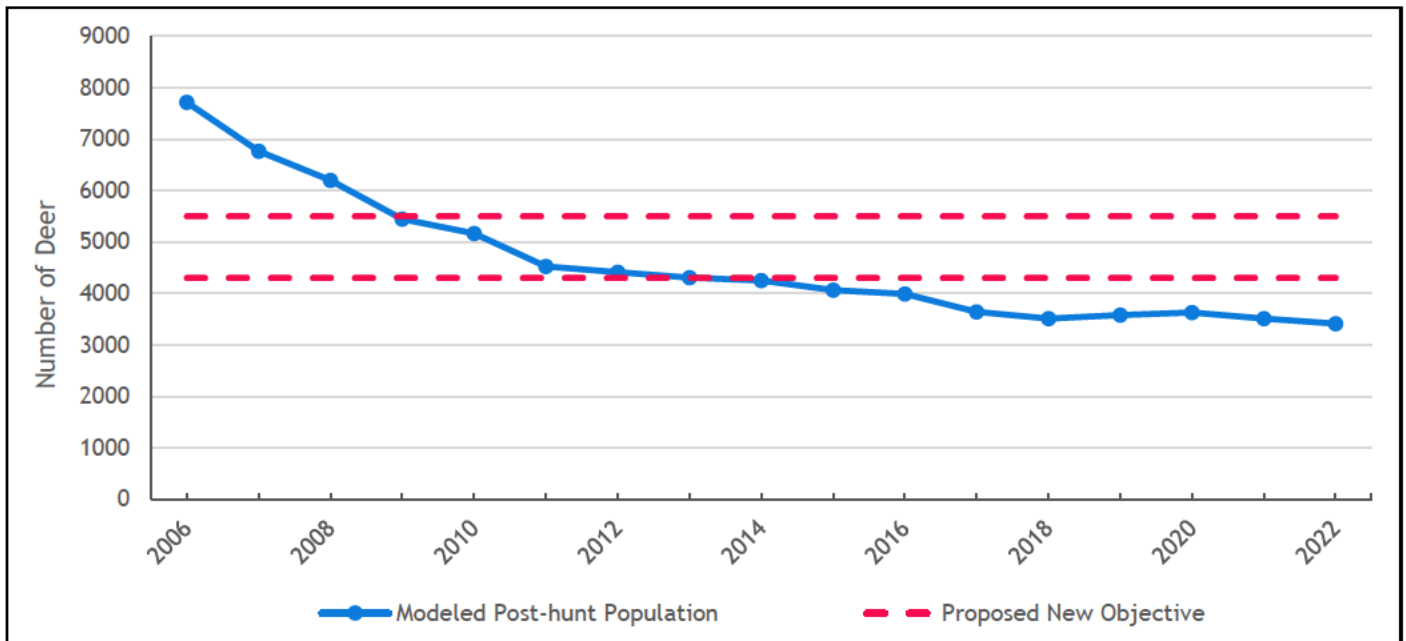
**Last HMP Approved Year: D-31 in 2010, D-37 in 2021**

**Post-hunt Population: Previous Objective: D-31 - 2,000-2,500, D-37 - 2,300-3,000; 2022 Estimate: D-56 3,400**

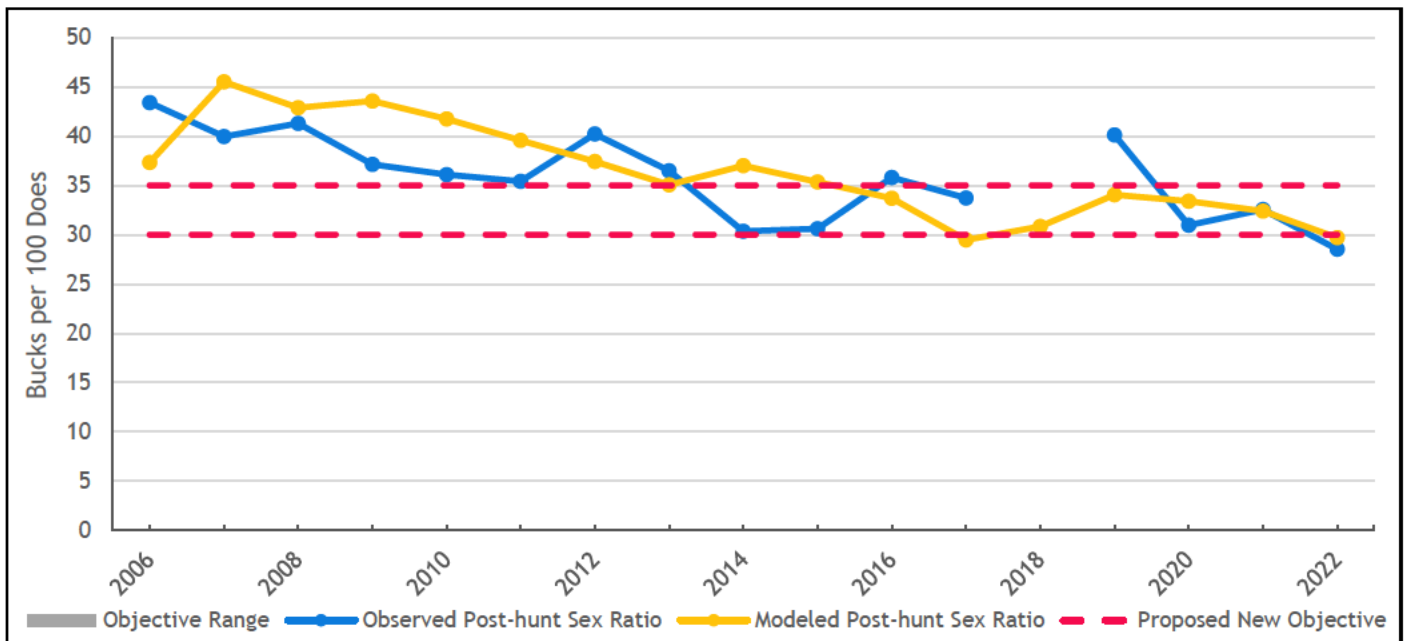
**Preferred Alternative: Maintain a combined population objective of 4,300-5,500 deer**

**Post-hunt Sex Ratio (bucks:100 does): Previous Objective:D-31 - 35-40, D-37 - 25-29; 2022 observed: D-31 - 30; 3-yr average modeled: 41; D-37 - 28; 3-yr average modeled: 31**  
**Preferred Alternative: 30-35 bucks:100 does**



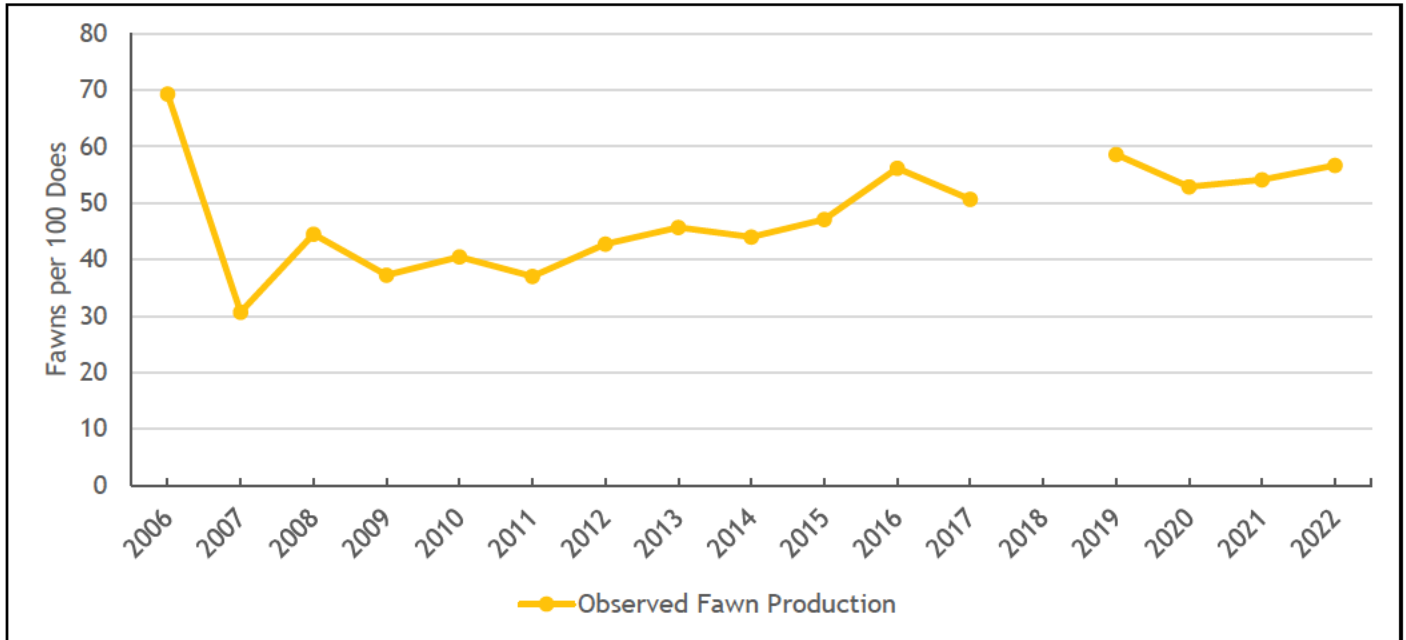


**Figure D56-1.** Deer DAU D-56 modeled post-hunt population and objective range, 2006-2022.

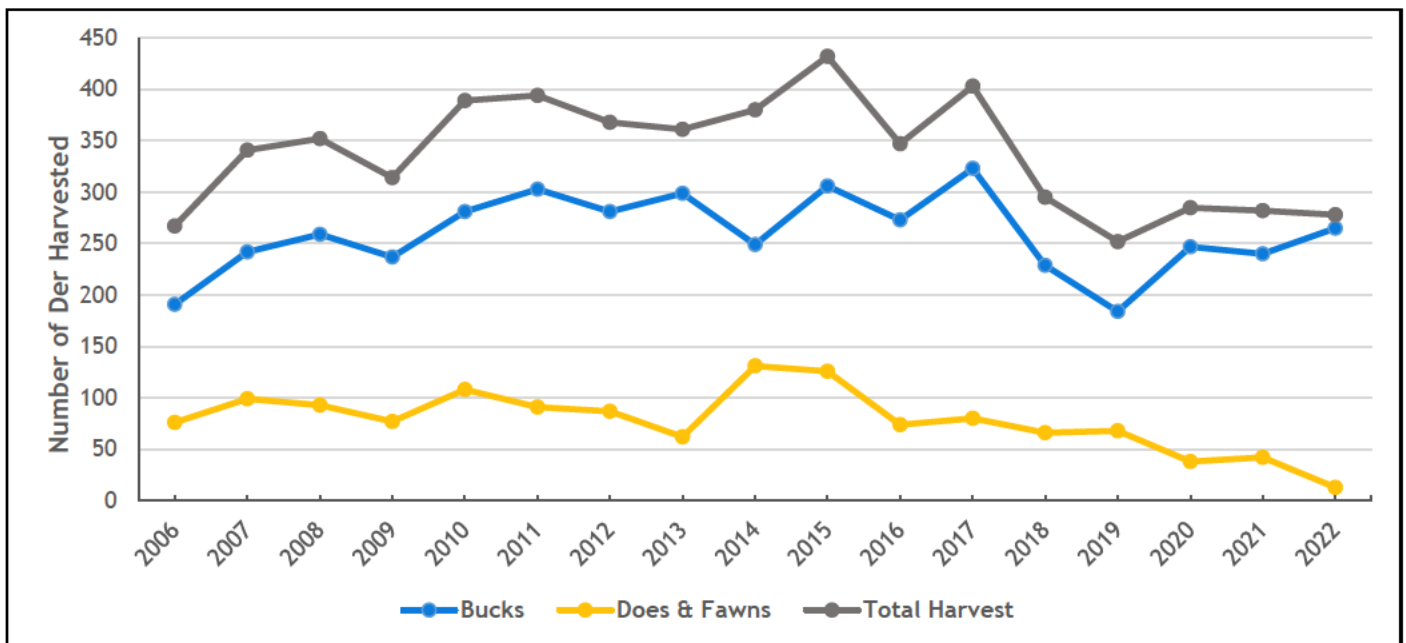


**Figure D56-2.** Deer DAU D-56 observed and modeled post-hunt sex ratio (bucks:100 does), 2006-2022.





**Figure D56-3.** Deer DAU D-56 fawn production (observed post-hunt fawns:100 does ratio, 2006-2022).



**Figure D56-4.** Deer harvest estimates in D-56, 2006-2022.

## Background Information

After careful consideration, CPW decided to combine two past adjacent DAUs, namely D-31 and D-37, into a single DAU, now referred to as D-56. The reason for combining the two DAUs into one larger geographical DAU is for CPW to model and manage the mule deer more efficiently on the east side of the San Luis Valley. In the past, poor DAU boundaries and sporadic data collection resulted in potentially underestimating the population in GMU 83 (southern herd) and potentially overestimating the population in GMU 82 (northern herd). The previous D-31 mule deer herd is in the southeastern region of the San Luis Valley, while the previous D-37 mule deer herd is in the northeastern region. This newly proposed DAU (geographic area) D-56 comprises the combined past D-31 and D-37 DAUs, each of which consists of a single Game Management Unit (GMU), 82 (in D-37), and 83 (in D-31), with an approximate area of 2,339 square miles. The mule deer winter range within D-56 includes roughly 657 square miles, whereas the summer range encompasses about 922 square miles. Portions of Alamosa, Saguache, and all of Costilla counties comprise the entire area. Public land constitutes about thirty-six percent of the DAU, while roughly sixty-four percent is privately owned.

Before 2006, the previous D-31 (GMU 83) and D-37 (GMU 82) herd population estimates fluctuated annually; however, there were several years in which CPW did not collect inventory data, or the data collected may have needed to be more accurate. Modeling the D-56 population from 2006 indicates it dropped from about 7,700 deer to almost 3,500 in the late 2010s. Since then, the population has remained relatively stable. In 2021, CPW updated the D-37 Herd Management Plan (HMP) population objective to allow for growth in GMU 82. Most mule deer hunters responding to the 2022 Big Game Harvest Survey for the GMU 82 were “somewhat satisfied” with the number of deer; however, a significant proportion would prefer to see more animals in the area. From the survey, most hunters would like to see an increase in the population over the next ten years.

On the contrary, CPW last revised the D-31 HMP in 2010, intending to stabilize the population estimate within the objectives at the time and allow for growth. According to the 2022 Big Game Harvest Survey, most deer hunters were relatively satisfied with the number of deer in GMU 83. However, the hunters would like the population to stay relatively stable over the next ten years with a slight increase. Nonetheless, the mule deer herd in GMU 83 is not evenly distributed; it is primarily located on private land in the northern portion of Costilla County, particularly in the fall and winter. Furthermore, the movement of animals between GMU 82 and 83 is known to occur.

Since 2006, the observed post-hunt sex ratios in GMUs 82 and 83 have also fluctuated considerably. Much of the fluctuation may have been due to annual inconsistent sightability factors and the distribution of animals with varying weather conditions, combined with movements across GMU boundaries. CPW raised the sex ratio objective in GMU 82 in 2021 to 25-29 bucks:100 does to manage for more mature bucks than the previous (2010) HMP while still allowing for hunter opportunities on public land. Since implementing the objectives for GMU 82, the observed sex ratio has been at the upper end of the desired range. Alternatively, GMU 83's observed sex ratio has been within or slightly lower than the objective range set in 2010. The area south of Hwy 160 is predominantly privately owned, making managing precisely to a desired sex ratio objective challenging. Nonetheless, the hunting community, private property owners, and CPW personnel would like to maintain management for a more mature buck population within GMU 83. Thus, CPW intends to manage for a slightly lower buck ratio in GMU 82 while providing improved public hunting opportunities and managing for a higher buck ratio in GMU 83 because of land ownership constraints and safety concerns. Thus, a median overall D-56 objective of 30 - 35 bucks:100 does is preferred.

For this revised HMP, modeling the combined northern (GMU 82) and the southern (GMU 83) mule deer populations within the larger geographical context, the modeled sex ratio dropped from the late 2000s (at approximately 45 buck:100 does) to the late 2010s (to around 29 bucks:100 does). Since then, the modeled sex ratio has remained relatively stable within the newly revised D-56 sex ratio objective range.

Before CPW limited buck licenses in 1999, the annual buck harvest in GMU 82 averaged approximately 220 animals. From that time through to 2006, the reduction in licenses resulted in an average harvest of 75 animals, but the sex ratio rose rapidly. To curb the rising sex ratio, CPW started increasing the buck licenses in 2007. Thereafter, CPW incrementally increased the licenses to reduce the sex ratio to the objective range set in 2010 and again in 2021. As for GMU 83, until 2021, management of license numbers was predominantly controlled by private landowners, most notably the Trinchera Ranch, under a "Ranching For Wildlife" (RFW) agreement with oversight by CPW. Nonetheless, since 2022, the Trinchera Ranch has withdrawn from the RFW program, resulting in fewer animals being harvested, particularly does. Before 2010, the buck harvest in GMU 83 averaged approximately 180 bucks, and 80 does. Since implementing the previous HMP in GMU 83, the buck harvest dropped to about 120 animals and doe harvest to 70 animals, with only 13 does harvested in 2022. For the entire geographic area for this HMP, the average harvest since 2010 is around 270 bucks, and 70 does, with significantly less doe harvest in 2022. However, the harvest is not evenly distributed throughout the DAU D-56 area, particularly in GMU 83. Most of the harvest in GMU 83 occurs in the northern area of Costilla County.

Additionally, license management is notably different between GMUs 82 and 83. For this new D-56 HMP, the mule deer in both GMUs will continue to be managed separately, as they have previously been under separate DAUs. The differences in management are due to the vast amount of private land that encompasses the southern half of D-56 in GMU 83, constraining precise local management. CPW will continue to allocate licenses to manage towards increased hunting opportunities and lower buck ratios in GMU 82. In contrast, CPW will manage GMU 83 at a lower license allocation to address human health and safety concerns, likely resulting in higher buck ratios, as in the past. The overall buck ration objective in D-56 will be the middle ground of these two ratios. CPW will also continue to provide depredation doe licenses as needed, which predominantly takes place south of Hwy 160.

Over the past ten years, the combined hunting-season success rates throughout D-56 have averaged 66%. However, harvest success rates are skewed between those in GMU 82, at approximately 46%, and those in GMU 83, at more than 86%. The harvest success differences between the northern and southern populations are likely due to deer distribution and available access. An example is the average archery success since 2013 in GMU 82 is about 16%; in contrast, the archery success in GMU 83 is around 69%. Comparatively, the harvest success in GMU 82 during the second and third rifle seasons is approximately 50% but more than 86% in GMU 83. Conversely, the harvest success rates do not vary significantly in the later fourth rifle season, when the animals are typically at lower elevations of the Sangre de Cristo mountain foothills; GMU 82 average success over the past ten years is about 81%, and GMU 83 success is around 72%. Since 2013, the muzzleloader season's success has fallen between the rifle and archery seasons, averaging 35% in GMU 82 and 89% in GMU 83.

### Management Concerns

Significant factors that may limit the D-56 population are the quantity and quality of winter range habitat. The winter range continues to diminish slowly, with increased development on private land and competition with domestic livestock fragmenting the range. Similarly, summer recreational activities continue to increase throughout the DAU but are restricted somewhat in the Costilla County portion of the area due to it being predominantly privately owned. The various anthropogenic impacts may affect distribution, reproduction, and fawning efforts, restricting population growth. Deer numbers dropped rapidly during the late 2000s until about 2011; the decrease continued but was considerably less until around 2018. The cause of the decline is unknown, but CPW attributed the cause to one or more of the following:

- 1) Interspecific competition with an increasing elk herd for limited resources.
- 2) Habitat succession limits the amount of quality habitat and forage available.
- 3) Record droughts from 1999 through 2004.

Nevertheless, since 2018, the population has stabilized but is trending below the objective range for this HMP.

Mule deer are not a significant problem on agricultural land in the northern half of the DAU, and depredation concerns are minimal. In contrast, the DAU's southern half is primarily under private ownership. Several large undeveloped residential subdivisions exist within the private land but with an established road infrastructure. Many private parcel owners are not on their property during hunting seasons when numerous hunters take advantage of the landowner's absence by hunting on these properties without their permission. Although this is illegal, hunters risk harvesting animals without the landowner's presence, thus avoiding trespass charges. The trespass concerns have created significant issues between hunters, landowners, and CPW from a human-safety aspect, illegal harvesting of wildlife, and the potential destruction of private property. CPW, along with local community support, limited rifle licenses during the second and third combined seasons because of these concerns for human health and safety. CPW will continue providing game damage and dispersal licenses to private landowners to address game damage issues. Localized problems may result from restricted mule deer distribution during the winter months. Nevertheless, private landowners who experience mule deer depredation concerns can access various management tools CPW offers. Similarly, CPW will address the trespass problems on a case-by-case basis.

**Management Alternatives**

In 2010, CPW considered two alternatives for the post-hunt population size objectives and three alternatives for the post-hunt sex ratio objectives in Data Analysis Unit D-31:

**Table D31-1. Proposed population objective ranges for the 2010 D-31 HMP.**

Post-hunt Population Objective Alternatives:	
2,000 to 2,500	(1) Status Quo - Approved
2,500 to 3,000	(2) Approximately 20% increase in objectives

**Table D31-2. Proposed buck ratio objective ranges for the 2010 D-31 HMP.**

Post-hunt Buck Ratio Objective Alternatives:	
25 to 30 Bucks per 100 does	(1) Decrease buck ratio objective by approximately 10 bucks per 100 does
35 to 40 Bucks per 100 does	(2) Status Quo - APPROVED
45 to 50 Bucks per 100 does	(3) Increase buck ratio objective by approximately 10 bucks per 100 does

In 2021, CPW updated the D-37 post-hunt population size and sex ratio relative to the context current at the time:

**Table D37-1. Proposed population objective ranges for the 2021 D-37 HMP.**

Post-hunt Population Objective Alternatives:	
2,300 to 3,000	(1) Approximately 20% increase in objectives - APPROVED

**Table D37-2. Proposed buck ratio objective ranges for the 2021 D-37 HMP.**

Post-hunt Buck Ratio Objective Alternatives:	
25 to 29 Bucks per 100 does	(1) Increase buck ratio objective by approximately 5 bucks per 100 does - APPROVED

For this HMP, D-56, combining the previous approved DAUs 31 and 37 and the higher and lower points of the past objectives:

**Table D56-1. Proposed population objective ranges for the 2024 D-56 HMP.**

Post-hunt Population Objective Alternatives:	
4,300 to 5,500	(1) Combination of previous objectives

**Table E56-2. Proposed buck ratio objective ranges for the 2024 D-56 HMP.**

Post-hunt Buck Ratio Objective Alternatives:	
30 to 35 Bucks per 100 does	(1) Combination of previous objectives

*Post-hunt Population*

The preferred management objective range for D-56 is to combine the previously approved objectives set for the northern population (GMU 82) in 2021 and the southern population (GMU 83) established in 2010 to an overall post-hunt population of 4,300 to 5,500 mule deer. CPW proposes monitoring and modeling the entire DAU as one entity; however, management will continue to differ between the mule deer in GMU 82 and GMU 83 based on land ownership, animal accessibility, and human safety concerns. The goal is to increase and maintain the herd through prudent management within the preferred objective range, simultaneously allowing for hunter opportunities within CPW control. The objective range allows the best balance and flexibility for managing the herd, recreational opportunities, minimizing agricultural conflicts, maintaining habitat carrying capacity, and creating a safe environment. Management for the life of this HMP would use the strategies mentioned below.

*Post-hunt Sex Ratio*

Similar to the population objective range, the preferred sex ratio objective range for the D-56 mule deer herd is to combine the previously approved objectives set for GMU 82 in 2021 and GMU 83 set in 2010 to an overall median post-hunt objective range of 30-35 bucks per 100 does. The range supports most stakeholder desires, preferring a slightly higher sex ratio objective in GMU 83, where licenses are highly limited, and a lower sex ratio in GMU 82, where hunting opportunities are greater and there is more accessibility to the animals. The preferred range allows for the best balance between satisfactory hunting experiences and the desired hunting opportunities throughout the DAU.

## Public Involvement

In 2020, CPW provided a draft HMP document for D-37 (Sand Dunes Deer Herd) to the public for a 30-day review. In addition, CPW sent the draft plan to the Bureau of Land Management (BLM), Baca National Wildlife Refuge (BNWR), Greater Sand Dunes National Park and Preserve (GRSA), local county commissioners, the local Habitat Partnership Program (HPP) committee, and the United States Forest Service (USFS) for review and commentary. The draft allowed all constituents to participate in the public process, including non-consumptive recreationists, hunters, landowners, local stores, or business owners. In 2009, CPW held a public meeting in Alamosa, CO, for the D-31 HMP (Trinchera Deer Herd), where local constituents representing different community stakeholder groups attended the meeting. CPW also provided a draft HMP online for a 40-day public review and to solicit feedback. Similar to the D-37 HMP, CPW sent a draft of the D-31 HMP to the local HPP committee and county commissioners. CPW's feedback from public involvement during the past HMP processes was that they were somewhat pleased with deer management in the areas. Most constituents would prefer to see more mule deer in the entire geographic area of D-56. However, CPW needs to be cautious about increasing the mule deer population in GMU 83 without increasing the distribution of the animals. CPW has re-examined and considered biological herd capabilities and social-political tolerance for this updated HMP. CPW will provide this updated HMP online for a 30-day public review; however, as stipulated earlier, there will be no changes to current management conducted in GMU 82 and GMU 83 within the DAU, and individual GMU management will remain separate.

## Preferred Management Objectives:

### *Post-hunt Population*

The preferred management objective for D-56 is a post-hunt herd **population of 4,300 to 5,500 mule deer**, aiming to maintain current management separately in the northern and southern populations and allow the overall herd to grow to the objective range. This objective range provides the best balance for managing the deer herd, hunting recreational opportunities, minimizing agricultural conflicts, and maintaining acceptable habitat-carrying capacity.

### *Post-hunt Sex Ratio*

The preferred post-hunt sex ratio objective range for the entire D-56 mule deer herd is attaining a median objective range to encompass the current sex ratio objectives in GMU 82 and GMU 83 to **30-35 bucks per 100 does**. The range supports most stakeholder desires, preferring management towards fewer licenses allocated, likely resulting in higher sex ratios in GMU 83 and a lower sex ratio in GMU 82 of the DAU. Establishing a median objective range for the current northern and southern population allows CPW flexibility to manage the different areas within the DAU safely, effectively, and within the needs and constraints of local constituents. The preferred range allows for the best balance between satisfactory hunting experiences, the desired hunting opportunities, and reducing human safety concerns.

## Strategies for Achieving the Preferred Objectives:

*Post-hunt Population* - CPW will continue collecting annual inventory data and managing to the preferred mule deer population objectives. The population should persist as long as fawn recruitment remains strong and public land doe hunting licenses are minimal. The Trinchera

Ranch may decide at some stage within the timeframe of this HMP to re-enlist into the RFW program, at which additional buck and doe harvest may take place. However, reenlistment is unknown and not currently within the Ranch's management plans. CPW will address potential reenlistment if requests emanate. Tools to control private land depredation issues will remain in place. CPW will consider public land doe harvest opportunities once the population estimate reaches the upper region of the preferred objective range or a significant deterioration in habitat conditions occurs.

*Post-hunt Sex Ratio* - CPW will maintain current and separate management of buck-hunting opportunities in GMU 82 (northern population) and GMU 83 (southern population) to sustain the observed and predicted sex ratio within the overall DAU preferred objective range. After that, CPW will monitor the D-56 entire herd and individual populations within to balance buck-hunting opportunities and the mature buck level relevant to the objective range. CPW will be mindful of maintaining a higher adult buck population in GMU 83 with the restriction of licenses, human safety concerns, and improved hunting opportunities in GMU 82. Expected harvest from the buck licenses should sustain an acceptable mature buck population and stakeholder satisfaction within the preferred objective range. The objectives, particularly in the GMU 82, should reduce the risk of CWD from the higher sex ratio levels CPW has observed in the past.

#### **CPW Commission Approved Objectives:**

*Post-hunt Population:* 4,300 - 5,500 deer

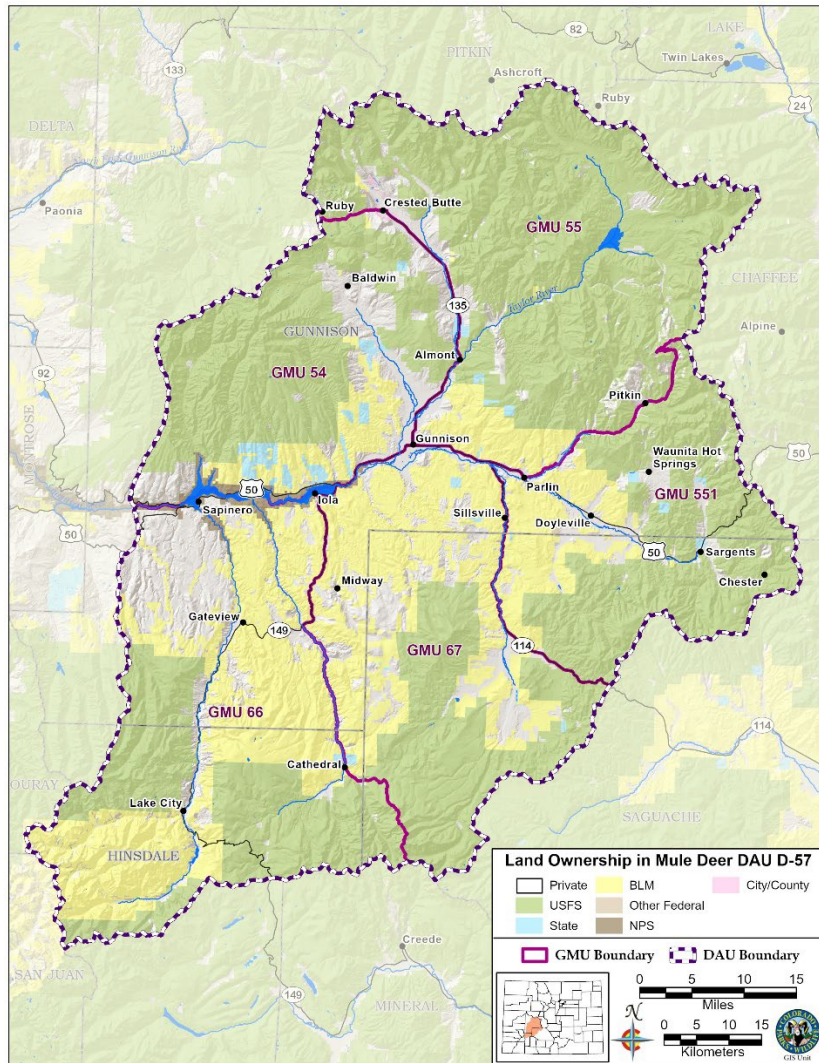
*Post-hunt buck ratio:* 30 - 35 bucks:100 does

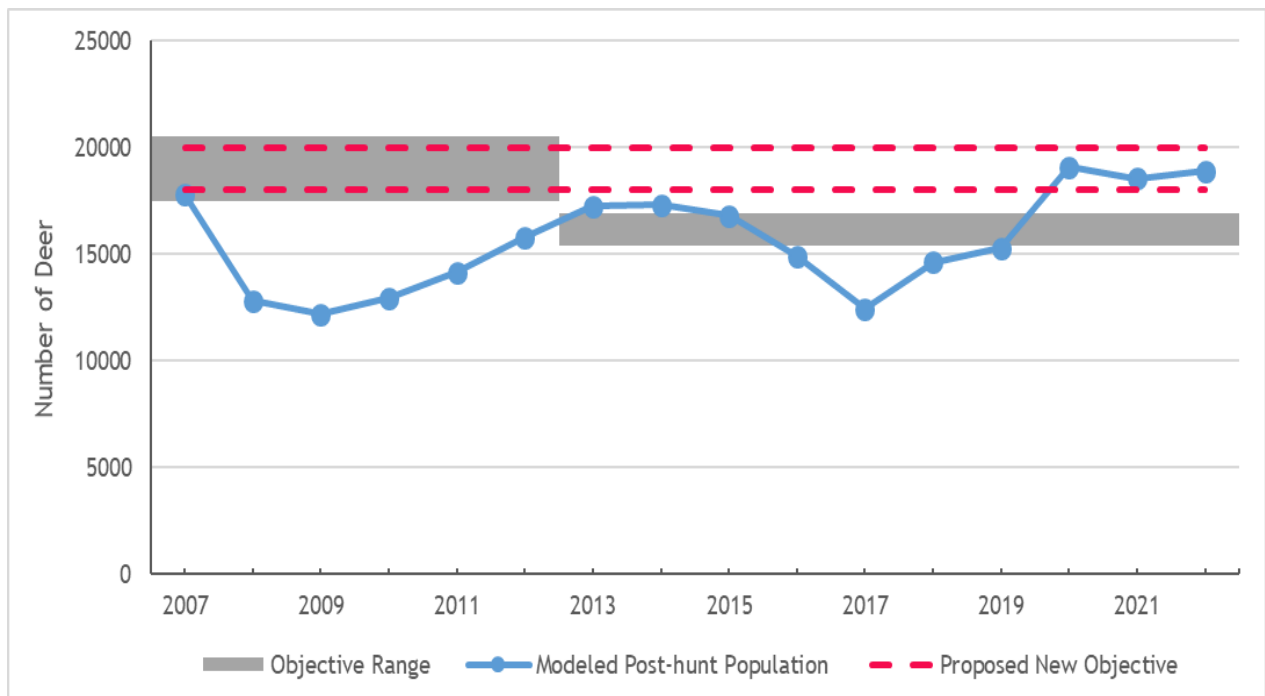


## GUNNISON BASIN DEER HERD MANAGEMENT PLAN REVISION DATA ANALYSIS UNIT D-57

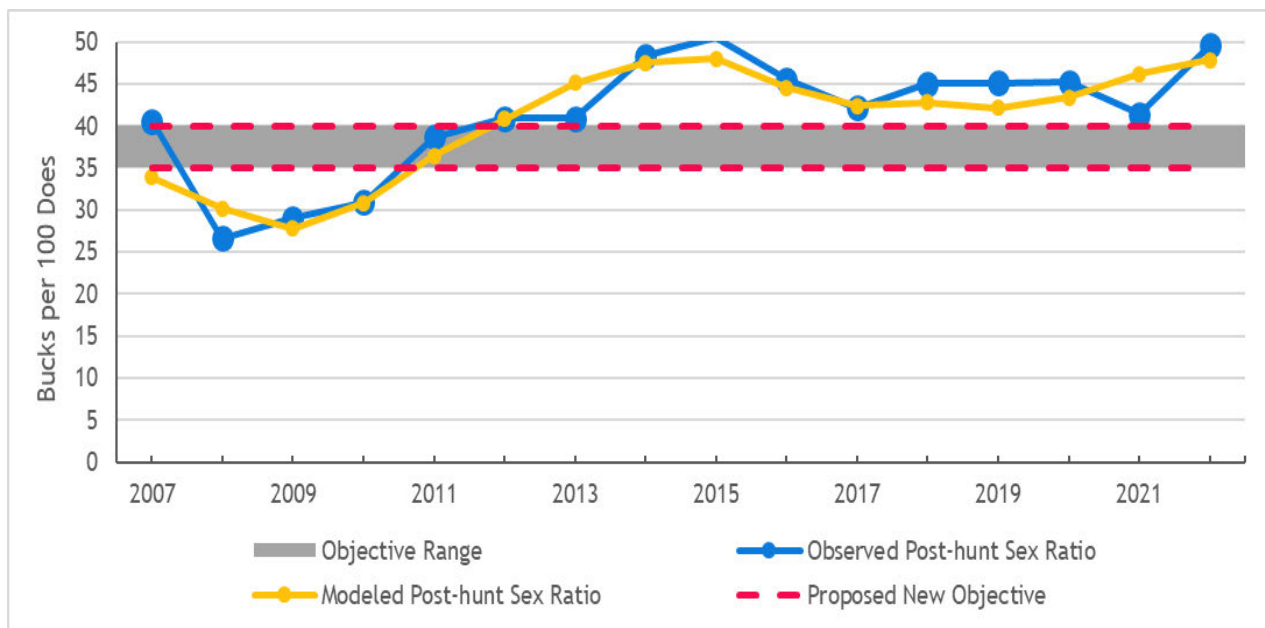
Alyssa Meier, Wildlife Biologist, Gunnison

<b>Gunnison Basin Deer Herd (DAU D-57)</b> <b>Last HMP Approval Year: 2013</b>	<b>GMUs: 54, 55, 66, 67, and 551</b>
Post-hunt Population: Previous Objective: 15,400-16,900 (combined D-21, D-22, D-25) 2022 Estimate: 18,900 <b>Preferred Alternative: <u>17,000-20,000 deer</u></b>	
Post-hunt Sex Ratio (bucks:100 does): Previous Objective: 35-40 2022 observed: 50; modeled: 48 <b>Preferred Alternative: <u>35-40</u></b>	

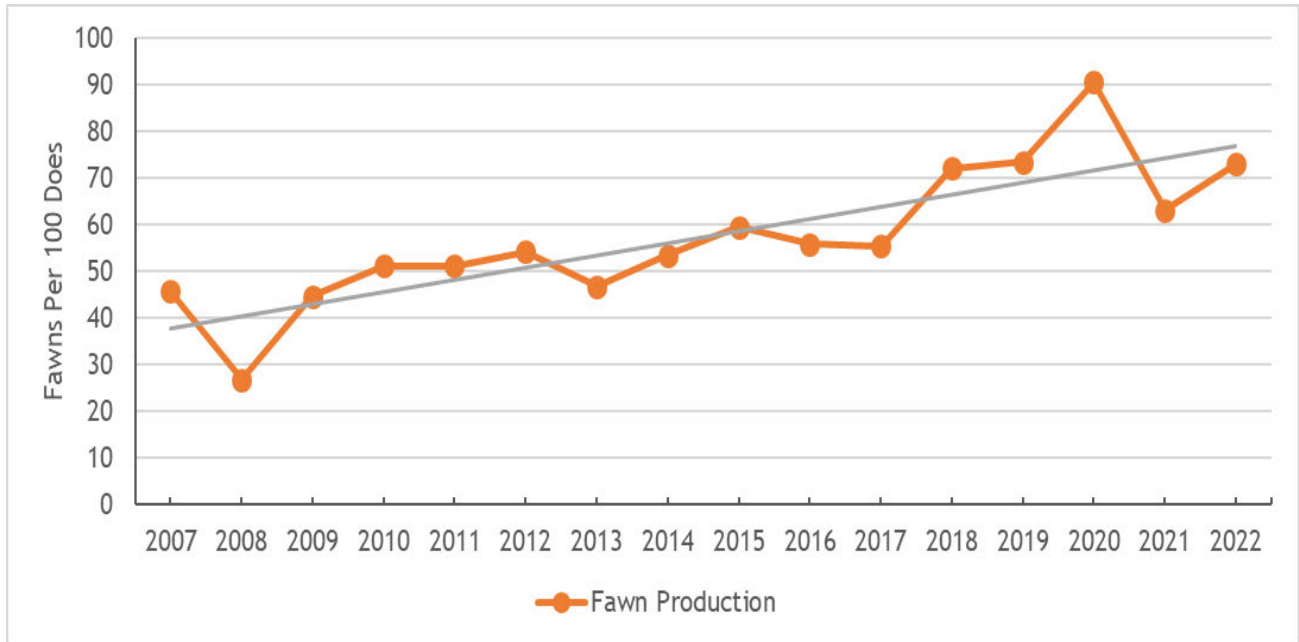




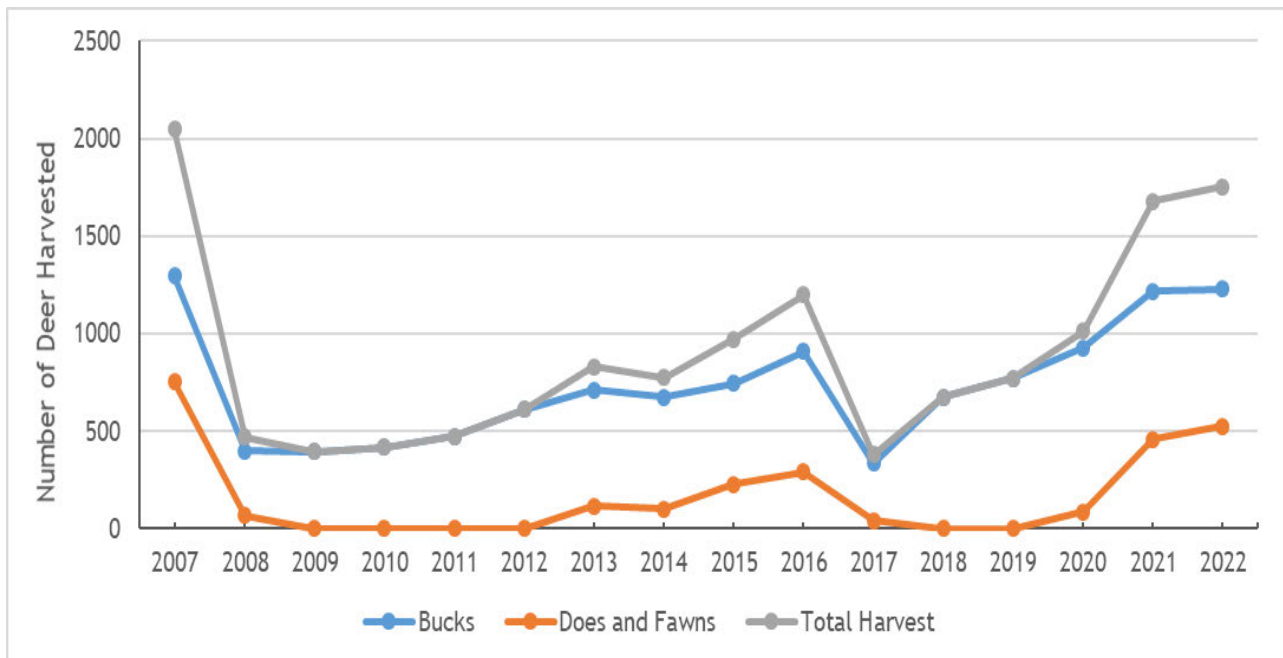
**Figure D57-1.** Deer DAU D-57 modeled post-hunt population estimate and objective range, years 2007-2022.



**Figure D57-2.** Deer DAU D-57 observed and modeled post-hunt sex ratio (bucks:100 does), years 2007-2022.



**Figure D57-3.** Deer DAW D-57 fawn production (observed post-hunt fawns:100 does, years 2007-2022).



**Figure D57-4.** Deer harvest estimates in D-57, years 2007-2022.

## Background Information

The Gunnison Basin Deer Population is now designated as Data Analysis Unit (DAU) D-57. It is located in southwest Colorado and encompasses Game Management Units (GMUs) 54, 55, 66, 67, and 551. The DAU is 3,589 square miles and includes portions of Gunnison, Hinsdale, and Saguache counties. The DAU is bounded on the north by the Gunnison-Pitkin Co. line, on the east and south by the Continental Divide, and on the west by the Hinsdale-San Juan Co. line, Hinsdale-Ouray Co. line, Cimarron River-Henson Creek divide and Big Blue Creek-Little Cimarron River divide, U.S. 50, Big Blue Creek, and Curecanti Creek. The towns of Gunnison, Crested Butte, and Lake City are located within the DAU. Land ownership in the DAU is 56% U.S. Forest Service, 25% Bureau of Land Management, 16% private, 1% National Park, and 1% CPW and State Land Board. Historically, this DAU has been managed as three DAUs: D-21, D-22, and D-25. Following discussions both internally and with the local community and stakeholders, CPW staff have decided to combine the three DAUs into one larger DAU encompassing the Gunnison Basin to better and more efficiently manage what is biologically one large deer population. Nearly 15 years of radio collar monitoring supports this new management paradigm.

The previous post-hunt population objectives for D-21, D-22, and D-25 were set in 2013 at 5,000-5,500 for both D-21 and D-22, and 5,400-5,900 for D-25. These populations suffered a significant winter-related die-off during the winter of 2007/2008, and to a lesser extent during the winter of 2016/2017, but have since rebounded to a current combined deer population estimate of approximately 18,900 deer (Figure D57-1). Based on a comprehensive assessment of biological data, and following engagement with hunters and other stakeholders such as the local Habitat Partnership Program (HPP) committee and the Gunnison Wildlife Association (GWA), CPW staff are proposing a new population objective of 17,000-20,000, which spans the post-hunt 2022 estimate. This objective would be an increase from the previous combined population objective of 15,400-16,900 deer for the current combined D-21, D-22, and D-25 DAUs.

The previous post-hunt buck:doe ratio objectives for D-21, D-22, and D-25 were set in 2013 at 35-40 bucks per 100 does. The average observed post-hunt buck ratio from 2007 to 2022 for these three DAUs was 41 bucks:100 does with a range of 27-50 (Figure D57-2). The observed three-year (2020-2022) average of 45 bucks:100 does is above the post-hunt buck:doe ratio objective for these three DAUs. CPW staff recommends that the sex ratio objective for DAU D-57 remain at 35-40 bucks:100 does.

Post-hunt fawn ratios and recruitment may be a good indicator of habitat conditions, herd health, and herd size relative to carrying capacity. Observed post-hunt fawn ratios averaged 57 fawns:100 does (range 27-90) between 2007 and 2022 (Figure D57-3). Above average fawn:doe ratios have been observed in the Gunnison Basin over recent years with concomitant population growth. In 2022 the observed five-year post-hunt average was 74 fawns:100 does.

Buck harvest has averaged 737 animals since 2007, but has varied greatly, with a low of 338 bucks harvested in 2017 and a high of 1,295 in 2007 (Figure D57-4). In 2022, the five-year average buck harvest was 964 animals. Success rates for hunters do not vary greatly, with the number of bucks harvested driven primarily by population size and the number of licenses available. Public land and private-land-only antlerless licenses are currently available in this DAU, with license allocation based on population size relative to the objective. Since 2007, antlerless harvest (does and fawns) has averaged 167 animals annually, ranging from zero

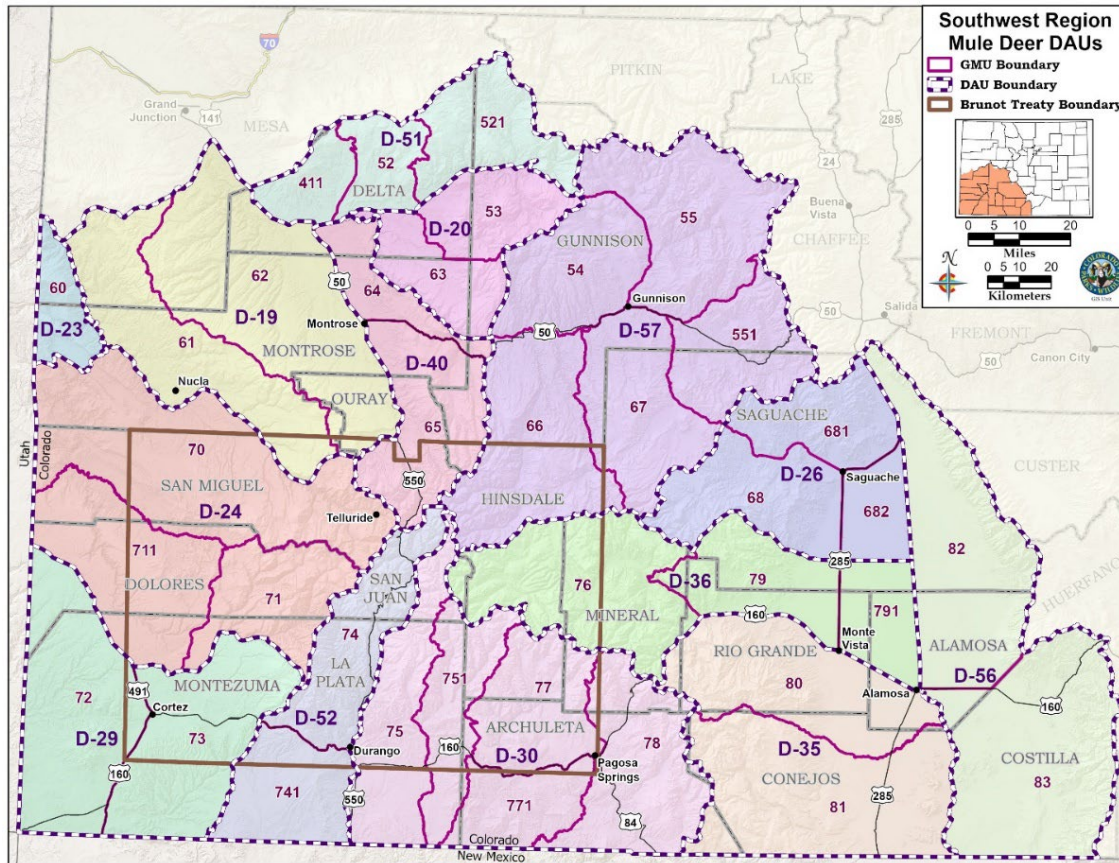
following harsh winters resulting in population declines, to 754 in 2007 (Figure D57-4). A combined estimate of 525 does and fawns were harvested in 2022.

Recent big game hunter survey data indicates that hunters are generally satisfied with their deer hunting experience across the Gunnison Basin, but there is some desire to see a slight to moderate increase in the deer population. In the winter-driven system of the Gunnison Basin, hunter preferences and experience must be weighed against habitat considerations and the biological carrying capacity of the landscape. Furthermore, Gunnison Basin hunters also indicated by a 3-1 margin that they prefer to be able to hunt mature bucks even if it means hunting less often. All buck licenses in the Gunnison Basin, and across Colorado, were limited in 1999. A variety of hunting seasons and opportunities are presently available across D-57, including archery and muzzleloader seasons during the month of September, as well as three regular rifle seasons across the months of October and November. CPW's Big Game Season Structure policy mandates season dates and timing, and is evaluated and updated every five years.

### **The Brunot Agreement of 1873**

In 1873, the confederated bands of Utes ceded a large portion of their 1868 reservation to the Federal government under a treaty commonly known as the "Brunot Agreement." This ceded area - or "Brunot Area" - is approximately 3.7 million acres of the San Juan Mountain region of southwest Colorado and includes many of the herds in this herd management planning document (Figure D57-5). Contained within the 1873 Agreement was an important provision reserving for the Utes the right to "hunt upon said land so long as the game lasts and the Indians are at peace with the white people." Despite the continued loss of lands, the corresponding reduction in the size of the Ute reservation, and the relocation of certain Ute bands outside of Colorado - this reserved right within the Brunot Area has remained undiminished to this day. In 2008, the Southern Ute Indian Tribe entered a new agreement - this time with the State of Colorado - addressing the Tribe's exercise of its long-held Brunot Area hunting and fishing rights. The Ute Mountain Ute Indian Tribe entered into a similar agreement with the State of Colorado in 2013. These agreements - or Memorandums of Understanding (MOUs) - detail how the Tribes and State approach Brunot Area hunting, fishing, and wildlife law enforcement, and expresses the intent of Tribal and State governments to work cooperatively towards the long-term conservation of wildlife within the Brunot Area. With the completion of the MOUs, Tribal Members can exercise the Tribe's long-held rights to hunt and fish within the Brunot Area in accordance with regulations established by the Tribes and State.

Thirteen percent (13%; 470 square miles) of the D-57 DAU is located within the Brunot Area. Working in tandem with our Tribal neighbors is of utmost importance to CPW as we cooperatively manage wildlife species, including elk, migrating seasonally across political boundaries. Annual meetings, harvest reporting, and open communication have allowed CPW and the Tribes to collaborate on population monitoring, radio-collaring efforts, and habitat improvement and connectivity. Tribal lands provide essential winter ranges and other seasonally-important habitats for a variety of wildlife, and the partnership between CPW and the Tribes is critical for future wildlife conservation in southwest Colorado.



**Figure D57-5.** The Brunot Treaty area, established in 1873 as an agreement between the Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, and the US Government preserving hunting and fishing rights for Ute tribal members.

### Significant Issues

Many issues surround mule deer management in the Gunnison Basin, and they generally fall into either a biological or socio-political category. Many of the issues raised during this planning process were similar to those discussed in 2012 during the previous planning effort. There are multiple important factors influencing mule deer population dynamics in the Gunnison Basin other than hunter harvest. Some of those factors include, but are not limited to, winter and drought severity, habitat availability and condition, fragmentation, competition with elk, increasing traffic volumes on local highways, and overall human development and expansion. A significant concern in D-57 is cumulative impacts on mule deer habitats, including winter range, migration corridors, production areas, and high-elevation summer ranges, due to human encroachment and anthropogenic influence. Exurban development continues throughout the DAU, impacting open lands supporting seasonal mule deer habitat. Outdoor recreation has increased dramatically, fragmenting habitat and diminishing effectiveness. Managers and the public remain concerned over the cumulative and prolonged impacts of development and associated land uses, decreasing the quality and quantity of available habitat, thus potentially reducing animal carrying capacity. Future actions to protect and enhance habitat will be essential for maintaining the Gunnison Basin deer population.

Like many places in the Rocky Mountain West, spring and summer ranges in D-57 are more expansive than the limited winter range. Most winter range areas occur many miles from summer range and can only be reached following lengthy migrations. Winters may be severe in the Gunnison Basin and the quantity and quality of winter habitat is arguably the primary limitation for herd productivity and sustainability in this region. Although superbly adapted to Rocky Mountain climates, mule deer in the Gunnison area are periodically subjected to severe winters which may result in significant mortality. The winters of 1978-79, 1983-84, 1996-97, 2007-08, and 2016-17 are recent examples of how unforgiving winters may be in the area. In modern times, dramatic population fluctuations are highly undesirable to the general public and big game hunters, based on the emotional response to seeing large numbers of animals die and the potential impacts on hunt quality and opportunity. The same may be said for local economic interests that rely on predictable levels of wildlife-related tourism. CPW maintains a policy pertaining to feeding big game animals during severe winters, and supplemental feeding programs have been initiated during four of the five winters previously mentioned with variable success. The winter of 2007-08 was particularly severe and had lasting repercussions.

Mule deer management in the Gunnison Basin is ultimately constrained by severe winters, and the ecological carrying capacity of winter range. During harsh winters, big game in the Basin tend to congregate along highway corridors, particularly along US Highway 50, making them extremely visible and vulnerable to vehicle collisions. Highway traffic volumes have increased markedly over the last 10 years, and will likely continue to increase into the future. Animals in declining body condition paired with excessive roadkill, often leads to advocacy for CPW-led supplemental feeding operations. In addition, there is a lengthy history of winter feeding and baiting efforts in Gunnison, which has led to an expectation for such programs, despite their questionable efficacy and considerable cost. Determining a precise winter carrying capacity across D-57 has proven challenging in the past, and capacity may change annually based on the current year's conditions. While many hunters desire to see more animals across the landscape, wildlife managers must remain conscious of habitat capacity when setting HMP objectives. The hunting community and the general public should not expect supplemental feeding programs during severe winters, and instead should direct their advocacy toward habitat conservation and mitigation for seasonal conflicts, including wildlife-vehicle collisions. Furthermore, Chronic Wasting Disease (CWD) has not yet been detected in the Gunnison Basin, but occurs in neighboring DAUs to the north, west, and south. Future management and discussions related to supplemental feeding or baiting programs should include ongoing consideration of CWD presence and prevalence, with efforts made to avoid the expansion and proliferation of the disease into D-57.

A key element of mule deer management is the public's desired level of hunting opportunity. Some hunters prefer to hunt every year, whereas others would wait five or more years to hunt in a highly sought-after unit. Some hunters forego multiple years of hunting in order to build preference points, while others are willing to buy expensive landowner vouchers to hunt every year. Mature mule deer bucks remain one of the most sought-after big game animals in the western United States, and hunters continuously seek opportunities to hunt mature deer. Demand for limited deer licenses in the Gunnison Basin remains high. For the 2023 rifle seasons, the average number of preference points (across D-57) required to draw an antlered license for a Resident or a Non-Resident was as follows: Second Rifle- 1 Res/4 Non-Res; Third Rifle- 7 Res/15 Non-Res; Fourth Rifle- 12 Res/22 Non-Res. The trade-offs of maintaining mature bucks and high buck:doe ratios while providing reasonable hunting opportunities continues to be discussed and debated amongst constituents.

## Management Alternatives

Three post-hunt population objective alternatives were considered for D-57:

Table D57-2. Proposed and recommended population objective ranges for the D-57 revised 2024 HMP.

Population Objective Alternatives:	
17,000 to 20,000 (midpoint 18,500)	(1) Moderate increase from previous combined D-21, D-22, and D-25 population objectives, but congruent with current population estimate of 18,900 deer
16,000 to 19,000 (midpoint 17,500)	(2) Slight increase from previous combined D-21, D-22, and D-25 population objectives, but congruent with current population estimate of 18,900 deer
15,000 to 18,000 (midpoint 16,500)	(3) Status Quo of combined D-21, D-22, and D-25 population objectives, but below the current population estimate of 18,900 deer.

Three post-hunt sex ratio objective alternatives were considered for D-57:

Table D57-2. Proposed and recommended sex ratio objective ranges for the D-57 revised 2024 HMP.

Sex Ratio Objective Alternatives:	
40-45	(1) Increase in the proposed objective range
35-40	(2) Status Quo (Maintain current sex ratio)
30-35	(3) Decrease in the proposed objective range

## Management Objectives

CPW staff recommend an increase to the D-57 population objective from the previous D-21, D-22, and D-25 DAU Plan objectives of 15,400-16,900 deer. A revised population objective of 17,000-20,000 is generally congruent with the current population estimate of 18,900 deer. Winter range availability and severe winters are the limiting factors for this mule deer population, therefore increasing the objective beyond 20,000, based on current population estimates, is not advisable. Game damage is minimal in the Gunnison Basin and would continue to be addressed as needed through existing management tools including PLO hunt codes or targeted damage hunts. The majority of hunters who responded to CPW surveys in 2021 and 2022 indicated that they are satisfied with their current hunting experience, but would like to see a slight or moderate increase in the population. Increasing the population objective through this planning process supports that desire by maintaining the D-57 deer herd at or slightly above the current estimate of nearly 19,000 deer.

The post-hunt buck:doe ratio objectives for D-21, D-22, and D-25 were all set at 35-40 bucks per 100 does in 2013. CPW staff propose to keep the same objective for the combined D-57 DAU. Most Gunnison Basin deer hunters who responded to CPW surveys in 2021 and 2022 were generally satisfied with the number of bucks in the population, and prefer to hunt mature bucks as opposed to hunting every year. This relatively high buck:doe ratio objective ensures that mature bucks are maintained within the population, although hunter selectivity, technology, and information sharing all contribute to what hunters may see across the landscape during annual hunting seasons.



## Strategies for Addressing Management Issues and Achieving Objectives

### Population size:

Since license limitations in 1999, discussion and debate relative to mule deer management in the Gunnison Basin has fundamentally revolved around a public desire for the largest deer population possible as well as sustained numbers of mature bucks. These discussions have been tempered based on consideration of winter range carrying capacity and the potential for significant die-offs during severe winters, as well as on-going assessment of annual hunting opportunity. The objectives proposed in this HMP are not entirely based on the threat of severe winters, however responsible and pragmatic management must account for winter range carrying capacity, and the myriad of issues associated with severe winters in the Gunnison Basin. Supplemental feeding should not be considered a surrogate for quality mule deer habitat, or as the perfect remedy for saving animals during severe winters. During the winter of 2007-08, despite an extraordinary supplemental feeding program, during which more than 10,000 deer were present on feed grounds, managers estimate that between 40-50% of the overall deer herd perished. It remains in the best interest of all mule deer stakeholders to help ensure that mule deer habitat is conserved and preserved in perpetuity.

### Sex Ratios/License Allocation:

CPW managers are tasked with managing to the objectives established in Herd Management Plans. Objectives are achieved by sustaining, increasing, or decreasing license quotas in relation to post-season population and sex ratio estimates. License allocation may fluctuate on an annual basis, particularly in stochastic systems like the Gunnison Basin where ‘bust or boom’ cycles are well documented. Within CPW’s current management paradigm, there is no capacity to specifically manage for certain age-classes of bucks, or to manage for specific antler characteristics. A sex ratio objective of 35-40 post-season promotes a diversity of age-classes within the D-57 population, however a sex ratio objective alone cannot ensure the maintenance of mature bucks. As stated previously, hunters must recognize that what they see on the landscape is a reflection of management, but also of hunter selectivity, technological advancements in hunting, information sharing and accessibility, season structure and annual weather conditions, and habitat security/animal vulnerability.

### Hunter Crowding & Experience:

Discussions relative to hunter crowding and experience have increased over the last ten years. CPW recognizes these issues and also understands that the perception of “crowding” may be different between individual hunters. Mule deer licenses for Gunnison Basin units are in high demand, which is reflected in preference point requirements. This is particularly true for non-residents who commonly use between 10-25 preference points to hunt during rifle seasons. This ‘expenditure’ of preference points often comes with extremely high expectations, both in terms of the experience of the hunt as well as the animal desired. The 2022 harvest survey indicated that a majority of hunters are satisfied with their overall deer hunting experience in the Gunnison Basin, however there continues to be concern with hunter distribution and crowding, particularly in the northern Gunnison Basin where bull elk licenses are Over-The-Counter (OTC) during the second and third rifle seasons. CPW managers are continuously exploring ways to address crowding and hunter distribution, although as stated previously, hunter distribution is now significantly influenced by the availability of information and other resources available to hunters, which is outside the control of CPW. Managing to objective requires allocating licenses to the level necessary for influencing the population. When a herd is performing well, more licenses are necessary for curbing population growth, which may compound existing hunter distribution and crowding concerns.

CPW is currently evaluating several management issues that could affect hunter crowding including the option to hunt deer during the first rifle season, and the sustainability and efficacy of OTC elk licenses.

#### Chronic Wasting Disease (CWD):

Chronic Wasting Disease is a prion disease affecting deer, elk, and moose in Colorado. A growing body of evidence suggests that CWD impairs long-term herd performance when the infection rate, or prevalence, becomes too high. There have been no positive CWD cases in the Gunnison Basin at this time, despite the presence of the disease in several adjacent Game Management Units (GMUs). CPW has documented radio-collared animal exchange between several of these GMUs, which is hypothetically perpetuating an unknown level of risk for CWD introduction to the Basin. The current management objectives are not entirely based on mitigating for CWD risk; however, responsible management should recognize the potential for CWD and the correlations between population density, animal age structure, supplemental winter feeding, and the cultural significance and ecosystem service (ie. food) that hunting mule deer provides.

#### Habitat Protection:

CPW recognizes the importance of habitat protection and enhancement. Local managers will continue to support conservation easements and land acquisitions that benefit big game and protect habitat connectivity between seasonal ranges. In addition, CPW will continue to support and advocate for projects that promote movement across the landscape for wildlife and enhance public safety, including the development of underpasses and overpasses on State and Federal highways. CPW will continue to engage and collaborate with land management agencies including the USFS, BLM and NPS, private landowners, County Governments, CDOT, and NGOs, advocating for habitat protection and enhancement across jurisdictions. Wildlife habitat is being developed and fragmented at an unprecedented rate across Western Colorado. The quantity and quality of habitat will dictate big game population performance into the future. Much to the chagrin of managers, big game hunters, and wildlife enthusiasts, many recent HMP objectives have been reduced from previous objectives as a result of reduced habitat carrying capacity over time. All Coloradan's must recognize that large, intact blocks of habitat are necessary to sustain our wildlife resources across the state. Collaboration between all stakeholders and resource managers is paramount for making informed and transparent land use decisions.

#### **Stakeholder Outreach**

Each year, a random sample of big game hunters are selected to participate in post-season harvest surveys to derive annual harvest estimates. In addition to their primary harvest survey, hunters may choose to answer several questions exploring their satisfaction with various aspects of their hunt. CPW has referred to these as "opt-in" questions. In 2022, 1,016 respondents (out of 2,814 hunters) answered these opt-in questions for the D-57 hunting units. Overall, hunters were generally satisfied with their hunting experience and the number of deer they saw, but wanted to see a slight to moderate increase in the deer population. Hunters also preferred hunting mature bucks (higher buck ratio) over hunting more often (lower buck ratio) by a 3-1 margin. Hunter crowding was an issue in some GMUs, and less so in others. These opt-in survey results have proven useful for evaluating Herd Management Plan objectives, and exploring hunter attitudes toward current and future management.

Area 16 CPW staff regularly engage with various constituents, both formally and informally, in discussions about mule deer management in the Gunnison Basin. CPW staff met with the Gunnison Wildlife Association and the Gunnison Basin Habitat Partnership Program committee in August 2023, and with the Gunnison County Stockgrowers Association in November 2023, to discuss management alternatives related to this Herd Management Plan revision. The draft HMP, with a pre-recorded video, was also sent out as a press release and posted on the CPW website for 30 days, allowing stakeholders to comment on the alternatives in the plan.

**CPW Commission Approved Objectives:**

*Post-hunt Population:* 17,000 - 20,000 deer

*Post-hunt buck ratio:* 35 - 40 bucks:100 does

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## Appendix A: Southern Ute Indian Tribe Comment Letter



# SOUTHERN UTE INDIAN TRIBE

Jamin Grigg  
Senior Terrestrial Biologist  
Colorado Parks and Wildlife  
415 Turner Drive  
Durango, CO 81303

December 12, 2023

Mr. Grigg,

Thank you for the opportunity to comment on the draft Southwest Region Deer Herd Management Plans (HMPs). Mule deer resources are very important to the Southern Ute Indian Tribe, and I appreciate your attention to reaching out to the Southern Ute Wildlife Resource Management Division for review and comment on these plans.

There are fourteen HMPs covered in the draft document. Of those, approximately seven Data Analysis Units (DA Us) fall completely within, or have significant area contained within, either the Southern Ute Indian Reservation or the Brunot Area. These include D24, D29, D30, D36, D40, D52, and D57. I'm encouraged to see that the proposed population objectives of each of these DA Us is to either maintain current numbers or to increase them if possible. Herd population trends in these DAUs have either been static or declining over the past 20 years and so maintaining present numbers may be the best that can be achieved with the current pressures on the herds and the landscapes they depend on. To achieve population growth, fawn survival and recruitment must be increased; something easier said than done. Drought persistence and concomitant habitat degradation due to lack of moisture and invasive weed and grass invasions are hardest on the youngest segment of these herds. CPW does a very good job at identifying and instituting habitat improvement projects, and continuing focus on restoring or enhancing winter range and transitional habitats will ultimately relieve some of these pressures.

In general buck to doe ratio objectives for these plans going forward are static at 25-30 bucks per 100 does across the HMPs. This range appears to balance state hunter opportunity with some degree of quality as well. Over the past decade, warm fall and early winter seasons have become the norm. Warm late season hunts in our region tend to reduce state harvest, which can inflate post-hunt buck ratios in some years. In general, however; 30 bucks per 100 does has been a benchmark number in D30/D52 and extending onto tribal lands for years and I have no concern with keeping buck ratios at that level.

Access to mule deer resources is both culturally and socially important to the Southern Ute tribal community. The Tribe has maintained a professional wildlife management program for over 4 decades and has worked diligently to manage tribal lands and wildlife for present and future generations of Southern Ute tribal members. In the last two decades we have worked, in concert with CPW, to understand the movement ecology of mule deer that use Southern Ute tribal lands seasonally. As you are aware, mule deer that winter on tribal lands typically summer on federal lands north of the Reservation and are subject to state hunting pressure in the fall as they complete their fall migration. Tribal members have opportunities to hunt mule deer both within the Brunot Area and on the

Reservation, however the state of Colorado hunting seasons are the primary driver of harvest on these herds. Maintaining current population levels and increasing herd numbers where possible ensures that both state hunters and tribal members and have equitable access to mule deer.

Chronic wasting disease (CWD) is of particular concern for the future of our local mule deer herds. CWD was detected in D24, D29, D30 in 2020, and was previously known in D40. Prevalence rates presently appear low; however, state testing and surveillance is not ongoing. CPW's *Chronic Wasting Disease Response Plan* notes, "A 5% prevalence threshold for compulsory intervention was selected as the lowest rate of adult male prevalence that is realistic to manage in herds statewide so as to minimize annual adult female CWD mortality." Unless testing is consistent enough to track the progress of the disease, there is fear that the next time Colorado institutes mandatory CWD testing, for state hunters in our local DAUs, that disease could surpass the 5% prevalence threshold and effectively take CWD management options off the table. As CWD impacts older age class bucks at higher prevalence rates this will certainly start to impact access to those older bucks and in time will impact the population in general. According to the State's CWD Plan mandatory testing for state hunters will return to our local DAUs in 2025. Results of that effort will be very important to the Tribe, and I urge continued open communication between our agencies so that we can discuss the results, and any future management actions based on those results.

There are ever-increasing pressures on these herds taking place outside of tribal lands that ultimately impact Southern Ute access to mule deer. Exurban and energy development, increasing vehicle traffic volumes, and recreation impacts are all named in the HMPs. In 10 years when these plans are up for renewal, we will also have wolves on the SW landscape, which will add another layer of complexity to management. I appreciate that CPW does have the ability to review and modify these plans prior to their formal 10-year expiration dates should any of these pressures start to impact mule deer herds sharply.

Once again, thank you for reaching out to the Southern Ute Wildlife Resource Management Division for review and comment on these plans and on wildlife management issues in general that are of mutual interest to our agencies.



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Appendix B: Ute Mountain Ute Indian Tribe Comment Letter

December 12, 2023

Jamin Grigg  
 Senior Terrestrial Biologist  
 Colorado Parks & Wildlife  
 415 Turner Drive  
 Durango, CO 81303



Mr. Grigg,

Thank you for providing the opportunity to comment on the draft Deer Herd Management Plans (HMPs) for southwestern Colorado. The Tribe values its relationship with Colorado Parks and Wildlife (CPW) in managing this shared wildlife resource. Deer are important to the Ute Mountain Ute membership and sustenance hunting is part of the Ute tradition. The Ute Tribes exercise treaty hunting rights in an extensive area of southwestern Colorado, known as the Brunot Area. Of the 14 HMPs being proposed, eight of the herds (D-19, D-24, D-29, D-30, D-36, D-40, D-52 and D-57) are within the Brunot Area and over one-third of D-29 is within the Ute Mountain Ute Reservation.

I am pleased to see the Brunot Agreement covered by an entire section at the beginning of the document. In my experience, the treaty hunting rights of the Ute Tribes are not well known by the general public, and this section will doubtless inform many readers. With that said, I would like to request that CPW include the Brunot Area in the “Background Information” section of each of the individual HMPs that are contained within it. I have provided this table for your convenience:

DAU	SQ MI	SQ MI IN BRUNOT	% IN BRUNOT
<b>D-19</b>	2297.9	110.6	5%
<b>D-24</b>	2848.1	1801.7	63%
<b>D-29</b>	1867.8	613.7	33%
<b>D-30</b>	2795.0	1401.6	50%
<b>D-36</b>	1806.1	551.7	31%
<b>D-40</b>	940.7	254.7	27%
<b>D-52</b>	1078.4	712.0	66%
<b>D-57</b>	3589.4	469.8	13%

Deer herds in southwestern Colorado have shown drastically different responses to similar challenges. Across the region, herds face significant pressure from increased development and land use change as southwestern Colorado becomes more populous and experiences higher levels of tourism and recreation. Additionally, chronic wasting disease (CWD) has recently been detected in most of the herds in southwestern Colorado. Controlling CWD prevalence will be crucial to maintaining the health of the herds. It is encouraging to see that the population of the D-29 herd has increased to pre-1998 estimates and the Tribe supports CPW’s plan to increase the population objectives accordingly. On the other hand, the decline in D-19 is alarming. Though the proposed population objective is greater than the current estimate of herd size, it would reduce the current objective, set in 2006, by almost a third. This signals that the decrease in accessible winter range has reduced the ability of the landscape to support tens of thousands of wild ungulates. While I hope that recovery is possible given good management and the restoration of connected habitats, this loss of carrying capacity may be permanent.

Tribal members often choose to hunt on public lands within the Brunot Area instead of obtaining access to private lands. Deer are remaining on agricultural land where resources are abundant, rather than migrate between summer or winter ranges on public lands. The response that is proposed in the HMPs for D-24 and D-29 would be to increase pressure on these resident herds by increasing the number of Private Land Only (PLO) permits while simultaneously reducing pressure on migratory herds that are likely present on public lands during hunting season. While I support both the management objective and proposed response, the shift in permits should not be the burden of Tribal members who prefer to exercise their treaty hunting rights on public lands.

Except for the previous comment, I support the proposed HMPs for the eight DAUs contained within the Brunot Area and Reservation. It is my opinion that the HMPs do a good job at balancing hunting opportunities while managing for resilience. A great example of this can be found in the HMP for D-40. This herd is challenged by declining fawn recruitment and increasing CWD prevalence. The preferred alternative would increase the population objective and reduce the buck ratio objective, leading to more buck hunting opportunities while decreasing transmission of CWD. In concert with the construction of wildlife infrastructure along highways and other habitat improvements, I am optimistic that the HMP will benefit the herd and the Ute Mountain Ute Tribe.

Sincerely,



Ben Robinson  
Biologist  
Environmental Programs  
(970) 564-5430  
PO Box 448 Towaoc, CO 81334



## Appendix C: 30 Day Comment Period General Responses

1. As an avid hiker and x-country skier I was pleased to see the recommendations for more seasonal closures on routes impacting both winter survival and calving. I realize that there are many recreationists who will cringe if they see that their "favorite" route may be closed and you will likely hear from more of those people. But there are many of us who understand our impact and are more than willing to "sacrifice" for the benefit of wildlife. As a dog owner most of my life, but not now, I am also well aware of the serious impact of dogs running loose and the stress it can bring to surrounding wildlife. I have wondered from time to time if areas could be off limits to dogs though I realize the enforcement of this is likely out of the question. I realize the focus of the HMPS doesn't extend to non-game and other wildlife species but the impacts to those species are critical as well and unfortunately poorly or simply not measured. Enough said. Bottom line I strongly support limits on recreational activity to support wildlife. Thank you.
2. My son had an archery deer tag for unit 65. I went with him for 8 days, and to our surprise we saw very few deer overall in the San Juans mountains of unit 65. I used to hunt this area 35 years ago and knew something was wrong. Years ago I would see lots more deer and elk. In fact we only saw 14 elk in 65, and we hunted very hard and were mostly above timber line for 8 days. Where in the past we would see herds of 30 to 40 elk every day, and many many deer including nice bucks. My son did not harvest a buck. One problem is they give out way too many early season high country buck tags, and the wait on these is only about 7 years. I truly believe Colorado is putting money over the animals by far. Money comes first in their eyes. They need to drop the numbers on early season high country buck tags by 50%, and drop the out of state hunter tags by 50%. We saw many more out of state hunters than local resident hunters.
3. All of the meadows just south of the new over/under wildlife pass on Hwy 160 at Hwy 151 are either completely covered in Musk Thistle or will be in a year or two. The Southern Ute Tribe is not taking care of the noxious weed problem there nor is the San Juan National Forest on the forest lands that lead to and are a part of the critical winter wildlife area on the HD's. In the future, with no real food to eat over the winter, I believe a significant die off will happen. This lack of food must be considered when determining how many deer can be shot. I am completely opposed to hunting but care deeply about the deer and elk that live on the HD's in the winter. Please take this seriously. The threat is real and big. Thank you.
4. Hello, I would like to submit public comment for D-35 Deer Herd Management plan. I would like to see Alternative 3 (7,000-9,000 population and 30-35 bucks:100 does) implemented. My second choice would be Alternative 2 (6,000-8,000 population and 25-30 bucks:100 does). I would like to see more opportunity to harvest mature bucks even if I would not be able to hunt as frequently as I do now. I would also love to be able to harvest does as a "meat hunt" on a semi frequent basis. As of right now, I have to travel quite a distance to be able to harvest a doe for meat annually and it is hardly

worth the money compared to just buying meat at the grocery store. That is my opinion. Thank you.

5. Hello, Below are some thoughts I have as a resident Hunter of unit 61 and 62 (DAU-19). Living in Delta, Colorado I am able to spend a lot of time in this DAU. Between my hunts and others that I help with I am fortunate to see this country quite often. Mule Deer are of particular interest to me and I hope to see them do better in the future. First of all I believe something drastic has to be done to reverse the trends of this herd. That means an all-encompassing approach to management, this includes hunting regulations, predator management, and a rethinking on CWD. Starting off with hunting structure I believe units managed for hunter opportunity are mutually exclusive to Mule Deer herd health. While I do not want to see a unit like 62 go to a 5 Preference point unit, an antler restriction would be ideal. While antler restrictions have lacking evidence to support their use, it should be illegal to shoot a 2 point deer, except for youth. The rest I feel should be 3 point or better. I know this would not change the population to any extent when talking about buck harvest, but it would produce a higher quality hunt if there were less small deer being shot. After some time if an antler point restriction does not yield results, then a tag reduction would be the logical next step. I do understand carrying capacity has something to do with this trend, as does CPW. With drought being prevalent the last few years this has become a more pressing issue. That is where Elk population and cattle grazing come in. Elk are becoming increasingly abundant in the unit, and despite what population estimates may say, they are moving into areas not previously inhabited by elk. More 1st Rifle tags would help this. Grazing is a sticky issue, but with the Escalante Ranch being sold this would be a good time to adjust the permit. Crop damage by deer is a major concern in the Uncompahgre Valley due to an increasing nonmigratory deer herd residing year-round on agricultural land. Frequently, prevention materials and game damage distribution management hunts are requested and given to landowners to proactively deal with damage before a claim is made. These methods also increase landowner tolerance for wildlife on private properties. Additionally, a recent influx of new homeownership in the Loghill Village subdivision has decreased social tolerance for the high concentration of deer in the southern portion of the DAU. I do not think the low county resident deer should be a justification for unit wide management. As seen above, there is two distinct populations within this DAU, furthermore it would appear that the Loghill/South section of this unit also has some unique problems. So I would propose to split the unit at transfer road since the Northern half of the unit is largely unbothered by human development. This would allow greater CWD control from the resident herd as well as reduce hunting pressure. I feel it is an overreaction to purposefully reduce the deer herd due to CWD concerns, aside from killing all deer, CWD will still be around. The largest issue and I feel the most pressing is predator management. While looking at the population trends there is a correlation between Spring Bear ban and herd size. While this does not prove that Bears are the sole cause of this trend it certainly cannot help. The scary part is the looming Mountain lion ballot initiative, this would virtually eliminate the harvest of these predators from the sportsman's side of the equation. I know the last predator management plan in the Piceance was met with lawsuits and plenty of resistance but the data must be

released. If successful it must be implemented into other DAUs. We cannot control the weather in regards to carrying capacity but predator management is something that is absolutely within our control. Thank you.

6. I only had a chance to glance over this. I read a lot about human related issues to deer declining. What about the deer declining due to the mountain lions, bear and coyotes?? Why is this not part of the equation? When I moved here 7 years ago, the number of deer carcasses behind my house from coyote and mountain lion kills was unbelievable how many were there.
7. I hunted deer this season during archery and all I saw was fork horned bucks bring back the point restrictions it was the best thing you ever did for quality deer hunting. It certainly helped the quality of elk hunting as well. Biggest problem for you is the land owners don't let people hunt anymore like the ranchers of the 70s and 80s. Quality not quantity please.
8. Hello. I'll be brief. I've been around. The greatest failure of the ego of humanity is in its pride that it must "manage wildlife" the whole idea is 1) demonstrated as absolutely failure and deceitful in its stated objective. 2) antitheoretical to the idea of "wildlife" in the first place. Wild animals are not domestic, but, the state consistently treats them as such. The TRUTH is that "wildlife" management should absolutely be inverted into HUMAN MANAGEMENT. As in, humanity needs to control itself, not "Wildlife". I comprehend that this is about hunting. Making things brief. CPW and other types of agencies should not look at controlling numbers of deer/"wildlife". It should seek facilitate exponential growth and redistribution of deer/wildlife numbers to maximum amounts mostly through NON INTERFERENCE. Just count them, involve yourself as little as possible and SUPPORT PLANT LIFE. Plants are the basis of ecosystem. Maybe instead of wasting \$ on programs of control, it should shift those resources to facilitating food based plant support for all living creatures and make a cap on hunting licenses based on herd growth per year seeking 80% net survival of newborn fawns. The herds are at disaster levels right now, in the 70s-80s there were HUGELY more, and pre Columbus, this country was literally LOADED with "Wildlife". Let's look for growth instead of more of the same folly that has been going on forever.
9. While I did not grow in areas of the state these new plans cover I did grow up on the front range. As a whole the deer population in this state is a far cry from what it was when I was young. I would drive with my family and see dozens of deer most days on our drive out of the foothills to Golden. Now I see deer seldom. I use to see giant bucks pushing does in the fall and now am lucky to see one or two 2 points. I drive 1.5 hours a day to and from work 5 days a week and should see more deer than I do. Now for the proposed areas, moving the objectives to meet your current level of population doesn't make sense when historic data shows the ability to support a healthier population of deer. Moving the goal posts doesn't not mean you're doing the right things. Our biologists should be figuring out how to put more deer on the landscape, not just say well let's just lower our goal. Figure out the ecological things that need to change. It's almost insulting for you to propose that. Considering the data the agency clearly shows how many deer can be there. Also managing for once in a decade or

century storm seem like poor management as well. Yes the loss is devastating but it's seems to stand that bigger populations will have more deer to survive after such events and leaves a bigger seed population to start herd growth again. With mule deer population across the west struggling we should do more than just try to keep the ones we have. We should in-fact build their numbers so their future isn't so bleak.

10. I would like to start by thanking CPW and their staff for their continued efforts to improve the quality and quantity of mule deer in CO. I am a non-resident of CO and I have only had the privilege of hunting deer once in the state, and that hunt was an archery hunt in Unit 66 which took place in 2022. I saw 3 mature bucks and multiple immature bucks and was blessed to kill a 170" 4X4 on day 2 of the hunt. With that said, I would like to see the objectives in D-57 and D-40 carried out as proposed. I am willing to wait several more years to have the same (or hopefully better) experience as I did in 2022 and support departmental goals geared toward that end. I hate that wolves are being dumped into the area as that will significantly effect the quantity and possibly the quality of deer and elk, so I am all in favor of higher deer populations and maintained, or slightly decreased buck:doe ratios to support a healthy and sustainable population in expectation of increased predation. Thank you for the opportunity to comment, have a blessed Christmas.
11. I would like to ask what the benefit and sustainability is of increasing the target population? Will hunter licenses increase with the growing population? One of the things pointed out in the presentation was that winter range was diminishing with development and competition. If this is the case, and development continues to increase, is this objective feasible? Will the area support increased populations given the drought conditions we continue to experience? Also, is this proposal in whole or in part in response or related to the reintroduction of wolves (food supply)? Has that been considered? Thank you
12. Hello Jamin/CPW team. I appreciate CPW's work developing HMP updates and accepting public comment. As a hunter that has seen significantly fewer animals over the last decade, I urge CPW to manage towards longer term herd viability, including being more proactive and aggressive in setting buck:doe ratios higher. Responding retroactively only once lower numbers are observed is not a realistic approach to dealing with the myriad of climate, recreationalist, and other land use issues that are impacting our herds. For example, the last three years in D-52 data show a drop in B:D ratio yet the target is not increased, and therefore more dramatic steps can't be taken if the 5 yr plan is not more ambitious. Thank you for considering comments.
13. I am including comments for both the D-24 and D-29 herds because I own land in both areas. My first issue, is the small percentage (30%) of private land and your admission to the number of deer it supports with minimal game damage. It is next to impossible to get damages out of CPW. CPW offers doe vouchers, of which no one wants a doe tag when young fawns are nearby. These deprivation tags do not cover the loss the farmer incurs for crops. From personal observation of what my son went thru to try to get game damages on his crops is one reason for the inaccuracy of minimal game damage on private land. With private property the deer will eagerly come to eat any

ornamental plants, gardens, fruit trees and crops. All much better food than what's offered on public land. This in turn causes damages for the property owner. The desire (by whom?) to see more animals on public land and increasing the herd population doesn't mean there is a wall to keep them on public land. In regards to energy development, Colorado has successfully put a stop to any new development.. Thanks to state laws energy development in Dolores County is almost nonexistent. Reclamation of energy development sites has even enhanced habitats. Drought is a fact of life in southwest Colorado and deer are mobile and will find what they need. That's why they come to private property. Public lands will never be able to provide the quantity or quality of forage and habitat that private property provides. That's why deer are here. Please respect land owners comments and wishes and not increase the deer herd. Hunters will always want more deer because they are not feeding them. The number of deer hit on roadways need to be considered, as well as, the expense to the traveling public (vehicle repairs) and the state for property repairs (fences). Again please do not increase the herds.

14. Hello Jamin, I know there is a chance of the deer herds over here increasing by about 25%. I just wanted to reach out and say I am definitely in support of this. I wish there was a way to make it happen quicker vs just letting the herd increase on its own. I know the doe licenses are very limited already so not much action could be taken there and I know the buck to doe ratio is w/n range so decreasing buck licenses probably isn't a possibility either. In regards to the deer herds specifically in parts of GMUs 72/73, the numbers look pretty good. There are a lot of does and fawns and quite a few bucks. My concern is the age class of bucks. Regardless of buck to doe ratios, when I see 1.5 to 2.5 year old bucks doing the majority of the breeding, this doesn't paint the picture of a healthy deer herd in my opinion. I'm not a biologist like yourself, maybe you can elaborate? I've seen one buck this fall during the rut that might be 3.5 years old, nothing older. I will admit I just like seeing old age animals and generally speaking that's not what CO is about. But when bucks this young are doing 90% of the breeding, how can that be a good thing? Thank you!
15. Dear Mr. Grigg, First off, I would like to compliment you and the other wildlife professionals within the CPW organization that have worked on the South West Mule Deer Management Plan. The plan is very informative and it provides considerable data that is very relevant to mule deer management in the southwest. My comments regarding the population objectives being established in the current plan are going to be very high level. I personally would like to see CPW establish population objectives for all DAU's above the current population counts. I support the proposed population objects for the following DAU's; D-24, D-29, D-35 and D-56. I would like to see the population objectives raised for the following DAU's; D-19, D-23 and D-57. It is no secret that mule deer populations across the western United States have been declining for years now. All state wildlife agencies in the west are struggling to reverse that downward trend. It is also no secret that the problem with declining mule deer herds is multi-faceted and also very complicated. I would ask that CPW implement changes within their control that will at least slow down the decline of mule numbers in south western Colorado. To be quite frank, I do not see the

challenges that mule deer are currently facing to get any better in the future. On top of all of the issues identified in the current management plan that are contributing to declining mule deer numbers, our mule deer are going to be facing additional challenges in the near future. Increased predation by the introduction of Canadian wolves as well as the possible increases in mountain lion numbers (due to the mountain lion hunting ban that will be on the 2024 Colorado ballot) are both going to have negative impacts on the mule deer in south west Colorado as well as the west slope herds. The long term prognosis for mule deer in the state is not looking favorable. Because you are managing the mule deer in D-57, I have some specific comments regarding the mule deer in your district. I have had the pleasure of hunting in the Gunnison Basin for the last 14 years. One of my biggest hunting regrets is that I didn't start hunting in D-57 sooner in my life. I can't say enough good things about the overall mule deer numbers in GMU-66 and GMU-67. I would ask that you please keep those mule deer populations as high as you can. The wildlife viewing/hunter experience in GMU-66 and GMU-67 is a quality experience. There are not many places in Colorado left where there is that much public land access combined with good big game animal numbers. I am grateful that the mule deer are doing well south of Gunnison. However, the lower number of mature mule deer bucks has declined noticeably as time has gone on. That is unfortunate. From my perspective, I would like to see high mule deer numbers in GMU-54, GMU-55 and GMU-551 as well. Thank you for reading my comments and more importantly, thank you for what you do. These big game animals need all the help that they can get.

## Appendix D19-A: Uncompahgre Habitat Partnership Program Letter



October 30, 2023

Alyssa Kircher  
Colorado Parks and Wildlife  
2300 S. Townsend Ave  
Montrose, CO 81401

RE: Uncompahgre Habitat Partnership Program Comments - HMP D-19

Dear Ms. Kircher,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Uncompahgre HPP (UNCHPP) Committee has reviewed the D-19 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The UNCHPP Committee supports the draft alternative to decrease the current population objective within this DAU and within our committee area. The UNCHPP Committee has heard from landowners and land managers about poor range conditions on both public and private lands. While many factors play into these conditions, reducing the number of big game animals is one step that would help improve range conditions and forage resources. Additionally, we support lowering the current sex ratio objective to a number that, while still maintaining larger bucks, would ultimately increase the opportunity for more hunters in the field.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-19. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The UNCHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

*Bobby Gray*

Bobby Gray, Chair  
Uncompahgre HPP Committee

## Appendix D19-B: United States Forest Service Letter



United States  
Department of  
Agriculture

Forest  
Service

Grand Mesa, Uncompahgre and  
Gunnison National Forests

2250 South Main Street  
Delta, CO 81416  
970-874-6600  
TDD: 970-874-6660  
Fax: 970-874-6698

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**File Code:** 2600  
**Date:** October 31, 2023

Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Ms. Kircher:

The Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) appreciate the opportunity to provide comments on your draft plan for deer management in game management units (GMUs) 61 and 62 (DAU-D-19) and GMUs 64 and 65 (DAU-D-40). The D-19 area is comprised of 37% National Forest System lands managed by the Norwood, Ouray, and Grand Valley Ranger Districts. The D-40 area is comprised of 29% National Forest System lands and is managed by the Ouray District. These lands provide year-round habitat for elk from summer habitats at the highest elevations to winter concentrations areas in the lower elevations. These lands are managed for the benefit of multiple uses, including wildlife habitat. The GMUG values Colorado Parks and Wildlife (CPW) coordination on habitat conditions, habitat management, and habitat improvements in these areas.

The GMUG supports CPW's proposal to decrease the current population objective in D-19 from 36,000-38,000 to 12,000-15,000 deer and amend the current sex ratio objective to 30-35 bucks per 100 does. The GMUG also supports CPW's proposal in D-40 to extend the current population objective of 6,500-8,500 deer and amend the current sex ratio objective to 22-27 bucks per 100 does. The reduction in population goals still aims for an increase in the current population while being a more realistic goal given the current population size and carrying capacity in these units.

The proposed GMUG Forest Plan is expected to complement herd management objectives in part by designating Wildlife Management Areas which limit the road and trail density in some of the key habitat areas for deer on the Uncompahgre Plateau and prioritizing habitat improvement projects.

If you have any further questions or concerns, please reach out to Ouray District Ranger Dana Gardunio, Norwood District Ranger Megan Eno, or Grand Valley District Ranger Bill Edwards.

Sincerely,

CHAD STEWART  
Forest Supervisor

cc: Megan Eno, Dana Gardunio, Williams Edwards





## Appendix D19-C: Bureau Of Land Management Letter



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Uncompahgre Field Office  
2465 South Townsend Avenue  
Montrose, Colorado 80401

In Reply Refer To: 8100 (COS050)

Re: Draft Herd Management Plans: D-19, D-20, D-23, D-40, D-51

Evan Phillips and Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Evan and Alyssa:

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) appreciates the opportunity to provide comments on your draft plans for elk and deer management in data analysis units D-19, D-20, D-23, D-29, D-40 and D-51. The BLM provides habitat management for CPW mapped winter habitats for deer and elk in these units and always appreciates local CPW cooperation with land use planning and habitat improvements in these areas.

The BLM UFO is committed to working cooperatively with CPW and have appreciated the partnership and opportunity to work together by protecting big game within D-20 through the Jumbo Mountain Travel Management Plan. The all uses travel restriction for Zone 2 of the Jumbo Mountain Special Recreation Management Area resulted in an increase of approximately 1200 acres of wintering habitat protection through implementing a travel restriction for all uses to protect big game during the winter months on the Jumbo Mountain Special Recreation Management Area. This project exemplifies the partnership that BLM is committed to ensuring to provide opportunities on this landscape in a way that protects and enhances CPW herd management objectives and achieves our corresponding agency multiple use mandates.

BLM has concerns about the proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 from the approved 2018 Herd Management Plan because of the ongoing drought. The significant issues identified in the 2018 HMP and the 2023 Draft Herd Management Plans include ongoing drought, human population growth, and development, coupled with disease issues in the North Fork valley and the South Grand Mesa deer herd. The portions of Gunnison, Delta and Montrose Counties within D-20 and D-51 are all in moderate or severe drought, which impacts the quality of deer habitat. Less food, water and cover are available to big game under drought conditions. Deer will enter the winter months with lower fat reserves and potentially less milk production for fawns which could limit recruitment. Winter range forage is particularly limited

in D-20 and D-51 because of development and topography, further limiting the available winter range for deer. Since the original DAU plans were released in 2018, the landscape has undergone prolonged drought which has disproportionately affected winter range. The proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 is counterintuitive to the trends suggesting that carrying capacity is an issue.

The Rangeland Analysis Platform estimates production and can be a useful tool in estimating how annual herbaceous production trends are different from historical averages. Figure 1 shows that since the HMP plan was signed in 2018, four out of five years have had less than average production on winter range in the DAUs on both public and private land. Figure 2 shows that despite an above average precipitation year in 2023, the effects of long-term drought persist on winter range below 7000 feet. This equates to 83% of the time since signing of the 2018 HMP that winter range has experienced below average production.

The Executive Summary of the Draft Mule Deer Herd Management Plans for the Southwest Region states that CPW may consider revisiting an HMP prior to the end of the ten-year term of the plan if outstanding circumstances arise and a revision is deemed necessary. The ongoing drought coupled with the other issues identified in the draft plan for D-20 and D-51 suggest outstanding circumstances and warrant reconsideration of the lower herd objectives. BLM is concerned in particular about current rangeland health and the sustainability of winter range, and suggests that CPW reconsider the lower herd management objective alternative.

BLM strives to work with CPW to provide meaningful habitat protections to wildlife during the planning stages of projects. We believe that the proposal to extend the population objective from the 2018 HMP does not account for the persistent long-term drought impacts and the drastic declines in winter range overall health and productivity. Continued public land degradation will only serve to increase private land conflicts.

If you would like more specific information or have any questions, please feel free to contact me at (970)-240-5338 or [scopping@blm.gov](mailto:scopping@blm.gov). For specific questions regarding big game habitat management on these units, please contact Emily Latta, Wildlife Biologist at 970-240-5332 or [elatta@blm.gov](mailto:elatta@blm.gov).

## Appendix D20-A: North Fork Habitat Partnership Program Letter



November 17, 2023

Evan Phillips  
Colorado Parks and Wildlife  
2300 S. Townsend Ave  
Montrose, CO 81401

RE: North Fork Habitat Partnership Program Comments - HMP D-20

Dear Mr. Phillips,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, sportsperson, Forest Service, BLM, and CPW representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance migratory corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the North Fork HPP (NFHPP) Committee has reviewed the D-20 draft alternatives regarding population range and sex ratio objectives and off these comments for consideration.

The NFHPP Committee supports the draft alternatives for the population objective and sex ratio range. We believe this adequately reflects the current population estimate and responsibly balances local range and habitat conditions with the sportsperson's desires and landowner concerns. While we still have concerns about habitat loss and degradation we believe the preferred alternatives are appropriate.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-20. Adequate habitat is critical in meeting game management objectives and we remain committed to maintaining and improving habitat in this area. The North Fork HPP Committee will continue to support management efforts in partnership with the numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Andrew Taylor, Chair  
North Fork HPP Committee

## Appendix D20-B: Bureau Of Land Management Letter



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Uncompahgre Field Office  
2465 South Townsend Avenue  
Montrose, Colorado 80401

In Reply Refer To: 8100 (COS050)

Re: Draft Herd Management Plans: D-19, D-20, D-23, D-40, D-51

Evan Phillips and Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Evan and Alyssa:

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) appreciates the opportunity to provide comments on your draft plans for elk and deer management in data analysis units D-19, D-20, D-23, D-29, D-40 and D-51. The BLM provides habitat management for CPW mapped winter habitats for deer and elk in these units and always appreciates local CPW cooperation with land use planning and habitat improvements in these areas.

The BLM UFO is committed to working cooperatively with CPW and have appreciated the partnership and opportunity to work together by protecting big game within D-20 through the Jumbo Mountain Travel Management Plan. The all uses travel restriction for Zone 2 of the Jumbo Mountain Special Recreation Management Area resulted in an increase of approximately 1200 acres of wintering habitat protection through implementing a travel restriction for all uses to protect big game during the winter months on the Jumbo Mountain Special Recreation Management Area. This project exemplifies the partnership that BLM is committed to ensuring to provide opportunities on this landscape in a way that protects and enhances CPW herd management objectives and achieves our corresponding agency multiple use mandates.

BLM has concerns about the proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 from the approved 2018 Herd Management Plan because of the ongoing drought. The significant issues identified in the 2018 HMP and the 2023 Draft Herd Management Plans include ongoing drought, human population growth, and development, coupled with disease issues in the North Fork valley and the South Grand Mesa deer herd. The portions of Gunnison, Delta and Montrose Counties within D-20 and D-51 are all in moderate or severe drought, which impacts the quality of deer habitat. Less food, water and cover are available to big game under drought conditions. Deer will enter the winter months with lower fat reserves and potentially less milk production for fawns which could limit recruitment. Winter range forage is particularly limited

in D-20 and D-51 because of development and topography, further limiting the available winter range for deer. Since the original DAU plans were released in 2018, the landscape has undergone prolonged drought which has disproportionately affected winter range. The proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 is counterintuitive to the trends suggesting that carrying capacity is an issue.

The Rangeland Analysis Platform estimates production and can be a useful tool in estimating how annual herbaceous production trends are different from historical averages. Figure 1 shows that since the HMP plan was signed in 2018, four out of five years have had less than average production on winter range in the DAUs on both public and private land. Figure 2 shows that despite an above average precipitation year in 2023, the effects of long-term drought persist on winter range below 7000 feet. This equates to 83% of the time since signing of the 2018 HMP that winter range has experienced below average production.

The Executive Summary of the Draft Mule Deer Herd Management Plans for the Southwest Region states that CPW may consider revisiting an HMP prior to the end of the ten-year term of the plan if outstanding circumstances arise and a revision is deemed necessary. The ongoing drought coupled with the other issues identified in the draft plan for D-20 and D-51 suggest outstanding circumstances and warrant reconsideration of the lower herd objectives. BLM is concerned in particular about current rangeland health and the sustainability of winter range, and suggests that CPW reconsider the lower herd management objective alternative.

BLM strives to work with CPW to provide meaningful habitat protections to wildlife during the planning stages of projects. We believe that the proposal to extend the population objective from the 2018 HMP does not account for the persistent long-term drought impacts and the drastic declines in winter range overall health and productivity. Continued public land degradation will only serve to increase private land conflicts.

If you would like more specific information or have any questions, please feel free to contact me at (970)-240-5338 or [scopping@blm.gov](mailto:scopping@blm.gov). For specific questions regarding big game habitat management on these units, please contact Emily Latta, Wildlife Biologist at 970-240-5332 or [elatta@blm.gov](mailto:elatta@blm.gov).

## Appendix D23-A: Uncompahgre Habitat Partnership Program Letter



October 30, 2023

Alyssa Kircher  
Colorado Parks and Wildlife  
2300 S. Townsend Ave  
Montrose, CO 81401

RE: Uncompahgre Habitat Partnership Program Comments - HMP D-23

Dear Ms. Kircher,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Uncompahgre HPP (UNCHPP) Committee has reviewed the D-23 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The UNCHPP Committee supports the draft alternative to decrease the current population objective range within this DAU and within our committee area. The Uncompahgre Committee has heard from landowners and land managers about poor range conditions on both public and private lands. While many factors play into these conditions, reducing the number of big game animals is one step that would help improve range conditions and forage resources. Additionally, we support lowering the current sex ratio objective to a number that, while still maintaining larger bucks, would ultimately increase the opportunity for more hunters in the field and help manage CWD.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-23. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The UNCHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Bobby Gray, Chair  
Uncompahgre HPP Committee

## Appendix D23-B: United States Forest Service Letter



United States  
Department of  
Agriculture

Forest  
Service

Grand Mesa, Uncompahgre and  
Gunnison National Forests

2250 South Main Street  
Delta, CO 81416  
970-874-6600  
TDD: 970-874-6660  
Fax: 970-874-6698

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**File Code:** 2600  
**Date:** October 31, 2023

Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Ms. Kircher:

The Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) appreciate the opportunity to provide comments on your draft plan for deer management in game management units (GMUs) 61 and 62 (DAU-D-19) and GMUs 64 and 65 (DAU-D-40). The D-19 area is comprised of 37% National Forest System lands managed by the Norwood, Ouray, and Grand Valley Ranger Districts. The D-40 area is comprised of 29% National Forest System lands and is managed by the Ouray District. These lands provide year-round habitat for elk from summer habitats at the highest elevations to winter concentrations areas in the lower elevations. These lands are managed for the benefit of multiple uses, including wildlife habitat. The GMUG values Colorado Parks and Wildlife (CPW) coordination on habitat conditions, habitat management, and habitat improvements in these areas.

The GMUG supports CPW's proposal to decrease the current population objective in D-19 from 36,000-38,000 to 12,000-15,000 deer and amend the current sex ratio objective to 30-35 bucks per 100 does. The GMUG also supports CPW's proposal in D-40 to extend the current population objective of 6,500-8,500 deer and amend the current sex ratio objective to 22-27 bucks per 100 does. The reduction in population goals still aims for an increase in the current population while being a more realistic goal given the current population size and carrying capacity in these units.

The proposed GMUG Forest Plan is expected to complement herd management objectives in part by designating Wildlife Management Areas which limit the road and trail density in some of the key habitat areas for deer on the Uncompahgre Plateau and prioritizing habitat improvement projects.

If you have any further questions or concerns, please reach out to Ouray District Ranger Dana Gardunio, Norwood District Ranger Megan Eno, or Grand Valley District Ranger Bill Edwards.

Sincerely,

CHAD STEWART  
Forest Supervisor

cc: Megan Eno, Dana Gardunio, Williams Edwards



## Appendix D23-C: Bureau Of Land Management Letter



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Uncompahgre Field Office  
2465 South Townsend Avenue  
Montrose, Colorado 80401

In Reply Refer To: 8100 (COS050)

Re: Draft Herd Management Plans: D-19, D-20, D-23, D-40, D-51

Evan Phillips and Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Evan and Alyssa:

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) appreciates the opportunity to provide comments on your draft plans for elk and deer management in data analysis units D-19, D-20, D-23, D-29, D-40 and D-51. The BLM provides habitat management for CPW mapped winter habitats for deer and elk in these units and always appreciates local CPW cooperation with land use planning and habitat improvements in these areas.

The BLM UFO is committed to working cooperatively with CPW and have appreciated the partnership and opportunity to work together by protecting big game within D-20 through the Jumbo Mountain Travel Management Plan. The all uses travel restriction for Zone 2 of the Jumbo Mountain Special Recreation Management Area resulted in an increase of approximately 1200 acres of wintering habitat protection through implementing a travel restriction for all uses to protect big game during the winter months on the Jumbo Mountain Special Recreation Management Area. This project exemplifies the partnership that BLM is committed to ensuring to provide opportunities on this landscape in a way that protects and enhances CPW herd management objectives and achieves our corresponding agency multiple use mandates.

BLM has concerns about the proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 from the approved 2018 Herd Management Plan because of the ongoing drought. The significant issues identified in the 2018 HMP and the 2023 Draft Herd Management Plans include ongoing drought, human population growth, and development, coupled with disease issues in the North Fork valley and the South Grand Mesa deer herd. The portions of Gunnison, Delta and Montrose Counties within D-20 and D-51 are all in moderate or severe drought, which impacts the quality of deer habitat. Less food, water and cover are available to big game under drought conditions. Deer will enter the winter months with lower fat reserves and potentially less milk production for fawns which could limit recruitment. Winter range forage is particularly limited



in D-20 and D-51 because of development and topography, further limiting the available winter range for deer. Since the original DAU plans were released in 2018, the landscape has undergone prolonged drought which has disproportionately affected winter range. The proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 is counterintuitive to the trends suggesting that carrying capacity is an issue.

The Rangeland Analysis Platform estimates production and can be a useful tool in estimating how annual herbaceous production trends are different from historical averages. Figure 1 shows that since the HMP plan was signed in 2018, four out of five years have had less than average production on winter range in the DAUs on both public and private land. Figure 2 shows that despite an above average precipitation year in 2023, the effects of long-term drought persist on winter range below 7000 feet. This equates to 83% of the time since signing of the 2018 HMP that winter range has experienced below average production.

The Executive Summary of the Draft Mule Deer Herd Management Plans for the Southwest Region states that CPW may consider revisiting an HMP prior to the end of the ten-year term of the plan if outstanding circumstances arise and a revision is deemed necessary. The ongoing drought coupled with the other issues identified in the draft plan for D-20 and D-51 suggest outstanding circumstances and warrant reconsideration of the lower herd objectives. BLM is concerned in particular about current rangeland health and the sustainability of winter range, and suggests that CPW reconsider the lower herd management objective alternative.

BLM strives to work with CPW to provide meaningful habitat protections to wildlife during the planning stages of projects. We believe that the proposal to extend the population objective from the 2018 HMP does not account for the persistent long-term drought impacts and the drastic declines in winter range overall health and productivity. Continued public land degradation will only serve to increase private land conflicts.

If you would like more specific information or have any questions, please feel free to contact me at (970)-240-5338 or [scopping@blm.gov](mailto:scopping@blm.gov). For specific questions regarding big game habitat management on these units, please contact Emily Latta, Wildlife Biologist at 970-240-5332 or [elatta@blm.gov](mailto:elatta@blm.gov).

## Appendix D24-A: Montelores Habitat Partnership Program Letter



December 11, 2023

Brad Weinmeister  
Colorado Parks and Wildlife  
151 East 16<sup>th</sup> St  
Durango, CO 81301

RE: Montelores Habitat Partnership Program Comments - HMP D-24

Dear Mr. Weinmeister,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Montelores HPP (MONHPP) Committee has reviewed the D-24 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The MONHPP Committee supports the draft alternative to increase the population objective. We believe that this increase will not create more conflicts and we believe we have the resources necessary to address conflicts should they occur. Additionally, we believe the current sex ratio is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-24. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The MONHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Andy Brown'.

Andy Brown  
Montelores HPP Committee

## Appendix D24-B: Uncompahgre Habitat Partnership Program Letter



December 11, 2023

Brad Weinmeister  
Colorado Parks and Wildlife  
151 East 16<sup>th</sup> St  
Durango, CO 81301

RE: Uncompahgre Habitat Partnership Program Comments - HMP D-24

Dear Mr. Weinmeister,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Uncompahgre HPP (UNCHPP) Committee has reviewed the D-24 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The UNCHPP Committee supports the draft alternative to increase the population objective within this DAU and within our committee area. We do not believe this increase would create more conflicts and we also believe we have the resources necessary to address conflicts should they occur. Additionally, we believe the current sex ratio is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-24. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The UNCHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

*Bobby Gray*

Bobby Gray, Chair  
Uncompahgre HPP Committee

## Appendix D26-A: San Luis Valley Habitat Partnership Program Letter



## Appendix D: HPP Response Letters

November 16, 2018

Brent Frankland  
Colorado Parks and Wildlife  
0722 S. CO Rd 1 East  
Monte Vista, CO 81144

**RE: San Luis Valley Habitat Partnership Program Comments - DAU D26**

Dear Brent:

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity to provide input into big game management in their areas. The diverse makeup of local HPP committees (3 livestock growers, Forest Service, BLM, USFWS, CPW and sportsmen representatives) provide a good cross section of local interests to review DAU proposals and respond accordingly for CPW consideration.

The San Luis Valley HPP committee has discussed your presentation and reviewed the draft alternatives for this DAU plan update. The San Luis Valley HPP committee is in agreement with the following comments pertaining to proposals for the population range and sex ratio objectives for the above DAU plan.

The SLVHPP committee supports the draft alternative to increase the number of animals within this DAU and within our committee area (alternative #3). The SLVHPP committee does not believe this increase would create more conflicts and we also believe we have the resources necessary to address conflicts should they occur. Increasing the population objective will ultimately lead to more hunting licenses and sportsmen opportunities.

The SLVHPP also discussed the proposed sex ratio alternative. We support raising the current sex ratio objective to provide larger bucks for sportsmen to pursue (alternative #3). We understand this option would reduce hunting opportunity but our committee believes having higher quality animals in this area is desired and possible.

Thank you for the presentation and the opportunity to provide these comments.

Sincerely,

Mick Davis, Chair  
San Luis Valley HPP Committee

## Appendix D26-B: United States Forest Service Letter



Forest  
Service

Rio Grande National Forest

10 55 9th Street  
Del Norte, CO 81132  
719-657-5017  
Fax: 719-657-5280

**File Code:** 2620  
**Date:** December 12, 2023

Brent Frankland  
Terrestrial Biologist  
Colorado Parks and Wildlife  
0722 South County Rd 1E  
Monte Vista, CO 81144

Dear Mr. Frankland:

Thank you for the opportunity to comment on Colorado Parks and Wildlife's (CPW) draft Mule Deer Herd Management Plans for Deer DAU D-26, D-35, D-36, D-56 (combined D-31 and D-37). These DAUs encompass GMUs 68,681,682, 76, 79, 791, 80, 81, 82 and 83 involving all the Rio Grande National Forest. My staff wildlife biologists have reviewed the draft plans for these DAUs and provided information to offer the following comments for consideration and use as you finalize the plans.

The Rio Grande National Forest (Forest) contains over 1.8 million acres of National Forest System land that are managed for multiple uses in the San Luis Valley area of south-central Colorado. The DAU Plans are an important aspect of our management because of high public interest in big game species and because the Forest is responsible for managing much of the habitat to support the desired population levels. However, it is also important that populations are maintained within the carrying capacities of the habitat, and that deer population objectives are managed in a manner that minimizes potential conflicts with other program areas. These comments reflect these mutual goals.

Prior to 2020, mule deer (along with Rocky Mountain elk and other species) were managed as Management Indicator Species (MIS) under our 1996 Land and Resource Management Plan (Forest Plan). As such, both population and habitat trends were tracked at the Forest-level in association with Forest Plan direction, including providing the quantity and quality of habitat capable of supporting the population objectives for these species.

As you likely know, big game has planning and monitoring components in the Rio Grande National Forest Land Management Plan (Plan) signed in 2020 and the MIS concept no longer exists. While the direction and mechanisms for protecting and monitoring big game have changed, the focus and importance of these species for the Forest has not. Many of the concerns noted in the DAU plans for mule deer can be tied to habitat connectivity. In the 2020 Plan, we added language specifically around managing big game habitat connectivity. For some species, such as mule deer, Forest landscape conditions will continue to facilitate historic game movement patterns within and among Forest and other public and private lands, including across state lines. Much of the Forest is designated wilderness or roadless, which will contribute to habitat connectivity and movement patterns for many species, particularly those that are sensitive to human disturbances. Additional



protected areas occur on adjacent Forest lands as well as across state and administrative boundaries.

Two guidelines incorporated into the Plan for big game and mule deer more specifically include:

**G-WLDF-1:** To reduce stress at a critical point in the lifecycle of big game, restrict activities on winter range from approximately December 1 to April 15, as needed. (Forestwide)

**G-WLDF-2:** To maintain habitat function, connectivity, and security for big game species, there should be no net gain in motorized and nonmotorized system routes where the system route density currently exceeds one linear mile per square mile or where the net gain would cause system route density to exceed one linear mile per square mile in areas mapped by Colorado Parks and Wildlife as important big game production areas, migration corridors, severe winter range, and winter concentration areas. Exception: This does not apply to administrative routes. (Forestwide)

In addition, mule deer (and other big game) habitat and population trend considerations remain a key part of the plan monitoring as focal species and both population and habitat trend considerations are included in the [Monitoring Plan](#). There are two key questions related to mule deer and other big game including:

[Monitoring Question 1:](#) What is the status and trend of populations of Rocky Mountain elk, Rocky Mountain bighorn sheep?

[Monitoring Question 2:](#) What is the status and trend of forage and cover for big game species?

While the data for MQ1 is and will continue to be provided by CPW and thus should reflect your estimates, the data and analysis for MQ2 includes incorporating current forest habitat and forage trends across the forest including current ecological conditions of all forest types. While our annual range monitoring indicates that current stocking levels are adequate and feasible, future detailed modeling will incorporate livestock and big game needs. Unfortunately for this review, the first full iteration of this analysis is not expected until early 2024.

As such, management of big game habitat will continue to involve evaluations of habitat conditions during project level evaluations and Forest Plan monitoring, but also through other project partnerships such as HPP, Mule Deer Foundation, Rocky Mountain Elk Foundation, and others. We therefore expect to continue to work closely with CPW to achieve mutually desired habitat conditions for all big game species.

Hunting and other wildlife-related recreation is one of the biggest uses experienced on the Forest. Although most of this occurs during the rifle season(s) for deer and elk, hunters utilize our public lands from the opening of pronghorn season in mid-August through the late season elk cow hunts of December. This large influx of visitors brings a huge economic boost to the San Luis Valley but also comes with challenges in increased off-road vehicle use, high density of hunter camps, and an increased need in Forest resource protection presence and front office staffing needs.

## **DAU specific review and recommendations**

### **DAU D-26 Mule Deer**

**Current Conditions:** The Forest manages approximately 46% of the land within this DAU, predominantly as summer and/or transitional range. Spruce bark beetles have impacted the mature Engelmann spruce forests since approximately 2013 and peaked around 2017 creating

more open canopy conditions in the sub-alpine habitat, which has provided more sunlight for grasses, forbs, and brush.

Approximately 126 mi<sup>2</sup> or 9.6% of winter habitat and approximately 6 mi<sup>2</sup> or 0.5% of severe winter range resides on land managed by the Forest. Both winter and severe winter ranges consist of mixed conifer type habitats such as Douglas fir/Ponderosa Pine and Pinyon/Juniper. There has been an uptick in insects such as Douglas fir beetle, and disease within Douglas fir forests. The Rio Grande watershed of southern Colorado has seen twenty plus years of below average precipitation and an increase in average winter temperatures. These impacts may impact some thermal cover and/or provide for better understory growth i.e., mountain mahogany and currants.


	Acres	Square Miles	Percentage
DAU-26	833,322	1,302	
RGNF within DAU-26	387,106	605	46.5
RGNF Summer Range	382,138	597	45.9
RGNF Winter Range	80,038	126	9.7
RGNF Concentration Areas	21,553	34	2.6
RGNF Winter Concentration	8,989	14	1.1
RGNF Severe Winter	4,114	6.4	0.5
RGNF Resident Population Areas	3,992	6.2	0.5

**Recommendations:** Based on existing habitat information and other factors, we concur with CPW that Alternative 3 (current population estimate) be extended as the population objective for DAU D-26. This objective would be set at 5,500 to 6,500 mule deer. We recognize that both winter and severe winter range should be a focus for management actions as needed to maintain or improve habitat conditions for mule deer in this DAU and look forward to working cooperatively with CPW and other partners to attain these goals. Based on input received for this draft plan, we concur that Alternative 3 (26 to 29 bucks per 100 does) be pursued as a sex ratio objective to provide a higher quality recreational experience to the public.

**Other General Comments:** The draft DAU Plan mentions winter range degradation and loss, and increased disturbance from people and domestic livestock as concerns. As mentioned earlier we are currently evaluating livestock and big game numbers as it relates to current forage availability. The Forest continues to identify user-created roads for closure and evaluate road construction for all projects to meet G-WLDF-2 mentioned earlier. We appreciate CPW's continued assistance in enforcing and monitoring potential resource damage and disturbance from OHVs to continue to educate the public and manage this activity and look forward to carrying out this effort into winter over the snow recreation and the ongoing general travel management efforts.

If you have any questions, please contact Jason Remshardt, Fisheries and Wildlife Program Manager at 719-872-4024.

Sincerely,

  
 X Tristram S. Post signing for Kristen Sexton

Signed by: TRISTRAM POST

**KRISTEN SEXTON**

Acting Forest Supervisor

cc: Rick Basagoitia, Andrew Kelher, Tristram Post, Andrea Jones, Patrick Moran, Jason Remshardt

## Appendix D26-C: Bureau Of Land Management Letter



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
San Luis Valley Field Office  
1313 E. Highway 160  
Monte Vista, Colorado 81144

In Reply Refer To:  
6521 (LLCOF03000, TLA)

**December 14, 2023**

Sent Via Email:  
[brent.frankland@state.co.us](mailto:brent.frankland@state.co.us)

Brent Frankland,  
Terrestrial Wildlife Biologist  
0722 South Road 1 East  
Monte Vista, CO 81144

Dear Mr. Frankland,

The Bureau of Land Management (BLM) San Luis Valley Field Office (SLVFO) appreciates the opportunity to comment on the draft D-26, D-35, D-36, and D-56 mule deer Herd Management Plans (HMPs). As the agency providing the majority of crucial winter range for big game in the San Luis Valley, we thought it important to provide comments on any changes Colorado Parks and Wildlife (CPW) may implement. The BLM SLVFO has a strong commitment to providing quality wildlife habitat as one of our important "multiple uses". We have appreciated our longstanding working relationship with CPW and partnership in managing wildlife habitats throughout BLM SLVFO-managed lands. Our input on each draft HMP is addressed individually below.

**D-26**

After reviewing the draft D-26 plan, we agree with the many current and emerging ecological constraints identified by CPW when considering deer herd objectives for this area, including increasing fragmentation from development, increasing recreation pressure, limited winter range and forage availability, prolonged drought, game damage issues, disease, and competition with other wild ungulates.

The BLM agrees with CPW's preferred management objective to remain the same with a post-hunt mule deer population of 5,500 to 6,500 and a sex ratio objective range of 26 to 29 bucks per 100 does, as it provides the best balance for managing the herd, supporting hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat-carrying capacity. This position is consistent with BLM's continuing efforts to enhance or restore proper rangeland functions, in particular, by attempting to reduce the intensity and duration of collective growing season use by wild and domestic ungulates through improved livestock management, noxious



weed control, carrying capacity analyses, more aggressive implementation of our Fire Management Plan, and through the development of climate change adaptation strategies. We feel that land management applied with an emphasis toward deer would continue to complement balanced management of woodland and shrubland communities across BLM lands in GMU 79. Additionally, we support the proposed management objective because it will minimize the overall financial and physical investments associated with improving habitat in the DAU—crucial for sustaining a viable deer population long-term.

The draft HMPs list winter range forage availability and quality as the limiting factors to herd size. Therefore, continued habitat partnership projects between CPW and the BLM will be critical to improve availability of browse and to ensure the long-term health and stability of both herds. To assist CPW in making management decisions within each herd area, the BLM would like to encourage CPW to gather utilization data in mule deer winter concentration areas and engage the BLM well-in-advance of draft HMP comment periods to discuss potential land health/habitat issues occurring on BLM-administered lands within the respective GMUs. This data and expanded coordination would help inform the decision between alternatives identified in the HMPs. Because of the uncertainties regarding ecological constraints, we believe a program to monitor habitat conditions is warranted, particularly to determine if population objectives need to be adjusted to fit more accurately with updated model estimates and to assist in quantifying carrying capacity. However, the BLM does not have the capacity to implement a monitoring program specific to wild ungulates.

If you have any questions regarding this matter, please contact Dale Culver, Field manager at (719-852-8171).

Sincerely,

DALE CULVER

Digitally signed by DALE  
CULVER  
Date: 2023.12.14 10:53:19  
-07'00'

Dale Culver  
Field Office Manager  
San Luis Valley Field Office

**Appendix D29-A: Montelores Habitat Partnership Program Letter**

December 11, 2023

Brad Weinmeister  
Colorado Parks and Wildlife  
151 East 16<sup>th</sup> St  
Durango, CO 81301

RE: Montelores Habitat Partnership Program Comments - HMP D-29

Dear Mr. Weinmeister,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Montelores HPP (MONHPP) Committee has reviewed the D-29 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The MONHPP Committee supports the draft alternative to increase the population objective in this DAU and within our committee area. We believe that this increase will not result in more conflict and should it arise we have the necessary resources to address those conflicts. Additionally, the committee believes the current sex ratio is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-29. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The MONHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Andy Brown  
Montelores HPP Committee

## Appendix D30-A: San Juan Basin Habitat Partnership Program Letter



December 11, 2023

Brad Weinmeister  
Colorado Parks and Wildlife  
151 East 16<sup>th</sup> St  
Durango, CO 81301

RE: San Juan Basin Habitat Partnership Program Comments - HMP D-30

Dear Mr. Weinmeister,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the San Juan Basin HPP (SJBHPP) Committee has reviewed the D-30 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

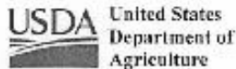
The SJBHPP Committee supports the draft alternative to keep the current population objective. We believe this alternative responsibly balances local range and habitat conditions with sportsperson desires and landowner concerns. The committee area does not experience many deer conflicts and we believe we have the resources necessary to address conflicts should they occur. Additionally, we support the draft alternative of keeping the current sex ratio objective, with the minor change to the lower end of the objective. We believe it is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-30. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The SJBHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Ty Smith  
San Juan Basin HPP Committee

## Appendix D30-B: United States Forest Service Letter



Forest  
Service

San Juan National Forest

15 Burnett Court  
Durango, CO 81301  
(970) 247-4874  
Fax: (970) 375-2319

**File Code:** 2610  
**Date:** January 22, 2020

Brad Weinmeister  
Wildlife Biologist  
151 East 16th Street  
Durango, CO 81301

Dear Mr. Weinmeister:

The San Juan National Forest (SJNF) appreciates the opportunity to comment on the Draft San Juan Basin Mule Deer Herd Management Plan for Data Analysis Unit (DAU) D-30. DAU D-30 includes Game Management Units 75, 77, 78, 751 and 771 which occur within portions of Archuleta, Hinsdale, La Plata, Mineral, and San Juan counties. As stated in the Draft DAU D-30 Plan, the primary decisions needed for an individual Herd Management Plan (HMP) are how many animals should exist in the DAU, and what is the desired sex ratio for the population of big game animals (e.g., the number of males per 100 females). The Draft HMP proposes to continue the same management objectives (posthunt population objective of 23,000-27,000 animals and posthunt sex ratio of 26-30:100 males to females), course of management actions, and strategies for the DAU.

The Draft HMP, provides information on habitat resource and capabilities, herd management history, herd management issues, management strategies, and management objectives. As mentioned in the HMP, National Forest System (NFS) lands comprise approximately 55% of the DAU, with the remaining ownership consisting of Bureau of Land Management (2%), private (30%), and Southern Ute Indian Tribe Lands (12%).

Winter range and migration corridors are two important habitats present in the DAU for sustaining mule deer. Of the total winter range available, 21% is located on public lands, much of which is managed by the SJNF. Large blocks of contiguous key mule deer winter range (winter concentration areas and severe winter range) are in the Valle Seco, Archuleta Creek-Vega La Juana, and Chimney Rock National Monument areas on the Pagosa Ranger District, and Sauls Creek, Spring Creek, and Fosset Gulch areas on the Columbine Ranger District. Large numbers of mule deer overwinter in these areas due to available forage and habitat security. Important migration corridors lead into these areas, extending from summer and transition ranges. Collectively, key winter range and migration corridors are areas the Forest Service is most concerned about with respect to mule deer habitat capability, sustainability, and effectiveness.

The SJNF is committed in assisting CPW manage habitat for mule deer and other big game consistent with the SJNF Land and Resource Management Plan (LRMP). The LRMP contains objectives and management direction to maintain or improve habitat quality, protect migration corridors, and minimize impacts from management actions to big game populations. Although the Forest Service, CPW, and other partners have implemented habitat enhancement projects in



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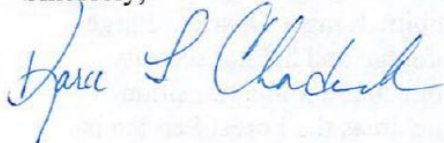


winter range and migration corridors with good success, we continue to see areas impacted by big game browsing. Forest Service wildlife biologists and other resource managers have identified areas with reduced habitat quality, as evidenced by extensive browsing in low elevation mountain shrubland communities (sagebrush, bitterbrush, serviceberry, and mountain mahogany). Examples of these areas include Vega La Juana-Archuleta Creek, Valle Seco, and Chimney Rock National Monument which encompass areas that are either closed to livestock grazing or have been placed in non-use status for resource protection. The Forest has ongoing projects in these areas such as prescribed burns and mechanical vegetation treatments, along with future projects planned to help enhance habitat for mule deer. The Forest recognizes that competition between livestock and wildlife exists in other areas and will continue to implement management actions to reduce herbivory impacts in areas with active livestock grazing and take action where illegal/trespass livestock grazing exists on NFS lands.

The Forest has also identified declining vegetative conditions in transition ranges that lie adjacent to winter range or comprise many of the important migration corridors leading into winter range. Current conditions have mostly been associated with past management actions such as fire suppression, livestock grazing and timber management. Much of the transition range consists of mixed shrub species (predominately Gambel oak and snowberry), ponderosa pine, aspen, and warm-dry mixed conifer forests. The forest is committed to improve vegetation conditions in transition ranges by implementing projects that restore ponderosa pine forests, regenerate aspen, and manage mixed conifer forest to more closely resemble historic range of variability. Projects are ongoing and planned in transition ranges to reduce fuel loadings, restore vegetative conditions, and improve wildlife habitat.

The Forest Service, CPW, and other partners have implemented habitat enhancement projects in areas with good success. Many of these projects have been co-funded by the San Juan Basin Habitat Partnership Program, Rocky Mountain Elk Foundation, CPW's Colorado Mule Deer Strategy, and other partners/collaboratives. These efforts should continue to ensure public land winter range, migration corridors, and transition range continue supporting habitat for mule deer and other wildlife. With CPW's continued cooperation in managing public land habitat, the SJNF supports CPW's Draft San Juan Basin Mule Deer Herd Management Plan for Data Analysis Unit (DAU) D-30.

Sincerely,



KARA L. CHADWICK  
Forest Supervisor

## Appendix D30-C: La Plata County Letter



*La Plata County*  
Colorado

Board of County Commissioners

Clyde Church, Chair • Gwen Lachelt, Vice Chair • Julie Westendorff, Commissioner

1101 East 2nd Ave.  
Durango, CO 81301  
(970) 382-6219

Colorado Parks and Wildlife  
Att: Brad Weinmeister  
151 E 16<sup>th</sup> Street  
Durango, Colorado 81301

January 28, 2020

RE: CPW San Juan Basin Mule Deer Herd Management Plan

Dear Mr. Weinmeister,

La Plata County appreciates the opportunity to provide a letter of support for the CPW preliminary herd management plan for the San Juan Basin mule deer on CPW managed lands located within La Plata County. La Plata County supports this plan that identifies areas with quality habitat, migration corridors and areas of high conflict. This plan outlines the management steps needed to continue CPW's objectives and provides mitigation to protect this natural resource. These areas provide economic benefits to our local community by tourists and locals who participate in hunting season.

CPW diligently worked to prepare this plan and identify areas that needed mule deer management. The wildlife areas are important for management to reduce conflicts with recreationists and to protect special habitat areas. Tourism is important to our local economy in many ways, through hunters, trail users and outdoor enthusiasts. The demand for trails has grown and these beloved areas are seeing more use.

Supporting the CPW's capacity to manage and plan for mule deer habitat within these recreational areas benefits our local community and creates extensive economic value to our area.

La Plata County appreciates this opportunity to participate and comment on this plan. We recognize the importance of what CPW is trying to accomplish with mule deer herds and how to best manage them. The County appreciates the CPW's coordination in helping to ensure reduced conflict for mule deer and trying to meet everyone's best interest.

Sincerely,

LA PLATA COUNTY  
BOARD OF COUNTY COMMISSIONERS

  
Clyde Church  
Chair

  
Gwen Lachelt  
Vice Chair

  
Julie Westendorff  
Commissioner



## Appendix D30-D: Archuleta County Commissioner Email

STATE OF  
COLORADO

Grigg - DNR, Jamin &lt;jamin.grigg@state.co.us&gt;

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**D-30**

3 messages

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**Warren Brown** <Warren.Brown@archuletacounty.org>  
To: "jamin.grigg@state.co.us" <jamin.grigg@state.co.us>  
Cc: "Purcell - DNR, Doug" <doug.purcell@state.co.us>

Mon, Nov 6, 2023 at 12:49 PM

Good afternoon,

I would like to take just a couple of minutes and comment regarding the San Juan Basin deer herd management plan. I am curious if this plan considers the number or percentage of deer killed by predation or vehicles? I see that there are estimates regarding the number of deer taken during the hunting season, but I didn't see anything specific on the other. I would expect that these numbers also affect the total population and can have bearing on the buck to doe and fawn to doe ratios.

To me, the overall deer population seems steady, but I am concerned about the lack of maturity in the buck population and the apparent increase of mountain lions. I can only judge from what I see while driving, while at my home where I regularly view a wide variety of animals to include deer, elk, turkeys, foxes, mountain lions and bear, but most bucks I see I would estimate to be three years old or less.

Thank you for your consideration,

*Warren M. Brown*

Archuleta County Commissioner

District 1

PO Box 1507 / 398 Lewis Street

Pagosa Springs, CO 81147

(970) 264-8304



## Appendix D35-A: San Luis Valley Habitat Partnership Program Letter



November 22, 2017

Brent Frankland  
Colorado Parks and Wildlife  
0722 S. CO Rd 1 East  
Monte Vista, CO 81144

**RE: San Luis Valley Habitat Partnership Program Comments - DAU D35**

Dear Brent:

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity to provide input into big game management in their areas. The diverse makeup of local HPP committees (3 livestock growers, Forest Service, BLM, CPW and sportsmen representatives) provide a good cross section of local interests to review DAU proposals and respond accordingly for CPW consideration.

The San Luis Valley HPP committee has discussed your presentation and reviewed the draft alternatives for this DAU plan update. The San Luis Valley HPP committee is in agreement with the following comments pertaining to proposals for the population range and sex ratio objectives for the above DAU plan.

The SLVHPP committee supports the draft alternative to keep the current population objective. We believe this alternative responsibly balances local range and habitat conditions with sportsmen desires and landowner concerns. We understand that the current population is below objective and that this alternative will still allow for some population growth in order to reach desired population objectives. We have not heard of any concerns about the current population, and any issues we have are more likely related to distribution of the herds in the area and not the overall population size.

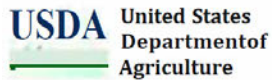
The SLVHPP also discussed the proposed sex ratio alternative. We support raising the current sex ratio objective to provide more bucks for sportsmen to pursue. We understand this option would reduce hunting opportunity slightly but our committee believes having more male animals in this area is desired and possible.

Thank you for the presentation and the opportunity to provide these comments.

Sincerely,

Mick Davis, Chair  
San Luis Valley HPP Committee

## Appendix D35-B: United States Forest Service Letter



Forest  
Service

Rio Grande National Forest

10 55 9th Street  
Del Norte, CO 81132  
719-657-5017  
Fax: 719-657-5280

**File Code:** 2620  
**Date:** December 12, 2023

Brent Frankland  
Terrestrial Biologist  
Colorado Parks and Wildlife  
0722 South County Rd 1E  
Monte Vista, CO 81144

Dear Mr. Frankland:

Thank you for the opportunity to comment on Colorado Parks and Wildlife's (CPW) draft Mule Deer Herd Management Plans for Deer DAU D-26, D-35, D-36, D-56 (combined D-31 and D-37). These DAUs encompass GMUs 68,681,682, 76, 79, 791, 80, 81, 82 and 83 involving all the Rio Grande National Forest. My staff wildlife biologists have reviewed the draft plans for these DAUs and provided information to offer the following comments for consideration and use as you finalize the plans.

The Rio Grande National Forest (Forest) contains over 1.8 million acres of National Forest System land that are managed for multiple uses in the San Luis Valley area of south-central Colorado. The DAU Plans are an important aspect of our management because of high public interest in big game species and because the Forest is responsible for managing much of the habitat to support the desired population levels. However, it is also important that populations are maintained within the carrying capacities of the habitat, and that deer population objectives are managed in a manner that minimizes potential conflicts with other program areas. These comments reflect these mutual goals.

Prior to 2020, mule deer (along with Rocky Mountain elk and other species) were managed as Management Indicator Species (MIS) under our 1996 Land and Resource Management Plan (Forest Plan). As such, both population and habitat trends were tracked at the Forest-level in association with Forest Plan direction, including providing the quantity and quality of habitat capable of supporting the population objectives for these species.

As you likely know, big game has planning and monitoring components in the Rio Grande National Forest Land Management Plan (Plan) signed in 2020 and the MIS concept no longer exists. While the direction and mechanisms for protecting and monitoring big game have changed, the focus and importance of these species for the Forest has not. Many of the concerns noted in the DAU plans for mule deer can be tied to habitat connectivity. In the 2020 Plan, we added language specifically around managing big game habitat connectivity. For some species, such as mule deer, Forest landscape conditions will continue to facilitate historic game movement patterns within and among Forest and other public and private lands, including across state lines. Much of the Forest is designated wilderness or roadless, which will contribute to habitat connectivity and movement patterns for many species, particularly those that are sensitive to human disturbances. Additional



protected areas occur on adjacent Forest lands as well as across state and administrative boundaries.

Two guidelines incorporated into the Plan for big game and mule deer more specifically include:

**G-WLDF-1:** To reduce stress at a critical point in the lifecycle of big game, restrict activities on winter range from approximately December 1 to April 15, as needed. (Forestwide)

**G-WLDF-2:** To maintain habitat function, connectivity, and security for big game species, there should be no net gain in motorized and nonmotorized system routes where the system route density currently exceeds one linear mile per square mile or where the net gain would cause system route density to exceed one linear mile per square mile in areas mapped by Colorado Parks and Wildlife as important big game production areas, migration corridors, severe winter range, and winter concentration areas. Exception: This does not apply to administrative routes. (Forestwide)

In addition, mule deer (and other big game) habitat and population trend considerations remain a key part of the plan monitoring as focal species and both population and habitat trend considerations are included in the [Monitoring Plan](#). There are two key questions related to mule deer and other big game including:

[Monitoring Question 1:](#) What is the status and trend of populations of Rocky Mountain elk, Rocky Mountain bighorn sheep?

[Monitoring Question 2:](#) What is the status and trend of forage and cover for big game species?

While the data for MQ1 is and will continue to be provided by CPW and thus should reflect your estimates, the data and analysis for MQ2 includes incorporating current forest habitat and forage trends across the forest including current ecological conditions of all forest types. While our annual range monitoring indicates that current stocking levels are adequate and feasible, future detailed modeling will incorporate livestock and big game needs. Unfortunately for this review, the first full iteration of this analysis is not expected until early 2024.

As such, management of big game habitat will continue to involve evaluations of habitat conditions during project level evaluations and Forest Plan monitoring, but also through other project partnerships such as HPP, Mule Deer Foundation, Rocky Mountain Elk Foundation, and others. We therefore expect to continue to work closely with CPW to achieve mutually desired habitat conditions for all big game species.

Hunting and other wildlife-related recreation is one of the biggest uses experienced on the Forest. Although most of this occurs during the rifle season(s) for deer and elk, hunters utilize our public lands from the opening of pronghorn season in mid-August through the late season elk cow hunts of December. This large influx of visitors brings a huge economic boost to the San Luis Valley but also comes with challenges in increased off-road vehicle use, high density of hunter camps, and an increased need in Forest resource protection presence and front office staffing needs.

## **DAU specific review and recommendations**

**DAU D-35 Mule Deer**

**Current Conditions:** The Forest manages approximately 41 % of the land within this DAU, predominantly as summer and/or transitional range. Spruce bark beetles have impacted the mature Engelmann spruce forests since approximately 2008 and peaked around 2012 creating more open canopy conditions in the sub-alpine habitat, which has provided more sunlight for grasses, forbs, and brush.

Approximately 141 mi<sup>2</sup> or 6.7% of winter habitat and approximately 9 mi<sup>2</sup> or 0.4% of severe winter range resides on land managed by the Forest. Both winter and severe winter ranges consist of mixed conifer type habitats such as Douglas fir/Ponderosa Pine and Pinyon/Juniper. There has been an uptick in insects such as Douglas fir beetle, and disease within Douglas fir forests. The Rio Grande watershed of southern Colorado has seen twenty plus years of below average precipitation and an increase in average winter temperatures. These impacts may impact some thermal cover and/or provide for better understory growth i.e., mountain mahogany and currants. We recognize that both winter and severe winter range should be a focus for management actions as needed to maintain or improve habitat conditions for mule deer in this DAU and look forward to working cooperatively with CPW and other partners to attain these goals.

	Acres	Square Miles	Percentage
DAU-35	1,344,000	2,100	
RGNF within DAU-35	551,484	862	41
RGNF Summer Range	538,231	841	40
RGNF Winter Range	89,907	141	6.7
RGNF Winter Concentration	33,595	53	2.5
RGNF Concentration Areas	22,338	35	1.7
RGNF Severe Winter	5,931	9	0.4
RGNF Resident Population Areas	167	0	0

**Recommendations:** Based on existing habitat information and other factors, we concur with CPW that Alternative 2 (Preferred objective) be implemented. This objective would be set at 6,000 to 8,000 mule deer. We recognize that both winter and severe winter range should be a focus for management actions as needed to maintain or improve habitat conditions for mule deer in this DAU and look forward to working cooperatively with CPW and other partners to attain these goals. Based on input received for this draft plan, we concur that Alternative 2 (25 to 30 bucks per 100 does) be pursued as a sex ratio objective to provide a higher quality recreational experience to the public.

**Other General Comments:** The draft DAU Plan mentions winter range degradation and loss, and increased disturbance from people and domestic livestock as concerns. As mentioned earlier we are currently evaluating livestock and big game numbers as it relates to current forage availability. The Forest continues to identify user-created roads for closure and evaluate road construction for all projects to meet G-WLDF-2 mentioned earlier. We appreciate CPW's continued assistance in enforcing and monitoring potential resource damage and disturbance from OHVs to continue to educate the public and manage this activity and look forward to carrying out this effort into winter over the snow recreation and the ongoing general travel management efforts. .

If you have any questions, please contact Jason Remshardt, Fisheries and Wildlife Program Manager at 719-872-4024.

Sincerely,

X   
Tristram S. Post signing for Kristen Sexton

Signed by: TRISTRAM POST

**KRISTEN SEXTON**  
Acting Forest Supervisor

cc: Rick Basagoitia, Andrew Kelher, Tristram Post, Andrea Jones, Patrick Moran, Jason Remshardt

## Appendix D35-C: Bureau Of Land Management Letter



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
San Luis Valley Field Office  
1313 E. Highway 160  
Monte Vista, Colorado 81144



In Reply Refer To:  
6521 (LLCOF03000, TLA)

**December 14, 2023**

Sent Via Email:  
[brent.frankland@state.co.us](mailto:brent.frankland@state.co.us)

Brent Frankland,  
Terrestrial Wildlife Biologist  
0722 South Road 1 East  
Monte Vista, CO 81144

Dear Mr. Frankland,

The Bureau of Land Management (BLM) San Luis Valley Field Office (SLVFO) appreciates the opportunity to comment on the draft D-26, D-35, D-36, and D-56 mule deer Herd Management Plans (HMPs). As the agency providing the majority of crucial winter range for big game in the San Luis Valley, we thought it important to provide comments on any changes Colorado Parks and Wildlife (CPW) may implement. The BLM SLVFO has a strong commitment to providing quality wildlife habitat as one of our important “multiple uses”. We have appreciated our longstanding working relationship with CPW and partnership in managing wildlife habitats throughout BLM SLVFO-managed lands. Our input on each draft HMP is addressed individually below.

**D-35**

CPW states within the *Preferred Management Objectives: Post hunt Sex Ratio* section that, “A higher objective from the previous HMP reduces the need for an aggressive harvest from what CPW has observed. However, higher sex ratios may increase CWD risk.” However, CPW then states in the *Strategies for Achieving the Preferred Objectives: Post-hunt Sex Ratio* section later in the document that, “The preferred objective should also help to reduce the risk of CWD.” We feel this is a point of contradiction, or at least a point of confusion, regarding Chronic Wasting Disease (CWD) risk that should be addressed and clarified.

CPW states the following in the draft D-35 HMP:

*From 1999 to 2018, the estimated population fluctuated between 5,000 and 6,000 animals. However, since 2018, the estimated population has continued on an upward trend, rising above the objective range to roughly 6,800 animals in 2022. The last time the herd was estimated to be greater than 6,000 animals was in the late 1980s and mid-1990s, with relatively sharp declines after both periods, the lowest estimate being at almost 4,000 mule deer in 1998.*

.....

*The quantity and quality of winter range habitat may limit the D-35 mule deer population carrying capacity. The winter range continues to diminish slowly, with increased development on private land and competition with domestic livestock. Similarly, summer recreational activities continue to expand throughout the DAU. The various anthropogenic impacts may affect distribution, reproduction, and fawning efforts restricting population growth. Since the previous HMP, CPW continued efforts to increase the population size of the D-35 herd. Although the population increased, it has done so beyond the objective range set at the time. Much of the population growth is likely due to improved fawn recruitment.*

The first excerpt details how the herd experienced relatively sharp population declines after the two periods when the population was greater than 6,000 animals, other than present (2022 estimate). Anecdotally, those sharp declines could indicate a carrying capacity limitation of mule deer on the landscape, at least at the time. The many management challenges referenced in the second excerpt above highlight the continued reduction of carrying capacity, increased anthropogenic impacts, continued drought conditions, etc.; especially since the late 1980s and mid-1990s. Without the appropriate data and studies/models to determine the carrying capacity of the landscape and a current herd population exceeding the herd prior to each sharp decline, as detailed above, the BLM cautions against the preferred alternative of potentially increasing the herd to 8,000 animals. We are concerned that this approach could result in another sharp decline, or population collapse, which would significantly impact hunting success and a wide range of ecological functions for years. Additionally, with a current population estimate that has exceeded the 2018 objective, the potential for the same to occur with the preferred herd increase (barring or facilitating a population decline/collapse) should be considered in the decision-making process. We are aware that if increases in numbers create land health impacts, CPW can moderate herd sizes with game management tools, but land health impacts are more difficult to reverse and can take many years to see improvement, especially in times of drought.

Although not explicitly stated in the plans, the long-term success of the D-35 herd is partially contingent on the successful management of the E-32 herd objective levels. We believe that continued interspecific competition between elk and mule deer and the reduction of habitat and resources available to the respective herds could eventually lead to a partial population collapse from exceeding the carrying capacity. Therefore, we recommend reducing the elk population objective in the upcoming E-32 HMP revision by a similar 10%-20% to offset the D-35 objective increase, should the D-35 preferred population objective alternative be chosen.

Conversely, if approved, we agree that issuing antlerless licenses on public land would be a valuable tool to help address the growing population trend, stabilize the population within the proposed objective range, and reduce the threat of a population decline/collapse from exceeding carrying capacity. However, we recommend including a caveat to the preferred population objective alternative that it will only be selected if the antlerless license proposal is approved.

The draft HMPs list winter range forage availability and quality as the limiting factors to herd size. Therefore, continued habitat partnership projects between CPW and the BLM will be critical to improve availability of browse and to ensure the long-term health and stability of both herds. To assist CPW in making management decisions within each herd area, the BLM would like to encourage CPW to gather utilization data in mule deer winter concentration areas and engage the BLM well-in-advance of draft HMP comment periods to discuss potential land health/habitat issues occurring on BLM-administered lands within the respective GMUs. This data and expanded coordination would help inform the decision between alternatives identified in the HMPs. Because of the uncertainties regarding ecological constraints, we believe a program to monitor habitat conditions is warranted, particularly to determine if population objectives need to be adjusted to fit more accurately with updated model estimates and to assist in quantifying carrying capacity. However, the BLM does not have the capacity to implement a monitoring program specific to wild ungulates.

If you have any questions regarding this matter, please contact Dale Culver, Field manager at (719-852-8171).

Sincerely,

**DALE CULVER**

Digitally signed by DALE  
CULVER  
Date: 2023.12.14 10:53:19  
-07'00'

Dale Culver  
Field Office Manager  
San Luis Valley Field Office



## Appendix D36-A: San Luis Valley Habitat Partnership Program Letter



The San Luis Valley HPP Committee has reviewed the Draft Herd Management Plans for Deer D-36 and Elk E-34. The Committee also appreciated Terrestrial Biologist Brent Frankland providing an overview of the plans at our October 12 meeting.

Upper Rio Grande Deer D-36 Herd Management Plan (GMU Units 76, 79 and 791)

The Committee supports CPW's proposed Alternative 3 regarding the *post-hunt population* objective which is an approximate increase in 10% over the 2010 objective of 2,000-2,500 to 2,200-2,800 mule deer. This objective range provides the best balance for managing the herd, hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat carrying capacity.

Additionally, Alternative 2 *post-hunt sex ratio* as proposed, is supported by the Committee which increases the 2010 current objective of 20-25 to 23-28 bucks per 100 does. The proposed range creates the best balance between the desired hunting experience and for harvesting a mature mule deer buck in the DAU.

Upper Rio Grande Elk E-34 Herd Management Plan (GMU Units 76 and 79)

CPW is proposing Alternative 4 to maintain current management to stabilize the elk population and sustain it within the proposed *post-hunt population* objective range of 5,800 – 7,800.

The current modeled population is approximately 7,000 elk, which is over the 2010 objective of 4,000 – 5,500. Alternative 4 offers the ability for a slight increase in population growth over the current modeled population. Under this alternative, cow hunting opportunities may initially increase slightly to curb potential upward trend in population growth. The Committee is supportive of Alternative 4.

The Committee also supports CPW's proposed Alternative 2 of 20-25 bulls per 100 cows which maintains the 2010 *post-hunt sex ratio* objective. This sex ratio range would maintain the desired bull-maturity level and provide adequate hunting opportunities, based on the current observed and estimated sex ratios.

The San Luis Valley HPP Committee appreciates the opportunity to review and comment on the Draft Herd Management Plans and commends CPW personnel on their efforts to involve the public in the planning process.

/s/ Dale Gomez  
San Luis Valley HPP Sportsmen Representative and Chairman

10/13/2021

## Appendix D36-B: United States Forest Service Letter



Forest  
Service

Rio Grande National Forest

1055 9th Street  
Del Norte, CO 81132  
719-657-5017  
Fax: 719-657-5280

**File Code:** 2620  
**Date:** December 12, 2023

Brent Frankland  
Terrestrial Biologist  
Colorado Parks and Wildlife  
0722 South County Rd 1E  
Monte Vista, CO 81144

Dear Mr. Frankland:

Thank you for the opportunity to comment on Colorado Parks and Wildlife's (CPW) draft Mule Deer Herd Management Plans for Deer DAU D-26, D-35, D-36, D-56 (combined D-31 and D-37). These DAUs encompass GMUs 68,681,682, 76, 79, 791, 80, 81, 82 and 83 involving all the Rio Grande National Forest. My staff wildlife biologists have reviewed the draft plans for these DAUs and provided information to offer the following comments for consideration and use as you finalize the plans.

The Rio Grande National Forest (Forest) contains over 1.8 million acres of National Forest System land that are managed for multiple uses in the San Luis Valley area of south-central Colorado. The DAU Plans are an important aspect of our management because of high public interest in big game species and because the Forest is responsible for managing much of the habitat to support the desired population levels. However, it is also important that populations are maintained within the carrying capacities of the habitat, and that deer population objectives are managed in a manner that minimizes potential conflicts with other program areas. These comments reflect these mutual goals.

Prior to 2020, mule deer (along with Rocky Mountain elk and other species) were managed as Management Indicator Species (MIS) under our 1996 Land and Resource Management Plan (Forest Plan). As such, both population and habitat trends were tracked at the Forest-level in association with Forest Plan direction, including providing the quantity and quality of habitat capable of supporting the population objectives for these species.

As you likely know, big game has planning and monitoring components in the Rio Grande National Forest Land Management Plan (Plan) signed in 2020 and the MIS concept no longer exists. While the direction and mechanisms for protecting and monitoring big game have changed, the focus and importance of these species for the Forest has not. Many of the concerns noted in the DAU plans for mule deer can be tied to habitat connectivity. In the 2020 Plan, we added language specifically around managing big game habitat connectivity. For some species, such as mule deer, Forest landscape conditions will continue to facilitate historic game movement patterns within and among Forest and other public and private lands, including across state lines. Much of the Forest is designated wilderness or roadless, which will contribute to habitat connectivity and movement patterns for many species, particularly those that are sensitive to human disturbances. Additional



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protected areas occur on adjacent Forest lands as well as across state and administrative boundaries.

Two guidelines incorporated into the Plan for big game and mule deer more specifically include:

**G-WLDF-1:** To reduce stress at a critical point in the lifecycle of big game, restrict activities on winter range from approximately December 1 to April 15, as needed. (Forestwide)

**G-WLDF-2:** To maintain habitat function, connectivity, and security for big game species, there should be no net gain in motorized and nonmotorized system routes where the system route density currently exceeds one linear mile per square mile or where the net gain would cause system route density to exceed one linear mile per square mile in areas mapped by Colorado Parks and Wildlife as important big game production areas, migration corridors, severe winter range, and winter concentration areas. Exception: This does not apply to administrative routes. (Forestwide)

In addition, mule deer (and other big game) habitat and population trend considerations remain a key part of the plan monitoring as focal species and both population and habitat trend considerations are included in the [Monitoring Plan](#). There are two key questions related to mule deer and other big game including:

[Monitoring Question 1:](#) What is the status and trend of populations of Rocky Mountain elk, Rocky Mountain bighorn sheep?

[Monitoring Question 2:](#) What is the status and trend of forage and cover for big game species?

While the data for MQ1 is and will continue to be provided by CPW and thus should reflect your estimates, the data and analysis for MQ2 includes incorporating current forest habitat and forage trends across the forest including current ecological conditions of all forest types. While our annual range monitoring indicates that current stocking levels are adequate and feasible, future detailed modeling will incorporate livestock and big game needs. Unfortunately for this review, the first full iteration of this analysis is not expected until early 2024.

As such, management of big game habitat will continue to involve evaluations of habitat conditions during project level evaluations and Forest Plan monitoring, but also through other project partnerships such as HPP, Mule Deer Foundation, Rocky Mountain Elk Foundation, and others. We therefore expect to continue to work closely with CPW to achieve mutually desired habitat conditions for all big game species.

Hunting and other wildlife-related recreation is one of the biggest uses experienced on the Forest. Although most of this occurs during the rifle season(s) for deer and elk, hunters utilize our public lands from the opening of pronghorn season in mid-August through the late season elk cow hunts of December. This large influx of visitors brings a huge economic boost to the San Luis Valley but also comes with challenges in increased off-road vehicle use, high density of hunter camps, and an increased need in Forest resource protection presence and front office staffing needs.

## **DAU specific review and recommendations**

**DAU D-36 Mule Deer**

**Current Conditions:** The Forest has a high responsibility for supporting the mule deer numbers that the CPW seeks to attain in this DAU with 66% of mule deer summer range existing on lands managed by the Forest. Spruce bark beetles have impacted the mature Engelmann spruce forests since approximately 2008 and peaked around 2013 and had the largest wildfire on record for the RGNF. These ecological conditions have created more open canopy conditions in the sub-alpine habitat, which has provided more sunlight for grasses, forbs, and shrubs. Also, the Divide District has been actively engaged in numerous habitat improvement projects to benefit mule deer and we hope to continue these efforts in a cooperative effort with CPW and other partners.

Approximately 170 mi<sup>2</sup> or 9.4% of winter habitat and approximately 96 mi<sup>2</sup> or 5.3% of severe winter range resides on land managed by the Forest. Both winter and severe winter ranges consist of mixed conifer type habitats such as Douglas fir/Ponderosa Pine and Pinyon/Juniper. There has been an uptick in insects such as Douglas fir beetle, and disease within Douglas fir forests. The Rio Grande watershed of southern Colorado has seen twenty plus years of below average precipitation and an increase in average winter temperatures. These impacts may impact some thermal cover and/or provide for better understory growth i.e., mountain mahogany and currants. We recognize that both winter and severe winter range should be a focus for management actions to maintain or improve habitat conditions for mule deer in this DAU as there are continued pressures with private land development and an increase in recreationists and look forward to working with CPW and other partners to attain these goals.


	Acres	Square Miles	Percentage
DAU-36	1,155,878	1,806	100
RGNF within DAU-36	760,601	1,188	65.8
RGNF Summer Range	758,761	1,186	65.6
RGNF Winter Range	108,805	170	9.4
RGNF Severe Winter Range	61,541	96	5.3
RGNF Concentration Areas	31,529	49	2.7
RGNF Winter Concentration	14,556	23	1.3
RGNF Residential Population	32	0	0

**Recommendations:** Based on existing habitat conditions and habitat improvement limitations, we recommend that Alternative 3 (current population) be implemented as the population objective for DAU D-36. This objective would be set at 2,200-2,800 mule deer. We consider this DAU, and in particular GMU 79, to be one of the most significant mule deer units and believe that quality hunting, wildlife viewing, and healthy habitat conditions can be achieved. We would also recommend that limited entry continue, as this helps to control and better manage potential resource damage from recreational hunter numbers that utilize public lands. Based on input received for this draft plan, we concur that Alternative 3 (23 to 28 bucks per 100 does) be pursued as a sex ratio objective to provide a higher quality recreational experience to the public.

**Other General Comments:** The draft DAU Plan mentions winter range degradation and loss, and increased disturbance from people and domestic livestock as concerns. As mentioned earlier we are currently evaluating livestock and big game numbers as it relates to current forage availability. The Forest continues to identify user-created roads for closure and evaluate road construction for all projects to meet G-WLDF-2 mentioned earlier. We appreciate CPW's continued assistance in enforcing and monitoring potential resource damage and disturbance from OHVs to continue to educate the public and manage this activity and look forward to carrying out this effort into winter over the snow recreation and the ongoing general travel management efforts. .

If you have any questions, please contact Jason Remshardt, Fisheries and Wildlife Program Manager at 719-872-4024.

Sincerely,

X 

Tristram S Post signing for Kristen Sexton

Signed by: TRISTRAM POST

**KRISTEN SEXTON**

Acting Forest Supervisor

cc: Rick Basagoitia, Andrew Kelher, Tristram Post, Andrea Jones, Patrick Moran, Jason Remshardt

## Appendix D36-C: Bureau Of Land Management Letter



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
San Luis Valley Field Office  
1313 E. Highway 160  
Monte Vista, Colorado 81144



In Reply Refer To:  
6521 (LLCOF03000, TLA)

**December 14, 2023**

Sent Via Email:  
[brent.frankland@state.co.us](mailto:brent.frankland@state.co.us)

Brent Frankland,  
Terrestrial Wildlife Biologist  
0722 South Road 1 East  
Monte Vista, CO 81144

Dear Mr. Frankland,

The Bureau of Land Management (BLM) San Luis Valley Field Office (SLVFO) appreciates the opportunity to comment on the draft D-26, D-35, D-36, and D-56 mule deer Herd Management Plans (HMPs). As the agency providing the majority of crucial winter range for big game in the San Luis Valley, we thought it important to provide comments on any changes Colorado Parks and Wildlife (CPW) may implement. The BLM SLVFO has a strong commitment to providing quality wildlife habitat as one of our important “multiple uses”. We have appreciated our longstanding working relationship with CPW and partnership in managing wildlife habitats throughout BLM SLVFO-managed lands. Our input on each draft HMP is addressed individually below.

**D-36**

After reviewing the draft D-36 plan, we agree with the many current and emerging ecological constraints identified by CPW when considering deer herd objectives for this area, including increasing fragmentation from development, increasing recreation pressure, limited winter range and forage availability, prolonged drought, game damage issues, disease, and competition with other wild ungulates.

The BLM agrees with CPW's preferred management objective to remain the same with a post-hunt mule deer population of 2,200 to 2,800 and a sex ratio objective range of 23 to 28 bucks per 100 does, as it provides the best balance for managing the herd, supporting hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat-carrying capacity. This position is consistent with BLM's continuing efforts to enhance or restore proper rangeland functions, in particular, by attempting to reduce the intensity and duration of collective growing season use by wild and domestic ungulates through improved livestock management, noxious weed control, carrying capacity analyses, more aggressive implementation of our Fire Management Plan, and through the development of climate change adaptation strategies. We feel that land management applied with an emphasis toward deer would continue to complement balanced management of woodland and shrubland communities across BLM lands in GMU 79. Additionally, we support the proposed management objective because it will minimize the overall financial and physical investments associated with improving habitat in the DAU—crucial for sustaining a viable deer population long-term. However, we recommend continuing that strategy of elk dispersal and alternative harvest opportunities to avoid exacerbating issues with interspecific competition and carrying capacity.

The draft HMPs list winter range forage availability and quality as the limiting factors to herd size. Therefore, continued habitat partnership projects between CPW and the BLM will be critical to improve availability of browse and to ensure the long-term health and stability of both herds. To assist CPW in making management decisions within each herd area, the BLM would like to encourage CPW to gather utilization data in mule deer winter concentration areas and engage the BLM well-in-advance of draft HMP comment periods to discuss potential land health/habitat issues occurring on BLM-administered lands within the respective GMUs. This data and expanded coordination would help inform the decision between alternatives identified in the HMPs. Because of the uncertainties regarding ecological constraints, we believe a program to monitor habitat conditions is warranted, particularly to determine if population objectives need to be adjusted to fit more accurately with updated model estimates and to assist in quantifying carrying capacity. However, the BLM does not have the capacity to implement a monitoring program specific to wild ungulates.

If you have any questions regarding this matter, please contact Dale Culver, Field manager at (719-852-8171).

Sincerely,

DALE CULVER

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Dale Culver  
Field Office Manager  
San Luis Valley Field Office

## Appendix D40-A: Uncompahgre Habitat Partnership Program Letter



October 30, 2023

Alyssa Kircher  
Colorado Parks and Wildlife  
2300 S. Townsend Ave  
Montrose, CO 81401

RE: Uncompahgre Habitat Partnership Program Comments - HMP D-40

Dear Ms. Kircher,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the Uncompahgre HPP (UNCHPP) Committee has reviewed the D-40 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The UNCHPP Committee supports the draft alternative to keep the current population objective. We believe this alternative responsibly balances local range and habitat conditions with sportsmen's desires and landowner concerns. The committee area does not experience many deer conflicts and we believe we have the resources necessary to address conflicts should they occur. Additionally, we support lowering the current sex ratio objective to a number that, while still maintaining larger bucks, would ultimately increase the opportunity for more hunters in the field.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-40. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in this area. The UNCHPP Committee will continue to support management efforts in partnership with the numerous local landowners and federal land management agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Bobby Gray, Chair  
Uncompahgre HPP Committee



## Appendix D40-B: United States Forest Service Letter



United States  
Department of  
Agriculture

Forest  
Service

Grand Mesa, Uncompahgre and  
Gunnison National Forests

2250 South Main Street  
Delta, CO 81416  
970-874-6600  
TDD: 970-874-6660  
Fax: 970-874-6698

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**File Code:** 2600  
**Date:** October 31, 2023

Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Ms. Kircher:

The Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) appreciate the opportunity to provide comments on your draft plan for deer management in game management units (GMUs) 61 and 62 (DAU-D-19) and GMUs 64 and 65 (DAU-D-40). The D-19 area is comprised of 37% National Forest System lands managed by the Norwood, Ouray, and Grand Valley Ranger Districts. The D-40 area is comprised of 29% National Forest System lands and is managed by the Ouray District. These lands provide year-round habitat for elk from summer habitats at the highest elevations to winter concentrations areas in the lower elevations. These lands are managed for the benefit of multiple uses, including wildlife habitat. The GMUG values Colorado Parks and Wildlife (CPW) coordination on habitat conditions, habitat management, and habitat improvements in these areas.

The GMUG supports CPW's proposal to decrease the current population objective in D-19 from 36,000-38,000 to 12,000-15,000 deer and amend the current sex ratio objective to 30-35 bucks per 100 does. The GMUG also supports CPW's proposal in D-40 to extend the current population objective of 6,500-8,500 deer and amend the current sex ratio objective to 22-27 bucks per 100 does. The reduction in population goals still aims for an increase in the current population while being a more realistic goal given the current population size and carrying capacity in these units.

The proposed GMUG Forest Plan is expected to complement herd management objectives in part by designating Wildlife Management Areas which limit the road and trail density in some of the key habitat areas for deer on the Uncompahgre Plateau and prioritizing habitat improvement projects.

If you have any further questions or concerns, please reach out to Ouray District Ranger Dana Gardunio, Norwood District Ranger Megan Eno, or Grand Valley District Ranger Bill Edwards.

Sincerely,

CHAD STEWART  
Forest Supervisor

cc: Megan Eno, Dana Gardunio, Williams Edwards

## Appendix D40-C: Bureau Of Land Management Letter



## United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Uncompahgre Field Office  
2465 South Townsend Avenue  
Montrose, Colorado 80401

In Reply Refer To: 8100 (COS050)

Re: Draft Herd Management Plans: D-19, D-20, D-23, D-40, D-51

Evan Phillips and Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Evan and Alyssa:

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) appreciates the opportunity to provide comments on your draft plans for elk and deer management in data analysis units D-19, D-20, D-23, D-29, D-40 and D-51. The BLM provides habitat management for CPW mapped winter habitats for deer and elk in these units and always appreciates local CPW cooperation with land use planning and habitat improvements in these areas.

The BLM UFO is committed to working cooperatively with CPW and have appreciated the partnership and opportunity to work together by protecting big game within D-20 through the Jumbo Mountain Travel Management Plan. The all uses travel restriction for Zone 2 of the Jumbo Mountain Special Recreation Management Area resulted in an increase of approximately 1200 acres of wintering habitat protection through implementing a travel restriction for all uses to protect big game during the winter months on the Jumbo Mountain Special Recreation Management Area. This project exemplifies the partnership that BLM is committed to ensuring to provide opportunities on this landscape in a way that protects and enhances CPW herd management objectives and achieves our corresponding agency multiple use mandates.

BLM has concerns about the proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 from the approved 2018 Herd Management Plan because of the ongoing drought. The significant issues identified in the 2018 HMP and the 2023 Draft Herd Management Plans include ongoing drought, human population growth, and development, coupled with disease issues in the North Fork valley and the South Grand Mesa deer herd. The portions of Gunnison, Delta and Montrose Counties within D-20 and D-51 are all in moderate or severe drought, which impacts the quality of deer habitat. Less food, water and cover are available to big game under drought conditions. Deer will enter the winter months with lower fat reserves and potentially less milk production for fawns which could limit recruitment. Winter range forage is particularly limited

in D-20 and D-51 because of development and topography, further limiting the available winter range for deer. Since the original DAU plans were released in 2018, the landscape has undergone prolonged drought which has disproportionately affected winter range. The proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 is counterintuitive to the trends suggesting that carrying capacity is an issue.

The Rangeland Analysis Platform estimates production and can be a useful tool in estimating how annual herbaceous production trends are different from historical averages. Figure 1 shows that since the HMP plan was signed in 2018, four out of five years have had less than average production on winter range in the DAUs on both public and private land. Figure 2 shows that despite an above average precipitation year in 2023, the effects of long-term drought persist on winter range below 7000 feet. This equates to 83% of the time since signing of the 2018 HMP that winter range has experienced below average production.

The Executive Summary of the Draft Mule Deer Herd Management Plans for the Southwest Region states that CPW may consider revisiting an HMP prior to the end of the ten-year term of the plan if outstanding circumstances arise and a revision is deemed necessary. The ongoing drought coupled with the other issues identified in the draft plan for D-20 and D-51 suggest outstanding circumstances and warrant reconsideration of the lower herd objectives. BLM is concerned in particular about current rangeland health and the sustainability of winter range, and suggests that CPW reconsider the lower herd management objective alternative.

BLM strives to work with CPW to provide meaningful habitat protections to wildlife during the planning stages of projects. We believe that the proposal to extend the population objective from the 2018 HMP does not account for the persistent long-term drought impacts and the drastic declines in winter range overall health and productivity. Continued public land degradation will only serve to increase private land conflicts.

If you would like more specific information or have any questions, please feel free to contact me at (970)-240-5338 or [scopping@blm.gov](mailto:scopping@blm.gov). For specific questions regarding big game habitat management on these units, please contact Emily Latta, Wildlife Biologist at 970-240-5332 or [elatta@blm.gov](mailto:elatta@blm.gov).

Sincerely,  
SUZANNE  
COPPING  
Field Manager

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## Appendix D51-A: North Fork Habitat Partnership Program Letter



November 17, 2023

Evan Phillips  
Colorado Parks and Wildlife  
2300 S. Townsend Ave  
Montrose, CO 81401

RE: North Fork Habitat Partnership Program Comments - HMP D-51

Dear Mr. Phillips,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, sportsperson, Forest Service, BLM, and CPW representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance migratory corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the North Fork HPP (NFHPP) Committee has reviewed the D-51 draft alternatives regarding population range and sex ratio objectives and off these comments for consideration.

The NFHPP Committee supports the draft alternative to extend the current population objective. We believe this alternative responsibly balances local range and habitat conditions with sportsmen's desires and landowner concerns. The committee area does not experience many deer conflicts and we believe we have the resources necessary to address conflicts should they occur. Additionally, we believe the current sex ratio is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters. While we still have concerns about habitat loss and degradation we believe the preferred alternatives are appropriate.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-51. Adequate habitat is critical in meeting game management objectives and we remain committed to maintaining and improving habitat in this area. The North Fork HPP Committee will continue to support management efforts in partnership with the numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Andrew Taylor, Chair  
North Fork HPP Committee

## Appendix D51-B: Bureau Of Land Management Letter



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Uncompahgre Field Office  
2465 South Townsend Avenue  
Montrose, Colorado 80401



In Reply Refer To: 8100 (COS050)

Re: Draft Herd Management Plans: D-19, D-20, D-23, D-40, D-51

Evan Phillips and Alyssa Kircher  
Wildlife Biologist  
Colorado Parks and Wildlife  
2300 S. Townsend Avenue  
Montrose, CO 81401

Dear Evan and Alyssa:

The Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) appreciates the opportunity to provide comments on your draft plans for elk and deer management in data analysis units D-19, D-20, D-23, D-29, D-40 and D-51. The BLM provides habitat management for CPW mapped winter habitats for deer and elk in these units and always appreciates local CPW cooperation with land use planning and habitat improvements in these areas.

The BLM UFO is committed to working cooperatively with CPW and have appreciated the partnership and opportunity to work together by protecting big game within D-20 through the Jumbo Mountain Travel Management Plan. The all uses travel restriction for Zone 2 of the Jumbo Mountain Special Recreation Management Area resulted in an increase of approximately 1200 acres of wintering habitat protection through implementing a travel restriction for all uses to protect big game during the winter months on the Jumbo Mountain Special Recreation Management Area. This project exemplifies the partnership that BLM is committed to ensuring to provide opportunities on this landscape in a way that protects and enhances CPW herd management objectives and achieves our corresponding agency multiple use mandates.

BLM has concerns about the proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 from the approved 2018 Herd Management Plan because of the ongoing drought. The significant issues identified in the 2018 HMP and the 2023 Draft Herd Management Plans include ongoing drought, human population growth, and development, coupled with disease issues in the North Fork valley and the South Grand Mesa deer herd. The portions of Gunnison, Delta and Montrose Counties within D-20 and D-51 are all in moderate or severe drought, which impacts the quality of deer habitat. Less food, water and cover are available to big game under drought conditions. Deer will enter the winter months with lower fat reserves and potentially less milk production for fawns which could limit recruitment. Winter range forage is particularly limited

in D-20 and D-51 because of development and topography, further limiting the available winter range for deer. Since the original DAU plans were released in 2018, the landscape has undergone prolonged drought which has disproportionately affected winter range. The proposal to extend the 10% increase of the current population estimate objective in D-20 and D-51 is counterintuitive to the trends suggesting that carrying capacity is an issue.

The Rangeland Analysis Platform estimates production and can be a useful tool in estimating how annual herbaceous production trends are different from historical averages. Figure 1 shows that since the HMP plan was signed in 2018, four out of five years have had less than average production on winter range in the DAUs on both public and private land. Figure 2 shows that despite an above average precipitation year in 2023, the effects of long-term drought persist on winter range below 7000 feet. This equates to 83% of the time since signing of the 2018 HMP that winter range has experienced below average production.

The Executive Summary of the Draft Mule Deer Herd Management Plans for the Southwest Region states that CPW may consider revisiting an HMP prior to the end of the ten-year term of the plan if outstanding circumstances arise and a revision is deemed necessary. The ongoing drought coupled with the other issues identified in the draft plan for D-20 and D-51 suggest outstanding circumstances and warrant reconsideration of the lower herd objectives. BLM is concerned in particular about current rangeland health and the sustainability of winter range, and suggests that CPW reconsider the lower herd management objective alternative.

BLM strives to work with CPW to provide meaningful habitat protections to wildlife during the planning stages of projects. We believe that the proposal to extend the population objective from the 2018 HMP does not account for the persistent long-term drought impacts and the drastic declines in winter range overall health and productivity. Continued public land degradation will only serve to increase private land conflicts.

If you would like more specific information or have any questions, please feel free to contact me at (970)-240-5338 or [scopping@blm.gov](mailto:scopping@blm.gov). For specific questions regarding big game habitat management on these units, please contact Emily Latta, Wildlife Biologist at 970-240-5332 or [elatta@blm.gov](mailto:elatta@blm.gov).

Sincerely,  
SUZANNE  
COPPING  
Field Manager

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## Appendix D52-A: San Juan Basin Habitat Partnership Program Letter



December 11, 2023

Brad Weinmeister  
Colorado Parks and Wildlife  
151 East 16<sup>th</sup> St  
Durango, CO 81301

RE: San Juan Basin Habitat Partnership Program Comments - HMP D-52

Dear Mr. Weinmeister,

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the local HPP committee (3 livestock growers, Forest Service, BLM, CPW, and sportsperson representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP exists to help reduce big game related agricultural conflicts, assist CPW in meeting big game management objectives, enhance big game migration corridors, and support conservation efforts on private lands as they relate to deer, elk, moose, and pronghorn. With this perspective in mind, the San Juan Basin HPP (SJBHPP) Committee has reviewed the D-52 draft alternatives regarding population range and sex ratio objectives and offer these comments for consideration.

The SJBHPP Committee supports the draft alternatives for the population and sex ratio objectives. We believe this adequately reflects the current population estimate and responsibly balances local range and habitat concerns with sportsperson desires and landowner concerns. We believe the current sex ratio is a good balance and provides ample hunting opportunities while also providing a reasonable number of mature animals for hunters.

As stated above, HPP is directed by statute to assist CPW in meeting game management objectives. The committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat within D-52. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in the area. The SJBHPP Committee will continue to support management efforts in partnership with numerous local landowners and federal land managing agencies that place a high priority on implementing valuable habitat improvement projects and have expressed the desire to continue this work. Thank you for the opportunity to provide these comments.

Sincerely,

Ty Smith  
San Juan Basin HPP Committee

## Appendix D52-B: United States Forest Service Letter



Forest  
Service

Columbine Ranger District

P.O. Box 439  
367 South Pearl Street  
Bayfield, CO 81122  
(970) 884-2512

**File Code:** 2600  
**Date:** December 15, 2023

Jamin Grigg  
Wildlife Biologist  
415 Turner Dr  
Durango CO 81301

Comments to CPW on the Mule Deer Herd  
Management Plan for D-52

Dear Mr Grigg,

The San Juan National Forest (SJNF) appreciates the opportunity to comment on Colorado Parks and Wildlife's (CPW) Draft Hermosa Mule Deer Herd Management Plan (HMP) for Data Analysis Unit (DAU) D-52. The DAU includes Game Management Units 74 and 741, which occur in San Juan and La Plata Counties. The Herd Management Plan designates a post-hunt population objective and post-hunt sex ratio. The draft selects as a preferred objective to carry forward management that was set in 2010, stating "management objectives have been working well for this population and there was overall satisfaction with this management". We agree that current population objectives and sex ratios are reasonable for the DAU D-52 and should be continued at levels set in 2010, when objectives were decreased.

The San Juan National Forest, Columbine Ranger District, manages a large portion of DAU D-52. Forty two percent (291,494 acres) of the entire DAU is managed by the Columbine Ranger District. Additionally, we manage 10% (35,200 acres) of mapped Winter Range, 5% (8,659 acres) of Winter Concentration Areas, 42% (291,494 acres) of Summer Range, and several migratory paths in Hermosa Creek Watershed. As currently mapped, we do not manage Migratory Corridors, nor Severe Winter Range in DAU D-52. The rest of the DAU largely occurs on Private Property (31%), Southern Ute Tribal Lands (17%) and BLM (5%). The State, including all state lands not just State Wildlife Areas, accounts for just 1.5% of DAU D-52.

The draft HMP points to an accumulation of impacts to critical habitats as the primary threat to deer in DAU D-52. According to the draft HMP, important habitats in the DAU are winter range, migratory corridors, production areas and high elevation summer ranges. Cumulative impacts that affect these habitats are listed as homes replacing open lands on private property in winter range, energy development on public and private land, and expanding recreation. The draft also considers drought and disease current threats to the population.

The SJNF is committed to assisting CPW to manage habitat for mule deer and other big game. The SJNF Land and Resource Management Plan (LRMP) contains objectives and management direction to maintain or improve habitat quality, protect migration corridors, and minimize impacts from management action to big game populations. In every decision we consider these objectives.





A large portion of the DAU falls within the Hermosa Creek Special Management Area and the Hermosa Creek Wilderness, both of which are managed by the 2017 Hermosa Creek Watershed Management Plan. A Desired Condition in the plan is to ensure “[n]ative species diversity across the watershed is high, and migration of species is not inhibited so that species may move into new sites and take advantage of changing bioclimatic envelopes and growing conditions while maintaining proper ecological function.” Additionally, the plan requires no net increase of trails within the management area, capping the total number of trails allowed.

The Columbine ranger district is currently in the planning phase of the Junction-Falls Integrated Resource Management project. CPW is a Cooperating Agency for this planning effort. We hope to finish planning in early 2024 and begin implementing in the summer of 2024. There are several components of the project that are designed to improve habitat for mule deer. Prescribed fire, forest thinning and selective brush clearing would all improve browse and cover for mule deer. One portion of the project, named Wildlife Oak Thinning, is designed to specifically improve habitat for mule deer and other big game and falls within mule deer mapped Winter Concentration areas. This work would add to several other habitat improvement projects that have been completed over the last 15 years by CPW, in the Perins Peak area, and the SJNF in the Lightner Creek area. The goal of the project would be to thin pockets of overgrown and decadent shrubs to make them more palatable for big game while maintaining cover. It is our hope that this portion of the project could offset other impacts on public and private lands in the area during winter and migration, improving habitat for mule deer and elk.

The preferred population and sex ratio objectives drafted in the Draft Hermosa Mule Deer HMP for DAU D-52 are reasonable in our opinion and we support the continuation of current management. Increasing numbers in the DAU seems unfeasible given the population has been on a decreasing trend for 20 years, and recently maintaining at the low end of current objectives. We also do not support lowering population numbers, recognizing that these objectives are already much lower than objectives set in the early 2000s. We are committed to working with CPW to maintain objectives into the future.

The SJNF manages a significant portion (42%) of summer range within DAU D-52. The DAU D-52 HMP draft points to an accumulation of impacts to production areas as an issue within the DAU. The Columbine Ranger District is committed to working with CPW to maintain summer range within DAU D-52.

The SJNF appreciates the opportunity to comment on the Draft Hermosa Mule Deer HMP for DAU D-52. We look forward to a continued partnership with CPW to manage Mule Deer habitat on Forest Service lands in DAU D-52.

If you have any questions regarding these comments, please feel free to reach out to Michael Schmidt, District Wildlife Biologist, Columbine Ranger District, at [Michael.schmidt4@usda.gov](mailto:Michael.schmidt4@usda.gov).

Sincerely,

NICHOLAS  
GLIDDEN

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NICHOLAS GLIDDEN  
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NICHOLAS GLIDDEN  
District Ranger

## Appendix D56-A: Mount Blanca Habitat Partnership Program Letter



November 20, 2020

Brent Frankland  
Colorado Parks and Wildlife  
0722 S. CO Rd 1 East  
Monte Vista, CO 81144

**RE: Mount Blanca Habitat Partnership Program Comments - DAU D-37**

Dear Brent:

One of the initial reasons for creating the Habitat Partnership Program was to provide local landowners and other interests an opportunity for input into big game management in their areas. The diverse makeup of the Mount Blanca HPP committee (3 livestock growers, Forest Service, BLM, USFWS, CPW and sports persons representatives) provide a good cross section of local interests to review DAU proposals and respond accordingly for CPW consideration.

HPP has two purposes; to resolve big game wildlife (deer, elk, pronghorn, moose) conflicts with agricultural landowners and to assist CPW to meet game management objectives for those same species. From those perspectives, the Mount Blanca HPP committee has discussed your presentation, reviewed the draft alternatives and offer these comments for consideration.

The Mount Blanca HPP committee is in agreement with the following comments pertaining to proposals for the population range and sex ratio objectives for the above DAU plan.

The Mount Blanca committee supports the draft alternative to increase the objective for the number of animals within this DAU and within our committee area. Currently, the population is above the objective, and CPW proposes to increase that objective to match the current population. Increasing the population objective to match the population levels should not create more conflicts.

The Mount Blanca committee also discussed the proposed sex ratio alternative. We support raising the current sex ratio objective to provide larger bucks for sportsmen to pursue. We understand the current observed sex ratio is above the current objective and would need to be reduced. Reducing the observed sex ratio to meet objectives will help to reduce the risk of CWD while still providing satisfactory hunting opportunities.

As stated above, HPP is also directed by statute to assist the Division to meet game management objectives. The Mount Blanca committee has worked with both public land managers and private landowners to improve the quality and quantity of the habitat in DAU D-37. Adequate habitat is critical to meeting game management objectives and we remain committed to maintaining and improving habitat in this area.

Our committee is confident about CPW being able to achieve the proposed objectives due to:

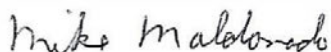
- Winter range in this DAU is limited, but CPW will work with public land agencies to implement habitat improvement projects on public land. Federal land managing agencies place a high priority on habitat improvement and we feel confident that we will be able to work with them to achieve valuable habitat projects and increase the quality and quantity of winter range for deer.

- CWD is a concern, but CPW will be working to lower the observed sex ratio to meet their objectives, which will help to reduce CWD prevalence. We are reassured that CPW has implemented mandatory CWD testing, because we feel that this will give us a better understanding of CWD prevalence in this DAU. If the testing reveals high rates, we trust that CPW will adjust their management plans to further help reduce those rates.

- We have worked with numerous landowners who want to implement improvements for big game on their property.

Thank you for the presentation and the opportunity to provide these comments.

Sincerely,



Mike Maldonado, Chair  
Mount Blanca HPP Committee

## Appendix D56-B: National Park Service Letter

United States Department of the Interior  
NATIONAL PARK SERVICEGreat Sand Dunes National Park and Preserve  
11500 State Hwy. 150  
Mosca, CO 81146

November 16, 2020

CPW Colleagues,

I am writing on behalf of Great Sand Dunes National Park and Preserve to comment on the Colorado Parks and Wildlife 2020 D-37 Deer and E-11 Elk herd management plans.

## Deer:

Great Sand Dunes National Park and Preserve has not observed resource concerns associated with mule deer populations within the park; therefore, we do not have any objections to the proposed objectives that would allow the mule deer herds to grow to 3,000 animals unit wide. Great Sand Dunes is not planning management actions on mule deer herds within the park. If circumstances change or CWD or other issues arise, the park would seek to collaborate with our State partners to determine what is best for the resource. Mule deer on the National Preserve are hunted per the regular state seasons prescribed by Colorado Parks and Wildlife. Great Sand Dunes supports the CPW objectives for managing mule deer within D-37 unit wide and on portions of D-37 within Great Sand Dunes National Preserve.

## Elk:

Great Sand Dunes National Park and Preserve supports CPW's population objectives of 3,000-4,000 elk for E-11. Under the park's Ungulate Management Plan (UMP), Great Sand Dunes is currently collaborating with CPW to redistribute elk from sanctuary areas within the park to protect resources identified in the UMP. As the park intensifies these redistribution efforts over the next few years in cooperation with CPW, it is our hope that our efforts will make more animals available to hunters by denying elk refuge during hunting seasons. Through our combined efforts, this redistribution will contribute to CPW's ability to manage E-11 at biologically sustainable levels. We do not have any goals to manage elk at a specific sex-ratio but would support CPW if such management became necessary to control CWD within E-11. Elk on the National Preserve are hunted per the regular state seasons prescribed by Colorado Parks and Wildlife. Great Sand Dunes supports the CPW objectives for managing elk within E-11 unit wide and on portions of E-11 within Great Sand Dunes National Preserve.

Dewane Mosher  
BiologistPamela Rice  
Superintendent

## Appendix D56-C: US Fish And Wildlife Service Letter



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
69812 Co. Rd. T  
Crestone, Colorado 81131



In Reply Refer to:  
FWS/IR05/IR07

November 23, 2020

Brent Frankland, Terrestrial Wildlife Biologist  
Colorado Parks and Wildlife, Area 17  
0722 South Road 1 East Monte Vista, CO

Dear Mr. Frankland,

We are writing this letter on behalf of the U.S. Fish and Wildlife Service (Service), in response to your request for comments on the proposed updates for Herd Management Plans (HMPs) for deer and elk in GMU82. Thank you very much for this opportunity to provide feedback.

#### SAND DUNES DEER D-37 HERD MANAGEMENT PLAN EXTENSION

Deer associated with the Sand Dunes Deer D-37 Herd occasionally venture on to the northeastern corner of the Baca National Wildlife Refuge (Baca Refuge), and usually are only in this small portion of the refuge for a short time. We have constructed ungulate exclosures to protect sensitive riparian habitats from the browsing deer and other ungulates here. As such, we support Colorado Parks and Wildlife's (CPW) proposed increase to the herd objectives from 1,500-2,000 deer to 2,300-5,000, knowing that the most recent estimate shows they are currently within that range. In addition, we support CPW's proposed increase in the buck/doe ratio from 20-25 bucks per 100 does to 25-29 bucks per 100 does.

#### SAND DUNES ELK E-11 HERD MANAGEMENT PLAN EXTENSION

As stated in CPW's SAND DUNES ELK E-11 HERD MANAGEMENT PLAN EXTENSION (E-11 Plan), elk from this herd (E-11) frequent the San Luis Valley floor including the Baca Refuge. The Service understands that many animals in the E-11 herd are attracted to the Baca Refuge during Summer months because the habitats there, primarily wet meadows, provide optimal calving habitat for the elk. In addition, the Service also understands that the Baca Refuge which remains largely closed to public access, can become refugia for elk during hunting seasons. We feel it is important to note, however, that Service staff have and continue to work diligently with CPW to address the issue of elk using the refuge as sanctuary during hunting seasons. In 2016 the Service implemented the carefully designed *San Luis Valley National Wildlife Refuge Complex Migratory Game Bird, Big Game, and Upland Game Hunt Plan* (Hunt Plan), with primary objectives of; protecting sensitive habitats on the refuge, providing quality public hunting opportunities, and assisting CPW in meeting herd (E-11) objectives. In addition to providing public hunter access on over half the refuge, the plan also allows for agency (CPW or Service) actions (including lethal) on the entire refuge, designed to redistribute elk on the landscape to protect sensitive habitats and/or to distribute elk to areas where more harvest by public hunters can be effected. The Service continues to manage the elk hunting program on the Baca Refuge adaptively, as to ensure that the above mentioned objectives can best be met. In addition, the Service has prompted CPW and the Mt. Blanca Habitat Partnership Committee (Mt. Blanca HPP) to take steps to assist in our attempts to prevent elk from congregating on portions of the refuge closed to hunting due to safety and conflict concerns.

The Service fully supports CPW's proposed population objective of 3,000-4,000 elk and a sex ratio of 17-23 Bulls per 100 cows in the Sand Dunes E-11 Herd Management Plan Extension, and looks forward to continued collaboration with CPW, Mt. Blanca HPP and the Great sand Dunes National Park in working to meet these objectives.

Thank you again for this opportunity to provide feedback. If you have any questions, please contact Project Leader Vaughn or myself.

Best Regards,

Ron Garcia  
Refuge Manager  
Baca National Wildlife Refuge

Sharon Vaughn  
Project Leader  
San Luis Valley National Wildlife Refuge Complex

## Appendix D56-D: United States Forest Service Letter

Forest  
Service

Rio Grande National Forest

1055 9th Street  
Del Norte, CO 81132  
719-657-5017  
Fax: 719-657-5280

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**File Code:** 2620  
**Date:** December 12, 2023

Brent Frankland  
Terrestrial Biologist  
Colorado Parks and Wildlife  
0722 South County Rd 1E  
Monte Vista, CO 81144

Dear Mr. Frankland:

Thank you for the opportunity to comment on Colorado Parks and Wildlife's (CPW) draft Mule Deer Herd Management Plans for Deer DAU D-26, D-35, D-36, D-56 (combined D-31 and D-37). These DAUs encompass GMUs 68,681,682, 76, 79, 791, 80, 81, 82 and 83 involving all the Rio Grande National Forest. My staff wildlife biologists have reviewed the draft plans for these DAUs and provided information to offer the following comments for consideration and use as you finalize the plans.

The Rio Grande National Forest (Forest) contains over 1.8 million acres of National Forest System land that are managed for multiple uses in the San Luis Valley area of south-central Colorado. The DAU Plans are an important aspect of our management because of high public interest in big game species and because the Forest is responsible for managing much of the habitat to support the desired population levels. However, it is also important that populations are maintained within the carrying capacities of the habitat, and that deer population objectives are managed in a manner that minimizes potential conflicts with other program areas. These comments reflect these mutual goals.

Prior to 2020, mule deer (along with Rocky Mountain elk and other species) were managed as Management Indicator Species (MIS) under our 1996 Land and Resource Management Plan (Forest Plan). As such, both population and habitat trends were tracked at the Forest-level in association with Forest Plan direction, including providing the quantity and quality of habitat capable of supporting the population objectives for these species.

As you likely know, big game has planning and monitoring components in the Rio Grande National Forest Land Management Plan (Plan) signed in 2020 and the MIS concept no longer exists. While the direction and mechanisms for protecting and monitoring big game have changed, the focus and importance of these species for the Forest has not. Many of the concerns noted in the DAU plans for mule deer can be tied to habitat connectivity. In the 2020 Plan, we added language specifically around managing big game habitat connectivity. For some species, such as mule deer, Forest landscape conditions will continue to facilitate historic game movement patterns within and among Forest and other public and private lands, including across state lines. Much of the Forest is designated wilderness or roadless, which will contribute to habitat connectivity and movement patterns for many species, particularly those that are sensitive to human disturbances. Additional



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protected areas occur on adjacent Forest lands as well as across state and administrative boundaries.

Two guidelines incorporated into the Plan for big game and mule deer more specifically include:

**G-WLDF-1:** To reduce stress at a critical point in the lifecycle of big game, restrict activities on winter range from approximately December 1 to April 15, as needed. (Forestwide)

**G-WLDF-2:** To maintain habitat function, connectivity, and security for big game species, there should be no net gain in motorized and nonmotorized system routes where the system route density currently exceeds one linear mile per square mile or where the net gain would cause system route density to exceed one linear mile per square mile in areas mapped by Colorado Parks and Wildlife as important big game production areas, migration corridors, severe winter range, and winter concentration areas. Exception: This does not apply to administrative routes. (Forestwide)

In addition, mule deer (and other big game) habitat and population trend considerations remain a key part of the plan monitoring as focal species and both population and habitat trend considerations are included in the [Monitoring Plan](#). There are two key questions related to mule deer and other big game including:

[MonitoringQuestion 1:](#) What is the status and trend of populations of Rocky Mountain elk, Rocky Mountain bighorn sheep?

[MonitoringQuestion 2:](#) What is the status and trend of forage and cover for big game species?

While the data for MQ1 is and will continue to be provided by CPW and thus should reflect your estimates, the data and analysis for MQ2 includes incorporating current forest habitat and forage trends across the forest including current ecological conditions of all forest types. While our annual range monitoring indicates that current stocking levels are adequate and feasible, future detailed modeling will incorporate livestock and big game needs. Unfortunately for this review, the first full iteration of this analysis is not expected until early 2024.

As such, management of big game habitat will continue to involve evaluations of habitat conditions during project level evaluations and Forest Plan monitoring, but also through other project partnerships such as HPP, Mule Deer Foundation, Rocky Mountain Elk Foundation, and others. We therefore expect to continue to work closely with CPW to achieve mutually desired habitat conditions for all big game species.

Hunting and other wildlife-related recreation is one of the biggest uses experienced on the Forest. Although most of this occurs during the rifle season(s) for deer and elk, hunters utilize our public lands from the opening of pronghorn season in mid-August through the late season elk cow hunts of December. This large influx of visitors brings a huge economic boost to the San Luis Valley but also comes with challenges in increased off-road vehicle use, high density of hunter camps, and an increased need in Forest resource protection presence and front office staffing needs.

## **DAU specific review and recommendations**



**DAU D-56 Mule Deer= D37+D31**

**Current Conditions:** The Forest manages approximately 7.6% of the land within this DAU, predominantly as summer and/or transitional range. Spruce bark beetles have impacted the mature Engelmann spruce forests since approximately 2013 and peaked around 2019 creating more open canopy conditions in the sub-alpine habitat, which has provided more sunlight for grasses, forbs, and brush.

Approximately 26 mi<sup>2</sup> or 6.7% of winter habitat and approximately 6 mi<sup>2</sup> or 0.3% of severe winter range resides on land managed by the Forest. Both winter and severe winter ranges consist of mixed conifer type habitats such as Douglas fir/Ponderosa Pine and Pinyan/Juniper. There has been an uptick in insects such as Douglas fir beetle, and disease within Douglas fir forests. The Rio Grande watershed of southern Colorado has seen twenty plus years of below average precipitation and an increase in average winter temperatures. These impacts may impact some thermal cover and/or provide for better understory growth i.e., mountain mahogany and currants. We recognize that both winter and severe winter range should be a focus for management actions as needed to maintain or improve habitat conditions for mule deer in this DAU and look forward to working cooperatively with CPW and other partners to attain these goals.

	Acres	Square Miles	Percentage
DAU-56	1,498,309	2,341	100
RGNF within DAU-56	111,458	177	7.6
RGNF Summer Range	108,677	170	7.3
RGNF Winter Concentration	31,129	49	2.1
RGNF Winter Range	16,432	26	1.1
RGNF Concentration Areas	12,449	19	0.8
RGNF Severe Winter Range	3,787	6	0.3
RGNF Residential Population	0	0	0

**Recommendations:** Based on existing habitat information and other factors, we concur with CPW's proposal for D56. This objective would be set at 4,300 to 5,500 mule deer. We recognize that both winter and severe winter range should be a focus for management actions as needed to maintain or improve habitat conditions for mule deer in this DAU and look forward to working cooperatively with CPW and other partners to attain these goals. Based on input received for this draft plan, we concur that (30 to 35 bucks per 100 does) be pursued as a sex ratio objective to provide a higher quality recreational experience to the public.

**Other General Comments:** The draft DAU Plan mentions winter range degradation and loss, and increased disturbance from people and domestic livestock as concerns. As mentioned earlier we are currently evaluating livestock and big game numbers as it relates to current forage availability. The Forest continues to identify user-created roads for closure and evaluate road construction for all projects to meet G-WLDF-2 mentioned earlier. We appreciate CPW's continued assistance in enforcing and monitoring potential resource damage and disturbance from OHVs to continue to educate the public and manage this activity and look forward to carrying out this effort into winter over the snow recreation and the ongoing general travel management efforts. .

If you have any questions, please contact Jason Remshardt, Fisheries and Wildlife Program Manager at 719-872-4024.

Sincerely,

X   
Tristram S. Post signing for Kristen Sexton

Signed by: TRISTRAM POST

**KRISTEN SEXTON**

Acting Forest Supervisor

cc: Rick Basagoitia, Andrew Kelher, Tristram Post, Andrea Jones, Patrick Moran, Jason Remshardt

## Appendix D56-E: Bureau Of Land Management Letter



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
San Luis Valley Field Office  
1313 E. Highway 160  
Monte Vista, Colorado 81144



In Reply Refer To:  
6521 (LLCOF03000, TLA)

**December 14, 2023**

Sent Via Email:  
[brent.frankland@state.co.us](mailto:brent.frankland@state.co.us)

Brent Frankland,  
Terrestrial Wildlife Biologist  
0722 South Road 1 East  
Monte Vista, CO 81144

Dear Mr. Frankland,

The Bureau of Land Management (BLM) San Luis Valley Field Office (SLVFO) appreciates the opportunity to comment on the draft D-26, D-35, D-36, and D-56 mule deer Herd Management Plans (HMPs). As the agency providing the majority of crucial winter range for big game in the San Luis Valley, we thought it important to provide comments on any changes Colorado Parks and Wildlife (CPW) may implement. The BLM SLVFO has a strong commitment to providing quality wildlife habitat as one of our important “multiple uses”. We have appreciated our longstanding working relationship with CPW and partnership in managing wildlife habitats throughout BLM SLVFO-managed lands. Our input on each draft HMP is addressed individually below.

**D-56**

After reviewing the draft D-56 plan, we agree with the many current and emerging ecological constraints identified by CPW when considering deer herd objectives for this area, including increasing fragmentation from development, increasing recreation pressure, limited winter range and forage availability, prolonged drought, game damage issues, disease, and competition with other wild ungulates.

The BLM agrees with CPW's strategy to combine the D-31 and D-37 DAUs into a single DAU to improve efficiencies and accuracy in modeling and management of the respective mule deer. We also agree with the combined preferred management objective to remain the same with a post-hunt mule deer population of 4,300-5,500 and a preferred sex ratio objective range of 30-35 bucks per 100 does, as it provides the best balance for managing the herd, supporting hunting recreational opportunities, minimizing agricultural conflicts, and maintaining habitat-carrying capacity. This position is consistent with BLM's continuing efforts to enhance or restore proper rangeland functions, in particular, by attempting to reduce the intensity and duration of collective growing season use by wild and domestic ungulates through improved livestock management, noxious weed control, carrying capacity analyses, more aggressive implementation of our Fire Management Plan, and through the development of climate change adaptation strategies. We feel that land management applied with an emphasis toward deer would continue to complement balanced management of woodland and shrubland communities across BLM lands in GMU 79. Additionally, we support the proposed management objective because it will minimize the overall financial and physical investments associated with improving habitat in the DAU—crucial for sustaining a viable deer population long-term.

The draft HMPs list winter range forage availability and quality as the limiting factors to herd size. Therefore, continued habitat partnership projects between CPW and the BLM will be critical to improve availability of browse and to ensure the long-term health and stability of both herds. To assist CPW in making management decisions within each herd area, the BLM would like to encourage CPW to gather utilization data in mule deer winter concentration areas and engage the BLM well-in-advance of draft HMP comment periods to discuss potential land health/habitat issues occurring on BLM-administered lands within the respective GMUs. This data and expanded coordination would help inform the decision between alternatives identified in the HMPs. Because of the uncertainties regarding ecological constraints, we believe a program to monitor habitat conditions is warranted, particularly to determine if population objectives need to be adjusted to fit more accurately with updated model estimates and to assist in quantifying carrying capacity. However, the BLM does not have the capacity to implement a monitoring program specific to wild ungulates.

If you have any questions regarding this matter, please contact Dale Culver, Field manager at (719-852-8171).

Sincerely,

DALE CULVER

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Dale Culver  
Field Office Manager  
San Luis Valley Field Office

**Appendix D57-A: Gunnison Basin Habitat Partnership Program Letter**

September 15, 2023

Jamin Grigg, Senior Terrestrial Biologist  
Colorado Parks & Wildlife  
7405 Highway 50  
Salida, CO 81201

RE: Gunnison Basin Habitat Partnership Program Scoping Comments - HMP D-21, D-22 and D-25

Dear Mr. Grigg,

This letter is in response to your request for formal comment regarding the Colorado Parks & Wildlife Gunnison Basin Herd Management Plan. The Habitat Partnership Program (HPP) was created to help resolve wildlife conflicts, particularly those associated with fence and forage issues; and to assist CPW in achieving game management objectives. The diverse makeup of local HPP committees (3 livestock growers, Forest Service, BLM, CPW, and sportsmen representatives) provides a good cross-section of local interests to review DAU proposals and respond accordingly for CPW consideration. The Gunnison Basin HPP Committees held special meetings on August 16<sup>th</sup> and August 31<sup>st</sup> to discuss deer population objectives for the basin and review the current herd management plan objectives. It is understood that CPW intends to manage to objective to the best of its ability. After careful consideration, the committees will offer the following recommendations:

The committee agreed that the Basin's deer population is currently performing very well and continuing to grow. The committee discussed the current range conditions and understands that habitat quality and quantity have been slowly decreasing over the last few years according to BLM data. It is also understood that while there is a desire to manage towards carrying capacity, a balance must be struck between population size and responsible management of the habitat that the animals rely on. It was also acknowledged that there will continue to be changes to the landscape with development and other human uses, potential for CWD, the upcoming reintroduction of wolves, and hard winters that will pose challenges. The committee feels that the population could be managed at its current level with the option for a slight increase depending on conditions. Additionally, the committee recognizes that recent surveys have shown that overall hunter satisfaction throughout the Basin is generally good, with good hunter opportunity, minimal crowding in most seasons and units, and very high license demand.

The committee supports managing the buck to doe ratio according to the current status quo. This represents an objective of 35-40 bucks per 100 does. This is the current range for all of the DAU's in the Basin. The committee feels that this ratio is acceptable to the public as it

should not result in decreased hunter opportunity or increased hunter crowding, and will be sustainable throughout the population increase.

The committee supports CPW's desire to combine the 3 current DAU's (D-21, D-22, and D-25) into one DAU. The committee understands that much of the management will continue to be done at the GMU level, including population classifications and license setting, but allows for better overall management and future project competitiveness. The committee also supports allowing for a wider population objective range to accommodate the merging of the DAU's (i.e. 18,000-22,000).

Finally, there are currently ongoing mule deer research and monitoring efforts which began after the winter of 2007/08. The study is anticipated to continue to yield data that can help inform HPP decision-making processes, and help drive CPW's management strategies within the basin. The committee feels it is important to continue these efforts to have the best possible information and data to inform managers on future management decisions.

On behalf of the Gunnison Basin HPP committee, we thank you for allowing us to participate in this portion of the process and for the opportunity to comment. We look forward to seeing the draft plan and alternatives to discuss as a committee.

Sincerely,

The Gunnison Basin HPP Committee

## Appendix D57-B: Gunnison Wildlife Association Letter



August 31, 2023

Dear Colorado Parks and Wildlife (CPW) staff and Commission,

As a Colorado nonprofit corporation whose mission is protecting and enhancing the health and sustainability of wildlife and public lands in the Gunnison Basin, Gunnison Wildlife Association (GWA) thanks you for the opportunity to provide comments on Deer Herd Management Plan (HMP) revisions, including for data analysis units (DAUs) in the Gunnison Basin.

First off, we believe the current approach to deer management in the Gunnison Basin DAUs has led to a generally high level of hunter satisfaction and herd stability based largely on effective management within the context of current population objectives and buck-doe ratios. For that, CPW staff should be commended.

Going forward, however, we support converting the three existing local DAUs — comprising game management units (GMUs) 54, 55, 551, 66 and 67 — to a single DAU for the entire Gunnison Basin. We see a few notable benefits from such a change. For one, mule deer within the Gunnison Basin have long been considered for rhetorical (and, in some cases, management) purposes as a single herd, distinct and separate from deer in other geographical units within Colorado's Southwest Region. We believe more formally managing Gunnison Basin deer within a single DAU would not only help streamline CPW processes affecting these animals without impacting management, but also would provide a more clear indication of herd size and likeness within funding and decision-making processes involving other state or federal agencies, or even non-governmental organizations. We find this to be particularly beneficial amid Colorado's ever-increasing population and growing pressures placed on wildlife and natural resources through additional traffic, tourism and recreational development — particularly as new policies are considered and funding sources become available to protect wildlife habitat and migration corridors.

Within a revised HMP for Gunnison Basin GMUs, we support increasing the total population objective to between 19,000 and 21,000 animals. As 2022 Big Game Deer Hunter Attitude Surveys indicated, the majority of respondents expressed a desire for either a slight or moderate increase in the population of deer in local units over the next 10 years. This desire

within the surveys bears true regardless of the local DAU. As a local nonprofit representing the voice of hunters in the Gunnison Basin, we support this desire.

Lastly, through the Deer HMP revision process, we would like to ensure the door remains open for discussion about, and consideration of, special or unique approaches to managing deer in the Gunnison Basin. Such an approach could entail, for example, varying buck-doe ratios which rotate among local GMUs on a regular basis. We would like to continue to explore this possibility with CPW staff.

We thank you for consideration of GWA's perspective.

Sincerely,

A handwritten signature in cursive script that reads "Bruce T. Mullin, Jr." The signature is written in black ink and is positioned above the typed name and title.

Bruce T. Mullin, Jr.  
President  
Gunnison Wildlife Association Board of Directors



**Appendix D57-C: Gunnison County Stockgrowers' Association Letter**

December 14<sup>th</sup>, 2023

Jeff Davis  
Director, Colorado Parks and Wildlife Division  
6060 Broadway  
Denver, CO 80216

**Re: Gunnison Basin Mule Deer Herd Management Plan Data Analysis Unit D-57.**

Dear Director Jeff Davis, and Members of the Colorado Parks and Wildlife Commission,

Please accept the following as the official comments of the Gunnison County Stockgrowers Association, Inc. (GCSA) on the Gunnison Basin Mule Deer Herd Management Plan, Data Analysis Unit D-57.

The Gunnison County Stockgrowers (GCSA) is an incorporated non-profit company, founded in 1894 and managed by its elected President and Board of Directors, GCSA represents nearly all the active livestock producers in the Gunnison Valley and advocates on behalf of its members, the cattle producers and ranch families of the Gunnison.

GCSA supports Alternative 1 for the Population Objective Alternatives, although, we believe that population estimates should be higher. As the mule deer herds face increased pressure from the reintroduction of wolves, it will be important to maintain herd size to maintain genetic diversity.

GCSA supports Alternative 1 for the Sex Ratio Objective Alternatives. As our members are on the landscape every single day, we are noticing a decreased number of mature bucks. The Gunnison Basin relies heavily on the economic impact from hunting, and increasing the maturity and number of bucks will have a positive impact on hunting experiences.

GCSA does support the combined management of Data Analysis 57 as presented by the Commission.

Thank you for consideration of these comments. If we can be of any assistance, please do not hesitate to reach out to us.

Sincerely yours,



---

Andy Spann, President  
Gunnison County Stockgrowers' Association, Inc.

## Appendix D57-D: Public Comment Letter

Good morning, Jamin! First, great work with all of the videos and supporting data related to the SW Deer Herd Management Plans. I usually do not submit comments on the vast majority of the work that CPW conducts. I support, personally and professionally, the decisions that you all make within the Regions and Areas. Not always at the Commission level, specifically this Commission, but still remain silent. However, in the case of the SW Deer Herd Management Plans and specifically the Gunnison Basin, D-57 Plan, I would like to provide just a few, general comments as follows.

### DAU Combination to D-57

I support CPW's effort to combine all of the DAUs within the Gunnison Basin into one, D-57. As it is mentioned in the narrative and in your presentation, the Gunnison Basin is a "closed basin" with a significant amount of inter-DAU and even GMU migration that occurs throughout the year. I also appreciate and support that deer will be managed at the GMU level within D-57 and that licenses will be allocated similarly.

### Post-Hunt Population Estimate

A **Preferred Alternative-Post-Hunt Population Objective** of 17,000-20,000 deer across D-57 with a current population estimate of 18,900 deer seems like very conservative Objective in my opinion. With all due respect to this proposal, the preference to move the herd objective from an upper level of 16,900 to 20,000 appears to be more of a book keeping effort to incorporate a current population estimate of 18,900 into the new herd objective to simply not show an "over objective" deer estimate publically. I only say this given my time in the seat and when that strategy was used then, legitimately, as I feel may be here. My observations of mule deer sight-ability, albeit is all anecdotal, leads me to feel that if the current population estimate of 18,900 is an accurate estimate, a preferred objective of 20,000 is conservative. I fully trust the "best available science" approach and those that apply it to this effort and put full faith in the numbers presented as accurate. However, in my observations across the Gunnison Basin, mule deer numbers, overall, seemed to have diminished noticeably over the past few years along with not only total bucks:100 does but especially in the mature bucks:100 doe ratios. Again, all anecdotal observations, however, our current home has been situated in winter range since 2011 and my family and I spend considerable time in various parts of the Basin year round.

### Post-Hunt Sex Ratios

As I have mentioned above, I am not supportive of a strict management of bucks:100 does with no consideration given for a mature bucks:100 does metric included. Prior to Gunnison Basin deer being managed as part of the statewide limited license strategy implemented in the 1990's, bucks:100 does, in some years remained below 5 while mature bucks:100 does were below 1 at times. While those are extreme examples, the Gunnison Basin deer herd has long since recovered from that embarrassing time (which I was part of and take some responsibility for). I also realize that it makes no sense biologically, socially or financially to manage buck:100 doe levels so high that it severely limits hunter participation only to watch large numbers of mature bucks die in an 07-08 type winter. However, I feel that a balance could be struck that does recognize the importance that a healthy, sustainable mature bucks:100 does level carries with the public, land management agencies and those that desire to hunt mature bucks in the Gunnison Basin. All this said while also realizing that buck levels are a metric that is monitored with regard to CWD prevalence while also recognizing that the Gunnison Basin (as far as I know to date) has yet to record a positive CWD deer in D-57.

Severe Winter Range Observation

Throughout most of my life and certainly during my tenure with DOW/CPW (31 years), I have observed and/or been directly engaged in many severe winter events in the Gunnison Basin. These include winters of 1978-79 (observed while in college), 1983-84 (observed and engaged), 1996-97 (observed/engaged), 2007-2008 (was SW RM during this time, very engaged) and 2016-2017 (observed). During the winter of 07-08, a literature review documented historically "severe" winters in the Gunnison Basin. These records going back to winters of 1956, 57, 58 and the mid-1960's are documented along with the above winters in the, *Division of Wildlife, Gunnison Winter Feeding Operations Guide, Winter 2007-08*. In the 1980's, while serving as a District Wildlife Manager for the Gunnison East District, staff referred to winters such as the winter of 83-84 as the "2 in 10" winters. It was a known fact then and still applies today, maybe only in my opinion, but that these are not the winters to manage deer herds by in relation to "winter range" or even "severe winter range". In these, the most severe of winter conditions that are well established in the Gunnison Basin, deer populations utilize very limited portions of the Basin that are not dictated by available forage, rather by the physical condition that deer find themselves in at that space and time in the winter and, somewhat, by previously utilized feed sites on winter ranges. Snow depth, extreme and sustained low temperatures, and how early in the winter they occur, will dictate winter severity. The saying always was and still applies, "if deer maintain **fair body condition** by January 1<sup>st</sup>, they will largely survive the winter". As is known, body condition is related to hip angularity and body/organ fat as well as bone marrow condition.

I mention all of the above simply to make the point that mule deer in the Gunnison Basin should not, in my experience and opinion, be managed based on an "07-08" winter. In these most severe of winters, they will die at a significant level regardless of any actions taken. Winter feeding efforts, like that of 78-79, 83-84 and 07-08, provide social license for DOW/CPW in terms of doing something during an all-age die off winter. Winter feeding during 07-08, conducted with the research based and scientifically developed Ranch Way Feed for mule deer, did mitigate the die off level. However, doe deer did still die in excess of the 30% established in Commission Policy. Gunnison Basin deer, overall, did die at a documented 40%-60% level. However, winter feeding in 07-08 did socially and biologically benefit DCW and mule deer respectively. This effort also kept elk populations at higher elevations and mostly off of deer feed sites and critical gathering areas and prevented significant elk mortality. Pronghorn antelope did not mix with deer and elk and, despite feeding, died at very high levels.

One last general comment. The severe winter of 2022-23 that occurred in the NW Region, in my opinion, not only had a severe impact on the big game of the NW Region, but nearly caused the same for all other OTC units that exist for elk in Colorado. As you already know, OTC license sales in the Gunnison Basin were drastically increased by as much as 300% due largely to the severe license limitations in the GMUs of the NW Region in response to the winter mortalities. I support these license reductions in the NW. However, OTC elk licenses with no limits or caps could have had a very significant, negative impact on elk populations in the Gunnison Basin if weather conditions with early, deep snow had occurred. Thankfully, that did not occur and was only in the hands of mother nature. Unfortunately, hunter numbers were at a very high level that hurt the quality of the hunting experience for both elk and deer hunters in the OTC units. Aside from my comments on D-57, I strongly urge that CPW consider, again, a totally limited license structure for elk licenses going forward. I especially recommend this approach if CPW's philosophy or the Commission Policy regarding big game mortality thresholds (*when winter-related mortality exceeds 30% of an adult female segment of a major big game population*) and subsequent feeding of big game has changed to a more conservative application. I assume this Policy was not applied in the NW Region last winter?

Thank you for the opportunity to send comments and please know that I always do and will continue to fully support the decisions/recommendations that are made by CPW Area and Regional staff and greatly appreciate you all for what you do for Colorado's wildlife! Please let me know if you have any questions and Good Luck! [REDACTED]