



April 2, 2024

Dear Colorado Parks and Wildlife 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, while advocating for the North American Model of Wildlife Conservation, Gunnison Wildlife Association (GWA) thanks you for the opportunity to provide comments on the 2025-2029 Big Game Season Structure (BGSS) decision-making process.

First off, there are many aspects of the Colorado Parks and Wildlife staff recommendations, as reflected in a February 22, 2024 memo to the Parks and Wildlife Commission, which GWA supports, as well as a few items with which we disagree, as outlined below.

Broadly, we strongly support the opportunity for flexibility that is reflected in staff's recommendations, including the addition of optional seasons, maintaining the current five-year cycle length for BGSS, and *especially* management flexibility offered by additional license limitations. The benefits of such flexibility are many, from more precise science-based management; to the ability to adapt to uncertainties such as harsh winters, drought, wildfire, and other climate-induced impacts; to ensuring healthy and sustainable ungulate populations amid the restoration of native carnivores to the landscape. Further comments on specific BGSS ideas and initiatives are as follows:

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

This would address overcrowding concerns in units where it's enacted by spreading out hunters across more seasons, and would only be implemented in units in which the pronghorn population supports an additional season. As is the case for all big-game species, this concept supports the advantages of a limited license structure. GWA strongly supports providing CPW staff with additional flexibility to meet biological and social management objectives. GWA supports staff Alternative 1.

Season Structure for Early Seasons (Archery/Muzzleloader) for Deer and Elk West of I-25

We see benefit from a law enforcement standpoint and to reduce confusion on the part of hunters by starting deer, elk, and bear hunting on the same date. GWA also supports an additional stand-

alone limited archery antlered deer season that opens August 15 and closes September 1, annually, for the same reasons we support the addition of an optional second regular rifle buck and doe pronghorn season, as outlined above. The addition of optional seasons has the potential to alleviate hunter crowding concerns in units where management in accordance with biological objectives can accommodate these seasons. Thus, GWA supports the staff recommendation, Alternative 1, on this matter.

Season Structure for Regular Deer/Elk Rifle Seasons

Later season dates under the current season structure pose significant problems for deer and elk in the high-country habitat of the Gunnison Basin. This is due to the potential for weather to increase vulnerability to harvest and the timing of migration to winter ranges where animals are more vulnerable. In fact, data presented to GWA in April 2023 by local CPW staff highlights this problematic scenario. Harvest rates have increased under the current season structure as compared to the previous. Paired with the availability of Over-the-Counter (OTC) licenses during second and third regular rifle seasons, this presents management challenges that have become a significant concern in the Gunnison Basin, and for which GWA has received feedback from area residents and non-residents. As a result, we strongly support reverting back to earlier dates that coincided with the 2015-2019 BGSS, thus staff Alternative 1, to alleviate ongoing management concerns for biological and access reasons. This season structure was in place for over two decades, apparently functioning reasonably well for the majority of the public and staff.

However, GWA recognizes potential shortcomings of a 5-9-9-5 (number of days in the rifle seasons) structure from an animal vulnerability and distribution standpoint, as well as for hunter and outfitter safety/logistics with only a two-day break between third and fourth seasons. As a result, we would support a shorter third rifle season, such that the number of days for each rifle season would be 5-9-7-5 to allow for a longer break between third and fourth rifle seasons. This is in line with staff Alternative 1 with the potential for non-weekend start and stop dates that attempt to balance social and biological objectives.

Over-the-Counter Archery Limitations

Statewide, Colorado has experienced increasing demand for archery hunting opportunities in recent years, but the current OTC approach has led to negative impacts to animal distribution and hunter satisfaction alike. As CPW staff have noted, one of the major concerns expressed repeatedly during public outreach efforts over the last ten years is the overcrowding of OTC archery elk units. While during the previous BGSS decision-making process, the Commission agreed to consider limitations for both residents and nonresidents on a case-by-case basis, since then, additional units have been converted to limited licensing for archery. This has increased crowding and hunter pressure in remaining OTC units, now leading to consideration of limitation for many of those OTC units. Put simply, Colorado has reached a tipping point.

GWA supports limiting all resident and nonresident archery licenses statewide, staff Alternative 1. Benefits include: eliminating hunter crowding, reduced hunter pressure, improved management of elk distribution at the local level, quality of hunter experience, and greater consistency with how Colorado manages deer.

Over-the-Counter Rifle Limitations

As noted in recent comments submitted to CPW staff by GWA regarding Deer Herd Management Plan revisions, GWA strongly supports additional license limitations, including to rifle seasons. This same sentiment was predominantly reflected in CPW's August 2023 public outreach meeting in Gunnison through surveys conducted. In addition, statewide results from the 2023 public and staff outreach efforts, as well as the 2023 public OTC survey and Big Game Attitude survey, reflect interest in limiting OTC elk rifle licenses.

It's easy to understand why. Numerous CPW surveys and outreach efforts show that crowding is a major concern. Elk refuging on private lands is a widely recognized problem. Yet, OTC license distribution continues to limit managers' ability to intervene in these and other local management issues, such as severe winter events, drought, and climate change impacts. Conversely, limitation allows for more effective, adaptive, science-based management of our wildlife resources. For these reasons, GWA supports limiting all resident and nonresident rifle licenses.

However, in recognizing that limitation raises concerns over lost revenue and the resulting negative impact to CPW's budget, we support a phased approach to limitation similar to Alternative 3 (or Alternative R6 in OTC survey) as outlined in staff's February 22, 2024 memo to the Commission, beginning with installation of limited license hunt codes, but no license reductions during the first few years. Incremental reductions could then occur to license allocations in following years, allowing for adjustment to loss of revenue, businesses that depend on hunting time to adjust, and hunters to be educated about the new licensing model.

BGSS Cycle Length

For reasons stated above around flexibility and adapting to complex changes facing Colorado's wildlife, GWA also supports continuation of the current five-year BGSS cycle.

In conclusion, we thank you for the opportunity to comment on this important decision-making process.

Sincerely,



Bruce T. Mullin, Jr.
President
Gunnison Wildlife Association Board of Directors