



November 21, 2022

To Whom It May Concern,

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 the Elk Herd Management Plan for Data Analysis Unit E-43. For many years, GWA has patiently awaited the release of, and ability to comment on, the draft plan and has been involved in discussions related to E-43 with Colorado Parks and Wildlife (CPW) staff over the past many years on this front.

First and foremost, the Herd Management Plan for E-43 is woefully outdated. The last plan for the DAU was approved in 2001. While we commend CPW staff for working to update this plan, we urge the agency and Parks and Wildlife Commission, in the future, to ensure that Herd Management Plans, including for E-43, are revisited on a more regular basis. As noted in the draft E-43 plan, much has changed over the last 21 years, including habitat loss due to increased pressures of residential and recreation uses of the land, the federal listing of the Gunnison Sage-grouse as “threatened,” elk migration data, and CPW’s own population estimation model, to name a few.

Additionally, we do have concern with the timing in which the draft E-43 plan was shared with us since it was during busy hunting seasons, and sportspeople have limited availability during that time frame. We also have concern with the relatively short duration of time in which we were able to provide comments on the draft. We believe it extremely important for members of the public to have both the ability to comment on such processes and ample time to do so. We’re not certain that happened in this case. On that note, we notice that public survey results that influenced the draft E-43 plan only included hunters who applied for the limited draw, when it would have been more equitable—if not accurate—to capture the perspective of OTC hunters as well. We also fully understand that many of the factors around future management of E-43 are dependent on decisions pertaining to the statewide season structure, and we look forward to being fully engaged in that process. Lastly, in the future we would like to see management of E-43 more closely aligned with all other units in the Gunnison Basin.

That said, GWA supports the staff preferred, status quo post-hunt population objective range of 6,200-7,200 animals reflected in the draft plan, based on the current population model. We believe this population range is adequate for minimizing conflict between stakeholders, while

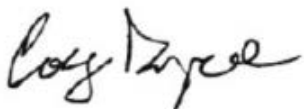
providing ample hunting opportunity and ensuring the long-term success of the herd. Particularly amid increasing pressure from non-hunting recreation and residential development in the Gunnison Valley, we believe it to be of utmost importance to ensure that the sustainability of elk and other ungulate populations, and their habitat, do not suffer. We also support CPW staff's preferred objective for the bull ratio of 23-28 bulls per 100 cows *if* E-43 were ever to be managed as a limited license unit.

On that note, we appreciate the education and contemplation of some form of license limitation for current over-the-counter (OTC) hunting seasons in E-43. While outside the scope of decision-making for this herd management plan, GWA supports implementing some form of additional license limitation as part of the next five-year season structure process. As noted in the draft plan, crowding issues are becoming a growing concern in E-43 resulting in elk concentrating in lower elevations during the rifle seasons and conflicts for law enforcement staff. Additionally, CPW's recent survey indicated support for implementing some type of license limitation during second and third bull elk rifle seasons. GWA places high priority on elk hunting opportunity in E-43, and we recognize that harvesting wild game meat is the top reason why recently surveyed hunters hunt in E-43. However, recently surveyed hunters reported less than 50% satisfaction with hunter crowding, noted inaccessibility of elk due to private land refuges, and expressed that elk distribution is a bigger issue than elk abundance.

This public sentiment paired with a growing number of OTC hunters during second and third rifle seasons leads us to believe that in order to preserve the quality of hunting experience in E-43, reasonable rates of success, and to more scientifically manage bull:cow ratios within a certain objective range, license limitation during second and third bull elk rifle seasons is in order.

We thank you for the opportunity to provide comments on the Elk Herd Management Plan for Data Analysis Unit E-43 and hope that our perspective as outlined above is reflected in future decision-making, including the final Elk Herd Management Plan for E-43.

Sincerely,

A handwritten signature in black ink, appearing to read "Cody Dyce". The signature is fluid and cursive, with the first name "Cody" and last name "Dyce" clearly distinguishable.

Cody Dyce
President
Gunnison Wildlife Association Board of Directors