

Colorado Bowhunter's Association

13611 E. 104th Ave, Commerce City, CO 80022 coloradobowhunting.org



CBA Analysis -CPW BGSS 25-29 Preliminary Alternatives March 2024

The Colorado Bowhunters Association has reviewed the CPW's Preliminary BGSS season alternatives to be presented to the Colorado Parks and Wildlife Commission on March 14th found here:

[https://cpw.state.co.us/Documents/Commission/2024/March/2025-2029 Big Game Season Structure Preliminary Alternatives and Staff Recommendations Memo.pdf](https://cpw.state.co.us/Documents/Commission/2024/March/2025-2029%20Big%20Game%20Season%20Structure%20Preliminary%20Alternatives%20and%20Staff%20Recommendations%20Memo.pdf)

We encourage bowhunters to comment your opinions to the CPW Commission in person or online through zoom testimony. To testify online, please sign up by noon March 8th at: <https://cpw.state.co.us/aboutus/Pages/Submit-Public-Comments.aspx>

If you can neither testify online or show up in person, you can email public comments to dnr_cpwcommission@state.co.us Comments are due by noon March 8th. We are strongly encouraging members to show up to testify in person or do online testimony and send an email.

Many topics are covered in the BGSS proposal, but we believe the following items are key and in need of your focus:

1. CPW Staff is recommending to eliminate OTC Archery Elk tags but keep OTC rifle tags
2. CPW (after recommendations from the CBA) has proposed an early archery deer season.

Key talking points for these two recommendations

1. Early Deer season
 - We like the idea of this but do not like the idea of two different seasons. Instead we would like the archery deer season to align with the archery antelope seasons.

2. OTC Archery elk
 - Colorado residents that pay taxes here should have priority to the resources of the state that we live in.

Please read more about both of these proposals below

Item 4. Alternative 1; Season Structure for Early Seasons (CPW & CBA SUPPORTED) starting on page 7 of the BGSS draft

- Alternative 1 includes a framework to allow an earlier start to archery deer season west of I-25 in some nominated units. This alternative is supported by CPW staff and the CBA. We encourage your input in support of Item 4 alternative 1. This was originally proposed by the CBA trying to tie the dates of archery deer West of I-25 to the archery antelope dates, as an option to reduce pressure in September. The dates in the proposed alternative are much shorter than we had requested.

Item 6a. Alternative 1; Totally Limited Archery Elk Licensing (CPW supported, CBA opposed) Starting on page 11

1. CPW surveys, CBA surveys and the petition from **resident hunters DO NOT SUPPORT Alternative 1**, they support Alternative 2. Taking action in direct conflict with overwhelming public sentiment.
2. **Alternative 1 would impose a 66% fee increases on residents.** It would force both residents and nonresidents to apply for a limited license and increase fees. Resident applications for big game require the purchase of \$60.97 elk license with a \$32.21 turkey or small game and an \$8.00 application fee. Final Adoption of Alternative 1 would raise the cost of a resident archery elk license from \$60.97 to \$101.18. The fee increase for nonresidents would raise the cost to include a \$92.03 qualifying license(minimum) and a \$10 application fee which is a 13% price increase.

Many resident hunters residing in rural Colorado have median income levels at or near poverty level. Increased pricing is a barrier for low income, youth, heads of households, and those new to hunting. This seems to be a double lose for residents to lose OTC licensing, and incur a fee increase after supporting the future generations act of 2018 which created ~26M in additional revenue for CPW. Factual data shows resident archery participation trends are flat to declining, while nonresident participation growth is clearly a bigger cause of crowding complaints.

Limiting licenses for residents should not include fee increases or loss of allocation splits. Additionally, CPW receives federal matching dollars for every license sold. Since we require the purchase of a qualifying license it brings in an unknown amount of federal matching funds. Not disclosing the fee increase and matching funds in the analysis for public review is disappointing and lacks transparency.

Alternative 1 lacks compassion and empathy for those in need. Families, youth, new hunters and low-income earners will suffer.

3.

While commission policy states the public draw shall provide 75 percent preference to residents, the actual draw results in new archery DAU's limited since 2019 show **nonresidents are drawing 67% of the license quota..**

4.

CPW claims **alternative 1 will include a 10% hunter reduction from existing participation. This level won't solve crowding or improve hunt quality.** Improving hunt quality includes lower hunter density, bull elk maturity, abundance, and access. Elk maturity and abundance is highly unlikely to improve while 2nd and 3rd rifle remain OTC unlimited. Examples include the entire SW region where bull rifle remains unlimited, archery is limited, and bull ratios are reported to be the lowest in the state.

5.

A move to total license limitation in archery **would cause uncertainty and upheaval to the preference point landscape.** It is likely going to be a huge dissatisfier. Going to limited licensing will create a multitude of hunt codes drawable with zero points. Nonresidents will dominate the draw as they are more willing to spend their points on a first-choice hunt code than a resident. See the attached slide deck for evidence.

6.

Continued suggestions from CPW and others point the finger at bowhunters as being the cause of elk movement, while September public land usage is at an all time high with a bear quota of ~23,000, ~18,000 Muzzleloaders, high country deer hunters, PLO hunters, bird hunters and a huge (and growing) segment of recreation users. Elk move for a multitude of reasons, including drought. As an example, in the drought of 2002 hundreds of elk moved into the Loveland, Berthoud, and Lyons areas. **Archery pressure had nothing to do with elk movement.** The last time that these **elk movement studies were done was**

over 20 years ago and the non-hunting recreation in the mountains has increased substantially in that time.

7. **A limitation of OTC archery will likely cause forced hunter migration into 2nd and 3rd rifle seasons** as the licensing remains unlimited, and a party can gain a point while hunting.

Item 6a Alternative 2 Resident OTC, Nonresident Limits (CBA supported alternative):

- **There may be no loss in revenue as CPW** will receive purchase of qualifying licenses, and application fees. Our excel modeling suggests the fee increase for require the purchase of a “qualifying license” for both nonresidents and residents may result in an increase of revenue for CPW in the range of ~2M million dollars annually, assuming the same participation and allocation splits. The data from the closure of 5 elk DAUS since 2019 show nonresidents are drawing 67% of the limited licenses, which would increase CPW revenue by over 6 million dollars before federal matching funds.
- PWC still can change quotas annually, there is a hunter limit and it is flexible.
- Retains lower pricing and OTC licensing for residents
- **Improved hunt quality with lower hunter density through reductions in nonresidents**
- CBA met with CPW staff in August 2023, and proposed a reduction of 7,000 nonresident bowhunters. This is exactly the number of archers that were cut out when 5 DAU’s were limited for archery since 2019. We proposed if reduction of hunters should become a future funding issue, the CPW Commission should adopt a \$5 resident elk preference point fee, and a \$25 nonresident elk preference point fee. In this scenario, all limited license hunters would fund retention of an improved OTC hunting opportunity for use in years they do not draw a limited license. The payment of the point fee benefits everyone in this scenario.
- Alternative 2 will no cause upheaval, and uncertainty in the point system
- **Allows families to hunt together and youth recruitment** based on the licensing scheme and lower cost.
- Facts suggest resident OTC archery elk participation is flat to declining. There is no need to limit residents. Residents should be recruited to grow in number, they will vote to retain the North American Model of Conservation, and preserve hunting heritage.

Item 6b OTC Rifle Limitation Alternatives

Status Quo (CPW staff supported alternative):

- We are uncertain how unlimited rifle bull licenses will improve the hunt quality promised by limiting bowhunters. Many GMU's across the state have limited licenses for archery and unlimited rifle bull tags. Bull maturity and abundance do not appear to be improved by this licensing scheme.
- As outlined above, there appears to be no financial analysis how limited licenses in 2nd and 3rd rifle could actually increase funds for CPW given a \$92 qualifying license, \$10 app price increase and matching federal funds.

6b Alternative 1 OTC resident, nonresident limitations

- Retains lower priced OTC licensing for residents
- PWC still can change nonresident cap quotas annually, there is a hunter limit and it is flexible.
- Improves hunt quality through reduction in nonresidents
- Alternative 1 will no cause upheaval, and uncertainty in the point system
- Allows families to hunt together and aids youth recruitment based on the licensing scheme and lower cost.

Thank you for your time and consideration.

Sincerely,

CBA Board of Directors