BUFFALO PEAKS
ELK MANAGEMENT PLAN EXTENSION

DATA ANALYSIS UNIT E-22

GAME MANAGEMENT UNITS
49, 57, 58

June 2018

Jamin Grigg, Wildlife Biologist
Colorado Parks and Wildlife
7405 Highway 50
Salida, CO 81201

DAU E-22 (Buffalo Peaks)
EXECUTIVE SUMMARY
June 2018

GMUs: 49, 57, and 58
Land Ownership: 39% Private, 33% USFS, 21% BLM, 8% State of Colorado
CPW Recommended Post-hunt Objective: 3,150-3,500
Previous Post-hunt Objective: 3,150-3,500 **2016 Post-hunt Estimate:** 3,900
Current Post-hunt Sex Ratio (Bulls:100 Cows) Objective: 35-40
Previous Post-hunt Sex Ratio (Bulls:100 Cows) Objective: 35-40
2016 Observed: 29 **2016 Modeled:** 31

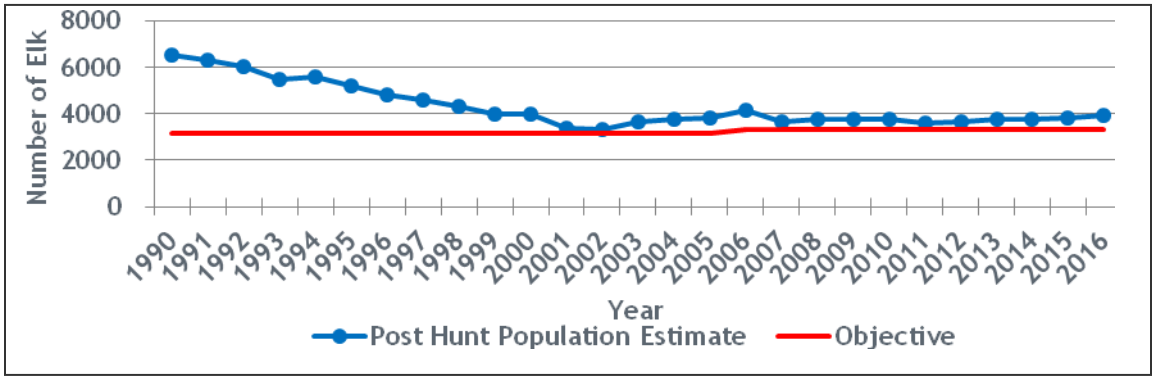

Figure 1. Elk Herd E-22 Post-hunt Population Estimate between 1990 and 2016

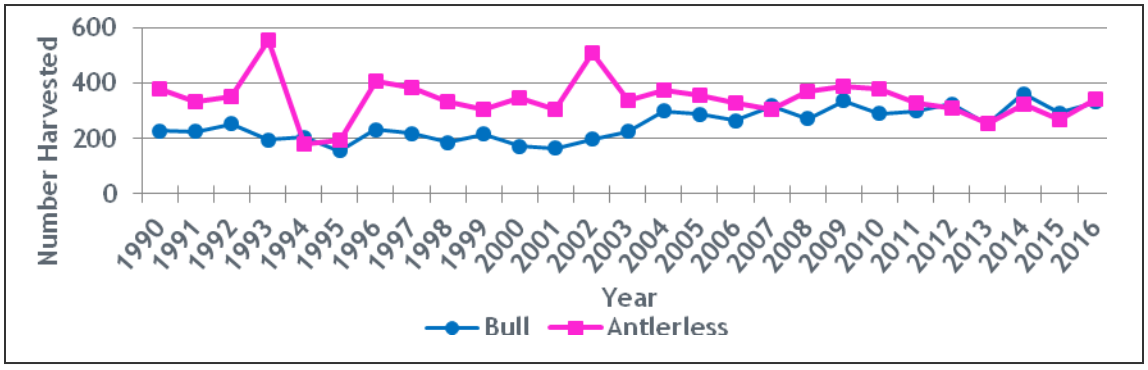

Figure 2. Elk Herd E-22 Harvest between 1990 and 2016

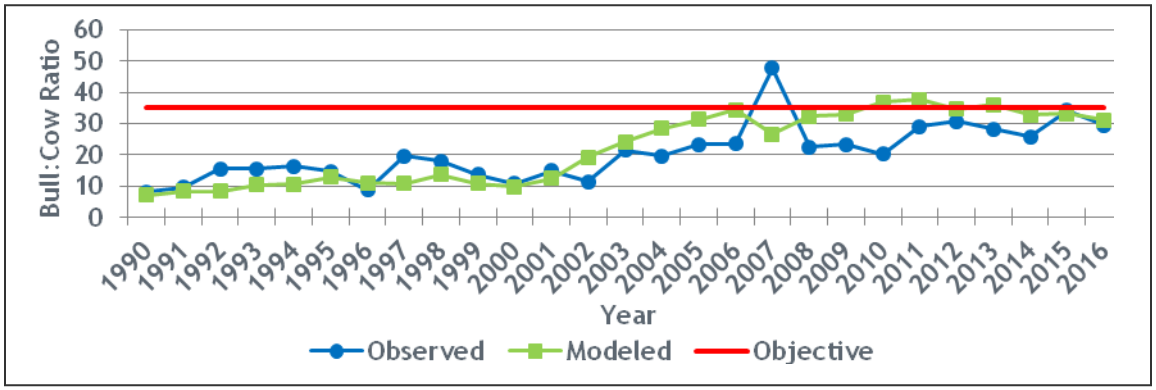

Figure 3. Elk Herd E-22 Post-hunt Bulls/100 Cows between 1990 and 2016

E-22 Background

The Buffalo Peaks (E-22) elk herd has been managed as a quality hunting area since the early 1970s with limited bull licenses. Historically, this herd has been above the population objective. In the 1990s, the herd underwent a gradual reduction due to increases in antlerless harvest, until leveling off in the 2000s. For the past ten years, the population estimates have ranged from 3,615 to 3,915 elk, which is 315-615 elk over the current objective target of 3,300. Antlered and antlerless harvest numbers both generally range from 200-400 animals per year, with annual variation largely attributed to weather conditions.

Over the last 5 years, hunter satisfaction in E-22 has ranged between 70% (2013) and 77% (2015) of sportsmen satisfied with their hunt. During that same time period, on average, only 19% of hunters reported feeling moderately or extremely crowded during their hunt.

Two public meetings were held in September 2017 to take public comment about management of this herd, one in Buena Vista and one in Canon City. The plan was also presented to the Arkansas River and South Park Habitat Partnership Program Committees. Public comments generally supported the CPW recommended objectives, as did HPP committee comments.

Within the past five years, herd composition has held steady with a five year observed post-hunt average of 42 calves and 30 bulls per 100 cows. Normally, bulls are able to winter throughout the area and are difficult to find during counts. Cow/calf groups, on the other hand, often spend the winter in very open areas and are disproportionately represented in age and sex ratio counts. Since 2000, post-hunt cow/calf ratios varied between 35 and 59 calves per 100 cows. Post-hunt bull/cow ratios have generally ranged between 20-30 bulls per 100 cows during that time, but have increased to 30-35 in recent years. Since 2003 the observed estimates have ranged approximately between 20 and 30 bulls. The current post-hunt bull:cow ratio is estimated to be 31 bulls per 100 cows.

CPW Recommendation to the Parks and Wildlife Commission

Population and Sex Ratio Objectives: The CPW recommendation is to extend the current E-22 post-hunt population objectives of 3,150-3,500 elk with a sex ratio of 35-40 bulls per 100 cows for the life of this plan.

Strategies for Achieving Objectives

Population- To maintain the population within objective, antlerless harvest will be increased slightly; this will be accomplished through allocations of antlerless elk licenses, primarily during the general elk rifle seasons.

Herd Composition- E-22 license quotas have generally kept bull:cow ratios within the objective range of 35-40 bulls per 100 cows, and antlered licenses will continue to be allocated accordingly.

Strategies to Address Management Concerns

Habitat Availability and Quality- CPW personnel will continue to work in cooperation with public land management agencies and private landowners on habitat improvement projects, conservation of important elk habitat areas, and protection of elk movement corridors within E-22.

Elk Distribution and Movement- Private land only licenses will continue to be allocated to maintain hunting pressure on private lands and reduce agricultural depredation issues. When necessary, game damage permits will also be allocated for individual landowners experiencing conflicts.

This herd management plan was approved by the Colorado Parks and Wildlife Commission in June 2018

BUFFALO PEAKS ELK MANAGEMENT PLAN

Table of Contents

INTRODUCTION AND PURPOSE

Colorado Parks and Wildlife (CPW) manages big game for the use, benefit, and enjoyment of the people of the state in accordance with the CPW's Strategic Plan (2010-2020). Elk 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 and varied public demands and growing human impacts. The CPW uses a "Management by Objective" approach to manage the state's big game populations (Figure 4).

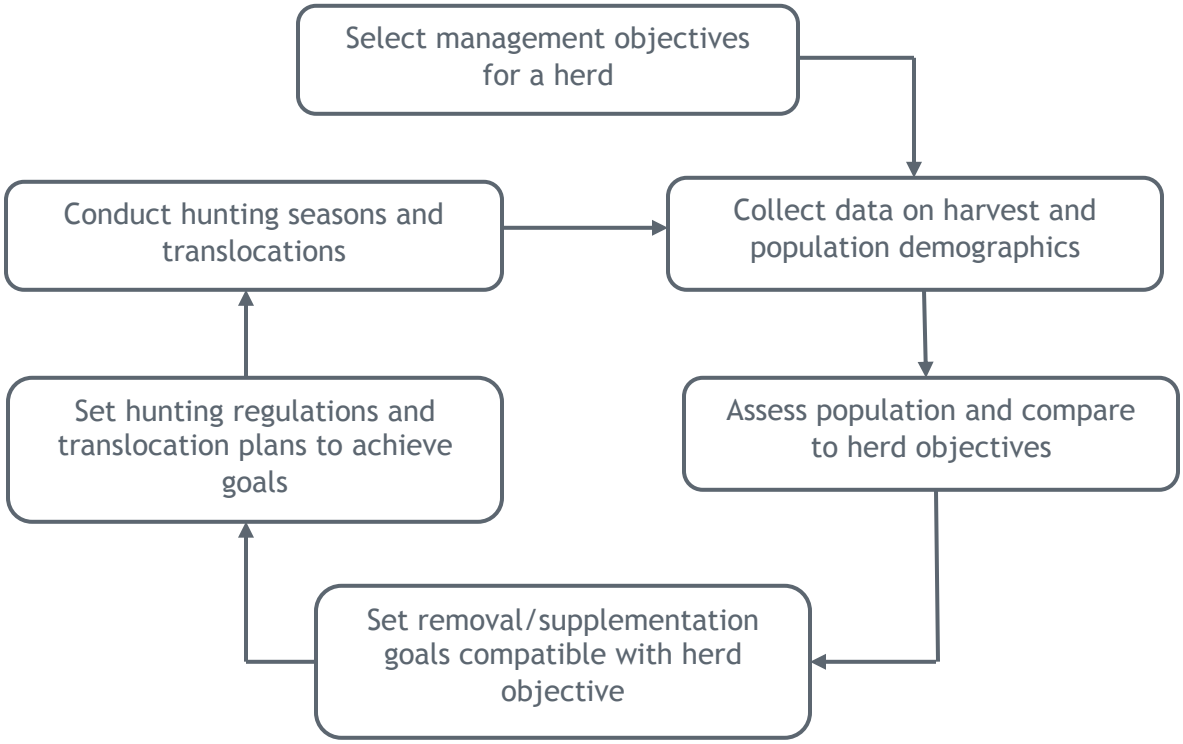

Figure 1. Management by Objective process used by Colorado Parks and Wildlife to manage big game populations by Data Analysis Units.

With the Management by Objective approach, big game populations are managed to achieve population objectives established for a herd. The Herd Management Plan (HMP) for each herd incorporates the capability of the habitat to support big game populations, other social and biological limiting factors, and input from the public, organizations, and other agencies about their issues and concerns regarding hunting management and herd objectives. Each HMP is publicly approved by the Colorado Parks and Wildlife Commission. Annual harvest objectives and the resulting license recommendations for all hunts are designed to achieve the management objectives approved in the HMP. A Data Analysis Unit (DAU) is the geographic area and identifying number of a relatively discrete big game population. DAUs can contain multiple Game Management Units (GMUs) which are geographic areas delineated to distribute hunters using limited licenses. A DAU is the geographic area that includes the year-round range of a big game herd. A DAU includes the area where most animals in a herd are born,

live and die. DAU boundaries are delineated to minimize interchange of animals between adjacent herds.

Management decisions within a herd are based on an HMP. The primary purpose of an HMP is to establish population and sex ratio (i.e., the number of males per 100 females) objectives for the herd. The HMP also describes the strategies and techniques that will be used to reach these objectives. During the herd management planning process, public input is solicited and collected through questionnaires, public meetings, and comments to the CPW staff and the PWC. The intentions of the CPW are integrated with the concerns and ideas of various stakeholders including the State Land Board (SLB), the Bureau of Land Management (BLM), city and county governments, hunters, guides and outfitters, private landowners, local chambers of commerce, and the public. In preparing the 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 HMP serves as the basis for the annual herd management cycle. In this cycle, the size and composition of the herd is assessed and compared to the objectives defined in the Herd Management Plan and removal goals are set. Based on these goals, specific removal strategies are made for the coming year to either maintain the population or move it towards the established objectives (e.g., license numbers and allocation are set, translocation plans are made). Hunting seasons and/or translocations are then conducted and evaluated. The annual management cycle then begins again (Figure 4).

The purpose of this HMP is to set population and sex ratio objectives for the Buffalo Peaks elk herd. This HMP will be in place from 2018-2028 with the expectation that it will be reviewed and updated in 2028.

Description of Elk Herd E-22

Location

The Buffalo Peaks elk management area encompasses an area of 1,682 mi^2 in central Colorado, approximately 60 miles west of Denver and 40 miles west of Colorado Springs. It includes game management units 49, 57, and 58. The elk management area is bounded on the north by the Continental Divide, on the east by Colorado Highway 9, U.S. Highways 285 and 24, and Park County Road 59, and on the south and west by the Arkansas River. E-22 covers the southwestern one third of Park County, the northwestern quarter of Fremont County and the eastern one third of Lake and Chaffee counties (Figure 5).

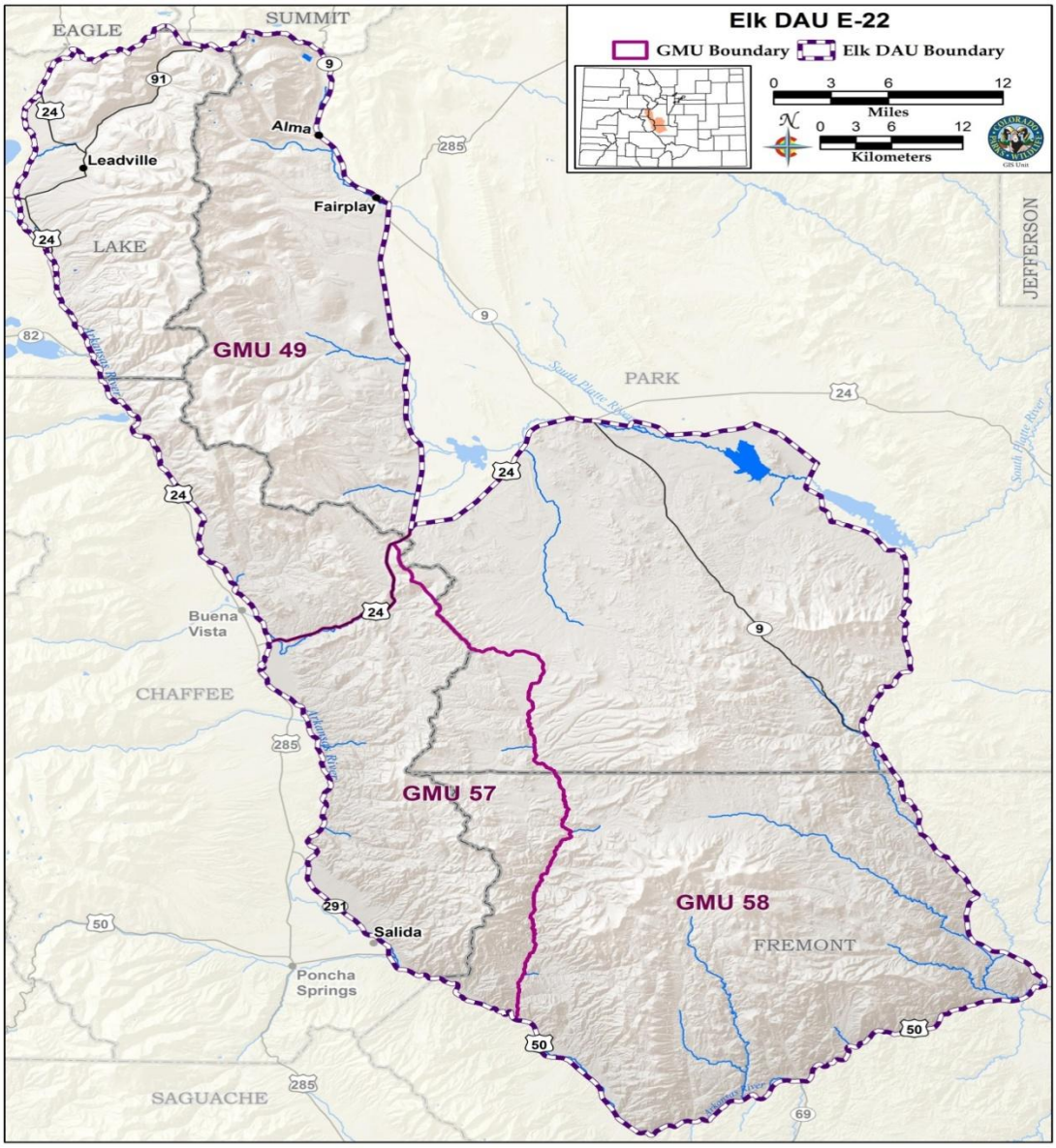

Figure 5. Elk management area E-22

Physiography

The area comprises the western and southern edges of South Park, as well as approximately one quarter of South Park itself. The three game management units descend steeply on both sides of the Mosquito Range to the flats of South Park on the east as well as into the bottom of the Arkansas River canyon east and north of Salida. Elevations range from 14,284 ft at Mount Lincoln, west of Fairplay to 5,720 ft at Parkdale west of the Royal Gorge where the Arkansas River leaves E-22. The Mosquito Mountain Range runs north to south and comprises the divide between the South Platte River and the Arkansas River drainage.

Vegetation

The western border of E-22 is alpine tundra (above 11,500 ft) and is characterized by sedges, forbs and stunted willows. As the elevation drops, the next ecosystem is subalpine forest (9,000 ft-11,500 ft) dominated by subalpine fir, Engelmann spruce, aspen and bristlecone pine. The montane forest (5,600 ft-9,000 ft), contains primarily ponderosa pine, Douglas-fir, lodgepole pine, and aspen. The semidesert shrubland areas (7,000 ft-8,000 ft), support sagebrush, rabbitbrush, mountain mahogany, grasses and numerous forbs. The pinon-juniper woodlands (6,800 ft-8,000 ft), contain primarily pinon pine, juniper, mountain mahogany, rabbitbrush, forbs and cactus. The riparian ecosystems extend along all of the drainages and include narrowleaf cottonwood, willow, cinquefoil, current and forbs and grasses. The shortgrass prairie of South Park supports grasses and forbs with fringed sage and rabbitbrush creating a low overstory. Agricultural cropland in E-22 is limited and consists mainly of native grass and a few alfalfa hay fields in the Arkansas River valley bottom and along tributaries (Figure 6).

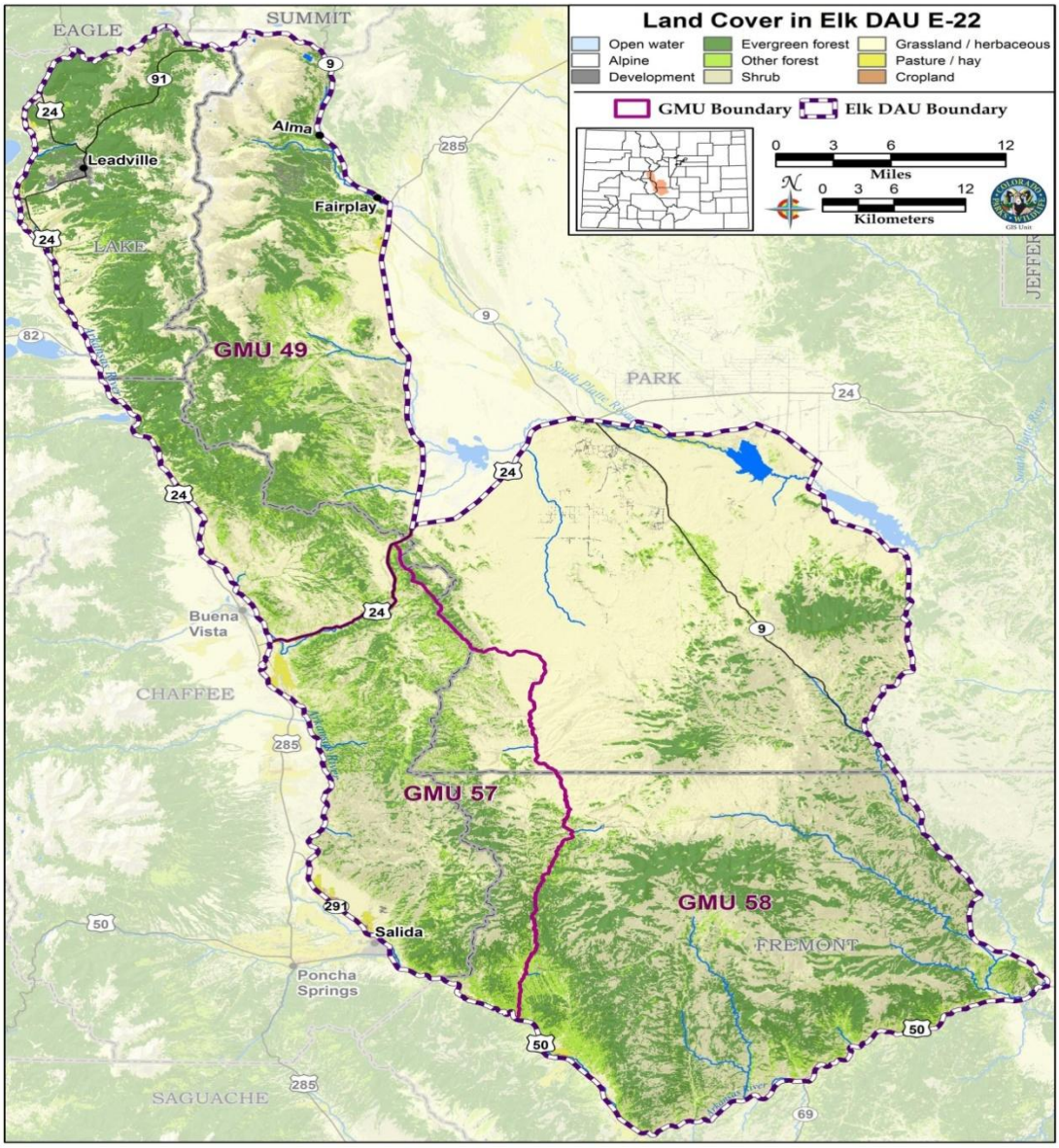

Figure 6. Land cover of elk management area E-22

Climate

As with all of mountainous Colorado, the climate varies significantly with season, elevation and aspect. Elevations below 7,500 ft are usually hot and dry in the summer and generally remain snowfree during most of the winter. Elevations between 7,500 ft and 9,500 ft have slightly cooler and wetter summers with persistent snow cover on north slopes during the winter. South facing slopes normally remain open or have minimal snow cover throughout the winter. Above 9,500 ft elevation is much cooler and wetter during the summers and north slopes are snow covered all winter except for windswept ridges above timberline. Annual precipitation varies from seven inches per year in portions of South Park to over 25 inches at the highest elevations. Snowfall accounts for the majority of the precipitation in E-22 with thunderstorms adding significant localized volumes in the summer.

Average daily high temperatures range from 41 degrees in winter to 82 degrees in summer, in Salida. Average lows range from 12 degrees in winter to 46 degrees in summer. In Leadville and Fairplay, daily high temperatures range from 30 degrees in winter to 67 degrees in summer while daily low temperatures average 0 degrees in the winter and 36 degrees in the summer.

Land Status

The Buffalo Peaks elk management area encompasses 1,682 mi^2. Private lands total 39% (649 mi^2) of E-22. The higher elevation portions of E-22 are in the Pike/San Isabel National Forest divided between the Leadville, Salida, Fairplay and San Carlos Ranger Districts. Forest Service lands total 33% (554 mi^2) of E-22. Lower elevation public lands, managed by the Royal Gorge field office of the Bureau of Land Management, are generally scattered between the lower edge of the USFS lands and private lands. BLM lands total 21% (349 mi^2) of E-22. The remaining parcels, comprising of local and state governmental properties, are dispersed through the private land portion of E-22 totaling approximately 130 mi^2 or 8% (Figure 7).

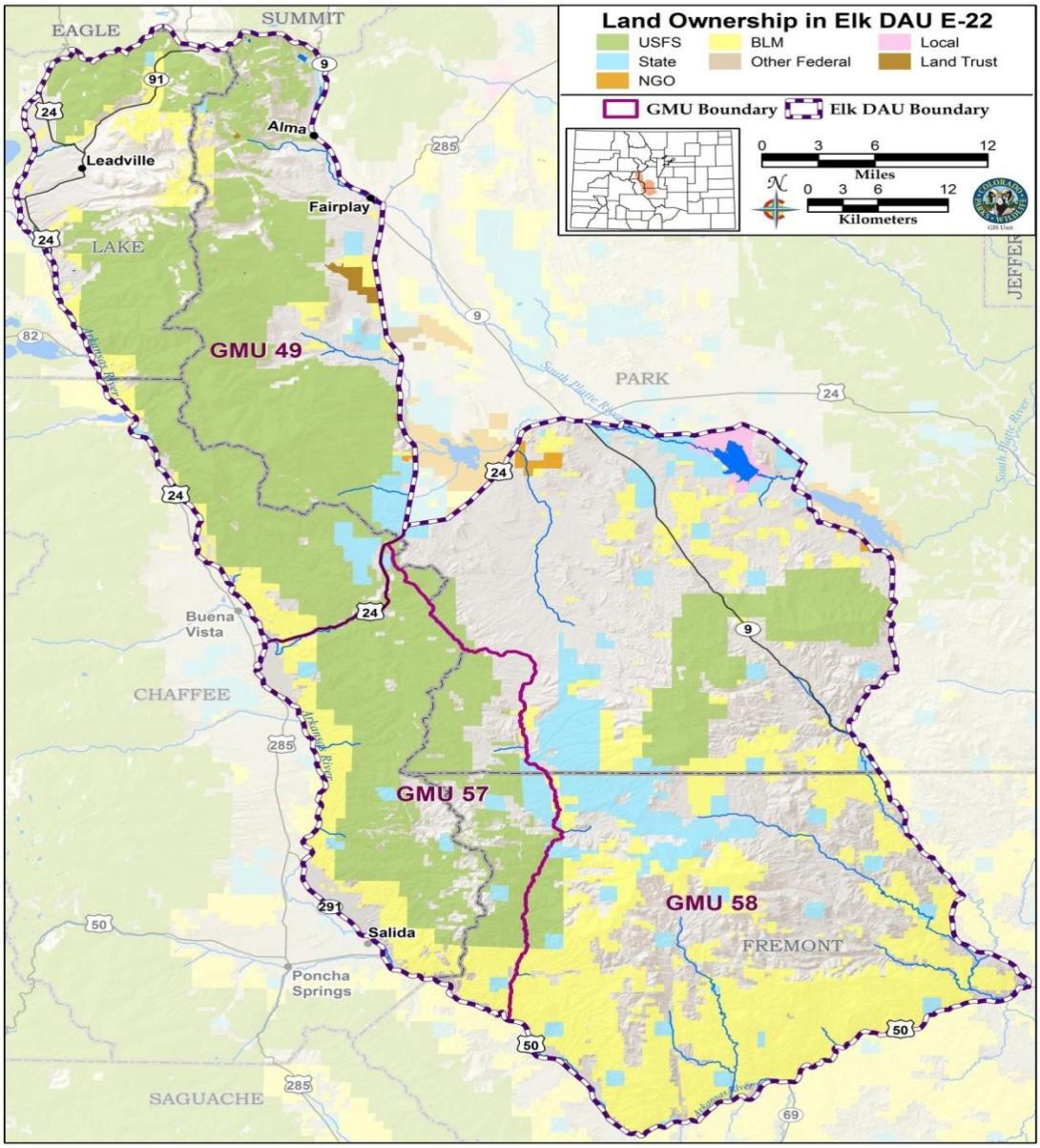

Figure 7. Land ownership within elk management area E-22

Land Use

Land use in E-22 has changed significantly in the last 20 years. Multiple uses of the public lands in the DAU include heavy recreational use of both USFS and BLM lands throughout the year. Additionally, most of the public lands have seasonal grazing allotments. There is a small amount of logging, primarily for disease control or salvage timber sales of beetle killed trees or for habitat improvement for deer and elk. Mining has been a significant historic use of public and private lands but has decreased to a very low level of activity at the current time. Private lands are generally in agricultural production, either by livestock grazing or hay production, however, there has been a steady and accelerating rate of conversion from agricultural status to subdivision for residential development. Much of the important

winter range for this elk herd has already been converted or is vulnerable to this change in land use.

Elk Distribution

Elk occupy all of the E-22 herd management area at some time of the year. Densities are low in the lower elevation habitats during the summer when most elk move up to traditional calving and summering areas in higher elevation habitats. During the winter, most elk move to lower elevation winter ranges as snow accumulates on the higher elevations and north slopes. Because of the relative mild and dry winters, winter ranges often extend to over 10,000 ft in elevation. Some elk will use windswept ridges at higher elevations during the winter. Approximately two thirds of E-22 can and does serve as winter range in normal winters with some concentration occurring in preferred habitats. During severe winter periods, habitat utilization is reduced to approximately one fifth of the size of the overall range (Figure 8).

In recent years an increasing number of elk are remaining in lower elevation habitats that have traditionally been used primarily by deer. They then seek refuge in new subdivisions which have created de facto refuges where elk cannot be hunted.

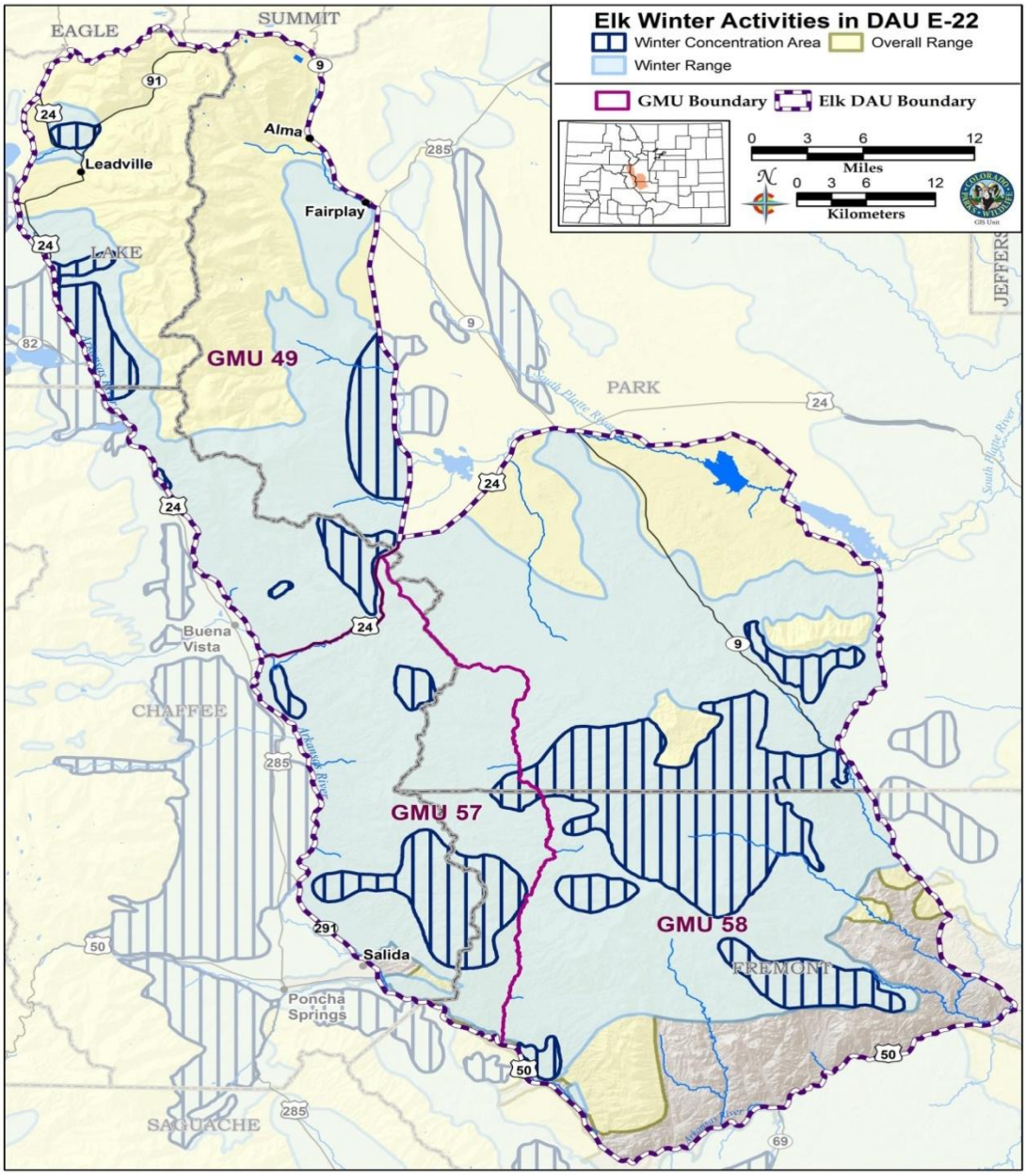

Figure 8. Elk range within elk management area E-22

HERD MANAGEMENT

Management of the elk herd in E-22 is conducted like most herds in Colorado. Hunting season regulations and license numbers are set based on the current estimated post-hunt population and the long term population and sex ratio objectives established by the Wildlife Commission in this Herd Management Plan. Those population objectives are considered to be the most reasonable goal for this herd based on the quantity and quality of available habitat for elk, the recreational, economic and political desires of the people of the state, the level of conflicts between the elk herd and agricultural producers in the area, and the comments of land management agencies.

The post-season population size is estimated each winter from a spreadsheet population model utilizing annual harvest data gathered by Colorado Parks and Wildlife, aerial age and sex ratio surveys conducted by CPW personnel, annual survival estimates, and population trend estimates based on all of the above data (Figure 9). Estimating numbers of elk over this large of a geographic area is a difficult and approximate science. Thus the population objectives considered in this plan are designated as ranges to reflect the fact that each year's population estimate may vary according to changes in hunting and counting conditions, survival rates, and winter snow conditions.

E-22 has been a "Specified" management herd with limited antlered elk hunting since 1967 in GMU 58, 1970 in GMU 57 and since 1972 in GMU 49. It was established as a "quality" elk hunting unit when those designations were established. While not impacting the population size, this management regime has kept the bull/cow ratio higher than unlimited bull hunting would have allowed. Additionally, managing E-22 as a quality area has limited hunter crowding during the hunting seasons.

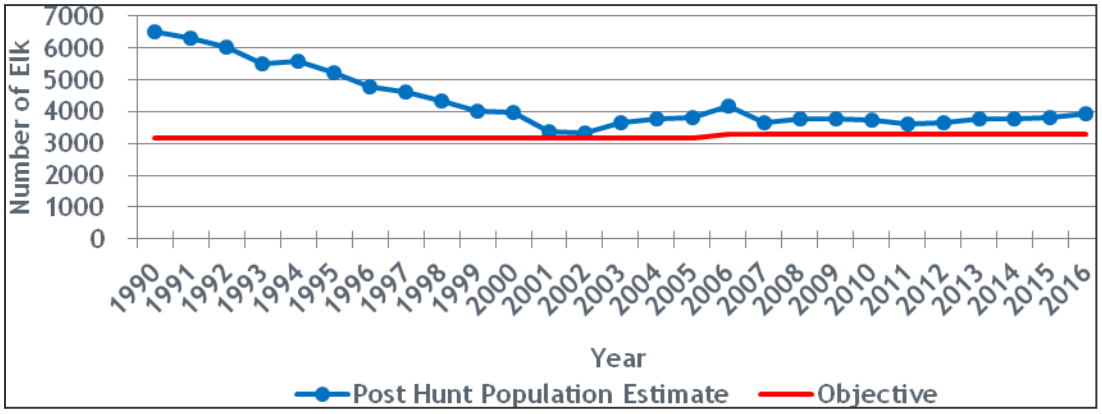

Figure 9. Post-hunt population estimate for E-22 since 1990.

Post Season Herd Composition

Herd composition data has been acquired using aerial sex/age composition surveys by CPW personnel from the end of November to mid January of each year. These surveys, via helicopter, are conducted to gather data on the post-hunt population and determine sex and age ratios. Since 2008, aerial count sample sizes have ranged from 850 elk classified in 2002 to 2,173 classified in 2013, with a five year average sample size of 1,441 elk classified from 2012 through 2016. Figure 10 shows the calf/cow ratio data from the classifications.

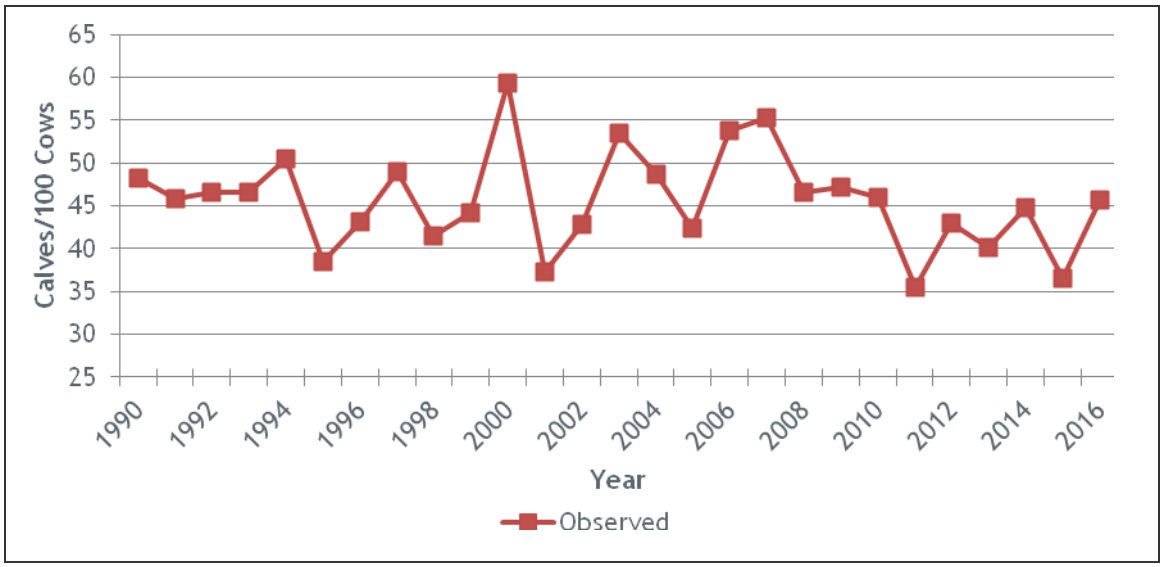

Figure 10. Observed post-hunt calf/cow ratios in elk herd E-22 between 1990 and 2016

The surveys favor the classification of groups of elk containing cows, calves and younger bulls. Because of the limited amount of snow in E-22 and the tendency of mature bulls to winter in heavier cover and at higher altitudes, they are generally harder to find and are under-represented in classification counts. Observed ratios of bulls, therefore, are typically lower than modeled bull/cow ratios. The overall observed average is 21 bulls per 100 cows and 46 calves per 100 cows. The 2016 post-hunt ratios calculate to 29 (observed) and 31 (modeled) bull/cow ratio and an observed 46 calves per 100 cows. Figure 11 shows both the observed and calculated sex ratios for E-22.

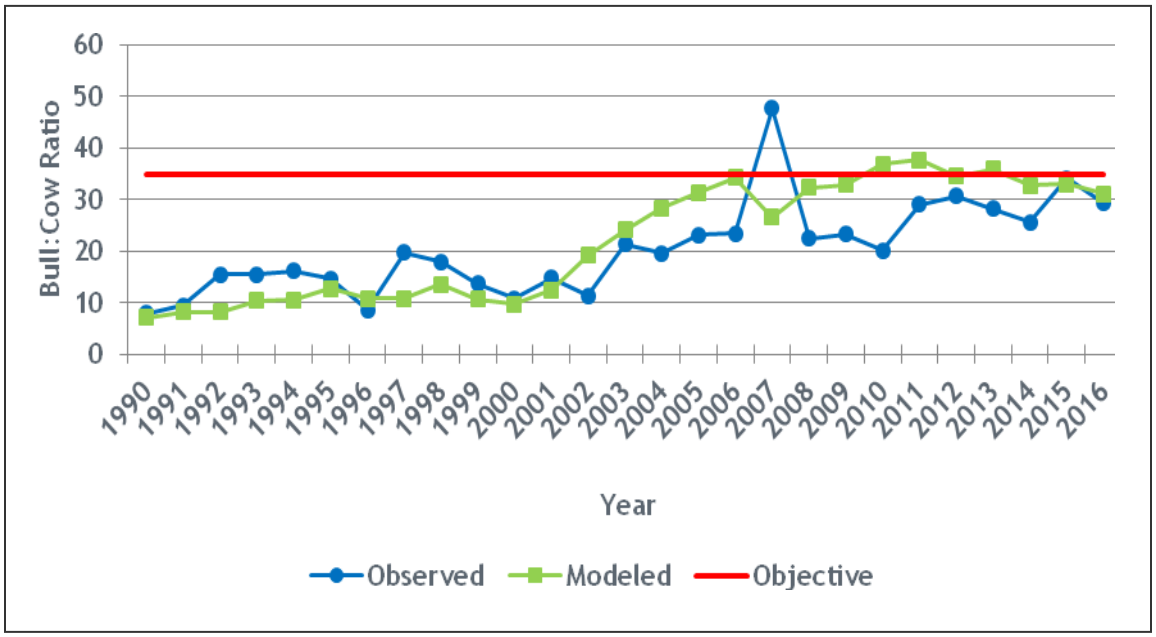

Figure 11. Observed and modeled bull/cow ratios in elk herd E-22 between 1990 and 2016

Game Damage

Since 2008, CPW has paid a total of $3,593.48 for five elk game damage claims in E-22, most located in GMU 57 (Table 1). Most claims were for damage to growing crops and livestock forage ranging from $258-$1,064. The remaining claim, which was most expensive at $1,500, was paid for damage to livestock. No other damage claims have been paid since 2012 in E-22.

Table 1. Game Damage Claims Paid between 2008 and 2012 in E-22

Claim Date	Damage Type	Claim Paid	GMU
12/18/2008	Growing Crop	$476.33	57
6/19/2009	Livestock Forage	$258.05	57
9/12/2009	Livestock	$1,500.00	49
1/26/2012	Growing Crop	$1,064.00	57
8/20/2012	Livestock Forage	$295.10	57

Harvest

Harvest in E-22 has varied through the years, primarily due to weather conditions during the hunting seasons. Generally, total harvest numbers have increased in the last 25+ years as the population approached and exceeded the objective. Antlerless harvest has made up the bulk of the increase in the effort to hold the population at the current goal. Antlered harvest has exceeded antlerless harvest five out of the last 27 years, however the margin of difference has been small (10-39 animals). As a result, the current population estimate is approaching the current long term objective. Figure 12 shows the total harvest with each age and sex component for the last 27 years.

Figure 13 gives the total hunter number and hunter success since 2005. The number of hunters has decreased within the past five years; however success has remained fairly steady. On average, hunters harvest 633 elk with 28 % success per year since 2005.

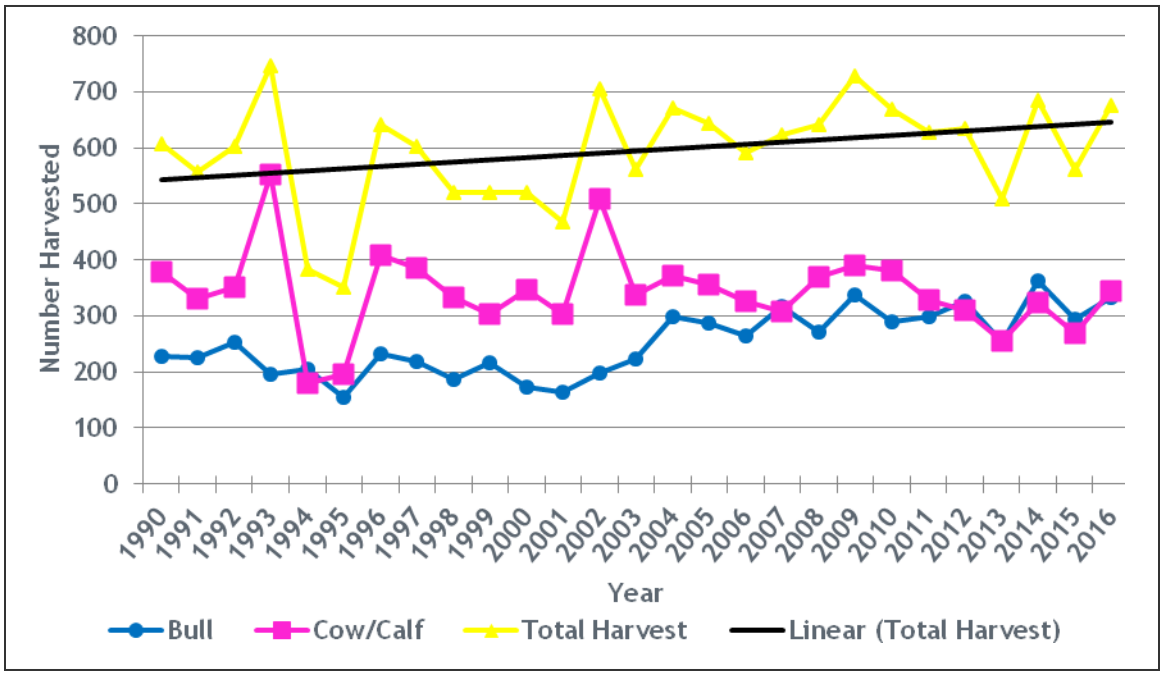

Figure 12. Elk harvest in E-22 between 1990 and 2016

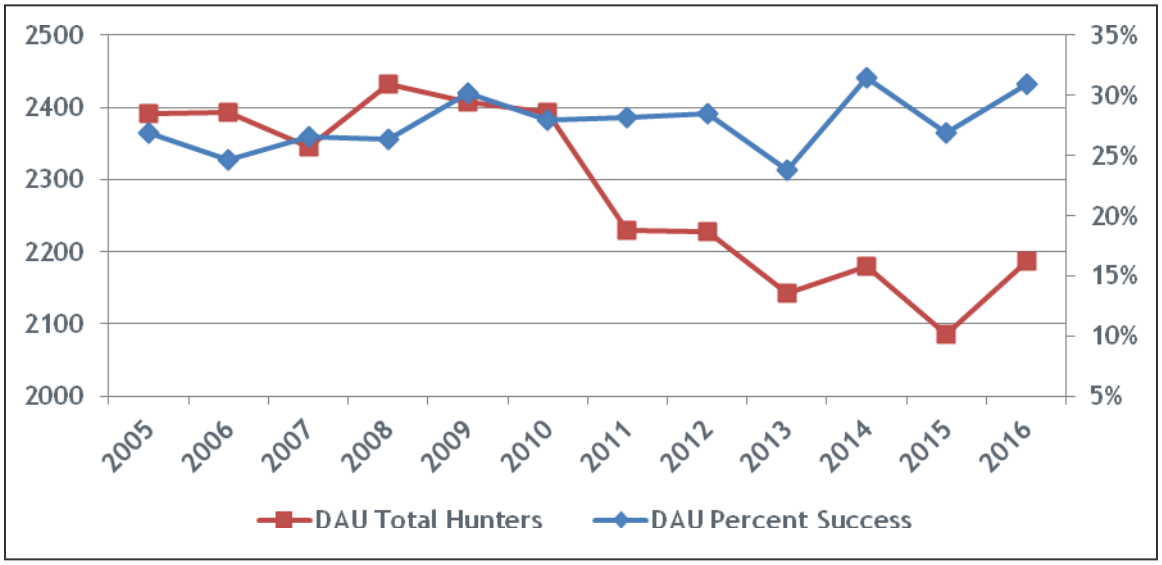

Figure 13. Total number of hunters and harvest success of elk in E-22 between 2005 and 2016

Current Herd Management

The current post-hunt herd objectives for E-22 are 3,150-3,500 for population with a bull/cow ratio of 35-40. These objectives have been in effect since a herd management plan was developed in 2005 (population objective) and 1987 (bull/cow ratio objective).

E-22 has been managed as a quality elk herd for over 40 years. As such, antlered licenses have been limited to provide a less crowded experience for hunters and maintain a sex ratio at or above 35 bulls per 100 cows.

Current Management Issues

E-22 is a large area for the current population. GMU 49 is mostly public land and supports the largest portion of the elk herd. During the fall and winter, elk move out of GMU 49 and onto wintering areas in GMUs 57 and 58. Large numbers of elk winter on the public, private, and state lands around Black and Waugh Mountains on the southern edge of South Park. Because of this movement, the hunting seasons were established so that hunters could hunt both GMU 57 and GMU 58 to increase the opportunity to find elk either as they are moving or after they reach their winter ranges. PLO licenses are offered in units 57 and 58 to mitigate private land conflicts and to encourage winter use by elk of the public lands within those units.

Historically, habitat improvements have occurred in the form of controlled burns and forest thinning efforts. There has been a significant loss of elk habitat due to changes in land use in E-22. Most of the conversion from agricultural to residential use has occurred in winter and transitional ranges which are critical in determining the carrying capacity of E-22. Impacts from development include direct loss of habitat capability as well as the loss of the ability to hunt those lands.

Traditionally, because of the relative small amount of hay production in E-22, there has been relatively little game damage conflict (see *Game Damage* for details). Following past droughts, when elk use patterns changed in response to reduced amounts of green forage, there is occasionally an increase in complaints about elk use of the few alfalfa and grass hay fields in E-22. The attractiveness of these fields draws elk use away from available public lands. While there is adequate forage to support a larger elk population, the concentration of elk in these conflict areas may become a problem in the future.

Much of the South Park area has a high incidence of locoweed which does occasionally impact this elk herd. During years with low precipitation in the early spring significant numbers of elk develop symptoms of locoism. The highest documented impact to E-22 was over 200 elk killed in one summer. Normal years result in an average of less than 25 elk killed by this poisonous plant. Due to habitat use patterns by bulls versus cows, there is a greater impact to the male segment of the population. Additionally, some areas have noticed deformed antler development as a result of the alkaloid toxin affecting hormone levels in bulls. While locoism does not present a threat to the population as a whole, it can affect bull survival rates and may impact sex ratios in some years.

RECOMMENDED OBJECTIVES

Over the last 5 years, hunter satisfaction in E-22 has ranged from 70% (2013) to 77% (2015) satisfied with their hunt. During that same time period, on average, only 19% of hunters reported feeling moderately or extremely crowded during their hunt. Two public meetings were held in September 2017 to take public comment about management of this herd, one in Buena Vista and one in Canon City. The plan was also presented to the Arkansas River and South Park Habitat Partnership Program Committees. Public comments generally supported the CPW recommended objectives, as did HPP committee comments.

Colorado Parks and Wildlife recommends the following extension objectives for E-22:

1) Maintain the current post-hunt population objective of 3,150 to 3,500.

2) Maintain the post-hunt sex ratio objective of 35 to 40 bulls per 100 cows.

APPENDIX A – HPP Letters of Support

October 19, 2017

Brian Dreher
Colorado Parks and Wildlife
4255 Sinton Road
Colorado Springs, CO 80907

RE: Arkansas River HPP Committee Comments - DAU E-22

Dear Brian:

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 Arkansas River HPP committee has discussed your presentation and reviewed the draft recommendation for this DAU plan update. The ARHPP committee offers the following comments for your consideration.

The ARHPP committee supports the draft recommendation to keep the current population objective. We believe this alternative responsibly balances local range and habitat conditions with sportsmen desires and landowner concerns. We also heard, and agree, that the current plan objectives and licensing is acceptable to most sportsmen and landowners and the overall system is working well in this area.

One of our committee discussions involved simply increasing the objective to match the current post hunt population levels. This would not have increased the total number of animals on the ground but merely put the objective where the population levels have been for the past several years. However, landowners were concerned that if this change were made, herd size would eventually grow above the upper objective limit and result in conflicts and range impacts. This discussion led to our agreement to keep the current population objective range as it is.

The ARHPP committee understands that, since the population is above objective, continuing with the current objective range will mean CPW will have to increase harvest to get within the objective range.

The ARHPP committee also discussed the proposed sex ratio alternatives. We believe the current sex ratio is a good balance which provides ample hunting opportunity while also providing for a reasonable number of mature animals for those hunters who want to take a larger bull.

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

Sincerely,

Ted Grover

Ted Grover, Chair
Arkansas River HPP Committee

November 20, 2017

Jamin Grigg
Colorado Parks and Wildlife
7405 Hwy 50
Salida, CO 81201

RE: South Park Habitat Partnership Program Comments - DAU E-22

Dear Jamin:

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 South Park HPP committee has discussed your presentation and reviewed the draft alternatives for this DAU plan update. The South Park 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 SPHPP 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 have not heard of any concerns about the current population or any desires to increase the local herd size and so we believe the current levels are where they should be. Any issues we have are more likely related to distribution of the herds in the area and not the overall population size.

The SPHPP committee also discussed the proposed sex ratio alternative. We believe the current sex ratio is a good balance and provides ample hunting opportunity while also providing for a reasonable number of mature animals for those hunters who want to take a larger bull.

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

Sincerely,

John Woodward, Chair
South Park HPP Committee

APPENDIX B - USFS Letters of Support

USDA United States Department of Agriculture Forest Service Leadville Ranger District
810 Front Street
Leadville, CO 80461
719-486-0749
Fax: 719-486-0928

File Code: 2600
Date: January 12, 2018

Jamin Grigg
Colorado Parks and Wildlife
7405 Hwy 50
Salida, CO 81201

Dear Mr. Grigg:

The Leadville Ranger District of the Pike & San Isabel National Forests and Cimarron & Comanche National Grasslands (PSICC) was pleased to received Colorado Parks and Wildlife's *Buffalo Peaks Elk Management Plan Extension* for review and comment. We understand the importance of herd management plans and their role in conserving and protecting iconic wildlife species such as Rocky Mountain Elk. The proposed population range objectives (3,100-3,500 elk) for elk herd E-22 addressed in the management plan are reasonable though we do support and advocate for the upper end of objectives. Current data in the management plan shows that the land is currently supporting more than stated objectives and the forest service has not observed significant ecological issues due to elk over-use across the landscape on public lands. The management plan data also indicates there has not been any monetary game damage claims from public land owners in the past five years, further indicating that the current population, which is slightly above proposed objective, is sustainable.
We support the procedures of limiting hunting seasons as well as license numbers as methods to maintain the herd objectives. Maintaining quality elk hunting through draw units within the herd data analysis unit is important to providing unique recreational opportunities on public lands as well. Higher bull/cow ratios and fewer hunters limits "overcrowding" and provides quality hunting in all of these game management units.

We look forward to partnering with Colorado Parks and Wildlife in future endeavors to protect and enhance quality habitat on public lands for Rocky Mountain Elk as well as other wildlife species.

Sincerely,

MARY MOORE
District Ranger

cc: jamin.grigg@state.co.us

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USDA United States Department of Agriculture
Forest Service
Salida Ranger District
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Salida, CO 81201
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File Code: 2600
Date: January 16, 2018

Jamin Grigg
Colorado Parks and Wildlife
7405 Highway 50
Salida CO 81201

Dear Jamin Grigg. ,

The Salida Ranger District of the Pike and San Isabel National Forest received the Colorado Parks and Wildlife's *Buffalo Peaks Elk Management Plan Extension* for review and comment. We understand the importance of herd management plans and interagency cooperation to achieve wildlife conservation goals. Current data in the management plan displayed that the land currently supports more elk than stated objectives and the Forest Service has not observed significant ecological issues due to elk over-use across the landscape on public lands. The management plan data indicates there has not been monetary game damage claims from public land owners in the past five years. The proposed population range objectives (3,100-3,500 elk) for elk herd E-22 are reasonable, though we do support and advocate for the upper end of population objectives based on the information in the plan.

Maintaining quality elk hunting through draw units is providing important recreational opportunities on public lands. Managing for higher bull/cow ratios and limiting hunter numbers prevents "overcrowding" and provides quality hunts in game management units managed this way. We agree with the post-hunt sex ratio objective of 35 to 40 bulls per 100 cows based on the quality of habitat and the recreational opportunity it supports, and balancing those needs with economic and political influences. For these reasons, we support the procedures of limiting hunting seasons as well as license numbers as methods to achieve the herd objectives.

We look forward to continued cooperation with Colorado Parks and Wildlife in future endeavors to conserve and enhance quality wildlife habitat on public lands for Rocky Mountain Elk as well as other wildlife species. Thank you for this opportunity to review the *Buffalo Peaks Elk Management Plan Extension.*

Sincerely,

JAMES PITTS
District Ranger