CITIZEN PETITION FORM

Date:	April 21,2021

Issue:	Weighted Points For Moose, Sheep, and Goat

Which rule are you seeking to create or revise? Please include a copy of the rule you are proposing to create or change, preferably with the change made in redline format.

Revise; Rule Chapter W-2, Article 1, #206.B.4.1.b
Weighted preference is calculated by converting the applicant's original application number into a new random application number, then dividing that random application number by ~~the number of weighted preference points the applicant currently has for that species plus one.~~

Change to: Weighted preference is calculated by converting the applicant's original application number into a new random application number, then dividing that random application number by one plus (the number of weighted points held divided by the maximum number of weighted points for that species.)

$$\text{random application number} \Big/ 1 + \left(\frac{\text{weighted points held}}{\text{max number weighted points for that species}} \right)$$

Why are you seeking to create or revise this rule? Please include a general statement of the reasons for the requested rule or revision and any relevant information related to the request.

The current rule reduces an applicant's randomized number by half if they have one weighted point. The advantage of applicants with more weighted points becomes less signicant each year.

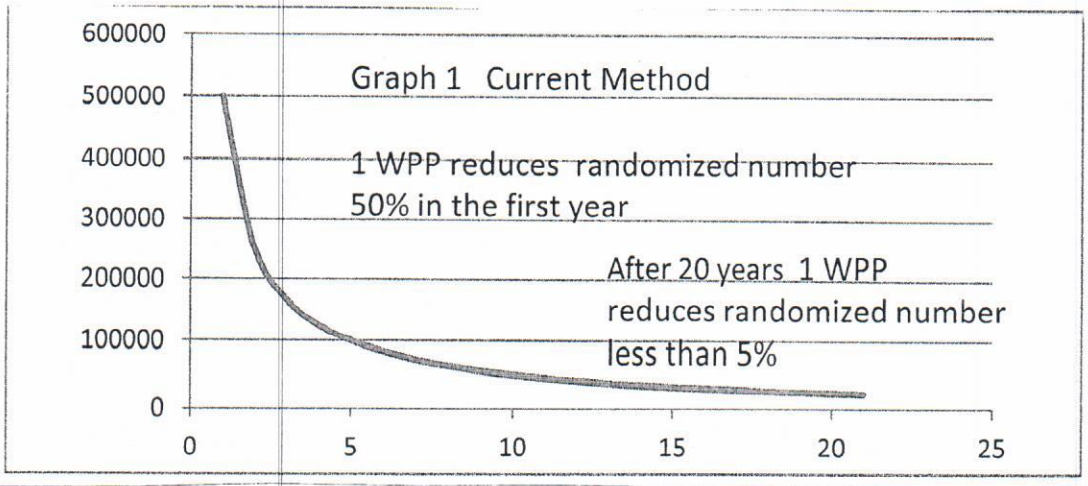
Graph 1 shows the current method's regressive influence on the randomized number. The line becomes almost flat after 10 years.

CPW data for 2020 shows there is statistically no difference between having 9 or 19 weighted points. See Graph 2.

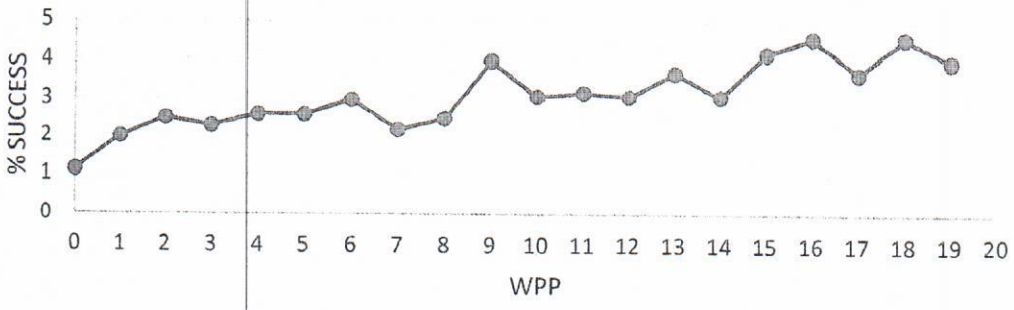
Graph 3 shows a proposed solution using linear regression. The total number of weighted points reduces the randomized number consistenly between zero weighted points and the maximum points.

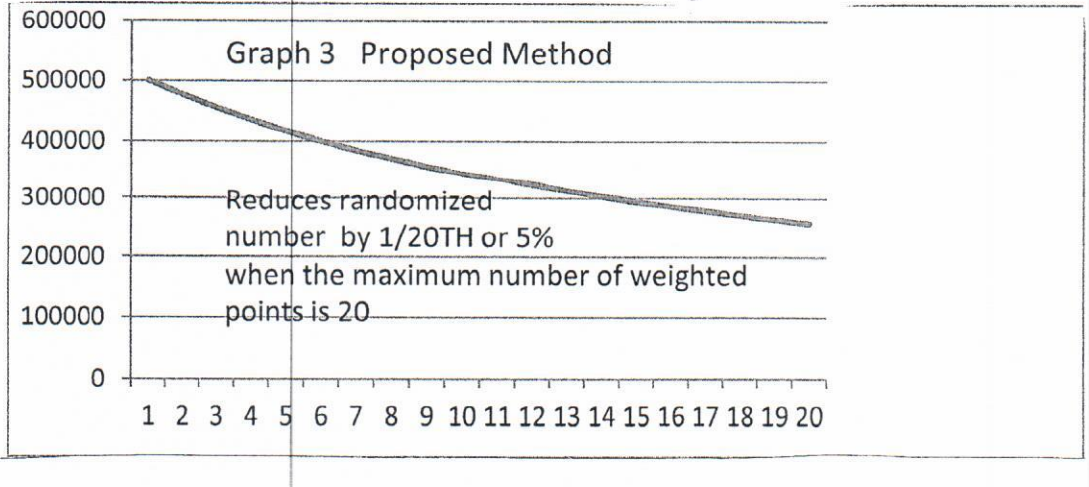
Something must be done for hunters who have applied for decades and are growing old but have not drawn a permit! Also, CPW is requiring a $50 fee if applicants want to keep newly awarded preference point. This seems unfair to those who have more than ten weighted points and gain no advantage.

Petitioner's name:	Robert Tardy



Graph 2 2020 % Successful Moose Draw
as a function of WPP





COLORADO
Parks and Wildlife
Department of Natural Resources

Director's Office
6060 Broadway
Denver, CO 80216
P 303.297.1192

Robert Tardy
[redacted]

Emailed to: [redacted]

Dear Mr. Tardy:

Colorado Parks and Wildlife (CPW) is in receipt of your April 21, 2021, petition requesting the Parks and Wildlife Commission (Commission) amend regulation Ch. W-2, #206.B.4.j.1.b regarding the calculation of weighted preference for bighorn sheep, mountain goat, and moose licenses. The Commission will consider your petition at its scheduled meeting on July 15-16, 2021. The Division of Parks and Wildlife (Division) will recommend denying your petition for the following reasons:

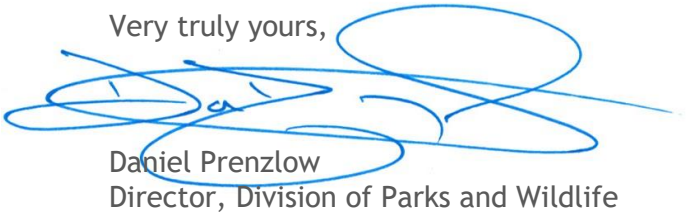
- The Division is currently looking for ways to simplify its drawing processes for limited bighorn sheep, mountain goat, and moose licenses to improve customer clarity and to reduce the demand on both staff and the licensing system. The method outlined in the petition would not simplify the calculation of weighted preference for these licenses and would not be compatible with the Division's Integrated Parks and Wildlife Licensing System (IPAWS).
- The Division has run initial simulations of the limited license drawing using your proposed approach and determined your approach increases the probability of those with fewer points drawing a license and decreases the probability of success for those with more points. So your approach would not accomplish the objectives of your petition. Please contact the Division's Statistical Analyst, Dr. Jonathan Runge (jon.runge@state.co.us), for further information.
- If the Division were to make significant changes that affect the probability of drawing a license, additional public involvement would be necessary. Due to the Commission's ongoing request to consider changes to allocation and preference point policies and regulations, the Division is proposing a more comprehensive process to analyze and recommend changes, including stakeholder outreach and involvement. In lieu of considering changes that may affect the probability of drawing certain licenses at this time, the Division recommends the Commission consider the changes proposed in this petition as a part of these more comprehensive processes.

For more information on citizen petition process, please refer to Ch. W-16, #1606 and the Policy on Citizen Petitions to Initiate Rulemaking, available at: https://cpw.state.co.us/Documents/Commission/policy_procedures/POLICY-Public_Rulemaking_Petitions.pdf. As discussed in the policy, the Division has recommended placing your petition on the consent agenda for denial. If the Commission adopts the

Division's recommendation, this letter will become the order of the Commission and be effective upon mailing.

Thank you for your interest in CPW and your interest in this important topic.

Very truly yours,



Daniel Prenzlow
Director, Division of Parks and Wildlife