



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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

TO: Ms. Mallorie Short

RE: Petition to add the lesser hedgehog tenrec to Colorado's list of unregulated wildlife

Dear Ms. Short:

Colorado Parks and Wildlife (CPW) has received your September 30, 2020, petition to add *Echinops telfairi* (the lesser hedgehog tenrec) to the list of unregulated wildlife in Ch. W-11, #1103.B. The Parks and Wildlife Commission will consider your petition at its scheduled meeting on January 14, 2021. For the reasons explained below, the Division of Parks and Wildlife opposes your petition and will recommend the Commission deny it.

The CPW Commission's regulation concerning citizen petitions is W-16, #1606. The CPW Commission's policy implementing this regulation is available at [https://cpw.state.co.us/Documents/Commission/policy\\_procedures/POLICY-Public\\_Rulemaking\\_Petitions.pdf](https://cpw.state.co.us/Documents/Commission/policy_procedures/POLICY-Public_Rulemaking_Petitions.pdf).

A petitioner bears the burden of demonstrating that the Commission should add a species to the list of unregulated wildlife. Ch. W-11, #1114.A. When evaluating a petition to add species, the Commission takes "a risk averse precautionary approach." Ch. W-11, #1114.B. The Commission may grant a petition only when "there is compelling scientific consensus that the species will not threaten public health, safety or welfare, or native wildlife, ecosystems, agricultural operations or wild populations of the species in question." *Id.* "If the impacts from the species are unknown," the petition "will be denied." *Id.*

Your petition to add the lesser hedgehog tenrec to the list of unregulated wildlife fails to meet this high standard. For example, it does not demonstrate a "compelling scientific consensus" that adding the species to the list would not threaten native wildlife or ecosystems by:

- spreading zoonotic diseases or parasites;
- preying upon native wildlife or invertebrates;
- competing with native wildlife for food or other resources; and
- establishing wild populations in any region of Colorado.

In addition, you cite no evidence supporting your claims that:

- the lesser hedgehog tenrec would not destroy native vegetation;
- native species would likely prey upon the lesser hedgehog tenrec;
- the lesser hedgehog tenrec would not damage crops or rangeland;
- the lesser hedgehog tenrec cannot reproduce with native wildlife;
- the lesser hedgehog tenrec would present only limited competition with native wildlife for resources; and
- the lesser hedgehog tenrec is aggressive only when provoked.



Even your claim that the lesser hedgehog tenrec could not survive and disperse in Colorado, for which you cite some evidence of its temperature requirements, fails to establish a “compelling scientific consensus” that the species could not become established in *any* region of this climatically diverse state.

In short, the Division does not believe you have met your burden of demonstrating the Commission should add the lesser hedgehog tenrec to the list of unregulated wildlife. Despite the information in your petition, there is significant uncertainty about the consequences of adding this species to the list of unregulated wildlife. With this uncertainty, we cannot recommend the Commission grant your petition. Ch. W-11, #1114.B.

Lastly, CPW is engaged in other regulatory priorities, which must take precedence at this time, including the reintroduction of wolves and the allocation of limited big game hunting licenses.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Daniel Prenzlow', with a large, stylized flourish above the name.

**Daniel Prenzlow**

Director, Division of Parks and Wildlife