

CITIZEN PETITION FORM

Date: December 27, 2024

Issue: This petition requests the definition of archery in the Colorado Wildlife Regulations be amended to include crossbows and to allow the use of both handheld and crossbows during all Colorado big game archery seasons

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.

Chapter W-0 General Provisions
 -Article 1 – Definitions
 #000 – The following definitions supplement the statutory definitions found in the Wildlife Act, including, but not limited to, those definitions found in section 33-1-102, C.R.S.
 A. General Definitions Including Manner of Take Definitions
 3. “Archery” means the use of hand-held bows **and crossbows**.
 Chapter W-2 Big Game (PAGE 4)
 - Article I
 - #203: Manner of Take
 3. Handheld bows, including compound bows, using arrows equipped with a broadhead with
 an outside diameter or width of at least 7/8ths of an inch with no less than two steel cutting edges. Each cutting edge must be in the same plane throughout the length of the cutting surface.
 a. During the archery seasons for deer, elk, pronghorn, bear, sheep, goat, and moose, **only** lawful hand-held bows **and crossbows** may be used by archery license holders.
 5. Crossbows, provided the minimum draw weight is at least one hundred twenty-five (125) pounds and has a minimum draw length of fourteen (14) inches as measured from the front of the bow to the nocking point of the draw string and contain a positive mechanical safety device. In addition, the bolt must be at least sixteen (16) inches in length equipped with a broadhead with an outside diameter or width of at least 7/8th of an inch with no less than two steel cutting edges and each cutting edge must be the same plane throughout the length of the cutting surface.
 a. Crossbows are **not** legal during the archery seasons for deer, elk, pronghorn, bear, sheep, goat, and moose.
 - Article V – BLACK BEAR (PAGE 53)
 #237 – ARCHERY BLACK BEAR SEASONS – **ONLY** LAWFUL HAND-HELD BOWS **AND CROSSBOWS** MAY BE USED TO HUNT OR TAKE BLACK BEAR DURING THIS SEASON.
 - Article VIII – DEER (PAGE 64)
 #248 – ARCHERY DEER SEASONS – **ONLY** LAWFUL HAND-HELD BOWS **AND CROSSBOWS** MAY BE USED TO HUNT OR TAKE DEER DURING THIS SEASON.
 - Article IX – ELK (PAGE 94)
 #255 – ARCHERY ELK SEASONS – **ONLY** LAWFUL HAND-HELD BOWS **AND CROSSBOWS** MAY BE USED TO HUNT OR TAKE ELK DURING THIS SEASON.
 - Article X – PRONGHORN (PAGE 126)
 #255 – ARCHERY PRONGHORN SEASONS – **ONLY** LAWFUL HAND-HELD BOWS **AND CROSSBOWS** MAY BE USED TO HUNT OR TAKE PRONGHORN DURING THIS SEASON.

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.

Across the United States, the use of crossbows as a means of take for big game animals has been gaining popularity among hunters over the past several decades. Today 70% of all states allow the use of crossbows during big game archery seasons. Colorado's neighboring states of Wyoming, Nebraska, Kansas, and Oklahoma allow all hunters to use crossbows when hunting big game during their archery seasons. Colorado does not.

There are separate archery, muzzleloader, and rifle hunting seasons in Colorado, but Colorado's archery season restricts the means of take to handheld bows. In Colorado, able bodied hunters are only allowed to use crossbows during rifle seasons. This puts crossbow hunters at a severe disadvantage compared to rifle hunters, as rifles produce extreme loud noise that greatly disturbs game animals and can make kills at distances hundreds of yards further than any crossbow arrow can reach. Like handheld bows, a crossbow is a weapon that propels or launches a fletched arrow nocked against a rapidly forward moving string powered by a set of bent limbs. Crossbow hunters should be given the same opportunities as handheld bow hunters to pursue big game during archery seasons when the woods are less crowded, the animals are less disturbed and there is a possibility of getting within bow range of the quarry. Crossbows are considered archery weapons by the vast majority of states, as well as most hunters and they should be allowed as a means of take by all hunters during Colorado's big game archery seasons.

Like handheld bows, crossbows are a primitive weapon. They were first invented and used by the Chinese as early as 400 BC. Crossbows are unique in their design with a bow assembly mounted horizontally on a main frame that is handheld and mounted on the hunter's shoulder similar to the stock of a firearm. However, they are not firearms and should not be relegated for use only during Colorado's rifle seasons. Just like handheld bows, crossbow release a single arrow with limited range. The trajectory and speed of the arrow is comparable to that of an arrow launched by a compound bow. On the end of the crossbow arrow is the same type of broadhead used by any other hunting archer. The Internal Revenue Service classifies crossbows, accessories attached to them, and their arrows as archery equipment subject to the Federal archery excise tax. Given these facts, crossbows are archery equipment and the definition of archery within the Colorado Wildlife regulations needs to be revised to reflect this.

There are some that oppose the use of crossbows during archery season because they feel crossbows require little or no practice and are too easy to use. The fact is the effective range of crossbows and compound bows is comparable and the shooting and hunting skills required to be successful in the field with a crossbow are very similar to those of a handheld bow hunter. Limiting archery season to only handheld bows unfairly discriminates against hunters who prefer crossbows. Crossbows simply offer a viable and ethical alternative to handheld bows, and are likely easier to use for young persons, some women and elderly hunters who no longer have the physical strength to draw and maintain the hold of a handheld bow. Allowing crossbows during all archery seasons would increase participation in hunting by making the sport more accessible to a broader range of individuals. By permitting crossbow use by all hunters during big game archery seasons, Colorado Parks and Wildlife would encourage more people, including those with physical limitations, older hunters, and newcomers, to participate in archery hunting. This inclusivity can help rejuvenate the hunting community, encouraging younger generations to engage with

wildlife conservation and continue the tradition of hunting, which is a viable tool in maintaining wildlife populations within the state.

Providing opportunities for more youth, women, and older hunters to hunt big game in archery seasons with crossbows can help increase participation in hunting license sales, gear purchases, and other hunting-related activities, which in turn supports Colorado’s wildlife conservation funding. Increased participation translates to greater financial resources for managing and protecting wildlife populations through the sale of licenses, tags, and permits, which directly benefits Colorado’s wildlife programs and conservation efforts.

In addition to increasing hunter participation, crossbows offer a safer alternative for certain individuals who may find the mechanics of traditional bows challenging. Crossbows are often easier to draw and hold steady, particularly for those with limited upper body strength, making them a more stable and secure tool for hunting. This factor contributes to safer hunting practices, reducing the likelihood of accidents related to fatigue or improper use of a traditional bow.

As stated previously, a majority of neighboring states, including Wyoming, Nebraska, Kansas, and Oklahoma all allow crossbow use during their archery seasons. Aligning Colorado’s regulations with neighboring states will create consistency for hunters who travel across state lines to hunt. This not only simplifies regulations but also increases public understanding of hunting practices in the region. Uniformity in hunting laws fosters a culture of compliance, reduces confusion for hunters, and enhances the overall reputation of responsible hunting across the country.

In conclusion, allowing crossbows during all archery seasons would support greater participation in hunting, promote ethical and safe hunting practices, provide a better balance hunters in the field across all hunting seasons, fund wildlife management, and enhance the local economy—all without compromising the core principles of conservation and wildlife protection. In striving to ensure the future of wildlife and hunting in Colorado, Colorado Parks and Wildlife needs to make the sport as accessible and inclusive as possible.

Hopefully Colorado Parks and Wildlife will consider the merits of this petition and support the necessary regulatory adjustments to allow crossbows to be used by all hunters during all archery seasons in the state.

Petitioner’s name:	John Swihart
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COLORADO

Parks and Wildlife

Department of Natural Resources

Director's Office
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To: Colorado Parks and Wildlife
From: Jeff Davis, Director
Date: April 25, 2025
Re: Division recommendation to deny petition to amend the definition of archery

On December 27, 2024, John Swihart filed a citizen petition seeking to amend CPW's definition of archery to include crossbows and allow the use of crossbows during all big game archery seasons. I recommend the Commission deny the petition for the reasons stated below.

The Commission has denied identical petitions in the past, including in 2012 and 2020. The Commission discussion of the 2020 petition is available on YouTube, starting at [1:39:26](#) (May 6, 2020). Division staff opposed the 2020 petition for numerous reasons:

- CPW's regulations are designed to ensure all archery equipment conforms to minimum standards for the well-being of wildlife while allowing for a "primitive season" for archery.
- The Commission's regulations already allow hunters to use crossbows during rifle seasons. CPW also provides accommodation permits that allow hunters with disabilities to use crossbows during the archery season.
- The length and dates of the archery season, as well the proportion of licenses sold over the counter, are based in part on archery hunters' success rate. Because crossbows may affect that success rate, allowing hunters to use crossbows during the archery season would require the Commission to revisit the season structure.
- Allowing crossbows to be used in archery season could lead to increased crowding and hunter dissatisfaction.

The Division opposes the current petition for the same reasons it opposed the 2020 petition. If the Commission adopts this recommendation and denies the petition via the consent agenda, this memo will express its rationale.

Jeff Davis
Director, Division of Parks and Wildlife

