



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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

Robert Tardy  
[REDACTED]  
[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.

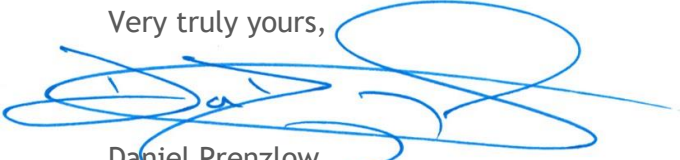
For more information on citizen petition process, please refer to Ch. W-16, #1606 and the Policy on Citizen Petitions to Initiate Rulemaking, available at: [https://cpw.state.co.us/Documents/Commission/policy\\_procedures/POLICY-Public\\_Rulemaking\\_Petitions.pdf](https://cpw.state.co.us/Documents/Commission/policy_procedures/POLICY-Public_Rulemaking_Petitions.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,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Daniel Prenzlou  
Director, Division of Parks and Wildlife