



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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

TO: Parks and Wildlife Commission

FROM: Dan Prenzlów, Director, Division of Parks and Wildlife

RE: Division recommendation to deny petition to allow youth under 12 years old to purchase preference points

The Division has reviewed the citizen petition (dated July 12, 2021) to allow children under 12 years old to purchase preference points. As provided in the Commission's June 30, 2020, policy on citizen petitions, the Division recommends placing the petition on the consent agenda for the Commission's September 2021 meeting and denying the petition for the reasons explained below. If the Commission does so, this recommendation will become the order of the Commission and be effective upon mailing.

The petition asks the Commission to create a new rule that states: "Youth under the age of 12 years old are permitted to apply for big game preference points once they have fulfilled the hunter's education requirements." The Division recommends denying the petition because (1) it would exacerbate "preference point creep"; (2) the Division offers numerous opportunities for young hunters to pursue big game; and (3) pressuring children to complete hunter education too early and encouraging them to compete for high-value hunting opportunities does not further our agency's mission.

First, children under the age of 12 cannot lawfully buy big game licenses or hunt big game. See §§ 33-4-117(4); 33-6-107(4), C.R.S. Selling children preference points they cannot use could encourage stockpiling, which would ultimately require draw participants to accumulate more preference points to succeed. In other words, it would exacerbate the "preference point creep" the Commission has repeatedly sought to avoid.

Second, young hunters (albeit over the age of 12) have ample opportunity to pursue big game. For example:

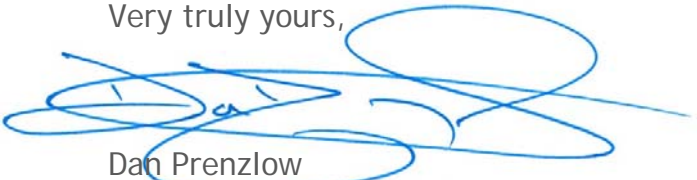
- Youth hunters may often keep hunting, with certain restrictions, if they do not harvest a deer, elk, or pronghorn with their original license. Ch. W-2, #207.B-C.
- They may access select state trust lands and state wildlife areas that are limited to youth hunting. Ch. W-9, #901.B, #903.



- With a few exceptions, a substantial portion of licenses sold in the primary draw are earmarked for youth between 12 and 17 years old. Ch. W-2, #206.B.4.d.
- Youth are given absolute preference in the secondary big game license draw. Selling preference points to children under 12 would not expand these opportunities. Ch. W-2, #206.B.7.b.

Third, the mission of both the Commission and Division includes perpetuating the wildlife resources of the state and inspiring current and future generations to serve as active stewards of Colorado's natural resources. See § 33-9-101(12)(b), C.R.S. Selling preference points to children under 12 could pressure them (directly or indirectly through their guardians) to complete hunter education earlier than they might otherwise and encourage them to compete with their peers for high-value or trophy hunting opportunities. We have some concern about appearing to encourage first-time youth hunters to begin their hunting experience pursuing older aged male animals (and perhaps unintentionally implying that younger animals and female animals are not desirable to harvest).

Very truly yours,



Dan Prenzlöw  
Director, Division of Parks and Wildlife