Colorado Parks and Wildlife Commission
6060 Broadway
Denver, CO 80216

14 August 2025

Dear Commissioners:

On behalf of the Colorado Wildlife Conservation Project (CWCP)—a diverse alliance of wildlife organizations committed to conserving Colorado's wildlife and habitats—we write to express our gratitude and concerns regarding recent changes to the Commission's public comment process. CWCP members share a deep commitment to science-based wildlife management, the North American Model of Wildlife Conservation, and the enduring value of wildlife, their habitats, hunting, and angling.

We appreciate the Commission's efforts to manage meetings efficiently and understand the intent behind recent adjustments to public testimony procedures. There is immense value in meaningful public engagement on critical issues. The Commission and CPW staff need to hear public comments early in the decision-making process and we appreciate the Commission's willingness to hear comments that directly affect our shared natural resources early and throughout the regulatory process.

We respectfully offer the following:

1. **Limit Repetitive, Non-Agenda Comments**
   Comments unrelated to agenda items often do not serve the Commission's mission or the public interest. Because these topics are not publicly noticed, they may present a narrow perspective. We suggest alternative avenues—such as Commissioner "office hours" or direct email—for these types of input.
2. **Consider allowing "time-pooling"**
   CWCP recognizes that we have a role in being a part of the solution. To support the Commission, CWCP members are coordinating comments, minimizing duplicative comments, and are thoughtful about providing constructive comments based on data, multiple interests, and other factors, rather than providing many analogous comments. Our efforts occasionally require additional comments, due to the complexity of the topic, the amount of data available, etc. We encourage the Commission to consider allowing opportunities for like-minded parties to pool their time under a single spokesperson to streamline agenda-driven comments and make them as meaningful as possible. We suggest that time-pooling be allowed with a cap or reasonable time limit.
3. **Ensure Adequate Time for Agenda-Driven Comments**
   Public input on agenda items is essential. It allows staff to identify potential concerns early and improve proposals before making final decisions and reducing the potential for engulfing the Commission in unnecessary and avoidable conflict. We appreciate that the Commission allows public comment immediately following each agenda action item, at any stage in the process, to foster transparency and collaboration. The potential for agenda-based comments to "get lost" in general public comments limits their usefulness for the

Commission and CPW staff. We appreciate that the Commission understands the value of keeping comments connected with the respective agenda action items rather than becoming severed from and losing their value to the relevant topic.

4. **Acknowledge Written Comments**
   Written comments provide a valuable opportunity for thoughtful, detailed input and help streamline meetings. We appreciate this option and encourage the Commission to formally acknowledge receipt of written submissions to reinforce their value in the decision-making process.

We recognize the complexity of your role and the competing interests you must balance. Thank you for your continued service to Colorado's people, wildlife, and public lands. We urge you to maintain open and accessible avenues for public engagement, particularly on agenda-related matters.

If you have any questions or would like to discuss this further, please feel free to contact our Chair, Gaspar Perricone, or any of the undersigned organizations or professional members.

Sincerely,

*Colorado Wildlife Conservation Project Members*

Professional members: Rick Cables (Retired CPW Director), John Howard (Former Wildlife Commission Chair), Jon Holst (Retired CPW Energy Liaison), Dean Riggs (Retired CPW Deputy Regional Manager), Ron Velarde (Retired CPW Regional Manager), Perry Will (Former Colorado State Senator, State House member, retired CPW Area Wildlife Manager)