



**THE HUMANE SOCIETY
OF THE UNITED STATES**

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November 18, 2020

Daniel Prenzlou, Director, CPW
Marvin McDaniel, Chair CPW Commission
Colorado Parks & Wildlife
1313 Sherman St., Denver, CO 80203
% krista.heiner@state.co.us

Re: Petition to stop trapping on Colorado's public lands

Dear Director Prenzlou, Chair McDaniel and Members of the CPW Commission:

The Humane Society of the United States, Humane Society Veterinary Medical Association, Animal Help Now, Animal Legal Defense Fund, Center for Biological Diversity, Colorado Voters for Animals, Endangered Species Coalition, Footloose Montana, Mountain Lion Foundation, Predator Defense, Project Coyote, Nevada Wildlife Alliance, Northeast Oregon Ecosystems, Sierra Club, Trap Free Montana, Trap Free Montana Public Lands, Western Watersheds Project, Western Wildlife Conservancy, WildEarth Guardians and Wyoming Untrapped request that the Colorado Parks and Wildlife Commission disallow the trapping of wildlife for recreation and commerce for the reasons that we elaborate on more fully in our citizen's petition to the Colorado Parks and Wildlife (CPW) Commission that is filed herewith. We also file all the journal articles we have cited in the petition into the administrative record, which we have uploaded and made available to the CPW Commission as part of this rulemaking.

The North American Model of Wildlife Conservation advises against the market hunting of wildlife for private profit; yet CPW allows trappers to kill wildlife and sell their pelts, a form of market hunting. In other words, we can find no distinction between disallowing the sale of an animal who was stalked, chased and then shot, but not disallowing the sale of one who was trapped and then killed. To make a distinction is cognitive dissonance.

Both fur sales and trapping recruitment are in precipitous decline. Trapping is cruel, and most Americans abhor this practice. Studies and polls show that the number of Coloradans who disapprove of trapping has increased in recent years. Data from Manfredo et al.'s (2018) America's Wildlife Values project show that in Colorado, the majority – 84% – want to view wildlife in the future and want wildlife protected over private property rights. A 2019 survey of Americans by the National Shooting Sports Foundation and Responsive Wildlife Management found that trapping is highly unpopular and is far more controversial than even trophy hunting. And even most wildlife management professionals dislike trapping because of its indiscriminate nature and the cruelty involved.



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In 1996, Colorado voters passed Amendment 14, an initiative that restricts traps and poisons on public lands *because voters believed that trapping is cruel and harmful to wildlife*. In 1996, Colorado voters opposed trapping, and if polled again now, we know that an even greater number of Colorado citizens would object to trapping for the purposes of sport or commerce (e.g., fur products).

Each year, trappers in Colorado set out thousands of cage traps that capture both target and non-target species, and those animals are not only subjected to exposure to the elements while captured, but also fight to free themselves, causing damage to their bodies or even death.

Colorado's bobcats, lynx, swift foxes and other wildlife face significant jeopardy because of a myriad of human causes including habitat and corridor destruction, record wildfires caused by climate change, predator control, hunting, vehicle collisions and disease transmission.

CPW does not adequately regulate trapping. It knows neither how many "furbearers" are killed annually, nor the health or stability of their populations. It also does not know how many non-target animals, including golden eagles and lynx, are captured in box traps. We examine swift foxes and bobcats in depth in our petition.

We urge the Commission to ban the trapping of bobcats, swift foxes and other so-called "furbearers" on Colorado's public lands. To uphold Amendment 14 would honor the fair and democratic process of the ballot measure, and not disregard the will of the people of our state.

Sincerely yours,

Wendy Keefover, Senior Strategist, Carnivore Protection
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Aubyn Royall, Colorado State Director
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cc:
Dan Gates, DNR Director

Encl:
All the journal articles cited in the citizens' petition which is also filed with this letter.