



February 17, 2023

**Re. Colorado Wildlife Conservation Project (CWCP) Support for Draft Colorado Wolf Restoration and Management Plan and Requests for Additional Action by the Commission**

Dear Members of the Colorado Parks and Wildlife Commission,

We, the undersigned organizations write to express our support for the draft Colorado Wolf Restoration and Management Plan and request the support of the Parks and Wildlife Commission (“the Commission”) for several additional action items not presently included in the Plan.

Our organizations collectively represent tens of thousands of Colorado hunters, anglers, conservationists, and outdoor enthusiasts who share a deep connection to Colorado’s wild landscapes and wildlife. As you know, hunting, fishing, and watchable wildlife contribute \$5 billion in economic output in Colorado each year and support over 40,000 jobs across the state. In addition to the economic contributions of Colorado’s outdoor sporting community, hunting, trapping, and fishing also strengthen people’s connections to nature, improve individuals’ physical and mental health, foster lasting bonds between family members and friends, and are an important part of our outdoor culture.

Our members recognize the urgent need to conserve and sustain Colorado’s wildlife so that future generations can enjoy quality hunting, fishing, and wildlife viewing opportunities. To achieve this, we need Colorado Parks and Wildlife (CPW) to have sufficient funding, a complete set of management options at its disposal, and excellent data collection mechanisms in place to successfully and sustainably restore and manage gray wolves. It is important to remember that Proposition 114, the Gray Wolf Reintroduction Initiative, passed with less than 51% of voter support and, therefore, it is imperative that the final plan is moderate, workable and inclusive of considerations for both those who supported Proposition 114 and those who did not. With that in mind, our alliance, [the Colorado Wildlife Conservation Project \(CWCP\)](#) has collated the following key provisions we urge you to support, followed by additional considerations for the Plan and decisions going forward.

**Do not alter phased management thresholds or add conditions.**

CWCP supports the draft Plan recovery thresholds as drafted by CPW and would oppose any increase in the thresholds for wolf recovery phases' start and end points (see draft Plan Chapter 4, Table 2). These phase recovery thresholds also should not be dependent upon wolves' specific geographic locations or distribution across the landscape. The minimum statewide wolf count numbers are consistent with numbers used in other states and we have full confidence that this phased management approach will result in a recovered gray wolf population in Colorado. Once wolves are recovered and reach phase 3 of recovery, we ask that CPW analyze and review the data available at that time to derive a science-based threshold for the conclusion of phase 3, and then develop a plan for phase 4.

**Provide CPW the option for lethal removal when and where it's needed.**

The use of approved lethal removal of problem wolves to address depredation conflict must be included as a management option. We support the impact-based management approach that considers situations on a case-by-case, context-specific basis and endeavors to prevent, de-escalate, and minimize conflicts, using lethal take as a last resort. Our organizations agree with CPW and the majority of the Technical Working Group and Stakeholder Advisory Group that lethal removal is a critically important tool to employ when and where necessary for a successful wolf management program. It's also important to remember that not only did Proposition 114 narrowly pass, but the general public understood the initiative to be about active reintroduction of wolves (as the title made clear), not about prohibiting take when the situation calls for it.

**Collect additional ungulate and hunter satisfaction data locally before wolf introduction.**

As ungulates are primary prey for wolves, we ask the state to provide funding as soon as possible for the Research Needs described in the draft Plan (Chapter 7, pg. 60) and do more to estimate herd sizes and conditions, and hunter satisfaction in the areas where wolf introduction is planned. Doing so would create a valuable baseline from which CPW and the Commission could evaluate post-wolf introduction and recovery conditions. Additional data collection efforts could include improving big game estimation (potentially through harvest checks) and targeted hunter satisfaction surveys during the 2023 hunting season at the DAU or regional level where wolves will be released, or where they're expected to inhabit.

**Develop cost estimates for initial years of reintroduction and management immediately.**

The draft Plan states that funding for a wolf conservation program "will be" developed (Chapter 9, Funding, pg. 65). However, CWCP insists that cost estimates be established before Plan implementation. Doing so will not only build the foundation for a strong funding model, but also increase transparency for members of the public to know who will be paying for implementation, and how the monies will be made available.

CWCP urges CPW to estimate expenditures for wolf restoration, management, and livestock compensation for three fiscal years. We appreciate the presentation by CPW's chief financial officer during the Commission meeting on January 19<sup>th</sup> and we recognize that actual costs will be difficult to predict, however, providing a "best guess" range for anticipated expenditures would be useful and

instructive to ensure the agency can fully implement the restoration and management plan over time.

Cost estimate categories that should be addressed include, but are not limited to: Initial release logistics and collaring [Chapter 3]; Tools employed to continually track and monitor wolves, and application of metrics [Chapters 4, 7]; Management actions [Chapter 5]; Education, outreach, and tools to minimize livestock conflict [Chapter 6]; Compensation to landowners [Chapter 6]; Research to gather meaningful data regarding social and ecological effects, and real time social data monitoring [Chapter 7]; Research and monitoring of wolf-ungulate interactions [Chapter 7]; Annual report generation [Chapter 7]; Public education and outreach [Chapter 8]; and Coordination with USFWS, tribes, other state agencies, local governments [Chapter 8].

Potential funding sources should be identified and developed before the initial release of wolves, and subsequently augmented to facilitate sustainable management after the release. We support the annual appropriations to CPW from the General Assembly, but additional funding is needed to generate adequate annual revenue to defray reasonably foreseeable expenses. We note that in its Report on Funding Recommendations (June 2022), the Stakeholder Advisory Group's preliminary estimate was "an amount up to \$3 million annually for funding of directly related expenses. The number could potentially be more when considering adjacent expenses that are indirectly or partially related to wolf restoration and management" such as staff time, administration, or other management or operations expenses.

**Prioritize habitat conservation, supporting healthy populations and connected, functional big game habitats in all future decisions.**

Wolf reintroduction and recovery at the scale suggested in this plan will impact big game and other wildlife. As is, Colorado's deer population has declined over the last couple decades, and CPW has already reduced the number of limited cow elk licenses available to hunters by 68,000 licenses since 2004 to try to stabilize elk herds (see draft Plan pg. 24). Existing threats to Colorado's big game herds commonly cited in CPW's [Herd Management Plans](#) and reports such as CPW's [2020 Status Report: Big Game Winter Range and Migration Corridors](#), [2021-2022 Colorado Big Game Action Plan](#), and the [2014 Colorado West Slope Mule Deer Strategy](#) include, but are not limited to: habitat loss, fragmentation, and degradation from residential and commercial development, energy development, and year-round recreation; as well as disease, vehicle collisions, severe winters, and predators. We ask that Commissioners keep these present and increasing threats to big game and big game habitat integrity in mind as they continue to make important decisions on CPW programs' funding, regulations, management plans, and other matters that impact Colorado's big game herds and the hunting community.

One such matter is the increasing overlap and incompatibility between high priority big game habitats and high-use recreational trails. CWCP mentions this here because the Commission plays an important role in approving recreation development funded through the State Trails Committee, and as wolves inevitably apply additional pressure on big game herds, we believe the Commission should scrutinize funding recommendations for new trail projects to ensure that trail expansion proposals will not exacerbate negative impacts to big game herds (or to other wildlife). We urge the Commission to

prioritize the conservation and enhancement of big game habitat whenever your jurisdiction provides the opportunity to do so.

**Hold wolf management to the same science-based standards that have successfully recovered numerous other species in Colorado and throughout the U.S.**

Despite being considered charismatic, wild, and mysterious to some people in our modern age, wolves are not fundamentally different from other wildlife species in Colorado. We believe it is a mistake for the Commission to evaluate wolves under a different model from all other wildlife species. Wolves need to be managed within both ecological and social carrying capacity, just like elk, deer, moose, mountain lions, bobcats, bears, trout, and so many other species in Colorado. It is CPW's duty and within their capacity to manage Colorado's wildlife species within the biological, ecological, and social limitations of the state. CWCP urges the Commission and CPW to not treat wolf management as the exception, but rather to hold wolves and wolf management to the same science-based standards that have proven time and time again to be extremely successful in recovering species in Colorado and throughout the U.S. under the North American Model of Wildlife Conservation.

CWCP organizations believe CPW's draft Wolf Restoration and Management Plan will result in a self-sustaining, recovered population of wolves in Colorado. After on-the-ground data accumulate and wolves are recovered, CPW and the Commission should discuss the North American Model of Wildlife Conservation and the American System of Conservation Funding before developing long-term wolf management strategies and data-driven phase 3 and 4 management plans. In the meantime, funding is urgently needed to address current gaps and needs; monitor and track wolf introduction impacts on other wildlife populations; measure social outcomes using good baseline information; and enable a successful wolf restoration and management program.

Thank you for your dedication to Coloradans and our state's visitors. We understand that balancing interests is a difficult task, and we commend CPW's work to strike that balance.

Sincerely,

Colorado Wildlife Conservation Project members:

[Backcountry Hunters & Anglers](#)  
[Colorado Bowhunters Association](#)  
[Colorado Outfitters Association](#)  
[Coloradans for Responsible Wildlife Management](#)  
[Colorado State Muzzle Loading Association](#)  
[Colorado Trappers & Predator Hunters Association](#)  
[Colorado Wildlife Federation](#)

[Congressional Sportsmen's Foundation](#)  
[Keep Routt Wild](#)  
[Muley Fanatic Foundation](#)  
[Rocky Mountain Big Game Recovery](#)  
[Rocky Mountain Bighorn Society](#)  
[Rocky Mountain Elk Foundation](#)  
[Safari Club International](#)  
[Theodore Roosevelt Conservation Partnership](#)

*The Colorado Wildlife Conservation Project is an alliance of diverse wildlife organizations with a common interest in conserving wildlife and wildlife habitats, and in preserving our hunting, angling, and conservation heritage. We are steadfast in our efforts to continue the state's long history of responsible, science-based wildlife management. Learn more about us at our website: <https://www.cowildlifeconservationproject.org/>*