



TO: Members of the Colorado Parks and Wildlife Commission; Colorado Parks and Wildlife Staff

FROM: Keystone Policy Center

RE: Final Summary of Written Public Comments Concerning the Draft Gray Wolf Restoration and Management Plan

DATE: March 23, 2023

Background

This summary reflects high-level themes of comments submitted by members of the public to provide feedback on the Colorado Parks and Wildlife draft gray wolf restoration and management plan. Comments were received through <https://www.wolfengagementco.org/> from the date the draft wolf restoration and management plan comment form was opened, December 9, 2022, to the date of its closure, February 22, 2023.

In addition to online public comment, verbal public comment was given to the Colorado Parks and Wildlife Commission through four in-person sessions and one virtual session during this period. Previous public engagement had been conducted during the Stakeholder Advisory Group and Technical Working Group processes, as well as a wolf planning engagement series during the summer of 2021. For additional details regarding the stakeholder recommendation and public engagement processes, see <https://www.wolfengagementco.org/>.

3,975 public comments were received via the public comment form. Of these comments, 3,918 were submitted by individual members of the public and 57 were submitted by organizations. Results were analyzed and summarized by Keystone Policy Center, an independent non-profit organization supporting public engagement and stakeholder facilitation for the gray wolf restoration and management planning process.

Demographic data

Comment form respondents were given the opportunity to indicate their location of residence. Of the 3,975 responses, 1,401 respondents indicated they lived in a Colorado county that is within CPW's Northeast or Southeast region; 757 respondents indicated they lived within a Colorado county that is within CPW's Northwest or Southwest region; and 1,817 respondents indicated they lived outside of Colorado;¹ (see *Figure A*). Respondents were also given the opportunity to identify their racial or ethnic background (see *Figure B*).

¹Commenters who lived outside of Colorado included commenters from all 50 states as well as territories such as American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands; non-U.S. residents included commenters from 20 other countries.

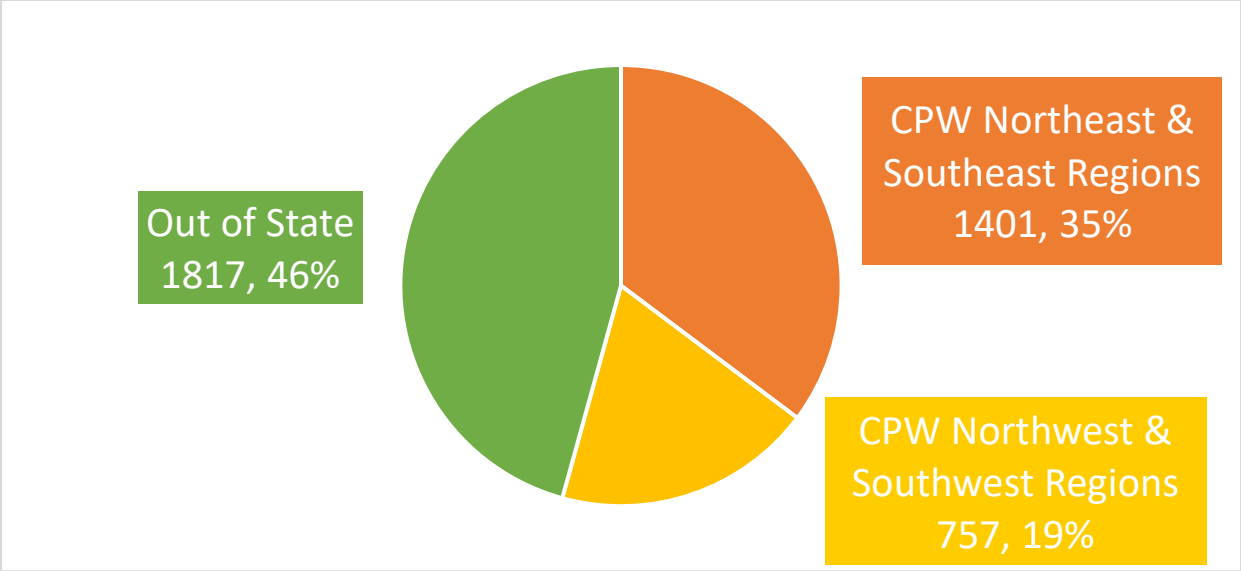


Figure A. Residency of respondents

White	2839
Hispanic/Latino	82
Black or African American	24
American Indian or Native Alaskan	24
Native Hawaiian or other Pacific Islander	1
Asian American	34
More than one	139
Choose not to specify	832

Figure B. Additional demographic information

Summary of Feedback Received on the Draft Wolf Restoration and Management Plan

Comment form respondents were given the opportunity to indicate what topics of the draft plan were addressed in their comments. Commenters selected one or more options from the following topics, which corresponded to the chapters of the draft wolf restoration and management plan.

The following figure reflects the cumulative results of self-selected topics of interest. Analysis of the contents of each comment suggested that the details of the comments may or may not have accurately reflected the topics selected, although self-selection likely reflected the issues that most concerned a commenter.

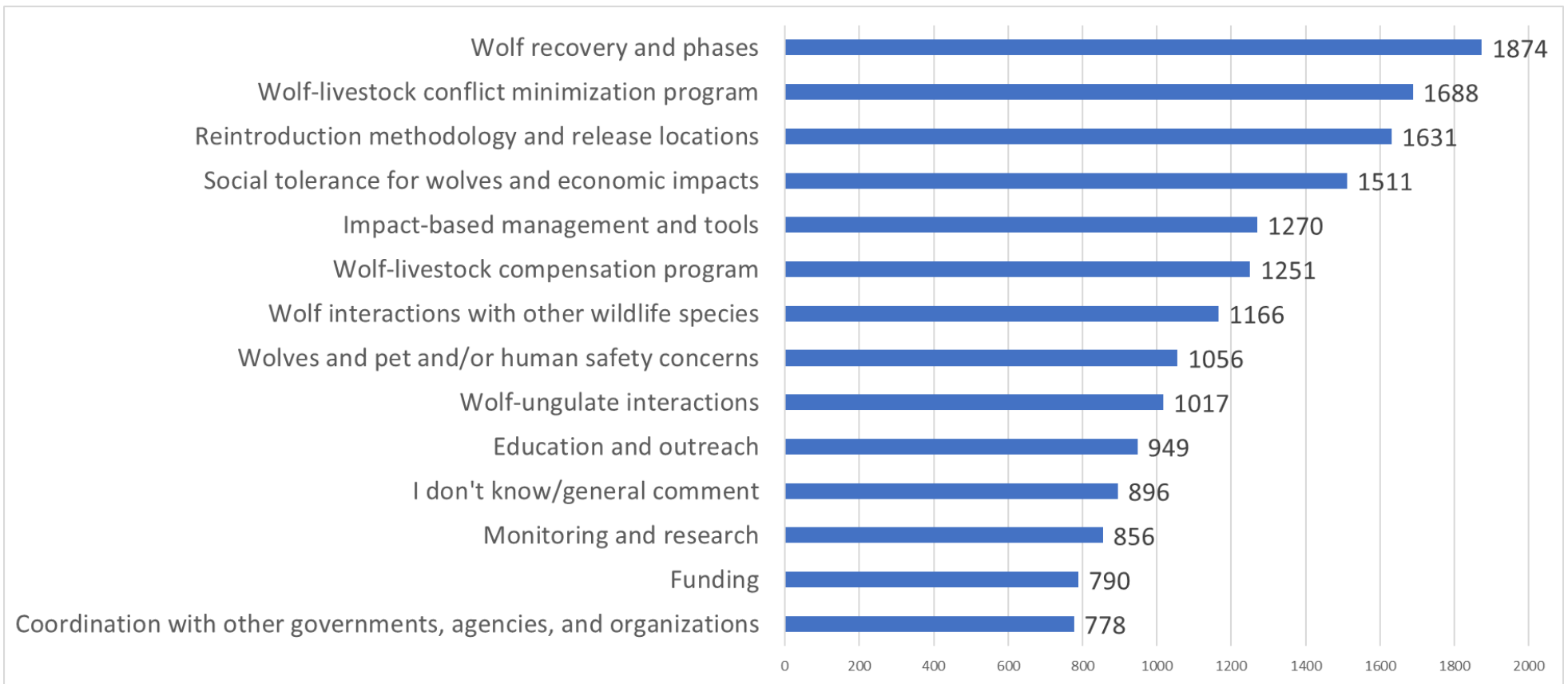


Figure C. Respondents' self-selected topics of comment focus

High-level themes of comments

Below is a high-level summary of recurrent themes that consistently emerged in comments on the draft plan. These common themes are not conclusive nor comprehensive of all topics raised. Themes of written comments were similar to themes of verbal comments offered during in-person engagement. Some themes cited below reflect divergent views on the same topics; this report characterizes aspects of support and/or opposition to themes where divergent views were observed.

Please note: The following themes of comments do NOT imply consensus of all commenters. Rather, bulleted items reflect perspectives that were recurrently offered by individual commenters.

Reintroduction methodology and release locations

- Regarding release area:
 - Suggestions to release wolves in the San Luis Valley, the San Juan Mountains, and Rocky Mountain National Park.
 - Suggestions to release wolves in counties that voted in favor of Proposition 114 and/or east of the Continental Divide in suitable habitat areas.
 - Opposition to releasing wolves west of the Continental Divide.
 - Opposition to the Gunnison Basin as a release area due to concerns such as lack of local support for wolves; conflict with livestock, especially given wintering elk range overlap with livestock operations; impacts to the Gunnison Sage Grouse; impacts to local ungulate herds; and relative proximity to the Brunot Hunting area.
- Regarding reintroduction logistics:
 - Suggestions to include the Mexican gray wolf subspecies in reintroduction efforts and/or use of the McCleery gray wolf subspecies.
 - Concern regarding impacts on other efforts to restore the Mexican gray wolf subspecies, such as potential interbreeding between reintroduced gray wolves and Mexican gray wolves.
 - Suggestions to rehabilitate and relocate wolves to wolf sanctuaries if wolves are injured during capture and are deemed unviable to release during reintroduction.
 - Concerns related to coordination with the US Fish and Wildlife Services draft Environmental Impact Statement to establish a 10(j) non-essential experimental designation for gray wolves in Colorado. Comments reflected: desires to ensure the 10(j) is firmly in place before wolves are released; concerns that the 10(j) will not provide adequate protection for wolves; and general support for enhanced clarity in how management allowances may differ between the state plan and the 10(j) rule.

Wolf recovery and phases

- Regarding phase 4 of wolf recovery and management:
 - Opposition to phase 4 and reclassification as a game species. Comments suggested game species designation is not consistent with state statute nor with the “will of the voters” in the passage of Proposition 114.
 - Support for phase 4. Comments suggested that if wolves reach certain population levels they should be classified as a game species to maintain consistency with management of

other predators; these comments at times referenced the principles of the North American Model of Wildlife Conservation.

- Regarding hunting of wolves, often as discussed in the context of wolf recovery and phase 4 of wolf recovery:
 - Proponents of wolf hunting suggested wolf hunting should be considered as a population management tool and as a tool for funding conservation through hunting fees when wolves reach a self-sustaining population.
 - Opponents of hunting wolves suggested it is not an ethical practice, is not aligned with the North American Model, and/or negatively impacts wolf population dynamics and social structure. These comments often referenced opposition to wolf management strategies in the Northern Rocky Mountain states, and/or suggested that discussing wolf hunting at this stage in wolf restoration and management planning may overshadow other elements of the wolf plan.
 - Suggestions to enhance direct take of wolves by state or federal agents rather than allow regulated public hunting after delisting.
- Regarding thresholds for downlisting and delisting wolves from their state endangered status:
 - Those advocating for lower thresholds suggested Colorado is more populous and has a higher potential for conflict with wolves than the Northern Rocky Mountains.
 - Those advocating for higher thresholds suggested this reflects the best available science, that the carrying capacity of Western Colorado supports higher numbers of wolves, and that the benefits of wolves will not manifest until carrying capacity is reached.
 - Comments reflected support and opposition to conduct a population viability analysis (PVA) to inform downlisting and delisting thresholds for wolves; opponents suggested the lack of Colorado-specific data on wolves did not support use of a PVA approach; supporters suggested a PVA would address concerns regarding use of best available science in determining thresholds. Alternatively, there were suggestions to set specific thresholds informed by conservation biology principles regarding population persistence rather than a PVA.
 - Concern that minimum counts will be interpreted as population targets or maximums.
 - Calls to clarify how existing wolves in Colorado will be accounted for in determining delisting and downlisting thresholds.
- Support and opposition for fixed objectives for wolf populations.
 - Supporters of fixed objectives expressed concern over lack of clarity for management outcomes of wolf restoration.
 - Opponents of fixed objectives expressed concern over lack of flexibility and suggested that a fixed objective contradicts principles of impact-based management.
 - Concerns were also expressed regarding potential for litigation based on a fixed objective or the lack thereof.
- Support and opposition for additional components and/or alternatives for wolf recovery thresholds beyond minimum counts; suggested additional measures included geographic components, number of packs/breeding pairs, or genetic connectivity.
 - Regarding a geographic component, proponents argued setting dispersal goals would support the goal of a self-sustaining population and prevent concentrated impacts to livestock producers in one geographic area; opponents expressed concern that

additional research needed to be conducted before a geographic component could be successfully implemented and that it may shift the thresholds for downlisting and delisting upwards.

- Suggestions to better define the language of recovery, such as define terms such as “self-sustaining” and “minimum viable populations,” among other concepts in the wolf plan.

Lethal management of wolves that depredate on livestock

- Supporters of lethal management argued it is an important tool to increase social tolerance of wolves, especially for livestock producers negatively impacted by livestock depredation.
 - These comments suggested maintaining lethal management options independent of nonlethal conflict minimization as a valuable tool to respond to conflict.
 - There was advocacy to enhance the flexibility of lethal management, including issuing time-sensitive take permits to livestock operators before a depredation is confirmed or allowing county or federal agents to issue permits within their jurisdictions.
- Opponents of lethal management of wolves that depredate livestock suggested that lethal management is not an effective tool to mitigate conflict and may increase likelihood of future conflicts. They also argued it would not increase the social tolerance of wolves in any phase of recovery and would work against the goal of a self-sustaining population especially in earlier phases.
 - There was specific opposition to lethal management of depredating wolves on public lands.
 - There was support for the impact-based management framework to require or more strongly emphasize that conflict minimization measures to be put in place before lethal management or compensation are allowed.

Wolf-livestock conflict minimization program

- Concern over lack of clarity of sources of funding and agency capacity to effectively implement the conflict minimization and compensation program.
- Concern that compensation programs for conflict minimization do not account for additional burdens placed on producers to implement and maintain conflict minimization tools.
- Concerns regarding the \$8000 limit to claim livestock losses at fair market value.
 - There were comments that suggested this limit is too low and does not adequately cover losses.
 - There were comments that suggested this limit is too high and overly generous.
- Regarding support and opposition to the compensation ratio to compensate for missing sheep and calves:
 - Comments that the ratio is too high or too low.
 - Suggestions to reduce the amount that missing livestock is compensated to 50% fair market value.
 - Suggestions to include other livestock, such as yearlings, in the ratio.
- Suggestions to review and/or revise the compensation plan for wolf depredation in the future, such as when gray wolves are delisted from the state endangered species list, to bring the plan into alignment with existing livestock compensation for other predators.

- Suggestions to enhance the ease of the process to receive compensation, including eliminating need for veterinarian statements or vaccination information to apply for compensation for itemized production losses and/or enhancing education efforts regarding reporting requirements for the proposed options or existing compensation.
- Suggestions to clarify compensation eligibility on public vs. private lands.
 - For public lands, there were suggestions that each producer on a multi-producer permit should qualify for compensation for missing livestock if another producer on their permit qualifies.
 - Others suggested opposition to compensation on public lands.
- Suggestions for CPW to proactively invest in carcass disposal facilities to mitigate the attraction and habituation of wolves.
- Suggestions to add detail to the conflict minimization plan, specifically that the plan should be expanded to include additional details on conflict minimization strategies, create budget estimates for implementation, and recognize opportunities to partner with non-government organizations to support conflict minimization implementation.

Wolf-ungulate interactions

- Concerns regarding impacts to specific ungulate populations in proposed release areas, as well as concerns for impacts to ungulate populations on the Western slope.
- Concerns that negative impacts to ungulate populations will negatively impact hunting opportunity and success, as well as outfitting operations, and suggestions that there should be compensation for these impacts.
- Concerns that positive benefits of wolves in regulating ungulate distribution and disease are not being recognized, suggesting that hunting success has increased where wolves have been reintroduced.
- Calls to enhance ungulate monitoring programs to assess potential wolf impacts.

Wolf interactions with other wildlife species

- Concerns regarding wolves' interactions with and potential negative impacts to threatened and endangered species, reintroduced species, or other specific species such as moose, sage grouse, and bighorn sheep.
- Suggestions to emphasize that wolves' impact on non-ungulate species are not likely to be substantial.
- Suggestions for additional monitoring and research to assess potential wolf impacts.

Wolves and pet and/or human safety concerns

- Concerns for safety of pets and humans, especially backcountry recreationists.
- Suggestions that there should not be concern for human safety, and education should be used to assuage safety concerns.
- Concerns over wolf impacts to recreation opportunities, such as trail closures, seasonal closures and shortened hunting seasons; suggestions that the wolf plan clarify the impact of wolf presence on recreation opportunities and recreational use management and restrictions.

- Comments reflected both support and opposition to compensation or lethal management allowance if wolves harm or kill pets. There were suggestions to generally enhance agency oversight of lethal control and better define allowance of lethal take specifically in the case of what is permitted when avoiding conflict with human activity.

Monitoring and research

- Regarding monitoring and research focuses:
 - Monitor and study diseases potentially carried by reintroduced wolves.
 - Monitor potential impacts to other species, such as ungulates, other predators such as mountain lion or black bear, and species such as moose and sage grouse, among others.
 - Ongoing, real-time social science research and monitoring.
- Regarding monitoring and research tools:
 - Include PIT tags and remote camera traps as tools to support proposed monitoring efforts.
 - Allow hunting and trapping as tools to support research.
- Support and opposition to share data with livestock operators to support preparedness in livestock management when wolves are in the area.
 - Supporters suggested data sharing would enhance trust and ability of producers to effectively implement risk reduction tools.
 - Opponents to data sharing expressed concern for safety of wolves.
- Calls for social science monitoring to support measurement of social tolerance and other social issues that commenters felt were relevant to the success of wolf restoration and management.

Education and outreach

- Regarding the engagement process for wolf restoration and management planning:
 - Concern about insufficient time for public comment during in-person Parks and Wildlife Commission meetings on the draft wolf plan; concerns about the advisory group processes and outcomes.
 - Support for the process; suggestions to closely follow the recommendations of the advisory group.
- Suggestions to enhance K-12 and general public education efforts. Focuses of education could include wolf biology, the positive impacts of wolves, ungulate trends, or livestock operations. Educational materials should be provided in languages other than English, such as Spanish.

Partnerships, funding and capacity

- Regarding partnership and coordination with other organizations:
 - Concerns regarding interagency coordination, cost- and data-sharing, and technical assistance on topics such as conflict minimization and management across state and Tribal boundaries.
 - Suggestions for close interagency coordination, such as with other states, or with state, federal, county, municipal, local, Tribal, and NGO partners to implement and inform the adaptation of wolf restoration and management on an ongoing basis.

- Calls to recognize Tribal sovereignty on non-Tribal lands, such as the Brunot Hunting area and Tribal fee lands.
- Regarding CPW funding and capacity:
 - Suggestions for more clarity and transparency regarding budgetary needs and funding sources for wolf reintroduction, wolf management, livestock compensation, agency capacity, and other costs of the wolf plan.
 - Suggestions to leverage potential economic benefits of wolf restoration to address these costs. There were suggestions to conduct economic cost-benefit analysis of wolf restoration to inform funding considerations, with suggestions that the economic benefits of wolves may not be adequately understood.
 - Calls to seek funding from the general assembly, non-government organizations, other private entities, GOCO, and any other sources possible.
 - Support and opposition for use of funding from CPW's wildlife cash fund.
- Regarding funding for compensation and conflict minimization:
 - Suggestions to distinguish funding for livestock compensation from conflict minimization.
 - Suggestions to create market-based incentivizes to support conflict minimization.
 - Comments that some funding sources would not support impact-based management plans that included lethal management options.

Social tolerance for wolves and economic impact

- General expressions of support or opposition to the reintroduction of wolves in Colorado and/or west of the Continental Divide that did not offer specific feedback regarding the draft plan.
- Concerns regarding bias in the draft wolf plan and wolf reintroduction that either favored what commenters perceived as urban or rural cultures and perspectives.
- Concerns that the plan's attention to social tolerance outweighed best available science.