



TO: Members of the Colorado Parks and Wildlife Commission

FROM: Jonathan Tyrrell, Keystone Policy Center Policy Fellow

RE: Interim/Draft Summary of Public Comments Concerning the Draft Gray Wolf Restoration and Management Plan

DATE: February 15, 2023

This summary reflects high-level themes of public comments received through <https://www.wolfengagementco.org/> from the date the draft wolf restoration and management plan comment was opened, December 9, 2022 to February 12, 2023. In that time, 2698 public comments were received; 2694 comments were submitted by individual members of the public. 4 comments were submitted by organizations. High level themes of comments submitted by members of the public are organized below by each key issue of the draft plan.

The following themes are not conclusive nor comprehensive of all topics raised; they will be revised and refined as appropriate in the final report on public comments after the February 22 closure of the draft wolf plan comment form.

Please note the following themes of comments do NOT imply consensus of all commenters. Rather, they reflect individual perspectives that were commonly offered. Some themes reflect divergent views on the same topics. This summary identifies 'key' topics that are most common among written comments, as well as additional themes that are recurrent although not as common as the 'key' topics.

Reintroduction methodology and release locations

- Release area was a key issue reflected in public comments.
 - Some comments expressed support to release wolves in the San Luis Valley, the San Juan Mountains, and Rocky Mountain National Park.
 - Other comments expressed support to release wolves in counties that voted in favor of Proposition 114 and/or east of the Continental Divide in suitable habitat areas.
 - Some comments expressed opposition to releasing wolves west of the Continental Divide.
 - Some comments specifically suggested opposition to the Gunnison Basin as a release area due to concerns such as conflict with livestock, especially given wintering elk range overlaps with livestock operations; impacts to the Gunnison Sage Grouse; and impacts to local ungulate herds.
- Some public comments reflected support to include the Mexican gray wolf subspecies in reintroduction efforts and/or use of the McCleery gray wolf subspecies.
- Some public comments also expressed support to rehabilitate and relocate wolves to wolf sanctuaries if wolves are injured during capture and are deemed unviable to release during reintroduction.

Interim Summary of Written Public Comments Concerning the Draft Gray Wolf Restoration and Management Plan

Wolf recovery and phases

- A key issue commonly discussed in public comments was the inclusion of phase 4 of wolf recovery and management.
 - Some comments reflected opposition to phase 4 and reclassification as a game species. These comments suggested game species designation is not consistent with state statute nor with the “will of the voters” in the passage of Proposition 114.
 - Some comments reflected support for phase 4, suggesting 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.
- Hunting of wolves was another key issue commonly discussed in the context of wolf recovery and phase 4 of wolf recovery.
 - Some comments reflected beliefs that 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.
 - Some comments suggested hunting wolves 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.
- Another key issue commonly discussed in public comment is 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 reflected 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.
 - There was concern that minimum counts would be interpreted as population targets or maximums.
- There was support and opposition for fixed objectives for wolf populations. Supporters of fixed objectives expressed concern that without fixed objectives, there would be lack of clarity around what management is allowed and how many wolves would be on the ground. Opponents expressed concern for lack of flexibility; concerns were also expressed regarding potential for litigation based on a fixed objective or the lack thereof.
- Some advocated for additional components and/or alternatives for wolf recovery thresholds based on minimum counts, such as geographic components, number of packs/breeding pairs, or genetic connectivity.
- Some called to define “self-sustaining” and “minimum viable populations” in the wolf plan.

Impact-based management and tools

- Another key issue was 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.
 - Some comments suggested enhancing the flexibility of lethal management, including issuing time-sensitive take permits to livestock operators before a depredation is confirmed.
 - 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.
- Some comments specifically opposed lethal management of depredating wolves on public lands.
- Some comments also suggested that the impact-based management framework should require or more strongly emphasize that conflict minimization measures be put in place before lethal management or compensation are allowed.
- Some comments also suggested the need to better define allowance of lethal take specifically in the case of what is permitted when avoiding conflict with human activity.

Wolf-livestock conflict minimization program

- A key topic of comments was lack of clarity of funding and agency capacity to effectively implement the conflict minimization and compensation program. There is also concern that compensation programs for conflict minimization do not account for additional burdens placed on producers to implement and maintain conflict minimization tools.
- There was concern regarding the \$8000 limit to claim livestock losses at fair market value.
 - Some comments suggested this limit is too low and does not adequately cover losses.
 - Some comments argued this limit is too high and overly generous.
 - Similar opinions were expressed regarding support and opposition to the compensation ratio to compensate for missing calves.
 - Some comments suggested review of the proposed compensation plan for wolf depredation, such as when gray wolves are delisted from the state endangered species list, to bring into alignment with existing livestock compensation for other predators.
- Some comments reflected support to enhance the ease of the process to receive compensation, including eliminating need for veterinarian statements to apply for compensation for itemized production losses. Some comments also suggested veterinary costs should be included in eligible compensation for wolf depredation on livestock.
- Some comments suggested that each producer on a multi-producer permit should qualify for compensation for missing livestock if another producer on their permit qualifies.
- Some comments reflected support for CPW to proactively invest in carcass disposal facilities to mitigate the attraction and habituation of wolves.
- Some comments reflected support 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

- Wolf impacts to ungulates were another key issue raised in comments.
 - Some comments reflected concern for impacts to specific ungulate populations in proposed release areas, as well as concerns for impacts to ungulate populations on the Western slope.
 - Some comments reflected concerns that negative impacts to ungulate populations will negatively impact hunting opportunity and success as well as outfitting operations.
 - Some suggested that concerns over negative impacts to ungulates overlook the positive benefits of wolves in regulating ungulate distribution and disease; some comments suggested that hunting success has increased where wolves have been reintroduced.
 - There were calls to enhance ungulate monitoring programs to assess potential wolf impacts.

Wolf interactions with other wildlife species

- Some comments reflected concerns for wolves' interactions with threatened and endangered species or species of concern, such as moose and sage grouse.
- Some comments suggested the need to emphasize that wolves' impact on non-ungulate species are not likely to be substantial.
- Some comments expressed desire for additional monitoring and research to assess potential wolf impacts.

Wolves and pet and/or human safety concerns

- Some comments expressed safety concerns for pets and humans, especially backcountry recreationists.
- Other comments suggested there should not be concern for human safety.
- Comments reflected both support and opposition to compensation or lethal management allowance if wolves harm or kill pets.
- Some comments expressed concern over wolf impacts to recreation opportunities, such as trail closures, and suggested the wolf plan make more explicit the impact of wolf presence on recreation opportunities.

Monitoring and research

- Some comments specifically suggested including PIT tags and remote camera traps to support proposed monitoring efforts.
- Some comments suggested hunting and trapping should be allowed to support research.
- Some comments suggested sharing data with livestock operators to support preparedness in livestock management when wolves are in the area.
- Some comments expressed support 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.

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Education and outreach

- Some comments reflected support to enhance K-12 and general public education efforts.
 - Some suggested a focus on better education regarding wolf biology and the positive impacts of wolves.
 - Some called for education of the public regarding livestock operations, suggesting a lack of public understanding.
- Some commenters expressed concern about insufficient time for public comment during in person Parks and Wildlife Commission meetings on the draft wolf plan.

Funding and capacity

- Funding and capacity were key issues commonly discussed in public comments.
 - Some comments noted the need for clarity in determining funding sources for wolf reintroduction, wolf management, livestock compensation, agency capacity, and other costs of the wolf plan.
 - Some comments suggested there were potential economic benefits of wolf restoration that should be leveraged to defer these costs.
 - Other comments suggested seeking funding from the general assembly, nongovernmental organizations, other private entities, GOCO, and any other sources possible.
 - There was both support and opposition for use of funding from CPW's wildlife cash fund.
 - Some comments reflected concerns regarding interagency coordination, cost-sharing, and technical assistance on topics such as conflict minimization and management across state and Tribal boundaries.
- Some comments called to enhance clarity and transparency of funding sources and budgetary needs or ranges of needs for wolf restoration and management, suggesting the need to determine dedicated funding sources not subject to annual appropriations.
- Some comments suggested distinguishing funding for livestock compensation from conflict minimization; some of these comments reflected concern that some funding sources would not support impact-based management plans that included lethal management options.

Social tolerance for wolves and economic impact

- Many comments did not offer specific or detailed feedback regarding the content of the draft wolf restoration and management plan, but rather noted their support or opposition to the reintroduction of wolves in Colorado, as well as opposition specifically to release wolves west of the Continental Divide.
- There was concern for bias in the draft wolf plan and wolf reintroduction that either favored what commenters perceived as urban or rural cultures and perspectives.