



COLORADO

Parks and Wildlife

Department of Natural Resources

Chronic Depredation

Colorado Parks and Wildlife (CPW, The Division), along with input from the Ad Hoc Wolf Working Group, the Attorney General's Office and in consultation with the USFWS has created an internal administrative directive defining 'chronic depredation' and lethal removal considerations for gray wolf management.

This document is intended to serve as a reference for Parks and Wildlife Commissioners.

Definitions:

"Chronic Depredation" means three or more depredation events caused by the same wolf or wolves within a 30-day period, provided there is clear and convincing evidence that at least one of the depredation events was caused by wolves. The other two events could meet either "clear and convincing" or "preponderance of evidence" standards.

"Clear and convincing" is a higher standard than the preponderance of evidence standard that is typically used for other game damage. Clear and convincing evidence leaves no room for serious doubt that a wolf or wolves caused physical trauma resulting in injury or death to livestock or working dogs. The Division will find the preponderance of the evidence standard is met when the evidence shows a wolf or wolves more likely than not caused physical trauma resulting in injury or death to the producer's livestock or working dogs.

A 'Depredation Event' means a 24-hour period in which the Division determines by a preponderance of the evidence that a wolf or wolves caused physical trauma resulting in injury or death to a producer's livestock or working dogs.

Lethal Management Considerations

The Commission's regulations require the Division to consider four factors when determining whether a situation qualifies for lethal removal of depredating wolves:

- documented repeated depredation and harassment of a producer's livestock or working dogs caused by the wolf, wolves, or pack targeted
- use of a variety of non-lethal conflict minimization materials and techniques,
- likelihood that additional wolf-related depredation will continue if lethal control is or is not implemented; and
- unintentional or intentional use of attractants that may be luring or baiting wolves to the location.

The Division will apply this standard on a case-by-case basis to determine whether lethal removal is appropriate under the circumstances. While the Division may conclude lethal removal is appropriate in other circumstances, the Division will conclude lethal removal is appropriate when it determines a livestock producer has experienced chronic depredation

despite implementing all non-lethal deterrence measures identified in a site assessment and removing any attractants that could lure wolves to the site.

The Director will make this determination in coordination with appropriate Division staff, and after consulting with the U.S. Fish and Wildlife Service, due to the federal status and 10(j) rule requirements.

If, after considering these factors, the Division concludes lethal removal “is appropriate under the circumstances,” Division staff or federal agents will lethally remove the depredating wolf or wolves. If state and federal agencies do not have the capacity to lethally remove the depredating wolf or wolves, the Division may issue a chronic depredation permit if additional criteria are satisfied.

When carrying out a lethal removal effort, the Division’s goals will include:

- targeting the wolves responsible for the depredations to the best extent possible
- minimizing the number of wolves that must be lethally removed
- changing pack behavior to reduce the potential for future depredation
- using the fastest, safest, most humane, and most cost-effective methods available

Consistent with these goals, the agency will use an incremental approach. For example, if an entire pack is responsible for the depredations, the Division will start by trying to remove one or two wolves (an active removal period), then evaluate whether the removal efforts have achieved the goal of changing pack behavior (an evaluation period). Even if the Division fails to remove wolves during the active removal period, it will conduct an evaluation period to assess any changes in pack behavior. The Division expects all non-lethal deterrence methods implemented prior to the agency’s removal efforts to continue during the evaluation period. If, after the evaluation period, the agency determines the removal efforts did not change pack behavior, it may initiate another active removal period, followed by another evaluation period, until the agency has removed the entire pack or determined its removal efforts have sufficiently changed pack behavior.

After the Division concludes a lethal removal effort, the agency will prepare a final report that includes the rationale for removal, the location of the removal, the identity of the wolves or pack targeted, the nonlethal deterrence methods implemented prior to removal, and whether any wolves were lethally removed.

Non-Lethal Conflict Minimization Techniques

The forthcoming Wolf-Livestock Conflict Minimization Program Guide will provide producers a full list of all conflict minimization tools, methods, state staff support available including contact information, and funding sources. The Division and CDA have significantly increased conflict reduction specialist staff throughout the first year of wolf restoration to implement non-lethal livestock/wolf conflict reduction.

- Site assessment program: these are already available and are free and voluntary.
- Range rider program: The Division and CDA will launch the Colorado Range Rider program in early 2025. The inaugural training will be in January 2025, in time for the calving and lambing season, beginning in late February 2025. In addition, state grants for range riders have been available since April 2024.

- Depredation response: The Division has developed criteria for different levels of response as a guide for field staff to use when addressing wolf conflict and depredations, either proactively or reactively. In addition, we are adding an additional 5 wildlife conflict specialists to our existing 5 full time employees to improve our support to ranchers in coexisting with bears, lions and wolves. This capacity will improve our proactive support for coexistence and be the regional leads for site assessments, non-lethal program coordination, depredation investigations, and follow-up on compensation processes.
- Carcass removal: CDA prepared a best practices one-pager for producers. State grants are available to assist ranchers with carcass removal.
- Communication plan: The Division continues to meet with local communities and elected officials for open discussions about potential release locations and how to prepare to live with wolves. The Division will continue to update the public on restoration activities throughout this capture and release season.
- The Division continues to pursue investigations into alternative non-lethal techniques and has been meeting with human-wildlife conflict technology companies. This will be ongoing as new technologies emerge.
- The Division has initiated a process improvement review of our carnivore depredation process with the goal of creating efficiencies and developing and implementing improvements to the process including documentation of the investigations. From this effort, we will develop a carnivore depredation protocol to improve our consistency and defensibility of the process and decisions the agency is making.