



October 7, 2024

Colorado Parks & Wildlife  
6060 Broadway  
Denver, CO 80216

Dear Director Davis, Chair May, and Members of the Parks & Wildlife Commission:

Colorado Counties, Inc.'s (CCI's) members have sought frequent updates regarding the status of wolf reintroduction and management. We understand and appreciate the complexity and dedication involved in this work as Colorado seeks to comply with Proposition 114, and we are particularly grateful for CPW's decision to relocate the Copper Creek pack in response to community feedback and concerns.

However, it is because of these complexities that we request that Colorado Parks and Wildlife (CPW) implement a temporary hiatus in reintroduction efforts to ensure all matters outlined below are in place before the introduction of additional wolves, in order to protect the interests of impacted communities, livestock producers, and wildlife. Such a delay would uphold CPW's mandate to continue wolf reintroduction efforts while providing adequate time to ensure future efforts do not create disproportionate harm.

Since the initial wolf release in 2023, several concerns have been raised that require urgent attention:

- **Time for Preparation:** Because Proposition 114 mandated the reintroduction of wolves by December 31, 2023, CPW has had limited time to plan, staff, and educate impacted stakeholders about the realities of living with wolves. Without sufficient communication and training, producers and rural communities are left vulnerable to livestock depredation and its consequences. A delay in further reintroductions would provide time for these efforts. Given the reality that wolves will either be relocated, or simply travel to new communities, a hiatus will lessen the negative impacts that communities have experienced. Ideally, these negative impacts will be a learning opportunity for CPW and future host communities.
- **Underestimated Costs & Resources:** While Proposition 114 originally estimated the program's costs at \$800,000 annually, it has already required \$5 million to date, and current funding levels remain insufficient. Given the status of the state budget, it seems unlikely that the funding challenges will be resolved this fiscal year. Additionally, counties across Colorado recognize and appreciate the need for more resources and believe CPW should be provided increased funding to most effectively manage this complex initiative.
- **Evaluation of Non-Lethal Measures:** Because there is disagreement about appropriate use of lethal and non-lethal methods of preventing livestock depredation, it is important that non-lethal methods be adequately tested across Colorado's diverse agricultural landscapes. These methods should be tailored to specific conditions, properly evaluated, and communicated effectively to ranchers and producers to ensure success over time. This evaluation should not be conducted at the cost of ranchers' livelihoods today. A pause would provide more time to effectively evaluate methods of preventing depredations.

- **Range Rider Program Development:** A well-funded, well-staffed, and well-trained Range Rider program is essential to protect livestock from wolf predation. This program must be implemented and operational *at scale* before any further wolf introductions occur.
- **Unresolved Definitions & Metrics:** The Wolf Plan as adopted still does not clearly define key terms such as “chronic depredation” or provide concrete goals for what constitutes a successful reintroduction in terms of wolf packs or population targets. It is appropriate for these definitions and metrics to be determined, widely communicated, and understood before further introductions take place.

Given these challenges, CCI respectfully requests the Commission temporarily pause further wolf introductions to allow full implementation of:

1. Hiring and training additional staff for conflict management and livestock depredation investigations.
2. Comprehensive education and communication with livestock producers on managing wolf conflicts.
3. Evaluation and testing of alternative non-lethal measures in different environmental conditions.
4. Range Rider funding to accommodate the program at geographical scale.
5. Transparent and collaborative dialogue as CPW determines future release areas and wolf management plan, including precise definitions of chronic depredation and success metrics for reintroduction.

We appreciate the Commission’s commitment to balancing the reintroduction of wolves with the protection of Colorado’s agricultural producers and wildlife as it complies with Proposition 114. A thoughtful and measured approach that ensures all necessary tools and resources are in place to mitigate conflicts is critical for successful wolf reintroduction that minimizes harm to our citizens and livestock producers.

We appreciate your consideration of this request and look forward to your continued collaboration on this important issue.

Sincerely,

Kelly Flenniken  
Executive Director  
Colorado Counties, Inc.

CC: Dan Gibbs, Executive Director of the Colorado Department of Natural Resources