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November 1, 2024

RE: Response to October 7, 2024

Dear Executive Director Flenniken,

Thank you for your letter describing CCI's concerns regarding the implementation of the Wolf Restoration and Management Plan. I assure you that I have been focusing my time on ensuring that we are making progress on the concerns we have heard from producers and counties. Please find our response to these concerns below.

Proposition 114 requires Colorado Parks and Wildlife (CPW) to establish a self-sustaining population of wolves in Colorado. In carrying out this mandate, CPW must also use funds made available to assist owners of livestock in preventing and resolving conflicts between gray wolves and livestock. Since Proposition 114 passed in 2020, CPW has been striving to fulfill both of these goals, and continues to do so. Be aware, however, that CPW will never be able to provide "certainty" to ranchers about the safety and well-being of their herds. With wolves on the landscape, CPW and ranchers must work in tandem to minimize the risks posed to livestock by wolves. Only with a strong partnership can we, together, keep herds as safe as possible. But we will never achieve certainty; that is why we also have a compensation program for the unfortunate instances of wolf depredation that may occur despite our partnership's best efforts.

In our role in this partnership, I want you to know that we have been listening to and acknowledge your concerns. CPW (including the Wolf Restoration Ad Hoc Working Group), the Colorado Department of Agriculture (CDA), USDA Wildlife Services, and NGOs have been working on solutions to the concerns that we have heard from ranchers and counties. Indeed, we had been doing so long before the Parks and Wildlife Commission received the recent citizen's petition identifying concerns and needs prior to releasing new wolves, many of which overlap with those in your letter.

Our work to date has focused on many of these specifics. First, we have heard and acknowledge the ranching communities' and counties' frustrations regarding transparency. CPW has reinforced with our staff that they are able to share wolf activity information with landowners in the areas of that activity. Additionally, we have put several plans into place to



enhance transparency, such as a communication plan for new wolf releases centered around an opportunity to dialogue with counties and producers on future wolf releases and wolf activities.

Second, our staff is close to finalizing a definition of chronic depredation, as well as a lethal management framework associated with the definition. We anticipate putting the definition into place in November 2024. This definition has been developed in close coordination with the Ad Hoc Working Group, which has members of the ranching community serving on it, and should provide clearer expectations for ranchers about how and when CPW will respond to wolf depredations.

Third, we are working in tandem with CDA on formalizing range rider and carcass management programs, including establishing adequate funding for those programs. We have also developed a site vulnerability assessment program that is ready to be deployed beginning November/December 2024.

Fourth, we have already hired 6 conflict specialists and are in the process of training them. We are also in the process of adding an additional 4-5 conflict specialists. These new hires will double our current capacity and increase CPW's ability to respond to and investigate livestock depredations.

Fifth, we have focused on developing proactive programs to support ranchers in avoiding and minimizing impacts to their livestock. This includes working with CPW, CDA and/or Wildlife Services to develop site vulnerability assessments which also identify the most effective non-lethal techniques to avoid and minimize conflicts between wolves and livestock. These agencies and NGOs can assist in providing funding, training, equipment and potential deployment of techniques.

While we anticipate these products, programs and capacities will be rolling out into late fall/early winter, we want to acknowledge that our plan appropriately calls for adaptive management. Thus, we anticipate that we can sit down with local communities as we move forward in a manner that allows us to adjust our programs as we learn about what works best for local conditions.

In addition to all this, however, CPW needs to be mindful of its mandate under Proposition 114 to establish, maintain, and manage a self-sustaining population of wolves in Colorado. We do not believe pausing wolf releases is consistent with that mandate. Indeed, although it may seem counterintuitive, getting more wolves on the landscape will advance two of our goals: creating a self-sustaining population of wolves and creating an environment that has more predictable wolf travel patterns, and therefore more efficient management of wolf-livestock conflict. As we learned from wolf reintroduction in the northern Rockies, more wolves on the ground will contribute to pack formation, which will create wolf territories, and therefore more

predictable wolf travel and behavioral patterns. Currently we have individuals or loose pairs of animals traveling 100-200 miles per week, which makes it challenging to predict where wolves will be and thus how to deploy co-existence techniques and strategies to avoid/minimize conflicts with livestock. Establishment of packs will create territories that are defended and where wolves will demonstrate more contained and consistent travel and behavioral patterns. More consistent travel patterns will allow us to better align site vulnerability assessments and techniques to reduce the likelihood of wolf-livestock conflicts.

As you are aware, three of the 10 translocated wolves from Oregon have died since their release last December. This is not a startling number - mortality is natural even in wildlife management and restorations. However, if we were to pause, it is likely that additional wolves from this preliminary source will also die before having the opportunity to pair and breed, making it harder to achieve Proposition 114's mandate to establish a self-sustaining population of wolves in Colorado. Please recall that while CPW had the opportunity to supplement the 10 wolves initially released last December with an additional 5 from the Confederated Tribes of the Colville Reservation later in the season, after requests from producers and elected officials, we agreed to stop at 10 for the first release season. Ten has become 7, and 7 may become 5 or even 4. Such a small number of wolves cannot adequately serve as a founding population to a self-sustaining population. Pausing releases for a year would essentially set us back to square one, at considerable cost that will only have to be duplicated as CPW continues to work to meet the mandates of state statute.

Please know that CPW is working diligently to navigate the implementation of the wolf restoration law with full knowledge of how difficult this has been for rural communities. These relationships are critically important to us, to both wolf and non-wolf conservation outcomes, to wildlife management generally, and to the broader public. CPW is committed to the hard work needed to to rebuild these relationships, and we request that you continue to invest your energy to work with us as a partner in this effort going forward.

Again, I thank you for continuing to share your concerns and your continued dedication to our long-standing relationships.

Sincerely,

Director

Colorado Parks and Wildlife