

# Providing input on Colorado’s draft Wolf Restoration and Management Plan

An advocate’s guide to speaking up for Colorado’s wolves

Feb. 22 is your last chance to tell CPW that you want a wolf plan focused on coexistence, not killing.

## Background

Wolves in Colorado need you! In November 2020, Colorado voters passed Prop 114 (now codified as [C.R.S. §33-2-105.8](#)) to restore gray wolves west of the Continental Divide by Dec. 31, 2023. As part of this process, the Colorado Parks and Wildlife Commission (known as CPW) must develop a plan to guide how wolves are restored and managed in the state. CPW recently released a draft of this plan for public review and comment.

The plan outlines where and how wolves will be released; phases for how many wolves are needed before they can be downlisted to “threatened” or delisted to “nongame” status at the state level; how the state will handle conflict prevention and address conflicts with livestock; and Colorado’s plan for education, outreach and funding; among other topics.

Over the next two months, CPW will be holding five public hearings to discuss the draft plan and accept oral public comment. At the same time, the commission will also be accepting written comments through an online survey. Between the end of February and April, CPW will revise the draft plan. In April, the commission will be presented with a summary of public input received and discuss any necessary regulation changes that need to happen in order to align with the plan. In May, CPW will finalize those regulation changes and adopt the final plan.

It is crucial that Coloradans speak up for our wolves. We must ensure the plan is based on sound science and public values and does not allow any unnecessary killing or future trophy hunting. [Tell us](#) how you plan to take action.

## KEY DATES

- [Feb. 16: Virtual hearing via Zoom](#)
  - 5:30 to 8:30 p.m.
- [Feb. 22: Hearing in Denver](#)
  - LOCATION CHANGED: Adams County Fairgrounds, Waymire Dome, 9755 Henderson Road, Brighton, CO 80601
  - Currently scheduled for 8 a.m. to 4 p.m.
  - Make sure to wear blue to show your support for wolves!
- All written public comments are due by Feb. 22.



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## IMPORTANT LINKS

- Review the [draft Gray Wolf Restoration and Management Plan](#).
- Online [comment form](#) to submit written comments.
- Review CPW's [Public Comment Guidelines](#) for the meetings about the wolf plan.
- [Register now](#) to speak at the virtual hearing on Feb. 16. Note that registration is first come, first served, so please sign up early!
- Share your interest in taking action with us through this [Google Form](#).
- Review the [Colorado Wolf Restoration Plan](#) authored by conservationists and released in July 2022. This plan aimed to help guide the work of CPW and provides a plan for full ecological recovery. It includes many of the provisions we would like to see in the final plan.

## Providing public input

### ATTENDING AND/OR SPEAKING AT PUBLIC HEARINGS

**The most important thing you can do for wolves is to attend at least one of the public hearings.** While we highly encourage you to sign up to speak at one of these hearings, even just your presence can help demonstrate that Coloradans care deeply about wolves and want them protected. We must outnumber those vocal few who are opposed to wolf protection.

The public hearings listed above are open to the public. In order to speak at the in-person hearings, you must register in person at the door the morning of the hearing. Registration opens 30 minutes before the start time of each meeting. It is important to arrive early if you wish to speak, as they will likely only allow up to 40 people to comment. Each person will have no more than two minutes to speak.

In order to speak at the virtual meeting on Feb. 16, you must [register online](#). It is important to do this ASAP, before all the spots are filled.

Please let us know if you plan to attend and/or speak at a hearing by completing this [Google Form](#) or by emailing us at [aroyall@humanesociety.org](mailto:aroyall@humanesociety.org). This will allow us to connect you with other advocates who are attending and assist you with any questions you may have. We are happy to help with additional talking points and guidance.

### SUBMITTING COMMENTS ONLINE

**Written public comments are due by Feb. 22.**

CPW is collecting written comments through an [online survey](#). Comments submitted via the survey will be shared directly with commissioners. While the comment form will be open until Feb. 22, it is helpful to submit comments early so that commissioners can review them ahead of hearings and incorporate those messages into their own questions and feedback for CPW.

The comment form asks for your name, organizational affiliation (if applicable), whether you live in the United States, whether you live in Colorado (and if so, what county) and what topics your comment will address. It then provides a text box for your feedback or the option to upload a file. We recommend commenting as an individual rather than stating any organizational affiliation unless you are a staff member of an organization.

We invite you to use the talking points below to help craft your written comments. Please do **NOT** copy/paste these talking points verbatim, but rather put them into your own words.

## Key talking points

### CHANGES THAT MUST BE MADE TO THE DRAFT PLAN

#### “Phase 4” must be removed from the plan

Currently, Chapter 4 of the draft plan describes the minimum number of wolves needed to transition wolves to different statuses or “phases” (i.e., from “state endangered” to “state threatened” to “delisted”). The current draft plan includes a “Phase 4,” which refers to when wolves may potentially be classified as game species and trophy hunted in the future.

While the plan does not include specific criteria for “Phase 4” and defers consideration of this status until later, its inclusion in the plan indicates such a phase is likely to occur in the future.

#### *Talking Points:*

- Any consideration of a future wolf hunting season in Colorado is contrary to the will of voters, who supported the designation of wolves as a nongame species.
- There are no sound scientific, ethical or social reasons to allow wolf trophy hunting. Killing wolves does not increase social tolerance for the species, nor does it prevent already rare conflicts with farm animals or “grow” elk, deer and other prey species for human hunters.
- An [August 2022 survey](#) of Colorado voters found that 64% of respondents, including 56% of respondents from the Western Slope, do not think wolves in Colorado should be trophy hunted, and 62% do not think wolves should be trapped.
- [Current social science](#) demonstrates that American values relating to wildlife, including wolves, are becoming increasingly rooted in an ethic of coexistence. Countless [studies](#) and [polls](#) demonstrate that Americans oppose trophy hunting.
- Coloradans not only voted to restore wolves, but a [2020 survey](#) found that 84% of Coloradans supported wolf reintroduction.
- A [2018 survey](#) found that only 22.7% of Coloradans support killing wolves that kill farm animals. In other words, 61.4% opposed killing wolves who killed farm animals (16% of respondents neither supported nor opposed).

**CPW’s proposed thresholds for downlisting and delisting (that is, removing protections for wolves that could involve trophy hunting and trapping) are dangerously low and must be increased.**

The current draft requires a minimum of just 50 wolves for four successive years before wolves can be downlisted from “state endangered” to “state threatened,” and just 150 wolves for two successive years (or

200 wolves anywhere in the state with no temporal requirement) for wolves to be delisted from “state threatened” to “delisted/nongame species status.” While the plan states that a population of 150-200 wolves is not considered a minimum or maximum allowable number of wolves and is not a management goal, these thresholds are appallingly low and not based on sound science. These numbers manage to prevent extinction at a bare minimum, not to ensure restoration and recovery.



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State statute requires that the plan must include actions necessary to establish and maintain a *self-sustaining* population. On Page 12, the current draft states that, “For the purposes of this Plan, a self-sustaining population is one that maintains viability over time without continuous human intervention and conservation actions.” However, in Chapter 4, the draft plan states that the value of 150-200 wolves will be used to determine when the wolf population is “self-sustaining.”

*Talking points:*

- The value of 150-200 wolves to determine a “self-sustaining” population is irresponsible and unscientific. The threshold of “self-sustaining” is much higher than the threshold required for wolves to not be at risk of extinction.
- The best available science demonstrates that there is suitable habitat for 650-1,500 wolves in Colorado. Please see Pages 12-15 of the [Wolf Restoration Plan](#) developed by conservationists last July for a detailed description of this science and a discussion of the more responsible thresholds identified by these organizations.
- Furthermore, there should be a geographic distribution requirement with regard to recovery.
- Coloradoans oppose trophy hunting and trapping of wolves by supermajorities.

### **Coexistence must be prioritized over killing**

Although the draft plan acknowledges that livestock losses to wolves are very low in states with established populations, it repeatedly overstates the potential for livestock-wolf conflict. The draft plan spends much more time discussing killing wolves in response to conflicts with livestock than it does discussing the effective, nonlethal management tools that can prevent conflicts from occurring in the first place.

While the draft plan indicates that nonlethal tools should be used before resorting to killing wolves and includes provisions for a fairly robust conflict minimization program, the draft plan allows wolves to be killed before livestock owners have tried any nonlethal techniques. This is nonsensical, as numerous [scientific studies](#) have found that killing wolves does not improve livestock safety.

Additionally, nearly an entire chapter of the draft plan is devoted to explaining the compensation scheme for livestock owners who lose animals to wolves. According to the plan, livestock owners will be compensated 100% fair market value, up to \$8,000, per livestock animal confirmed to have been killed by wolves. There are then additional methods for livestock owners to be compensated for up to seven missing calves or sheep per

confirmed loss, or for owners to be compensated for itemized losses, including missing animals, supposed decreased weight gain and alleged decreased conception rates. Again, it is not required that livestock owners have implemented nonlethal deterrent methods before being compensated.



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#### Talking points:

- Nonlethal methods must be required before compensation can be awarded.
- Killing wolves should never be the first line of defense, and killing wolves for livestock should never be allowed on public land.
- Nonlethal methods must be prioritized.
- Livestock who are turned out to graze on large allotments go missing for many reasons, and wolves should not become a scapegoat.
- Farm animal losses from wolves [are rare](#) in every jurisdiction in which wolves live.
- Killing wolves can [actually exacerbate conflicts](#) with farm animals by disrupting the stable social structures that wolves rely on. [Several scientific reviews](#) have questioned the scientific merit and efficacy of lethal predator control.
- [Nonlethal methods](#) to prevent conflicts are more effective, economical and humane than killing wolves.
- Even the draft plan states, “The best data on the effectiveness of lethal removal are inconclusive or even contradictory.”

### ADDITIONAL TALKING POINTS

#### Wolves are unlikely to significantly impact Colorado’s elk and deer herds

- Colorado’s elk herds are the [largest in the world](#).
- Wolves help keep elk and deer herds healthy and robust (e.g., [free from CWD](#)) and [don’t harm hunters’ ability to obtain elk](#).
- In a long-term [Colorado-based study](#), a group of biologists determined that if deer had access to adequate nutrition, neither mountain lions nor coyotes negatively affected deer populations. Biologists also found that [mountain lions selected for deer who had poor body condition](#). Similarly, wolves are very good at [identifying vulnerable prey](#) and tend to target individuals who are old, young, sick or otherwise weakened. They prefer to prey upon deer who are already in poor health or otherwise compromised.
- Wolves and other native carnivores also [play a critical role](#) in suppressing and limiting the prevalence of disease in prey species, including chronic wasting disease (CWD), an epidemic plaguing deer and elk that continues to spread across North America, [including Colorado](#).
- Elk and deer hunting numbers in states with established wolf populations remain high. Not to mention the fact that Colorado’s elk population is the [largest in the world](#).

#### Allowing trophy hunting of wolves can increase poaching

- [Recent scientific evidence](#) demonstrates that poaching is a primary cause of mortality for many large carnivores, including wolves.
- [Recent studies demonstrate](#) that liberalizing legal killing (through hunting/trapping seasons or predation removals) is likely to increase the incidence of illegal poaching of the same population.

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