**Wolf Restoration and Management Plan Summer 2021 Comment form**

The first seven questions collect information on who (person, organization, location) is making the comments. I am listing my name (Sallie Thoreson) and the organization as Great Old Broads for Wilderness **Northern San Juan Broadband**

8. What suggestions do you have for **engagement, education, and outreach** to make gray wolf restoration and management as successful as possible?

Outreach and education to any audience must be rooted in science, research and experience.

Elevate the science and ecological benefits of wolves on the landscape. These include how wolves strengthen ungulate populations, provide feeding sources for other animals, improve riparian areas, discourage coyote populations, boost ecotourism, and restore biodiversity and healthy ecosystems. Humans have eliminated wolves from Colorado and it is our obligation to return them back to Colorado ecosystems.

9. What **concerns or questions about engagement, education, and outreach** do you have?

No information on ecological benefits of wolves was presented at the open houses and these facts are missing from CPW’s website. There are many good scientific papers, many of them authored by members of the Technical Working Group. There needs to be information on the many ecological benefits that wolves provide in improving the health of elk and deer, improving landscape health and enhancing biodiversity. While many have asked for CPW to supply this information, it has not been forthcoming. CPW needs to rebuild their trust with Colorado residents, and prove that the agency is truly on-board with implementing wolf reintroduction. Discussing the ecological benefits of wolves would be a good place to start.

Many Great Old Broads for Wilderness have experience in the structure and process of focus groups. We are concerned that the focus group held in Montrose did not have the numbers and diversity to develop a robust discussion. Most focus group guidance would discourage the inclusion of the contract agency (in this case CPW) as a part of the group discussion. We would like the final report of the focus groups and public information sessions to be made public.

10. What specific suggestions do you have for **restoration logistics** to make gray wolf restoration in Colorado as successful as possible?

Look to the Technical Working Group for their expertise in logistics. Yellowstone National Park proved that restoration can be done safely and effectively. Put enough wolves on the ground, whether by soft or hard reintroduction, to develop a viable population.

11. What **concerns or questions about wolf restoration logistics** do you have?

The timing of restoration is essential. CPW should release wolves before breeding in mid-February so packs can get established before pups are born. Therefore, CPW needs to plan well so that this is done BEFORE the December 2023 deadline for reintroduction.

12. What **wolf population and other biological information** would indicate that the gray wolf restoration program was a success?

We oppose putting in the plan a specified number of wolves that would indicate a “sustainable” population because wolves are proven to self-regulate their population. We oppose a “cap” or number of individuals specified as such metrics typically leads to harm of the species when that number is reached – ie trapping, hunting, illegal elimination. We don’t want Colorado to duplicate what is happening in other states such as Idaho, Wyoming, Montana and Wisconsin.

CPW knows how to run a successful reintroduction program, as they have done so with restoring a self-sustaining lynx population in Colorado. Similar benchmarks can be used for wolf restoration:

* Reintroduced wolves demonstrate a high rate of survival in the critical first months after release.
* Released adult wolves demonstrate low mortality rates over the longer term, particularly in good habitat.
* Wolves remain in good habitat at densities sufficient for breeding.
* Reintroduced wolves successfully reproduce.
* Wolves born in Colorado survive and also successfully reproduce.
* Wolf recruitment equals or exceeds mortality over an extended period of time.

13. What suggestions do you have for **management strategies** to make gray wolf restoration in CO as successful as possible?

 CPW needs to ensure that the outcomes are healthy pack populations.

14. What suggestions do you have for **monitoring**?

CPW has the tools and expertise to use wolf radio/GPS collars, population studies, and den monitoring.

Additional monitoring should be done for numbers and health of deer, elk and moose and the vegetative health of landscapes.

The experts in the Technical Working Group and other wolf restoration experts can provide pertinent monitoring recommendations.

15. What suggestions do you have for **funding** gray wolf management?

Colorado has made a good start in clarifying that restoration funds will not come from hunting license revenue.

$1.1M was appropriated from the General Fund to support gray wolf reintroduction for FY 21-22. General funding should continue as this is a program that the majority of Coloradans voted for.

Great Outdoors Colorado should be considered as a funding source.

The CPW should have to ability to accept private and grant funding for restoration and compensation efforts.

16. What **concerns or questions about wolf management**do you have?

The focus should not be on managing wolves, but on restoration of a species that historically lived as part of the ecosystems in Colorado but was extirpated by humans.

The conservation efforts should be on the ecosystem level to restore wolves into the places where they will find habitat to thrive.

CPW needs to develop clear regulations and enforcement regarding the killing of wolves. CPW should have sole authority, under clear regulations and guidelines, to remove or, as a last resort, kill any wolf.

17. What suggestions do you have for **conflict minimization best practices**?

CPW needs to develop and distribute Conflict Minimization Best Practices and CPW needs to educate producers and the public on these practices. CPW staff need to also be educated on these practices.

Outreach to livestock producers is essential, must be ongoing and generational (not just one time or one family) and must include resources regarding co-existence. Working landscapes have always overlapped with carnivore habitat. Two examples of organizations doing excellent work are Working Circle workingcircle.org based in Colorado (focus on cattle) and Wood River Project woodriverwolfproject.org  in Idaho (focus on sheep) These projects to date have actually encouraged greater resiliency and sustainability of livestock production as well as ecosystem health. Outreach to recreation users must include users’ impacts on wolf habitat and working landscapes. Also important to educate elected officials, community leaders and the public. CPW must be involved in this work and it must be part of the Wolf Reintroduction Plan.

Ranchers must consider current/traditional practices such as bone yards/open pit of dead livestock that attract predators. Retraining of livestock to act like Bison that congregate rather than like elk that scatter is essential as are a review of current practices related to “supervision of cattle.” $1.1M was appropriated from the General Fund to support gray wolf reintroduction for FY 21-22. Some of these funds should be used for education and training for livestock producers. Additional funding from private and state sources is also available for co-existence strategies.

Given the science that demonstrates wolves self-regulate their population, we oppose hunting of wolves. While we support hunting as a way to provide food for people, we do not support trophy hunting of wolves or promoting wolf killing as a sport. Hunting and trapping of wolves is inhumane and unnecessary. Other states have demonstrated that unregulated “taking” of wolves is not what we want to see in Colorado.

18.What suggestions do you have for **compensation programs**?

Any compensation plan for loss of livestock must require that ranchers are taking/have taken measures to address co-existence of wildlife and livestock on working landscapes. The burden of proof must be on the livestock producer to prove any wolf kill as there are so many other factors involved in the death of livestock (including illness, consumption of poisonous plants, other predators, etc) We are not supportive of compensation when there is little to no proof. Assumptions are not sufficient.

Wolves who are verified to prey on livestock on public lands should not be harmed. These are public lands.

19. What suggestions do you have for **management of conflict wolves**?

First, consider that the conflict is not strictly due to the wolf. Conflict needs to also consider what CPW, other land managers, and private property owners did or did not do.

We oppose lethal control of wolves. recognizing that often the elimination of one “problem” wolf exacerbates the problem if a pack is disrupted. A proper livestock compensation program, and livestock management should be employed instead.

20. What **concerns or questions** **about livestock interactions**do you have?

CPW needs to be transparent on how they develop their livestock interaction program.

Will CPW commit to running a Conflict Minimization Best Management Practices program?

21. What **additional feedback** do you have?

 The public should have the opportunity to review the wolf reintroduction plan and provide a chance for public feedback prior to implementation. The focus groups and the public forums are/were welcome opportunities; however, the public deserves the opportunity to comment on the reintroduction draft plan.

Great Old Broads for Wilderness does not support consensus decision-making as the sole outcome requirement for the Stakeholder Advisory Group. Diverse voices should be recognized. There are other models including shared decision making, allowing multiple opinions, or providing a set of ranked options that CPW might use to get the best possible input from the SAG while combining science and honoring values, provide comfort level for all participants. and honor all group members.

22. Would you like to upload a letter?

NO