

# DRAFT COLORADO WOLF RESTORATION AND MANAGEMENT PLAN

## SUGGESTED COMMENTS

January-February 2023

CPW DRAFT WOLF MANAGEMENT PLAN: <https://cpw.state.co.us/Documents/Wolves/DRAFT-CO-Wolf-Plan.pdf>

COMMENT BEFORE FEB. 22: <https://cpw.state.co.us/aboutus/Pages/Submit-Public-Comments.aspx>

- **Phased Management of Wolves:** Remove references to *Phase 4 (game species status)*
  - The voters defined the wolf as a nongame species (Prop 114)
  - The SAG recommended that no decision about Phase 4 be included in the plan
- **Delisting criteria from Phase 2 (state threatened) to Phase 3 (nongame)**
  - Revise delisting numbers upward based on best available science
    - The criteria do not meet the standard of a “self-sustaining population” (Prop 114), as defined in conservation biology (Redford et al. 2011)
    - CPW must analyze and apply the meaning of self-sustaining (per Redford et al. 2011) and use that guidance in the plan
    - The plan criteria depend on outdated estimates from the Northern Rockies, which had little scientific data and do not apply directly to Colorado
    - Carrying capacity estimates are 750 to 1500 wolves in Colorado (Carroll et al. 2003, 2006)
    - Standard conservation biology requires 100 breeding individuals (50 breeding pairs) to avoid inbreeding (the 100/1000 rule; Frankham et al. 2014)
  - Add a geographic component to delisting criteria
    - Conservation science is clear that geographic distribution is an important part of recovery. Restoration means resilient across the species’ range
    - 200 wolves could occupy as little as 8% of available habitat
- **Background and Key Concepts (Ch. 2):** Clarify scientific concepts and cite science
  - Additive and compensatory predation
    - Wolf predation may replace that by bears, lions, and other predators; discuss this
  - Recent findings from Yellowstone
    - Review and incorporate the findings from Yellowstone (Smith et al. 2020)
- Incorporate individual animal welfare concerns, e.g., for wolves injured during handling
- **Impact-Based Management (Ch.5):** Begin with the SAG consensus that “Nonlethal methods should be explored and encouraged before lethal; lethal methods should not generally be a first line of defense” as the overarching policy
- In *Impact: Ungulate populations*, lethal control should only be considered if prey species are not only below objectives but also undergoing an unacceptably severe decline; and causality is clear
- Change *Impact: Populations of wildlife species other than ungulate prey* to *species of concern* (other threatened and endangered species), as discussed and recommended by the SAG
- In *Impact: Agency wolf management*, specify “to avoid conflict with human activities”
- **Wolf-Livestock Interactions (Ch. 6):** Expand **Conflict Prevention Program** into a full program
  - Conflict prevention receives less than one page of discussion (p. 50), it should be expanded and recognize the opportunities to work with non-profit groups to implement methods
  - Incorporate the full SAG consensus recommendation for conflict prevention
  - Describe the many available techniques for conflict reduction/ prevention

