

January 2, 2025

Via email: dnr_cpwcommission@state.co.us

Director's Office
6060 Broadway
Denver, CO 80216

Re: *Division Recommendation to Deny Petition to Halt Wolf Reintroduction*

Dear Colorado Parks and Wildlife Commission,

Friends of Animals¹ submits these comments on behalf of our Colorado members in support of the Colorado Parks and Wildlife (CPW) Division's recommendation to deny the petition to halt wolf reintroduction.

The reintroduction of gray wolves is vital for restoring ecological balance and fulfilling the mandate established by Colorado voters with the passage of Proposition 114 in 2020, now Colo. Rev. Stat. § 33-2-105.8. The law requires that the Commission develop a plan to restore gray wolves as a non-game species in Colorado and mandates that reintroduction and management be done "in a manner that fosters the species' capacity to sustain itself successfully."² The Colorado Wolf Restoration Management Plan (CWRMP) fulfills this mandate and demonstrates Colorado's commitment to implementing proactive, non-lethal management strategies.³ Over the past four years, CPW has developed a comprehensive reintroduction timeline and process in collaboration with the Colorado Department of Agriculture prioritizing wolf-livestock conflict mitigation through non-lethal management, carcass removal, specialized trainings and workshops, and increased resources toward non-lethal management. This demonstrates a practical, evidence-based approach to fostering coexistence while reducing wolf-livestock conflicts.

Gray wolves are a critical part of Colorado's natural heritage, and it is both legally and ethically unacceptable for the meat industry's interests to override the state's responsibility to protect and restore its native wildlife. Wolves are complex, social beings with strong family bonds, and the focus should be on nurturing their survival and restoring their rightful place in Colorado's wild landscapes -- not bending further to the demands of ranchers and the meat industry. The petition is misguided, as CPW has already addressed, or is actively addressing each of the concerns raised in the petition. Additionally, as CPW

¹ Friends of Animals is a non-profit international advocacy organization incorporated in the state of New York since 1957. Friends of Animals has tens of thousands of members worldwide. Friends of Animals and its members seek to free animals from cruelty and exploitation worldwide and promote a respectful view of non-human, free-living, and domestic animals.

² *Id.* § 33-2-105.8(5)(d).

³ Colo. Rev. Stat. § 33-2-105.8

indicates in its news release regarding the next phase in reintroduction, biological evidence shows that increasing the wolf population promotes natural family behaviors, stabilizes territories, and can reduce depredation rates.⁴

Any further delay of the planned reintroduction of gray wolves—including the release of the Copper Creek wolf family,⁵ the addition of wolves from British Columbia in 2025, and up to 15 wolves annually for the next three to five years—not only jeopardizes the survival of the mere nine wolves currently on the ground, but also undermines CPW’s regulatory obligations.⁶ Such a delay violates the CWRMP, which CPW is bound to follow. The CWRMP outlines specific actions and timelines to ensure the establishment of a self-sustaining wolf population, and any deviation from this plan undermines the agency’s accountability and commitment to its own policies.

Friends of Animals urges the Commission to deny the petition and support continued wolf reintroduction as mandated by Colorado law. Continuing reintroduction efforts is not only critical for the wolves’ survival but also essential for fostering successful and meaningful restorative action for Colorado’s wildlife and our shared environment, upholding CPW’s legal and regulatory responsibilities. Thank you for the opportunity to comment.

Sincerely,

/s/Elizabeth Holland

Elizabeth Holland

Philanthropy and Communications Manager

Wildlife Law Program

Friends of Animals

Liz.holland@friendsofanimals.org

⁴ Colorado Parks and Wildlife, (Dec. 9, 2024). CPW and CDA prepare for 2025 gray wolf releases with improved Livestock Conflict Minimization Program, <https://cpw.state.co.us/news/12092024/cpw-and-cda-prepare-2025-gray-wolf-releases-improved-livestock-conflict-minimization>. (Accessed Dec. 30, 2024).

⁵ Relocation of the Copper Creek wolf family initiated in August 2024 was unwarranted because the ranchers did not fully exhaust all non-lethal management strategies to deter these wolves. Such strategies should be required before any decision is made to relocate or remove wolves from the wild. Repeating relocation of wolves not only causes significant stress and disrupts their social structures during a critical time for their development but also creates the risk of subjecting even more wolves to the same harm if these families are relocated again in the future.

⁶See Colo. Rev. Stat. § 33-2-105.8(2)(a).