



February 21, 2023

Dear Colorado Parks and Wildlife Commission,

As a Colorado nonprofit corporation whose mission is protecting and enhancing the health and sustainability of wildlife and public lands in the Gunnison Basin, Gunnison Wildlife Association (GWA) thanks you for the opportunity to provide comments on the draft Colorado Wolf Restoration and Management Plan.

Since its initial introduction, the proposal to reintroduce wolves in Colorado has and continues to be a divisive topic within our community, as it has been in many parts of the state. While we don't agree with all parts of the plan proposed by Colorado Parks and Wildlife (CPW), because the Colorado Parks and Wildlife Commission and CPW are operating under a mandate created by the passage of Proposition 114 and subsequently reflected in state statute, there are certain aspects for which we have endeavored to provide useful comments as reflected below.

First, with the general vicinity along the Highway 50 corridor between Monarch Pass (east of Gunnison) and Montrose chosen as one of two potential initial release sites, our biggest concern is sufficient funding for the management of other local wildlife species and CPW staffing. Our concern is that without substantial additional funds and staff our existing local wildlife populations and the management thereof could be significantly compromised. Because of our close working relationship with local CPW staff, we are very aware of how diligently they work to merely "keep up" with the demands of successfully managing the wildlife that currently exist on the local landscape. Without adequate funding and staff, the health and wellbeing of our local public and private lands — and the myriad species that depend on them — have significant potential to be negatively impacted.

CPW's draft plan proposes programs that do not currently exist — including a restoration program to reestablish wolves to the state, monitoring programs to monitor both wolf and prey populations, and a mitigation and compensation program to mitigate impacts of wolf depredation on livestock. However, according to the plan, existing programs, funding, staffing, and resources are not sufficient to take on the new and significant responsibilities of reintroducing and managing wolves. For this reason, we strongly urge the Colorado Parks and Wildlife Commission to prioritize working with legislators, NGOs and other outside groups to address this shortcoming immediately.

Considering the existing stresses on the ecosystem — such as increased recreation development and the ongoing fragmentation of healthy habitats — wildlife populations and local CPW staff are already strained. With the addition of wolves to our wildlife management model and ecosystem, we anticipate that strain to increase exponentially. GWA strongly encourages all to consider these impacts, and we strongly advocate for additional funding and sufficient staff to help support this monumental effort to reintroduce wolves into the Gunnison Basin.

Second, we support the four-phase approach to reintroduction included within CPW's plan, based on the minimum number of animals known to be present in the state and corresponding with the status of the species on the Colorado Threatened and Endangered Species list. As the plan states, "A phased approach provides clarity for current and future management, while still supporting the statutory requirement of managing for a self-sustaining wolf population. A phased approach allows for increased management flexibility as the wolf population increases and provides the opportunity to manage conflict throughout all phases."

More specifically, we believe the minimum animal counts and associated timelines which would initiate movement from one phase to the next are appropriate for the experimental reintroduction of a large carnivore while attempting to minimize conflict. We believe these figures are adequate for supporting the establishment of a self-sustaining population while ensuring that restoration of the species does not result in undue impacts to existing wildlife populations which Colorado pours significant time and resources annually into managing.

Lastly, we strongly support the inclusion of Phase 4 within the plan. Providing for the reclassification of gray wolves as a "game" species in Colorado — and, by extension, allowing for the possibility of future public harvest — would provide CPW a key tool in the long-term management of the species. Regulated hunting, based on the best available biological and social science data provided by game management agencies, is utilized widely in Colorado and other states as the most effective tool for avoiding the potential for overpopulation of a species. Such overabundance can threaten the well-being of other species, and, in some instances, impact human health and safety. Colorado has a long-established record of utilizing regulated hunting to manage populations of other large carnivores — including black bears and mountain lions — and we believe this incredibly effective tool should extend to the management of wolves.

We thank you for consideration of GWA's perspective.

Sincerely,

A handwritten signature in black ink, appearing to read "Cody Dyce". The signature is fluid and cursive, with the first name "Cody" being more prominent than the last name "Dyce".

Cody Dyce
President
Gunnison Wildlife Association Board of Directors