

# State of Colorado Wolf Management Plan

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## Scoping Report

Prepared for

Colorado Division of Wildlife

Prepared by

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# Introduction

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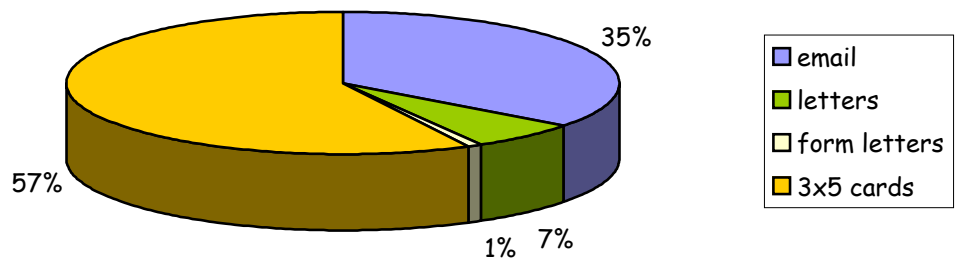
## Scoping

Scoping is the process that is used to identify the pertinent issues and frame the scope of a project such as the Wolf Management Plan. Scoping is generally separated into internal and external scoping. Internal scoping is conducted within an agency or several cooperating agencies to determine a beginning set of issues and concerns. Internal scoping is usually conducted prior to external scoping. External Scoping reaches out beyond the decision makers and agencies and attempts to clarify the issues that are high in the public conscience. This scoping report covers the external scoping efforts only. The external scoping effort included six public meetings throughout the state, as well as invitations through public information efforts for people to submit written comments. People attending the meetings were given a chance to comment orally, write their comments on 3 x 5 cards or submit comments after the meeting via mail or email. Individuals who did not attend the meetings were also able to comment via mail or email.

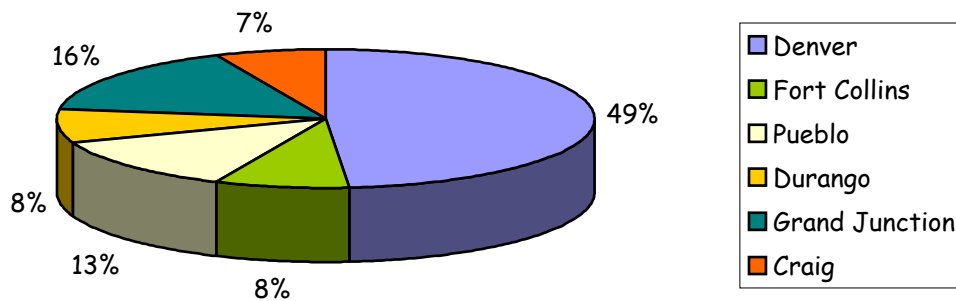
This scoping report presents the results of a content analysis completed on the comments. Content analysis is a process that identifies specific, separate statements within each submitted letter, card or email. These statements were then used to help frame the public issues for the Working Group. In this case it also identified items, possible points of conflict, misunderstandings and confusions that the Working Group should clarify.

### Content Analysis of Comments

A total of 261 comments were received during the external scoping period for this project. The majority (57 percent) of these submissions were comments written on 3x5 cards during the public meetings (Figure 1). The 3x5 comment cards were anonymous but the distribution of the numbers of comments received at each meeting shows that a majority (69 percent) of the comment cards were submitted at Front Range meetings (Figure 2).

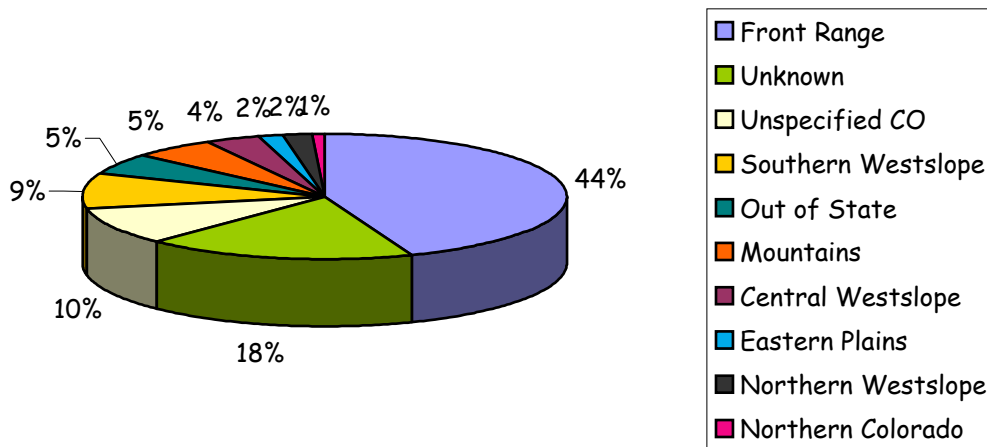


**Figure 1 - Distribution of Types of Comments**

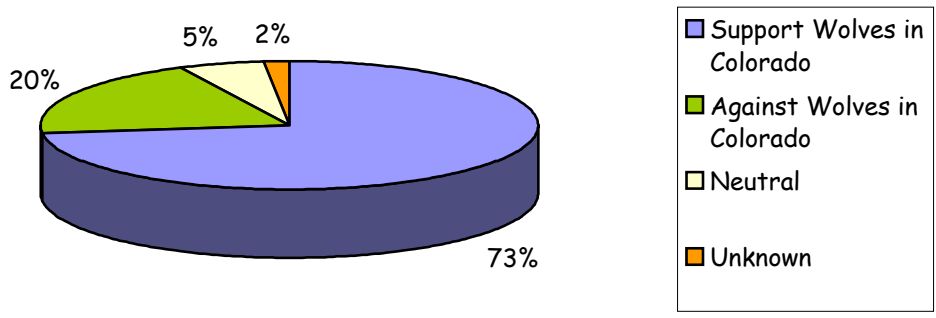


**Figure 2 - Number of 3x5 Comment Cards Received at Each Public Meeting**

A more specific geographic analysis was completed for the emails and letters because their origin could be determined. The largest percentage (44 percent) of the emails and letters came from the Front Range (Figure 3). These emails and letters were also classified as either supporting wolves in Colorado or not supporting them. The majority (73 percent) of these were categorized as supporting wolves in Colorado (Figure 4).



**Figure 3 - Geographic Distribution of Email and Letter Comments**



**Figure 4 - Categorization of Emails and Letters for Support of Wolves in Colorado**

The external scoping shows clearly that more comments were received from the Front Range, where support for wolves is high. So not surprisingly, the majority of comments received reflect a pro-wolf attitude about wolves in Colorado. However, it is important to state that the scoping process is not intended to be a voting contest, but instead a process to clarify, define the scope of, and frame the issues. The above analysis of demographics and attitudes is presented only to provide the Working Group with the proper context with which to view the results of the content analysis presented in this report.

The content analysis completed on these 261 comments has identified the following issues and sub-issues, which will form the structure of this report. The presentation of these issues in this report does not suggest to the Working Group that the issues should be grouped the same way for the Wolf Management Plan but rather is a reasonable approach for this scoping report.

## **Issues**

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In the following discussion of issues, numbers and percentages are provided to give the working group a sense of the tone of the comments and the issues important to those who responded. However, the overall process is intended be a collaborative attempt to develop a plan that considers and works with the issues that are important socially, economically and ecologically. Each issue will be first discussed in terms of the numbers and a sense of the demographics of the responses, and then in more depth into the nuances and details of these issues. The discussion also presents any misconceptions or questions that may need to be specifically answered by the working group in the Management Plan.

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## Issue 1 - Wolf Presence in Colorado

Although nearly all of the comments relate to the presence of wolves in the state, many individuals made specific comments advocating for, or speaking against, the reintroduction of wolves or the presence of wolves in the state. Of the nearly 780 individual comments, 30 percent were identified as specific to this issue. Within the larger issue of the desirability of wolf presence in the state, the comments were organized into two groups: issues concerned with the reintroduction of wolves and issues regarding the presence and population management of wolves once they are in the state, whether through migration or a reintroduction program.

### **Reintroduction**

Specific references to reintroduction made up 13 percent of the total comments. Among the letters and emails, 49 of the commentors, or nearly half, specifically addressed the issue of reintroduction. Among these respondents, 36 spoke in favor of the reintroduction of the wolf and 13 spoke in opposition. Ten of the commentors identified themselves as Sportsmen. Of these, 3 spoke in opposition to reintroduction and 1 spoke in favor. On the comments collected at the public meetings, there was only one comment, from the Durango meeting, specifically opposed to reintroduction. From the meetings, 27 comments were collected that spoke specifically in support of reintroduction, 23 from the Denver meeting, 2 from Ft. Collins and 2 from Grand Junction. It should be noted, however, that the comment cards capture only a small sense of those meetings and many individuals at the meetings spoke in favor or opposition to wolf presence in the state and these comments are not captured in these written comments. For example, there were many oral comments in the Pueblo meeting in support of wolf reintroduction and conversely many oral comments at the Craig meeting in opposition.

Within the issue of reintroduction of wolves to the state, there were many concerns and comments. Several individuals made suggestions as to appropriate sites for reintroduction including Rocky Mountain National Park, Mt. Zirkle and Flattop Wildernesses, Great Sand Dunes or the Baca Ranch area. One commentor suggested reintroducing in southwest Colorado as soon as possible. The overall sense is a desire to see wolves in suitable habitat throughout their former range, although the comment was also made that areas should be looked for where there would be a minimum of conflict with livestock. The lynx reintroduction program was also mentioned as a model for success that should be examined. Many voiced a concern that if reintroduction is proposed that an ecologically effective number must be introduced in order for the program to succeed. There also appeared to be confusion regarding the Endangered Species Act and its role in reintroduction. Several individuals indicated that should wolves be allowed to reintroduce themselves they would remain covered by the ESA. But if they were intentionally introduced they would have lesser protection.

There were several concerns or opinions voiced in opposition to reintroduction. From the Durango meeting there were several comments that the USFS recovery plan and objectives for wolves will be satisfied by the number of wolves in other states, so there is no need to bring wolves to Colorado. A concern was voiced that the species of wolf that has been introduced in other areas, and would be introduced here, is not a native species. The comment included that the native species was much smaller and less destructive to livestock and wildlife. Along this vein was a request, should reintroduction

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be proposed by the Plan, for peer reviewed research in the Management Plan that shows that the species to be reintroduced is the historically correct species.

**Migration and Subsequent Protection of Wolves**

Many individuals did not specifically advocate or oppose the reintroduction of wolves to the state, but did express opinions regarding whether wolves should be protected once here. Of the letters and emails that were received, 73 percent were identified as supporting the presence of wolves in the state, while 20 percent were opposed. Among those who support wolves in the state, many support protection and management of wolves once they arrive, but do not endorse reintroduction. Several individuals expressed their belief that polls have shown that a majority of Coloradoans support wolf presence in the state as a natural part of the ecosystem. Some asked that a vote be taken on this issue. In the Grand Junction meeting consideration was requested for the geography and population of Colorado and whether that limited the wolf presence.

Those who support wolves in the state point to a wide variety of other benefits that they perceive wolf presence would bring to Colorado. The most frequently cited benefit includes issues pertaining to ecosystem health and balance, economic benefits from tourism, a desire for restoration of the historic balance, and human values. These issues will be specifically discussed under other issues in this report.

Among the comments of those identified as opposed to wolves in the state, nearly 30 percent indicated opposition to any protection for wolves. A commenter from Las Animas County indicated that every person he called in the county was unanimously opposed to wolves in the state. As with those who support wolf presence in Colorado, there are many reasons for the opposition including fear of predation of livestock, cultural attitudes about the wolf, concern for big game herds, and the economic costs of management. These issues are discussed later as specific issues. One individual speaking at the Durango meeting felt that there are already too many factors negatively impacting the economics of ranching.

Some also indicated that although they considered themselves pro-wolf, they cannot endorse wolf presence. These individuals feel that wolves will be so harassed and persecuted that it would not be ethical to bring them into the state. One commentator felt that only if rancher's needs can be satisfactorily addressed would it be right to allow wolves into Colorado.

**Issue 1 - Wolf presence in Colorado - Points requiring clarification or consideration by the Working Group:**

- If reintroduction is proposed - there is a need for peer-reviewed research in the Management Plan showing the species to be reintroduced is historically accurate.
- The interaction of federal and state Environmental Species Acts and how reintroduction of wolves would affect the ability of the state to protect them.

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## Issue 2 - Ecosystem Issues

Ecosystem issues include those comments that pertain to the overall health of the ecosystem, the balance of predator/prey relationships between wolf and big game species and the possible effects of the wolf on other important wildlife species. These comments made up nearly 22 percent of the total comments received. Just over half of these comments discussed the effect of the presence of wolf on the ecosystem as a whole and most of the remaining comments were in regard to predator/prey relationships. A small number of comments brought up the effects of wolves on other species.

### **Ecosystem Balance and Restoration**

There were 91 comments about how the presence of the wolf would affect the overall ecosystem and balance of nature. Among these comments 56 support the wolf as a critical part of a healthy and balanced ecosystem; a piece that is currently absent and is needed to restore balance. Many of these comments mentioned the wolf as a "Keystone Species". A similar comment that was frequently expressed was the importance scientifically and ethically of restoring the balance of nature that existed prior to the eradication of the wolf. For many individuals, this is more than a need to balance predator/prey relationships but also a need to restore Colorado's wildlands to the condition that existed prior to euro-american settlement. Many of these comments were emotional and indicated a sense of wanting a place in this state for wildlands to exist and function in as natural and as historic way as feasible given modern realities. One of the comments that expresses this emotion is as follows:

*"We have made many mistakes, and have often acted as if all other species, plant or animal, have no intrinsic value beyond their utilitarian value to humans. This has proven to be wrong - wrong ecologically and wrong ethically."*

It is important to not that the above commenter also wrote:

*"I also feel it would be wrong to ignore the interests of the ranching community, as they play an important role in the maintenance of open spaces and wildlife habitat."*

Many of the comments that did hold strong, emotional feelings regarding the wolves place in the ecosystem, did also voice a willingness to consider compromise.

Several of the comments suggested that the presence of wolves could increase the biodiversity of affected ecosystems. Some of these commentors pointed to knowledge gained in Yellowstone. The impression of these individuals was that wolf presence has had a "profoundly beneficial effect" on the overall Yellowstone ecosystem. Some individuals stated that wolves have reduced populations of coyote, benefiting other predators such as hawks and bald eagles and relieved pressure on overbrowsed forests. One comment included a reference to improvement in riparian areas in Yellowstone and subsequent beneficial impacts on water resources. It should be noted that there is disagreement about the effects of wolves on big game herds in Yellowstone, as will be discussed below (under **Predator/Prey Relationships**).



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Not all of the comments about the ecosystem and balance of nature felt that the wolf's presence was a benefit. A couple of comments stated that the current predators were sufficient to keep the balance of nature. One comment also requested that the effect of livestock on the ecosystem be examined. This comment did not indicate a bias in terms of wolves in Colorado.

#### **Predator/Prey Relationships - Big Game**

There were 79 comments regarding the interactions between wolves and big game species. Although the majority of the comments indicated a belief that wolves would be beneficial to big game herds, many comments disagreed with that conclusion. The comments ranged from a belief that wolf presence would be beneficial to the population and health of big game herds to the statement that wolves would decimate wildlife populations. One frequent comment in support of the positive effect of wolves on big game stated that wolves are needed to provide population control of big game herds and would keep the natural balance in check. It is evident that the perception of these individuals is that big game populations are not being controlled by hunting or other predators and that the herds are too large to be maintained. One individual specifically stated that hunting has not proven effective as population control of elk.

Over half of the comments about predator/prey relationships stated that wolf presence would improve the health of big game herds. Reducing disease of elk herds was frequently cited. Many of the comments also stated that wolves remove the sick and the weak. Some added to this comment that hunters typically take the strongest. There also is the impression that wolves may control Chronic Wasting Disease (CWD). This however, was not stated as fact by any of the commentors. One individual questioned a response to the issue of CWD, a Colorado Division of Wildlife (CDOW) spokesman mentioned that wolves may act as vector agent for CWD. One commentor questioned this statement and in their written comment requested sources for that information.

Many of the comments disagreed directly with the above statements. The impression of these individuals is that big game, and particularly mule deer, are too pressured already. Some of the comments include "Big game already have too many pressures on them to sustain wolf predation", and "mule deer herds are in trouble and don't need more pressure". A concern was stated that wildlife herds would be decimated. There was also disagreement with the conclusion that wolves have been a benefit to the elk herds of Yellowstone. As in the previous comment, a belief was expressed that wolves have decimated the wildlife herds in Yellowstone. One individual stated that many hunting guides in Yellowstone have lost 1/3 to 1/2 of their clientele because of wolf predation on big game. The Colorado Trappers Association stated that in 1997 the Yellowstone elk herd was 19,500 and has been reduced to 7,300 today with an average cow age of 15 years, and 60 percent of all wolf kills being calves. No references were given for these numbers. One speaker at the Grand Junction meeting expressed a belief that big game recruitment numbers are down.

One comment, from an individual who generally supported wolf presence in Colorado was that wolves are opportunists like any predator and that the idea that they take mainly the sick and the weak is a myth perpetuated by Disney.

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### **Effects on Other Species**

There were concerns about the wolf's impact on other wildlife species. Several individuals questioned whether the wolf would impact sage grouse which may not be able to withstand more pressure. A couple of individuals would like information on the effect of wolves on coyote populations. Those individuals indicated wolves would be a positive presence for control of coyote. A final concern was whether the presence of wolves would adversely affect lynx recovery.

### **Issue 2 - Ecosystem Balance - Points requiring clarification or consideration by the Working Group:**

- Is there scientific basis for the sense that predator/prey relationships are currently not in balance, what does the research say about this issue?
- What has been the effect of wolf reintroduction on the overall ecosystem, and specifically the big game herds, of Yellowstone?
- Are the big game herds in Colorado too large to be sustained or are they under pressure and in trouble?
- What is the scientific research regarding the wolves impact on the overall health of big game herds? Do they really primarily take the sick and weak?
- Would wolves benefit the health of big game herds?
- What does the current research say about CWD and wolf predation? Is there a source for the possibility that wolves are vector agents?
- Would wolves be a concern for the viability of sage grouse or tip the scale to listing as a TES species, in areas where not already listed?
- Would wolves affect the recovery efforts for lynx?
- How would wolves impact the population of coyotes?
- Is there scientific research that documents the downstream effects of wolves on overall biodiversity?

### **Issue 3 - Livestock Interests**

There were 100 comments that pertained to livestock interests including discussions of compensation funds, livestock operations and views of wolf predation on livestock. A total of 63 percent of these comments discussed compensation. As with other issues there are areas of sharp disagreement that will require clarification by the Working Group.

#### **Predation**

There were 15 individual comments about predation of livestock by wolves. Several indicated a feeling that wolves will indiscriminately kill livestock or wildlife. Others expressed frustration or fear that the interests of livestock producers will be pushed aside. One commentor from the westslope stated:

*"We attended the wolf management meeting in Craig, Colorado and it was good we got to vent our anger over not being able to protect our livestock*

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*from the invasion of wolves. What is supposed to happen with them according to the book does not happen in reality.*

This individual went on to provide management ideas for a Colorado plan that included wolf management and compensation that she felt would make the plan palatable to livestock interests and satisfy groups such as SINAPU. These suggestions are incorporated into those discussions. Some of the comment cards from the Grand Junction meeting also expressed a concern about harassment and grazing allotments:

*"The presence of wolves could affect the suitability of grazing allotments for livestock - Once repeatedly harassed, the animals may refuse to stay on the allotment."*

Although there are few written comments expressing concern about predation on livestock, it was evident from the meeting notes and the numbers of written comments about compensation that this is a very important issue to livestock producers. At the Pueblo meeting, one older rancher got up and stated very simply and emotionally, "Please, don't forget about us."

On the other side of the predation issue are statements that wolf predation of livestock is actually very low, resulting in only a small percentage loss of livestock. One individual cited statistics from Montana's Agricultural Statistic Service that a conservative estimate of wolf predation on sheep was less than 1/5 of 1 percent of the sheep in Montana. Some compared the percentage of "problem wolves" killed to the percentage loss of livestock to wolves in Idaho, Wyoming and Montana. The numbers cited were approximately 8 percent of the total wolf population were killed, but less than 1 in 10,000 head of livestock were lost to wolf predation (From the 2003 Rocky Mountain Wolf Recovery Annual Report). A request was also made that any comments regarding wolf predation or harassment of livestock be backed up with scientific data or rejected by the Working Group.

#### **Compensation**

Compensation was the most frequently discussed element of the livestock issues. Although there was sharp disagreement regarding the impact of predation on livestock producers, there was general agreement that a compensation fund was a necessary element of any Management Plan. There were no comments that stated that there should not be any kind of compensation, although some suggested that the added costs of the management plan, compensation and other wolf management would be more than the presence of wolves would be worth. There was also some disagreement as to limitations and what would be compensated. There were also many comments regarding the use of public lands and the need for ranchers to accept the consequences of wolf predation on these lands by paying for damages. Although not expressly about the compensation program, it could be inferred from these comments that some individuals believe compensation should not be given for predation on public lands. This issue is discussed in detail under *Issue 6 - Public Policy*.

Half of the remarks about compensation specifically stated that the Management Plan should institute a compensation program. A few of these however, wanted to limit compensation to ranchers who practice "wise livestock management." Several individuals indicated that they would be will to pay extra taxes to fund a compensation program. A

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couple suggested the Working Group look into a way to put a checkoff box on the State Tax return to fund the program. Funding of the program is a concern, particularly in regard for a need for sufficient wildlife officers to confirm the kills expeditiously (important for proper identification).

One individual who advocated for wolves in Colorado stated that compensation programs should be at the fore of the Management Plan discussions. This person felt that an accepted compensation plan is the best way to implement a viable management or possible reintroduction plan. A rancher's email and comments collected at the Denver, Grand Junction and Craig meetings felt that, in order for a Management Plan to succeed and be accepted, the affected businesses must be protected. According to these individuals, any management plan must give maximum compensation and be liberal in determining wolf kills. This stance stems from a feeling among ranchers, expressed orally at meetings and in written comments, that most compensation programs are inadequate and not flexible enough to consider true value of a killed animal. There is concern that the proof of a wolf kill is sometimes difficult due to decomposition, while other carcasses will never be found. A couple of stated that a State Compensation program would be necessary because the reports from other states are that the DNR (WY Department of Natural Resources?) denies claims and are too slow to reimburse. To many ranchers this is unacceptable. Oral comments at meetings also indicated a concern about loss of breeding stock and flexibility in valuing a lost animal, depending on factors affecting the true value of that animal to the herd and business. One wolf advocate stated she did not feel that a comment from the Cattleman's Association regarding loss of breeding stock had been adequately addressed and asked for clarification. Finally, while Defenders of Wildlife was frequently cited as a source of funding for a compensation program, concerns were expressed that it lasts only a defined amount of time possibly until the wolf isn't endangered anymore.

A couple questioned whether there would be compensation for horses and pets. There was also a question as to whether there would be any kind of compensation if critical wolf habitat were to be established on public grazing lands.

Some individuals, although expressing support for the concept of a compensation program, did have reservations and disagree with the common knowledge of many ranchers that existing compensation programs are inadequate. It is stated that research shows that compensation programs are more than adequate. No references to that research were given. Several individuals stated that the Working Group should be cautious in the development of any "programs that allow monetary incentives to livestock owners for losses." These believe that although compensation may be necessary, such a program is potentially subject to abuse. Finally, a couple of commentors felt that it would be inappropriate to develop a compensation plan that rewards poor animal husbandry. It is likely that these commentors are referring to operational strategies that, in the view of the commentors, could be used by ranchers to avoid or minimize predation (discussed below).

#### **Operational Strategies**

Many suggested that the Management Plan should include education and assistance to ranchers for operational changes that could help avoid attacks and minimize conflicts. Numerous others provided specific ideas for operational strategies that could reduce wolf

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predation. For many of these individuals, operational changes are a way to reduce predation in a non-lethal way, a value that is important to this group. Specific suggestions include:

- Provide access to guard dogs to protect livestock (“Kuvasz”).
- Investigate the use of aversion techniques (taste aversion in particular, references are included in the appendix).
- Work to increase “hands on” husbandry, such as physically monitoring herds by horseback rather than letting them on allotments unattended.
- Use tax payers dollars to monitor wolf packs, providing a warning system and to help ranchers institute new management techniques.
- Raise hardier and larger species.
- Ranchers could convert some or all of their herds to feedlot sized operations. The cost to modify their operation could be offset by trading grazing rights for conservation easements or selling portion of land to state.

It should be noted that none of these comments were submitted by individuals who are themselves ranchers. However, at the Ft. Collins meeting, oral comments from livestock people indicated a desire for radio collars for tracking and warning. Three conservation organizations were included in this group. None of these comments cited any statistics on the effectiveness of these measures, which may be necessary to gain acceptability among the ranching public. However, one commentor did provide a reference to personal communication with a rancher who had implemented some of these strategies. His testimony was as follows:

*“I contacted a friend who is a ranch consultant and manages a ranch on Montana’s Sun River . . . He sent me a note outlining what they had done during 2003, in which they had no losses to wolves.*

*First, [he] obtained a radio receiver so that if a wolf was present, they would know of it, providing the wolf was collared. He raised only cattle that were large at maturity. The larger the animal, the less likely that a wolf would attack an adult animal. They bunched the herd at night to prevent strays from being attacked. They had drovers with the herd 24-7. He had radio alarm guard boxes to warn of approaching wolves at night. His crew harassed any wolf they observed stalking the herd. They attempted and succeeded in instilling a fear of humans into the local pack. . . . The key to this is 24 hour human presence with the herd.”*

One commentor did provide references for taste aversion programs for coyotes (references). Finally, one commentor felt that it may be possible to use some creative thinking and innovative tools that have not been used effectively in the Northern Rockies. One of the concepts is “grass banking”. It is described as follows:

*“As part of their planning process, the Forest Service and BLM could identify grazing allotments that are not currently leased but are in good enough condition that they can be grazed for at least one season. These “banked” allotments could be offered to livestock operators who would be likely to*

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*encounter wolf conflicts on their regular allotment, such as in areas where wolves are denning. There could be various incentives for operators to accept (or elect) such a temporary change.”*

There were no comments from livestock producers which specifically mentioned these types of strategies.

**Issue 3 – Livestock Interests – Points requiring clarification or consideration by the Working Group:**

- Predation is an issue that needs clarification. What are the factual experiences of livestock producers who live among wolves. The concern among many ranchers seems to be that there are many more lost animals than the cited statistics suggest. What does the research say about this issue?
- Are wolves tagged as “problem” wolves without substantial evidence that it is true?
- How are compensation programs set up in other areas of wolf recovery? Do all the other wolf plans include a compensation program?
- There is skepticism among the ranching community regarding the adequacy and responsiveness of compensation plans. What are the factual experiences of livestock producers with programs offered by Defenders of Wildlife, or with State funded programs?
- Is it possible to have a compensation plan that provides flexibility in valuing a lost animal to account for breeding stock or other values? Do other compensation plans do this?
- Have compensation programs in other areas been abused by livestock producers making false or exaggerated claims? If so, how would a compensation program, if established, guard against abuse?
- Would any limitations be placed on compensation awards if it is evident that the livestock producer did not make use of operational strategies (with documented effectiveness) to minimize wolf predation?
- Would a compensation fund include money to provide monetary assistance to livestock producers who are interested in making operational changes to minimize wolf predation?
- If critical wolf habitat is established on public grazing allotments, would any accommodation be given to a livestock producer?
- The Working Group could consider a demonstration pilot program or an incentive program to examine and demonstrate the effectiveness of the suggested operational strategies.
- Use of public lands and compensation for predation on these lands may be an issue that should be discussed by the Working Group.

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## Issue 4 - Human Risk

Only three individuals mentioned a concern to human life from wolf presence in Colorado. However, their concern for the safety of “hikers, campers, and children in mountain communities” is a point that the Working Group may need to clarify. One of the mentioned that he might like to see wolves back in Colorado but that campers would have to worry about a wolf attack. Another made reference to the pack mentality of the wolves and how they will surround and attack an individual. Two of the individuals referenced attacks in the late 1800s before wolves were extirpated. In the Durango meeting, there was a statement that not all problems are economic and that potential attacks are an emotional issue.

*“I have researched wolf attacks on the internet and find that there were instances of such attacks in Colorado in the late 1800s when wolves were roaming Colorado. The attacks involved both individual wolves and wolf packs. I am already worried about the increased threat to hikers and campers from a larger, more dangerous aggressive mountain lion population, and I worry that an infusion of wolves will add to the danger of hiking and camping.”*

Although there weren’t any specific references to this issue from pro-wolf advocates, many of their comments did reference fears about wolves being a part of myth.

### **Issue 4 - Human Risk - Points requiring clarification or consideration by the Working Group:**

- Consider providing a discussion of the history of wolves in the region and the risk to humans. As part of this discussion address the concern of the “pack mentality” of wolves and how that affects humans in back country areas.

## Issue 5 - Public Policy

Policy issues include issues or concerns regarding the roles of various governmental agencies, rules, regulations or policies that the Working Group must accommodate, use of public lands and issues that could require action on the part of policy makers, to effectively change. There were 54 comments about policy issues, almost half of which concerned the use of public lands. Nearly a quarter of these comments were concerned with the two Distinct Populations, separated by I-70. Other concerns included the roles in various governmental agencies in the process and ultimate management of wolves, policy regarding wolf/dog hybrids and policy regarding the taking of wolves.

### **Use of Public Lands**

All of the written comments regarding the use of public lands were submitted by wolf advocates. Therefore, the discussion of this issue lacks the perspective of the livestock producers, except for some of the notes from public meetings. Probably the most basic viewpoint presented is one that was also heard frequently in the public meetings: that is “We need to remember, we are discussing public lands - they don’t belong to the ranchers.” Another group of comments expressed a frustration that the livestock producers profit from public lands and are essentially subsidized by the government. References were made not only to profits from use of public lands for grazing, but also

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profits from leasing public lands for guided hunts and selling permits to hunt and fish (Ranching for Wildlife Program). It is the sense of these that livestock producers make good profits off of public lands and yet expect the state to pay them for wildlife damage that occurs on these lands. This attitude was expressed succinctly by one commentor:

*"As far as ranchers are concerned, they don't have to use public lands to graze their cattle. If they chose to do so, then they must be willing to accept the consequences."*

Another commentor stated:

*"The public lands and wilderness areas belong to all of us. If a livestock producer is going to use our lands to graze his product on them he/she must accept the fact that those lands are there for all animals and if he/she suffers predatory losses, then that is the price one must pay for using these areas. Turning your cattle loose in a wild area unattended is like an owner of a 7-11 opening his store and then leaving it and expecting everyone that enters to leave their money in the cash register."*

A sense in many of the comments was that wolf predation is a cost of doing business and although ranchers have avoided it for the past century, that doesn't mean that it isn't a fair cost that they have to accommodate. There is also an attitude that ranchers have been subsidized by public policy and have had too much influence on USFS and DOW policies regarding wildlife (and particularly wolves) in the West. One comment was submitted that stated that the BLM and USFS spend \$466 million annually to maintain public land that is destroyed by livestock (no reference). This individual asked that the costs of wolf management be weighed against the cost of livestock management. The role and perceived antiwolf bias of the Wildlife Commission was also brought up at public meetings as a concern.

Some of the oral comments from livestock producers at the public meetings did acknowledge their understanding of how many in the public perceive them and their use of public lands. However, the point was made that often big game herds use private lands for winter habitat and therefore, the rancher is providing a public benefit. They also mentioned the economic need and desire of the public to have affordable meat and said they are not getting rich from public policies.

Some of the commentors provided suggestions for management of predation on public lands and indicated that public policy should recognize rancher concerns but without necessarily weighting the problem towards the wolf. Three individuals suggested that predatory wolf kills should be allowed on public grazing allotments. The suggestion was also made perhaps harder species of livestock should be allowed on public lands to reduce predation. One of the comments relative to public land was:

*"Colorado is part of the gray wolf's original habitat. Wolves belong in Colorado. As wolves arrive . . . they should take precedence over cattle on public lands. If a problem exists between the two, management of cattle should be changed, wolves should not be removed."*



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### **Distinct Populations**

Twelve comments were submitted regarding the division at I-70 for wolf management with the Western Distinct Population Segment (DPS) to the north and the Southern DPS to the south of that boundary. There is much concern as to how the state will maintain two different management strategies, especially given that the Western DPS is likely to be delisted and the Southern population is likely to fall under the ESA for some time. This was a concern at the public meetings as well. Many of the written comments came from cards at the Grand Junction meeting and meeting notes also reflected the concern. This is understandable since Grand Junction sits on the border. It was also discussed at length in Craig. Many of the oral comments reflected confusion as to why I-70 was chosen as a border and wanted clarification as to the scientific rationale.

Finally, the suggestion was made that there should be two Working Groups, one for the southern segment and one for the northern segment. There were also oral comments that maybe a management plan for the south is not necessary because the federal government will control management until the Mexican wolf is delisted.

### **Roles of Governmental Agencies**

Comments regarding reintroduction of the wolf reveal a confusion as to what roles the federal government versus the state play under different sets of circumstances. Some individuals, when discussing reintroduction, seemed to believe that if wolves were to be reintroduced by the state into Southern Colorado, the state could assume more authority in the management of the wolves. These individuals believed that reintroduction could therefore benefit livestock producers who live south of the boundary. Other comments stated that a management plan in the southern DPS is unnecessary when Colorado has no authority anyway.

There was also confusion in the comments as to how the wolf would be delisted. It was often unclear as to whether the comments were in regard to the northern part of the state or southern. Some individuals seemed to believe that if the State of Colorado supported a certain number of wolves, delisting would occur more quickly. That comment seemed to be directed at the northern half of the state.

There was also a question as to what role the USFS and USFWS would play once wolves are in Colorado. The impression of this comment is that even if Colorado develops a plan, the USFS will dictate and supercede state control on federal lands. One commentator stated that the CDOW is in error in stating that Colorado will have control, particularly in special areas such as National Parks, where the Federal government has exclusive jurisdiction and would maintain management authority within its borders.

There was also concern that wolf management would be at the expense of other CDOW projects. One commentator suggested that it is possible that money from sportsmen would be used to shift personnel away from management of other wildlife. Others made the point that the CDOW is supposed to be managing wildlife, not managing hunting, fishing and livestock concerns.

### **Other Policy Issues**

Several individuals expressed concerns about the potential for wolf/dog hybrids. All of these comments were collected on cards at the public meetings. Three individuals

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wanted to know if the hybrids would also be protected. Several asked for a zero tolerance policy for hybrids and requested that the Management Plan include penalties for wolf/dog hybrid owners who release their pets once they can no longer manage them.

The taking of wolves was brought forward by several individuals. One comment was that ranchers should be exempt from penalties for the accidental taking of wolves. Another requested that the wolf bounty be removed in Colorado, which in their view, implicitly encourages taking. One individual strongly supported strict enforcement of all taking laws.

Finally, a couple of commentors felt that the hunting regulations and limitations for elk are part of the problem. The sense is that if hunting regulations were more lenient, hunters could do a better job managing elk populations without the wolf.

**Issue 5 – Public Policy – Points requiring clarification or consideration by the Working Group:**

- Consider providing a discussion about the costs and benefits to the public of the use of public lands for livestock production.
- Consider whether compensation would be given for wolf predation on public lands. Do the Defenders of Wildlife compensate on public and private lands?
- Would wolf control by ranchers protecting their herds be different on private and public lands? (See Issue 6 – Wolf Management for further discussion of wolf control).
- Clarify for the public the rationale for the decision regarding the I-70 boundary for the two wolf population segments.
- Clarify the interactions between the Federal role in the ESA, the state's role should the state designate the wolf as a T&E species, the authority of the USFS, USFWS and the jurisdiction in areas such as Rocky Mountain National Park.
- Given the above, clarify how reintroduction into the southern segment would affect the ability and flexibility of the state to manage the wolf.
- Is there a concern or have there been problems with wolf/dog hybrids in other areas of wolf recovery? Is there likely to be a problem in Colorado. How would these animals be managed?

**Issue 6 – Management of Wolves Once in Colorado**

This issue assumes that there is resolution to the issue of whether wolves will be in the State, whether by reintroduction or simply migration. There are very strong opinions as to how wolves should be managed once here, from absolutely no regulation (allow to be shot on sight) to total protection under every situation with the exception of defense of life. There are three main areas of discussion under this issue including the status that the wolf would be given under state law, the sustainability of a wolf population (which goes to the heart of population control), and what types of control measures would be allowed.

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## Status

The range of views on this issue cross the spectrum with some individuals advocating for permanent federal protection, to some stating a status of no more than Threatened, to a request that wolves be classified as large predators with a full hunting season and bag limits. By the tone and wording of some comments it is evident that some individuals would like to see the wolf classified as a Pest, although they don't speak directly to the issue of status. However, many of the individuals who suggested that the status be as a large predator, did not completely object to wolf presence. One commentor suggested that population numbers should be established that are realistic for Colorado's human population, and once those numbers have been achieved, then establish a hunting season. The comment was made that an orderly hunting season would discourage poaching.

Several individuals would like to see wolves listed as endangered by the state, although many of those did add "until a viable population is established." One commenter said that "Pest or Predator" status should never be an option. Most of them did seem to be willing to consider a status for wolves that would provide the ability to institute wolf control measures. Several suggested wolves could have experimental non-essential status and noted that this has worked as a compromise in other places.

Wyoming's plan was frequently cited as a mistake in proposed wolf management. One sportsman stated that Wyoming had catered to the views of a vocal minority, in disregard to the recommendations of its own group charged with making recommendations, in their decision to designate the wolf as a predator. Many asked that the Working Group be careful in their decisions not to make the same mistakes.

## Sustainability

One of the biggest concerns of the group of about this issue is that once wolves are in the state, that it is essential that their population be allowed to grow to an ecologically effective and sustainable number. Some of these individuals also asserted that scientific studies have established that Colorado has the habitat to support a self-sustaining population of wolves. One of these states these views as follows:

*"We firmly believe that science will support . . . the availability of natural resources in Colorado to support a self-sustaining, ecologically functional wolf population in Colorado"*

*"An ecologically effective population of wolves is critical to the success of any management plan. By ecologically effective we mean large enough numbers and distribution throughout suitable habitat across the state so that wolves fulfill their ecological role as predators and regulators of ungulates. A population goal that represents only minimum numbers for mere survival of the species is not adequate."*

Others recommended that a maximum number of wolves for the state be established. One individual asked that the Management Plan establish a number for a healthy population of wolves in the state.

Some individuals expressed concern that wolf population numbers need to be realistic given the ever growing population of the state. One commentor was concerned that

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specific wolf population numbers could limit development and therefore economic growth.

Finally, in order to sustain a wolf population, there is a concern that critical habitats and corridors would need to be protected or possibly even restored. The suggestion was made that the plan establish strong biological corridors and habitat plans. Another suggestion was to work with the CDOT and home builders to facilitate travel corridors.

#### **Wolf Control**

The wolf control issue appears to be one of the more polarizing issues, similar to reintroduction and presence in the state. This issue is related to, and overlaps, *Issue 3 - Livestock Predation*, which was previously discussed. However, in this discussion the control of wolves is discussed more broadly and is not specific to predation on livestock.

Among those who resist any wolf control measures are ardent pro-wolf advocates who strongly believe that in order for wolves to take their place in the ecosystem, wolf control measures except under extreme circumstance are inappropriate and an artificial imposition of management on their populations. These individuals believe that wolf populations will be managed through natural means. It should be noted that among those commenting on the issue of wolf control, those who advocate almost no ability to control wolves are a minority (less than 20 percent). There are also several individuals who believe wolves should only be killed if they are known to kill or in the act of killing. Although some of these individuals limit these comments to until a viable population is established.

Among those who advocate some control measures, particularly once viable populations have been established, are individuals from a wide variety of interests. These include advocates for wolves in Colorado. Some of these individuals believe that wolf control is necessary to protect other wildlife as well as themselves from ultimate starvation. Flexibility in the plan was mentioned by several individuals. It was suggested that the Management Plan should provide contingencies for wolf management should local game populations be depleted, or should wolf populations suddenly explode. Also as populations grow, it was suggested that hunters be allowed to take wolves that wander outside of core areas. Having flexibility in the plan regionally was also suggested. Wolves in areas of over abundance of elk herds could possibly be allowed to thrive until elk populations moderate.

One individual, who does not support wolves in the state, suggested that wolves moving into the state be trapped (although the practice is currently banned) and transplanted into state with wolf recovery plans. Several individuals state that if wolves are allowed into the state, people should be legally and fully protect themselves, their property, their pets and their livestock.

Some specific wolf control measures were proposed. Radio collaring was mentioned with completely opposite conclusions. One conclusion is that radio collaring allows wolves to be tracked and can be used to provide warning to ranchers. The opposite conclusion is that radio collaring has been used to track and kill wolves. Several advocated for non-lethal control measures only. One commenter requested that depredating wolves on livestock be given a 2<sup>nd</sup> chance at the minimum and that the extermination of a wolf or

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pack be a last resort. One wolf advocate did note that in cases of substantial and frequent impact on a herd, a wolf or pack may need to be removed or killed. One livestock producer noted that removal of a wolf or pack to another location is unacceptable because once wolves have become disassociated with natural prey they become dangerous.

One important note is that in some of the comments and many of the oral statements was a desire and request to work together to come to a compromise on these issues. One commentor made the observation that pro-wolf zealotry pushes the anti-wolf public into their own extremes and intimidates public officials, who possibly would support wolf recovery, to avoid the issue. He provides his observations in the following statement as to his perception of problems with reintroducing wolves and cultural attitudes stemming from the pro-wolf advocates:

*“The same cultural attitudes that fostered wolf recovery also encourage an extreme degree of wolf protectionism. Those of us professionally involved with wolf recovery have traditionally been maligned by antiwolf people (Haubner, 1990). Now we are vilified by many wolf lovers as wolf enemies because of our acknowledgement that wolves often require control.”*

He continues to provide observation regarding disagreements that are worsened by the stance individuals take on these issues. He discusses his perception of the resistance to wolf control by much of the pro-wolf public as follows:

*“Some people revere wolves so much that, rather than having wolves face control, these people would rather not restore wolves to areas where they would have to be controlled. Because wolves will probably have to be controlled almost everywhere they are restored, this sentiment translates into political pressure against wolf recovery. Second the anti-wolf public, such as some livestock owners and organizations, intensify their anti-wolf attitudes in reaction to the extremism of the other side. . . . If wolf advocates could accept effective control, wolves could live in far more places.”*

Finally, the suggestion was made in the Grand Junction meeting that a flexible plan that allows adaptive management, with ongoing monitoring and plan review at three year intervals, be considered.

**Issue 6 – Wolf Management – Points requiring clarification or consideration by the Working Group:**

- What are the range of status considerations and the impact on management options for each type of status?
- Has the science been established that Colorado has appropriate lands for a sustainable population of wolves?
- Has wolf presence limited population growth in areas of wolf recovery?
- Have critical habitats and travel corridors been mapped for wolves?
- Has wolf control been necessary in other States with wolf populations?

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- What is the current research on the effectiveness and use of radio collaring of wolves?

## Issue 7 – Economics

The majority of comments regarding the economics of wolves in the state were in regard to the impact wolves would have on the tourist industry. Over half of the comments on this issue requested that the Working Group consider the economic benefit that wolves would provide as a tourist attraction. It was frequently mentioned that wolves have become a 10 million dollar industry in Wyoming. No references were given for these figures. It is perceived that the effect of the wolf in the Northern Rockies has been low predation and high tourism. There was also a suggestion that Alaska's policies regarding killing wolves has resulted in tourist boycotts. The economic effect of that boycott was not given.

Many pointed to other economic benefits in addition to tourism. One commentor provided their observation that:

*“the economic future of the region depends heavily on tourism, outdoor recreation, and “lifestyle” migrants. Wolves are an attraction for these groups and are a net positive economic force.”*

A request was also made to the Working Group to examine the economic issue in a broader scope. The impression of these was that wolves would reduce costs for regulation of herbivores, and in turn, for riparian recovery projects. The wolves were cited as a possible benefit to the hunting industry. Diseased herds could result in a reduction in the number of hunting permits issued. This commentor believes wolves would improve the health of the herds, ensuring hunting levels can continue.

Not all of the comments were positive in terms of the affect of wolves on the economic health of the state. One commentor requested a balanced study by the Working Group that presented costs and benefits to the state for wolf presence. Another commentor is concerned that wolf presence would limit or restrict population growth.

### **Issue 7 – Economics – Points requiring clarification or consideration by the Working Group:**

- Clarify statistics regarding tourism in areas of wolf recovery.
- Provide a discussion of wolf presence and the economic and physical growth of human populations in Colorado.

## Issue 8 – Development of a Management Plan

Over 20 percent of them had specific endorsements or recommendations for a Management Plan. There were many groups of comments including attitudes about the development of a plan, comments on the Working Group composition, a desire for education to be a strong component of the plan, specific requests for content and recommendations for administration.

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### **Attitudes about the Plan Development**

There were 43 comments that revealed attitudes about the development of a management plan. Over half spoke in strong support of the concept behind the plan and the collaborative process. These comments expressed a desire to see the CDOW, livestock producers and environmentalists work together to find a fair compromise between concern of ranchers/protection of herds and protection of wolves. One individual stated a belief that "Conflicts and misunderstandings between ranchers and conservationists must be addressed before a serious plan is submitted." One commentor cautioned that the process should not be rushed and that there is too much work to be done within the proposed deadlines. There was also a request to clarify where the money would come from to fund the plan and its implementation.

Approximately 20 percent of these comments expressed opposition to the development of the plan. Several respondents did not feel that these types of management plans were worth the money and that too much money has been spent on the lynx program. Several others expressed the view that first public money would be spent on the plan, then on the implementation and possible costs of reintroduction, and then on a compensation fund to mitigate losses of livestock to predation. In their view, this would be a complete waste of public money. A couple expressed reservations about the high cost and the length of time it would take to implement any proposed plan.

### **Working Group**

A total of 13 comments were received that were specific to the composition of the working group. Half of these were a request to include a member of the tourist industry on the working group. On the flip side were several individuals who felt that the agricultural and livestock industries did not have adequate representation. Several others requested a working group that represented all interests in balance. Others would like to see a group that represents the population of Colorado and not be over-weighted by ranchers, agricultural interests and sportsmen. It is obvious from these comments that balance and fair representation depend highly on where the individual is coming from.

### **Education**

There were 34 comments about education. Nearly all advocating a strong public education program both as the plan is developed and as part of the implementation recommendations given by the plan. There is a strong belief that increased public education will help build support for the plan. It was also suggested that often kids are the target of educational programs, and that in this case the adults should be equally important. Many individuals believe that education should include school groups and interpretive exhibits. One commentor suggested that the Working Group lay out a public relations plan. Finally, one individual suggested that a public educational meeting be held prior to finalization of the plan.

One interesting implicit suggestion of many of the comments pushing for education was the subtle belief that if individuals on the opposing side of the issues were just more educated about the facts, they would come to the same conclusion. This is particularly true in suggestions for a need to educate ranchers about operational strategies and wolf behavior. One of the comments had the following statement, which does reflect an attitude among some pro-wolf constituents:

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*“Try to be respectful of the livestock comments. Most are not educated about wolf behavior. They also perceive that the wolf is a threat to their livelihood. It is our task to help them to understand the wolf and how to minimize depredation.”*

Another commentor made the statement that “When given a choice, enlightened citizens have voted overwhelmingly for the wolf.”

These attitudes may push those concerned about wolf presence and the impact on their livelihoods further away from the collaborative process. One individual expressed the belief that the front range environmental people don’t understand the real wildlife issues. An individual from the Denver meeting made a point of stating that education was needed on both sides of the issues to make more informed and better choices.

#### **Management Plan Content**

Many individuals had requests for specific components that should be part of the Management Plan. The most frequently requested consideration is that the plan rely on sound science for all issues. It was also frequently requested that the plan embrace sound progressive ecological and economic reasoning. Many of these issues have been discussed elsewhere in the document. However, the requests are also presented here to the Working Group for consideration.

- Suggests that a proposed plan from FWS could serve as a model for Colorado, except give the state more autonomy.
- Management plan should rely on most current peer reviewed science for all issues.
- Use lessons learned in Yellowstone, and current wolf researchers in Yellowstone, to help guide process.
- Working group should use biologists who specialize in deer, elk, cougar, and other animals that could be affected by wolf presence.
- Management Plan should provide an appendix that summarizes recent experiences and lessons learned in other areas of wolf recovery.
- Working Group should make recommendations about the kinds of research that will be needed and consider how those studies will be funded.
- Management Plan should address the integral part wolves play in a healthy ecosystem as well as their effects on other wildlife
- Management Plan statements and positions on predation of big game and livestock must be backed up with sound scientific data and research
- Management Plan should establish protocols for documenting wolf predation on livestock
- Management plan should provide guidelines for disposition of carcasses to prevent wolf predation
- Management Plan should specify the criteria used to measure predation impacts and recovery goals
- Management Plan should make recommendations for funding sources including for compensation fund and management



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- Management program needs to include funds to prosecute illegal taking of wolves and for inspection of depredation
  - Management Plan should include adequate mapping of public/private land and potential spots of conflict
  - Management Plan should examine the socioeconomic impacts to communities, livestock industry, big game hunting and other T&E species
  - Management plan should provide exhaustive list of benefits and costs of having a wolf population
  - Plan could channel a portion of wolf related tourist revenues back to compensation/operational fund
  - Management plan should clearly discuss the perceived risk of wolves to humans
  - Disney is not a scientific study, they are the ones who stated that predators kill the weak, predators are opportunists - bring balance and reason to the issues

## Attitudes and Perceptions

Many comments were made that reveal the attitudes that different groups have towards the process and towards each other. Many of the attitudes go to the heart of individuals' traditions and belief systems, making the viewpoints deeply emotional. It may be helpful to understand these attitudes in order to work toward common solutions.

On the side of those opposed to wolf presence or advocating strict controls, there is a sense that the "pro-wolf, front range environmentalists" don't understand the real livestock and wildlife issues that those living on the land deal with everyday. There is the sense that those who are living in urban communities can safely advocate, as they don't have to deal with the realities of wolves in their backyard. One comment was that "If areas that don't want wolves are advocated to accept them, the all counties of the state should get an equal number." There is also a sense of loss of the traditions of the west that some individuals learned from their parents and grandparents. One individual spoke of his grandfather being responsible for exterminating the wolf. He believed he was doing a good thing for society. What does bringing the wolf back say about his grandparents' life's work?

On the side of the wolf advocates, there is a sense that those opposed to wolves in the state have undue influence on the policies. Some mentioned that they did believe "the ranching community should be fairly considered but not given overly biased influence. There was also a comment that just because a person lives in the city does not mean that that person does not understand "real" wildlife and livestock issues. For many of the advocates for wolf control there is a belief that wolves are good for the human spirit and that "the elimination of an entire species to accommodate one interest is ecologically, economically and ethically wrong."

Obviously, the issue of wolves in Colorado is highly polarizing and deeply emotional. However, many individuals spoke about a need to listen and compromise. The degree of the support for the Management Plan and expressions of a desire for compromise

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reflected this attitude as well. One commentor requested that the working group be respectful and sensitive to the nuances of the issues. Another suggested that the Working Group find incentives for people on both sides to abandon extreme positions on the issue. There is also a sense in the comments that education is key, and that if Side 1 could just be educated as well as Side 2 that Side 1 would logically agree with Side 2. Finally, a commentor, perhaps seeing this tendency, gives this advice

*"There is too much emphasis on the differences between ranchers and environmentalists, too much sarcasm, which make the divisions greater - we need to find common ground."*