



August 18, 2021

Keystone Facilitation
Att: Julie Shapiro
1628 Saints John Road
Keystone, CO 80435

Re: Gray Wolf Stakeholder Meeting

Dear Julie:

The Organizations deeply appreciate Keystone's development of a mechanism for written public comment and targeted meetings throughout the State to facilitate recreational user input on the reintroduction of Gray Wolves in Colorado pursuant to Proposition 114. Feedback from our members that have participated in these meetings as been very positive but also created questions about why recreational partners were not included in other groups convened for the wolf reintroduction. The recreational community were perplexed and a little shocked by the failure to include recreation in the Stakeholder Advisory Groups established by CPW since balancing recreation and conservation has been a priority for the agency since day one.

The Organizations are intimately aware that poor public engagement plagued the lynx reintroduction and this poor engagement is a significant contributing factor to why there remains high levels of conflict almost a decade after the lynx reintroduction was declared a success. We passionately would like to avoid decades more conflict over another reintroduced species. Proposition 114 specifically required development of a statewide management plan for wolves to address scientific, economic and social considerations around the reintroduction. We are providing this correspondence in the hope of avoiding confusion around our interests and concerns when mandatory plan required under Proposition 114 is developed. We are also aware that this opportunity may be the only time we may be able to provide input in the process although we are also hoping to clarify why the recreational community should be involved moving forward.

Further perplexing the Organizations was the fact we were specifically identified as a priority stakeholder by CPW for participation in discussions around the possible reintroduction of Wolverine in the State in 2010 and the development of the 2013 Lynx Conservation Assessment and Strategy 3rd. The state level meeting on August 23, 2021 felt like a reunion of the team that was assembled for the lynx and wolverine discussions. Despite being almost a decade from those meetings, Colorado still continues to try and resolve these types of challenges that continue to grow more than a decade after the lynx reintroduction was undertaken by CPW and more than

5 years after the lynx reintroduction has been declared a success. While a success on the ground the Colorado reintroduction of the lynx has never altered its status on the federal ESA list. From our perspective the costs in getting the lynx reintroduced have far exceeded the benefits from the reintroduction at this point.

The Organizations have been actively involved in numerous discussions with CPW around the reintroduction of the wolf prior to Proposition 114 and were actively involved in passage of several pieces of legislation, such as HB21- 1040 clarifying Proposition 114 funding sources. Given the long history of our involvement in discussions around species and reintroductions and previously clear and unequivocal statements of interests and concerns to the CPW Parks and Wildlife commission the Organizations were shocked when recreation interests were not represented in the Stakeholder Advisory Groups.

While we are highly frustrated with the failures of the wolf process to date our concerns remain simple:

1. We want all wolves to be treated similarly;
2. No recreational opportunities should be lost and wolf habitat should not be a barrier to expansion of routes;
3. No recreational opportunities should be lost because of declines in ungulate and other predator populations in wolf habitat to avoid social conflicts around the species;
4. Educational materials are *badly* needed for the wolf reintroduction; and
5. Hard population goals must be established to allow for delisting of the wolf for State and federal management purposes.

While the Organizations most directly represent motorized users and concerns, the Organizations vigorously believe these are issues that will transcend traditional divisions in the recreational community and provide significant benefit to all recreational users of lands in Colorado.

General concern 1. CPW estimates Economic Contributions of Recreation to Colorado provide more than \$62.5 billion in income and account for 19% of all jobs in the State.

The Organizations are very concerned around the possible negative economic impacts that could result from the gray wolf reintroduction, not only from recreational related impacts but also the possible impacts to other activities as well. Too many of our small communities' struggle to provide even basic services to their residents and tourists visiting the areas. Without a well-rounded economic engine for the community, the community will struggle and possibly fail and this will degrade the recreational opportunities and support for them from the community and this is a concern for the Organizations.

Proposition 114 clearly identifies those economic considerations are to be mitigated in the collaborative efforts around the wolf reintroduction. CPW own conclusions on the economic

contributions of outdoor recreation in the state of Colorado, clearly identified as a consideration to be mitigated in planning under Prop 114, are as follows:

“Focusing on the state-level results below, the total economic output associated with outdoor recreation amounts to \$62.5 billion dollars, contributing \$35.0 billion dollars to the Gross Domestic Product of the state. This economic activity supports over 511,000 jobs in the state, which represents 18.7% of the entire labor force in Colorado and produces \$21.4 billion dollars in salaries and wages. In addition, this output contributes \$9.4 billion dollars in local, state and federal tax revenue.”¹

The Organizations submit that more than \$62.5 Billion Dollars of economic contribution that results in 18.7% of the entire labor force is an economic concern to warrant specific recognition of recreation in Stakeholder Advisory Groups, both now and in the future. Any assertion that such a massive economic contribution is insufficient to warrant inclusion in wolf stakeholder discussions simply lacks any factual basis. It is highly frustrating to open collaborations when contributions such as this are not worthy of recognition in the stakeholder advisory group. This type of arbitrary resolution of considerations will cause concern and frustration from the public generally, and our members more specifically, as the wolf reintroduction moves forward. We simply must do better than this in the future and we must do better than this in the development of the Plan required under Proposition 114.

General concern 2. Social considerations and why we are concerned about social impacts from Proposition 114.

Proposition 114 also clearly identifies social considerations are to be addressed as part of the wolf reintroduction. The Organizations are intimately aware of the decades of social issues around the wolf in the western United States and we are also aware of the social conflicts that continue to plague species that have been successfully reintroduced in Colorado, such as the lynx. Based our decades of involvement around large predator species management, we are aware of two general foundational conclusions on these species. Large predatorial species, such as the wolf and lynx and grizzly, all have been either poisoned or hunted to functional removal from most habitat areas in the west and CPW clearly states this is again the case with wolves.² The Organizations believe the primary means used to remove a species should be the primary management tool with any species reintroduction. The Organizations are also intimately aware that Colorado already provides large tracts of high-quality habitat for large predatorial species. CPW has repeatedly recognized the availability of high-quality habitat for wolves as a reason that wolves have migrated here from other populations. Given these conclusions, the Organizations must express serious concerns over the actual basis of any claim that fragmentation or degradation of habitat is occurring for these species.

¹ See, CPW 2017 Statewide Comprehensive Outdoor Recreation Plan: Appendix F Pg. 111. Dated July 23, 2018.

² See, [Colorado Parks & Wildlife - Wolves in Colorado FAQ \(state.co.us\)](https://state.co.us/parks-wildlife/wolves-in-colorado-faq)

There are numerous social considerations with the wolf reintroduction for the recreational community intertwined into more generalized discussion. These social considerations engage the more generalized discussions of recreation/population and wildlife that are being undertaken in Colorado currently. The general relationship of recreational activity and wildlife has been on the forefront of many discussions as the population of the state has continued to increase and many recreational facilities were overwhelmed after government directions to go outside were given as part of the COVID response. This socially based concern was specifically highlighted with the issuance of Executive Order B 2020-008³ by Governor Polis which specifically identifies concerns about possible recreation impacts on wildlife in great detail. As a result of this EO, the CPW COOP was formalized and expanded to try and address this issue. Additionally balancing recreation and wildlife has been the basis of other EO from Governor Polis as well, such as EO D 2019 011. The Organizations vigorously assert that social issues cannot be of such significance to warrant an entirely new board to be created to address them, issuance of numerous other Executive Orders and then to not warrant discussion at all in the Stakeholder Advisory Groups created under Proposition 114. This position would simply lack any basis in fact.

The Organizations have been heavily involved with discussions around wolf reintroductions and management in numerous states to our north, such as Wyoming, Idaho and Montana and are very aware of immense pressure on land managers to make management changes based on the mere sighting of wolves in the area. The Organizations are intimately aware that these discussions have spanned almost 50 years at this point and have these decisions have been the basis of almost ongoing litigation and legislative efforts to resolve the exceptional level of conflict around the species. The Organizations vigorously assert this half century of conflict is a serious social consideration and issue we would like to avoid if at all possible. This conflict would be exactly the type of social conflict to be addressed in Proposition 114 and planning efforts subsequently.

In addition to the provisions of Proposition 114 requiring information such as this to be considered similar provisions are mandatory both under the Federal and State Endangered Species Acts. Clearly, such recognition of recreational concerns as a protected class of interests under the State Endangered Species Act would have given rise to a generalized social consideration. While the federal status of the Gray Wolf is currently unresolved and too extensive to summarize in these comments, this effort has covered more than 30 years of conflict, litigation and rulemaking. We believe this is a social consideration worthy of inclusion under Proposition 114 and represents a model we vigorously would like to avoid.

While the Biden Administration publicly supports the delisting of wolves that was performed by the Trump Administration, we are aware this discussion is far from resolved. Steps in addressing wolves under the federal ESA would include designations of any population as experimental and non-essential under the Act (10j designation); liberal uses of both Candidate Conservation Agreement (CCA) and Candidate Conservation Agreement with Assurances (CCAA) agreements for the wolf where these are applicable. The use of these agreements would be supported for

³ A copy of this EO has been included as Exhibit 1.

any interest that is impacted by the reintroduction of wolves and despite the CESA not having specific authority for these types of documents we are also not aware of any reason these would not be honored under the CESA either. Agreements such as these provide important assurances against management consequences that the public understand.

The Colorado Endangered Species Act also has extensive requirements for addressing many concerns similar to ours for a listed species. These provisions of the CESA are specifically made applicable in Proposition 114 as follows:

“(III) Details for the restoration and management of gray wolves, including actions necessary or beneficial for establishing and maintaining a self-sustaining population as authorized by section 33-2-104; and”

Given the specific reference to the general rulemaking authority of the Commission Prop 114 also requires a separate process be complied with outside of Proposition 114 under the Colorado Administrative Procedure Act to comply with the Colorado Endangered Species Act. The Colorado ESA and Colorado Administrative Procedure Act specifically provides an extensive range of analysis of factors in the rule making to address economic and social impacts and specifically identifies that the mere potential of recreational impacts must be addressed in any rulemaking undertaken under the Colorado ESA.⁴

(3.5) "Aggrieved" for the purpose of judicial review of rule-making, means having suffered actual loss or injury or being exposed to potential loss or injury to legitimate interests including, but not limited to, business, economic, aesthetic, governmental, recreational, or conservational interests.

Given the specific recognition of the possible loss of recreational opportunities as a protected interest under the CESA, the Organizations must again express serious concerns as to how recreational interests were overlooked in the stakeholder advisory group process. Given the clear protection of social and economic concerns under Proposition 114 and also the possible loss of recreational opportunities being a specifically protected interest under the CESA the Organizations would hope that recreational concerns will occupy a prominent role in the discussion moving forward.

Our Reintroduction Concerns

Concern #1 – Regulations must protect recreational interest regardless of location in the State or wolves' origin.

The Organizations are attempting to identify significant concerns around the wolf reintroduction. While many are generally socially based, these social considerations could have serious economic impacts as well. Given the overlap of these categories for protection under Proposition 114 we

⁴ See, CRS 24-2-102(3.5)

are not going to break them down further as each are identified for protection. The Organizations vigorously assert all programmatic protections must apply to all wolves in the state, regardless of Prop 114 requirements that only reintroduced west of Continental Divide. It has been our experience that species will travel long distances after being reintroduced and wolves are no exception. Wolves have already been identified in areas, such as North Park, that are outside the areas where wolves are to be reintroduced under Prop 114.

Wolves appear to travel even longer distances than species the average Coloradan may be familiar with. This is exemplified by the fact that Nebraska Parks and Wildlife recently concluded that two wolves were killed in separate events in the last 18 months. The first being killed outside Uehling, Nebraska. This news was astonishing as most expected with wolf to be associated with the Yellowstone population, but this story was even more astonishing as the wolf was from the Great Lakes Population.⁵ The second wolf followed a similar fact patter and was killed outside Bassett Nebraska ⁶ Given the clear history of wolves traveling long distances, the Organizations believe that any clarity in the management plan being developed must apply to all wolves, regardless of where they came from or their genetic makeup.

Concern 2. No direct loss of recreational opportunities from the reintroduction of wolves now or in the future.

The Organizations would ask for a clear and unambiguous recognition of the lack of relationship between recreational activities and wolf habitat and populations as has been previously provided for the Wolverine. The USFWS has already identified that social impacts from the wolf reintroduction remain a major challenge in species management. Recognition of the lack of relationship between recreation and wolves is badly needed to avoid closures of existing recreational opportunities in areas where there may be wolves and in mitigating the challenges clearly identified by the USFWS.

Exceptionally clear statements from CPW must be made to avoid any impacts to recreational usages of roads and trails from the wolf reintroduction. The recreational community has too frequently had to fight closures based on management decisions based on the fact a species was seen in the area and have encountered these issues in areas with Lynx, and we have informally identified this management process as “We saw a lynx” management. The Organizations are aware that one of the challenges that has been consistently identified around the wolverine and lynx are the exceptionally small numbers of these species and limited research materials that are available. Our social considerations around previous species introductions have been able to be resolved in rulemaking through designations such as experimental non-essential classifications for wolverines and clear statements of the fact there should be no change in

⁵ See, Nebraska Parks and Wildlife; April 14, 2021. A complete version of this article is available here [Gray wolf confirmed in Nebraska • Nebraskaland Magazine \(outdoornebraska.gov\)](https://www.outdoornebraska.gov/news/gray-wolf-confirmed-in-nebraska)

⁶ [Wolf killed north of Fremont is the second in Nebraska since November | Nebraska News | journalstar.com](https://www.journalstar.com/news/local-news/wolf-killed-north-of-fremont-is-the-second-in-nebraska-since-november)

forest management from a wolverine being in the areas⁷. In the 2014 listing update this concern was addressed as follows:

“We find no evidence that winter recreation occurs on such a scale and has effects that cause the DPS to meet the definition of a threatened or endangered species. We continue to conclude that winter recreation, though it likely affects wolverines to some extent, is not a threat to the DPS”⁸

We thankfully are not in a situation where there is only minimal data or research available with the Gray Wolf, as USFWS has more than 3 decades of data on wolves that have been reintroduced throughout the Western United States. Additionally, there is a huge volume of information and planning resources available from the management of wolves in western states for more than the last decade. As a result of the decades of high-quality wolf research and data that is now available there is a well-documented consensus that there is no relationship between dispersed recreation and wolf habitat or survival must be clearly and unequivocally stated. We were able to obtain this level of clarity with the 2013 Wolverine Proposal and can see no reason why such clarity would not be obtainable for wolves as well. The Organizations would like to highlight the lack of concern between recreational usage of roads and trails and wolf populations or habitat quality. In their 2016 Review of the wolf population the USFWS specifically concluded as follows:

“To summarize, none of the status review criteria have been met and the NRM wolf population continues to far exceed recovery goals (as demonstrated by pack distribution and the number of wolves, packs, and breeding pairs in 2015). Documented dispersal of radio collared wolves and effective dispersal of wolves between recovery areas determined through genetic research further substantiate that the metapopulation structure of the NRM DPS has been maintained solely by natural dispersal. No threats to the NRM wolf population were identified in 2015. Potential threats include: A. The present or threatened destruction, modification, or curtailment of its habitat or range; B. Overutilization for commercial, recreational, scientific, or educational purposes; C. Disease or predation; D. Inadequacy of existing regulatory mechanisms; and E. Other natural or man-made factors affecting its continued existence (including public attitudes, genetic considerations, climate changes, catastrophic events, and impacts to wolf social structure) that could threaten the wolf population in the NRM DPS in the foreseeable future.

Delisting the NRM DPS wolf population has enabled the States, Tribes,

⁷ [2014-18743.pdf \(fws.gov\)](#)

⁸ 47532 Federal Register / Vol. 79, No. 156 / Wednesday, August 13, 2014 / Proposed Rules

National Park Service and Service to implement more efficient, sustainable, and cost-effective wildlife programs that will allow them to maintain a fully recovered wolf population while attempting to minimize conflicts.”⁹

The Organizations believe it is significant that the USFWS clearly identifies that reducing management conflicts are a major concern for the wolf, unlike the 3 criteria that the USFWS normally reviews for possibly listed ESA species. The US Fish and Wildlife Service also clearly states the major concern in wolf habitat with roads is wolves being struck and killed on roadways as follows:

“In this final rule, we refer to road densities reported in the scientific literature because they have been found to be correlated with wolf mortality in some areas. We are not aware of any scientific basis for the concern that lower road densities would substantially reduce prey availability for wolves to the extent that it would impact population viability.”¹⁰

The Organizations would note there is a significant difference between a wolf being impacted on a high-speed arterial road and the risk of a wolf being impacted on a low-speed dirt road or trail. If there was any concern on the latter impacting habitat quality or wolf populations it is of such little concern it is not discussed.

The Wyoming State wolf plan goes into great detail regarding the lack of relationship between roads and wolf habitat quality stating as follows:

“Wolves are not known to demonstrate behavioral aversion to roads. In fact, they readily travel on roads, frequently leaving visible tracks and scat (Singleton 1995). In Minnesota and Wisconsin, wolves have been known to occupy den and rendezvous sites located near logging operations, road construction work, and military maneuvers with no adverse effects [Minnesota Department of Natural Resources (DNR) 2001]. The only concern about road densities stems from the potential for increased accidental human-caused mortalities and illegal killings (Mech et al. 1988, Mech 1989, Boyd-Heger 1997, Pletscher et al. 1997). Although some of the areas within the GYA are administered by the U.S. Forest Service for multiple use purposes and have high road densities, much of the GYA is national parks or wilderness areas that have limited road access and minimal human activity.”¹¹

⁹ See, USFWS 2016 update at pg. 5.

¹⁰ See, DOI; US Fish and Wildlife Service; *Endangered and threatened wildlife and plants; removing the gray wolf from the list of Endangered and Threatened Wildlife*; Federal Register Vol 85 No 213 at pg. 69870.

¹¹ See, Wyoming Fish and Game; *Wyoming Gray Wolf Management Plan 2011* at pg. 30.

Wyoming State reports provide highly detailed outline of factors that are impacting wolf populations. There are no factors that are related to recreational activity and we again note trail-based recreation occurs at such a low speed as to make wolf fatalities on a trail almost impossible. The Wyoming wolf plan provides as follows:

“A total of 128 wolves were known to have died in Wyoming during 2016 (Table 1). Causes of mortality included agency removal ($n = 113$), natural causes ($n = 5$), other human-caused ($n = 5$), and unknown ($n = 5$).”¹²

Given there is no record of any wolf population decline from recreational activity being in the same area in the several states that have decades of high-quality data on the species, the Organizations are requesting that the lack of relationship be clearly and unequivocally stated in any planning documents. Minimizing these types of unintended social consequences from wolf management are already identified as a major management concern by the USFWS and are also exactly the type of social concern that Proposition 114 specifically requires to be addressed. As a result, the Organizations are seeking this type of clear and unequivocal statement addressing the lack of relationship between trails and recreational and wolf populations to protect existing recreational resources and to allow for development of new recreational facilities in the future.

Concern 3a. Indirect loss of recreational opportunities from the decline of ungulate species populations in wolf habitat after the wolf has been reintroduced.

The Organizations are very concerned that recreational access will be negatively impacted as herd populations of prey animals decline as a result of introduction of increased wolf populations in the area. Many states and the USFWS recognize these impacts can be severe in local areas. This indirect concern creates risk of closure of recreational facilities now and in the future if there is a severe impact on a local area. The Organizations are very concerned that declining ungulate populations are frequently cited as a reason to close or restrict recreational access, even when there is a lack of clarity around why the population in a location is declining. This is exemplified by the CPW comments regarding the recent Pike/San Isabel National Forest Travel Plan, where the comments were entirely based on possible impacts or impacts from a wide range of issues, such as residential development or wildfire impacts. Too often herd populations decline for a wide range of issues and easily get blamed on recreational usage, simply because of its visibility. These are issues that restricting recreational access will never address and the Organizations would like to avoid another layer of discussion around recreational access.

Unfortunately, the PSI travel planning is not the first time we have identified a lack of consensus around declines in herd populations which then gets blamed on trails. The proposed GMUG RMP provides 10 pages of muddled and weak information around herd population declines as result of recreational usage being dispersed across the forest. CPW then supports the absolutely

¹² See, Wyoming 2016 update pg. WY-6.

crushing restriction of only allowing 1 mile of trail per square mile in an attempt to provide protection of habitat, which is explained as follows:

MA-STND-WLDF-02: To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and non-motorized, where the system route density already exceeds 1 linear mile per square mile, within a wildlife management area boundary. Additions of new system routes within wildlife management areas shall not cause the route density in a proposed project's zone of influence to exceed 1 linear mile per square mile. Within the Flattop Wildlife Management Areas in the Gunnison Ranger District, there shall be no new routes.¹³

Clearly ungulate population declines due to wolf predation are going to drive management standards that are only targeting one aspect in a system with many variables such as the one above. The Organizations also submit that less direct impacts from the wolf reintroduction are exactly the type of issue that the USFWS recently identified as a management priority for the species in the western US. We would like to avoid another layer of confusion in these discussions and leverage the clarity around the fact populations are going to decline. It should not fall to the recreational community to try and understand a complex multi-faceted system such as this to explain recreational usage and population declines as this will create conflict for the wolf as everyone agrees populations of herd animals will decline. Clarity around

The Organizations would like to briefly identify the numerous highly credible resources that agree that herd populations will decline as a result of wolves in the area and sometimes at high levels on a localized level of analysis. While there is extensive scientific discussion around levels of decline in ungulate populations from wolves being introduced, there is also significant consensus on two important points around the wolf impact on herd size. This consensus is around three facets of the herd animal/wolf relationship mainly that:

1. Herd sizes will not remain the same;
2. Herd sizes will not increase; and
3. Herd animal populations will go down.

While the consensus of the scientific community immediately falters when reasons for landscape levels of decline are attempted to be summarized, this does not impact the consensus that populations will not increase and will not stay the same. This consensus is very important to the recreational community and to the clarity needed to protect recreational access and again would be a significant step in reducing a major challenge that the USFWS has identified in wolf management in other states. The complexity of understanding why ungulate populations is declining in wolf habitat was exemplified in the recent Montana recommendations for wolf management, which provide as follows:

¹³ See, USDA Forest Service, *GMUG National Forest; Draft Revised Forest Management plan*; August 2021 at pg. 93.

“We recommend that wildlife managers seeking to balance carnivore and ungulate population objectives design rigorous carnivore and ungulate population monitoring programs to assess the effects of harvest management programs. Assessing and understanding effects of carnivore harvest management programs will help to set realistic expectations regarding the effects of management programs on carnivore and ungulate populations and allow managers to better design programs to meet desired carnivore and ungulate population objectives.”¹⁴

While there is significant controversy around how much of a decline will occur at the landscape, the Organizations prefer to base our concerns on this issue on scientific certainty. Researchers are unanimous in concluding populations of herd animals will not stay the same and also will not increase at the landscape level. While landscape research around specific levels of population decline for ungulates can be difficult, we believe it is significant to note that Idaho Fish and Game estimates there is between a 4 and 6% decline in elk populations from wolf predation.¹⁵ This level of landscape population decline in herd animals will cause significant concern and possible impacts to recreational access.

The Organizations do not contest that landscape level impacts can be complex to analyze, localized severe population declines are frequently identified in other states. This type of localized impact was recently discussed in depth by the US Fish and Wildlife Service as follows:

“However, we acknowledge that, in some localized areas, wolves may be a significant factor in observed big game population declines, which could result in reduced allocation of hunting licenses and reduced revenue for both local communities and State wildlife agencies.”¹⁶

These types of concerns being addressed at this level of detail make the Organizations believe these issues are consistently occurring and sometimes at significant levels. because they are not occurring. The Idaho Fish and Game Service has also summarized this concern as follows:

“Temporary reductions in predator populations, by removing those wolves affecting the big game population, may be needed to assist in restoration of prey populations in conjunction with habitat management (Kunkel and Pletscher 2001).”¹⁷

Clearly in areas where wolves are possibly in need of removal to restore ungulate populations, protections of recreational access will be critically important in avoiding social impacts and lost

¹⁴ See, Proffitt Et Al; *Integrated Carnivore-Ungulate Management: A Case Study in West-Central Montana* Wildlife Monographs June 2020.

¹⁵ See, Idaho Fish and Game; 2017 Statewide Report – Wolf; 2017 at pg. 8.

¹⁶ See, DOI; US Fish and Wildlife Service; *Endangered and threatened wildlife and plants; removing the gray wolf from the list of Endangered and Threatened Wildlife*; Federal Register Vol 85 No 213 at pg. 69868.

¹⁷ See, Idaho Fish and Game; 2002 Wolf Plan at pg. 21 of 32.

recreational access. We are asking for this type of recognition before the wolves are even on the ground to avoid social and economic conflicts that clearly are occurring in these areas.

Protections such those targeting herd population declines are very important to mitigating impacts to recreation from these declines, as almost every CPW herd management plan we have ever reviewed is projecting that populations will stay roughly the same or possibly increase. This is really no longer possible and the recreational users would like a clear and unequivocal statement that populations will not increase or stay the same in order to avoid would base population declines being erroneously asserted to be the result of recreational activity in the same planning area. Additionally, localized herd size impacts have been raised as a management concern for both the USFWS and Idaho Parks and Recreation. These are major concerns that we would like protections against.

Concern 3b. Wolf impacts on other predator populations, some of which are threatened or endangered

In our research regarding wolf plans and reintroductions in other states, the impact of reintroduced wolves on populations of threatened or endangered species and general predator populations was significant enough of a concern that Idaho has management standards and discussions of this issue in their plan.¹⁸ We would ask for protection against this type of a management impact to recreational usage in any planning as we can easily envision situations where populations of reintroduced lynx will decline due to increased predation of wolves on the lynx and possible reductions of populations that the lynx and wolf might be feeding on in particular areas.

Concern 4. Educational materials must be developed

There is a compelling need for educational materials for the public recreating in possible wolf habitat. CPW always urges users to be “Bear Aware”. Similar efforts to be wolf aware must also be developed to avoid unacceptable interactions between recreational users, local communities and reintroduced wolves that are frequently and consistently seen in the Yellowstone Park area.

Socially based concerns have been a major concern around the management of wolves in Montana, so much so that Montana Parks and Wildlife has periodically undertaken numerous on the issue. Montana has also had to had to promulgate restrictions regarding the proximity of wolf traps to roads, trails, campgrounds and other recreational resources as a result of social concerns.¹⁹ Additionally, the State of Wyoming has devoted a significant portion of their wolf management plan to addressing the critical need for educational materials for the public to address wolf-based questions.²⁰

¹⁸ See, Idaho Fish and Game; 2002 Wolf Plan at pg. 16 of 32.

¹⁹ See, Montana Division of Fish, Wildlife and Parks; *Summary of Research: Better understanding of Montanans thoughts regarding wolves and wolf management in Montana*; 2018 At pg. 5. We have enclosed a copy of this report as Exhibit “2”.

²⁰ See, Wyoming Fish and Game; *Wyoming Gray Wolf Management Plan* 2011 at pg. 41.

Concern 5. Hard population goals must be established

The Organizations submits that the inclusion of a population objective for the wolf is critically important to the plan development. It has been The Organizations experience that often the desire to always want more of a particular species is controlling in the listing process rather than true science-based management objectives. It has been The Organizations experience that often target populations, and the scientific basis for these goals, are sometimes discussed when either listing was avoided or listing of a species on the ESA list occurred are dimmed with the passage of time. Often there are delays between initial decisions on a species and subsequent review of the decision and as a result participant in the original listing are no longer available or memories have been dimmed. With the passage of time, assertions of always needing more of a particular species never seem to dim or lose steam, making any position that species population goals being achieved difficult if not impossible to support. Always wanting more of a species simply creates social conflict and we submit this must be mitigated with the inclusion of a hard population goal for conclusion of the reintroduction must be done. Based on the experiences of the states around Colorado, this type of a tool will be needed far sooner than anyone anticipates at this point.

Conclusion.

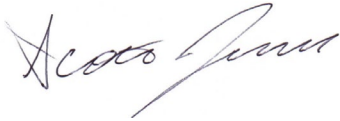
The Organizations deeply ***appreciate*** Keystone's development of a mechanism for written comment and targeted state level meetings to facilitate recreational user input on the reintroduction of Gray Wolves in Colorado pursuant to Proposition 114. The recreational community were perplexed and a little shocked by the failure to include recreation in the Stakeholder Advisory Groups established by CPW since balancing recreation and conservation has been a priority for the agency since day one. The Organizations are intimately aware that poor public engagement plagued the lynx reintroduction and are a significant contributing factor to why there remains high levels of conflict almost a decade after the reintroduction was declared a success. We passionately would like to avoid decades more conflict over another reintroduced species.

While we are highly frustrated with the failures of the mandatory stakeholder meeting for wolf process to date our concerns remain simple:1 We want all wolves to be treated similarly; 2. No recreational opportunities should be lost and wolf habitat should not be a barrier to expansion of routes; 3. No recreational opportunities should be lost because of declines in ungulate or predator populations in wolf habitat; 4. Educational materials are badly needed for the wolf reintroduction; and 5. Hard population goals must be provided to allow for the reintroduction to be declared complete.

The Organizations submit that the recreational community accounting for \$62 Billion in economic contribution to the State of Colorado and 18.7% of all jobs in the state is the type of economic impact that must be meaningfully addressed in the public engagement process around the wolf

reintroduction. Additionally, the Organizations have extensive social concerns on the reintroduction and as social concerns are identified as management priority by the USFWS in their wolf management. The Organizations would welcome a discussion of these opportunities and any other challenges that might be facing recreational opportunities moving forward at your convenience. Please feel free to contact Scott Jones at scott.jones46@yahoo or via phone at 518-281-5810.

Respectfully Submitted,



Scott Jones, Esq.
TPA Authorized Representative
COHVCO Vice President



D.E. Riggle
Director of Operations
Trails Preservation Alliance



Marcus Trusty
President – CORE

CC: CPW Director Prenzlów
DNR Director Gates