



March 7, 2024

Senator Perry Will  
200 East Colfax RM 346  
Denver, CO 80203

Senator Dylan Roberts  
200 East Colfax RM 346  
Denver, CO 80203

Representative McLachlan  
200 East Colfax RM 307  
Denver CO 80203

Representative Mauroa  
200 East Colfax, RM 307  
Denver CO 80203

RE: SB 24-171

Wolverine reintroduction in Colorado

Dear Senators and Representatives:

The above Organizations would like to express our support for the above legislation but are concerned that the Legislation does not provide enough protections for the public from unintended impacts from the reintroduction of the Wolverine. We have been very involved in the decades of discussion around possible reintroduction of wolverines in Colorado and management efforts for other species after they were reintroduced, such as the Canadian Lynx. As a result, we are intimately familiar with the need for legislation, such as SB 24-171, to avoid unintended impacts from the reintroduction. We are also unfortunately intimately familiar with the long and twisted history that the status of the wolverine has had on the Endangered Species Act. The Organizations vigorously support the concept that ranchers should be paid for any lost revenue they experience as part of a wolverine reintroduction.

The Organizations are all too familiar with assertions of the need for management of species based on possible sighting, which has too frequently driven lynx management efforts long after their successful reintroduction. The Organizations would like to avoid this situation being repeated with the wolverine. We are concerned that there are many other concerns and possible impacts of the wolverine reintroduction that are not addressed in SB24-171. While we support SB 24-171 we also would ask for additional protections for recreational activities on public lands that might be temporarily occupied by wolverines. This protection would reflect the dual mission of CPW to manage recreation and wildlife. The Organizations are aware that recreational activities have often immediately identified as risk to the wolverine despite decades of research being unable to identify any relationship between wolverines and recreation.

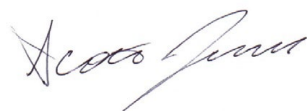
Our concerns on possible unintended impacts have been the basis for extensive efforts previously that are not currently addressed by the USFWS. The Organizations were active participants in collaborative efforts to address possible wolverine reintroduction that involved CPW, USFWS, CDOT, Colorado Ski County, Colorado Cattlemen Assoc. and many others in the 2010 to 2013 timeframe.

("2010 Collaborative"). This was a massive effort spanning several years and included in person meetings attended by sometimes more than 40 people. We have attached a list of attendees from the December 2010 meeting as an example of the diverse range of interested groups that participated as Exhibit "A". We have also attached a sample of the meeting notes and issues summary from these meetings as Exhibit "B". While this was a large CPW collaborative effort, awareness of the entire effort was marginal at best. It is disappointing that many of the priority issues around wolverine reintroduction identified in this CPW collaborative were simply not addressed in the most recent listing decision for the wolverine by the USFWS. Even more disappointing is the fact CPW simply did not address these concerns in their comments, despite many of these management designations, such as a 4d designation and 10j rule being hugely necessary. Our collaboratives also included designations of Candidate Conservation Agreements and Candidate Conservation Agreements with Assurances. The Organizations are thrilled that 24-171 makes these efforts mandatory.

The 2010 Collaborative effort led by CPW went as far as developing a draft reintroduction plan for the wolverine in Colorado. We have also attached a copy of the draft plan developed by CPW for your convenience as Exhibit "C". It is disappointing that none of these issues and concerns were even raised by CPW in their most recent comments on the 2023 listing proposal and science update. In the 2013 USFWS listing the Service specifically stated there should be no change in forest management decisions, as a result of the wolverine being present. We have attached a copy of the USFWS 2013 listing document that clearly states this in the highlighted portion of page 2. A copy of this document is attached as Exhibit "D". This type of protection would be hugely valuable to the recreational community if it was included in the reintroduction plan for the wolverine.

We are aware this is an usual letter of support for any piece of legislation and appreciate your engagement on this issue. We are aware this issue is highly complex and nuanced and are very concerned that CPW has not engaged on the most recent discussion on the wolverine. Rather than CPW taking a collaborative path as they did in previous discussions, collaboration has been avoided in the most recent discussions. The Organizations and our partners remain committed to providing high quality recreational resources on federal public lands while protecting resources and would welcome discussions on how to further these goals and objectives with new tools and resources. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com)) or Chad Hixon (719-221-8329/[Chad@Coloradotpa.org](mailto:Chad@Coloradotpa.org))

Respectfully Submitted,



Scott Jones, Esq.  
CSA Executive Director  
COHVCO Authorized Representative



Chad Hixon  
TPA Executive Director



Marcus Trusty  
President – CORE