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Colorado Gray Wolf Reintroduction
10(j) Management Rule Scoping Comments Guide

To provide scoping comments on the proposed 10(j) management rule:

1. Go to [regulations.gov Docket (FWS-R6-ES-2022-0100)](), click the comment button in the upper left of the page, enter your comments, indicate if you're submitting as an individual or representative of an organization and submit.
2. Craft your comments in your own words using the Talking Points below:

Talking Points (please personalize)

- Wolf management in Colorado should focus on reintroducing and conserving the species using an ecosystem-based approach that ensures the return of healthy and self-sustaining populations across suitable habitat, while promoting ethical human-wolf coexistence.
  - Wolves populations should be managed to allow for the flourishing of the species to ensure the [restoration of the full ecological benefits the species brings to ecosystems]().

- Proposition 114 requires Colorado Parks and Wildlife (CPW) develop a wolf reintroduction plan that will ["restore and manage gray wolves in Colorado, using the best scientific data available."]() United States Fish and Wildlife Service (USFWS) should integrate the CPW developed plan into the proposed 10(j) management rule framework only to the extent that such plan complies with the best available science.

- USFWS should consult with tribal representatives and indigenous voices from Colorado and draw on and use [traditional ecological knowledge to effectively guide the development of the 10(j) management rule]() and other wolf policies.

- The 10(j) management rule should reflect broad public values that support stricter protections for wolves and reflect low support for recreational hunting.

- [Studies show]() that the west slope region of Colorado could support a population of over 1,000 wolves. In addition, [Frankham et al. (2014)]() suggested that genetically effective population sizes of at least 1,000 are required to ensure the long-term viability of the species.

- ○ Therefore, 1,000 wolves should be a minimum requirement to reach the statutory requirement of restoration of a "self-sustaining" population.

- The 10(j) management rule should prioritize and concentrate solely on the non-lethal management of wolves in response to livestock conflicts to ensure proper recovery of wolves in Colorado and ethical coexistence between wolves and livestock. Several studies have proven a [proactive non-lethal approach to reduce livestock conflicts leads to better conflict mitigation](). Proposition 114 statute also requires CPW to assist livestock producers in preventing and resolving wolf conflicts with livestock.

- The 10(j) management rule should strictly curtail any lethal management or recreational hunting of wolves.
    - ○ Lethal management often fails to provide a long-term solution to wolf-livestock conflict and has the highest variability of success [when compared to non-lethal practices](). In addition, there is significant evidence showing that lethal management of wolves may be [less functionally effective at mitigating subsequent livestock losses than non-lethal deterrents]().
    - ○ A substantial body of research documenting human-caused mortality in North American wolves has found that policies that allow for the liberalized killing of wolves result in a direct increase in the hazard and incidence of illegal killings ([Louchouarn et al. 2021](), [Santiago-Ávila et al. 2022](), [Santiago-Ávila et al. 2020](), [Treves et al. 2021]()).

- Lethal management of wolves should not be permitted except in extremely rare circumstances of immediate defense of life.

- As recommended by wolf biologists who advise Mexican wolf recovery, the Colorado 10(j) management rule should include the introduction of a subpopulation of Mexican gray wolves in the southern region of Colorado. Such a subpopulation [would be able to connect to the existing population]() within the Mexican gray wolf experimental population area and [would provide this critically endangered subspecies with much-needed genetic diversity and resilience]().