



PO Box 292 ° Delta, CO 81416-0292 (970) 874-1433 ° (970) 874-4170 fax

cwgawool@aol.com ° coloradosheep.org

CPW Wildlife Commission
dnr_cpwcommission@state.us.co

November 9, 2022

Re: November 17th - Agenda Items: 16-18

The Colorado Wool Growers Association appreciates the opportunity to share our concerns about wolf management in Colorado, and would like to thank the members of the technical and stakeholder advisory groups for their hard work in developing their recommendations for the wolf management plan.

The ongoing attacks by wolves on livestock, from the wolves that have migrated into the state is an urgent warning about the need for a robust and proactive monitoring, management, and compensation program for the wolves in Colorado.

We urge the Commission to adopt Montana's statutory language:

87-5-132 Use of radio-tracking collars for monitoring wolf packs, MCA (mt.gov)

- (1) As part of a wolf management plan approved by the department, a radio-tracking collar or a collar that uses global positioning system technology must be attached to at least one wolf in each pack that is active near livestock or near a population center in areas where depredations are chronic or likely.

Currently, the only option livestock owners have is to use non-lethal deterrents with questionable efficacy, oftentimes only effective on a temporary basis. To accurately focus non-lethal resources and to bolster their effectiveness, it's crucial to know where the wolves are at. Consequently, radio-collaring wolves should be a top management priority. In order to collar wolves you need to trap them. Therefore, we strongly urge CPW to work with federal agencies to trap and collar wolves.

We support most of alternative 5 from the SAG Livestock Compensation Recommendations, which gives the livestock producer the option of choosing from a compensation ratio or submitting itemized expenses. However, we object to the two-tier ratio that would pay a lower ratio to livestock owners that do not use non-lethal deterrents. Many times, you don't know that you have wolves in an area until livestock are killed. It's wrong to penalize livestock owners for not using non-lethal deterrents

when they do not know where the wolves are. It's unrealistic to expect livestock owners to use non-lethal deterrents if they are unaware of the presence of wolves. Additionally, we disagree with the exclusion of adult cattle from the compensation ratio.

We appreciate and support the SAG recommendation to include working dogs (herding and livestock protection dogs) for compensation. Additionally, the wolf management plan definition of livestock for compensation should be consistent with the Colorado Revised Statutes (CRS) definition 35-1-102-(6) "Livestock" means cattle, sheep, goats, swine, mules, poultry, horses, alternative livestock, as defined in section 35-41.5-102 (1), and such domesticated animals as fox, mink, marten, chinchilla, beaver, and rabbits, and all other animals raised or kept for profit.

We also support the SAG recommendations for impact-based management and lethal take options that received full SAG consensus as well as the options that were only one vote short of consensus; including the ability of a producer to take a wolf that is attacking, wounding or chasing their livestock or working dogs and the ability to get a permit to take chronically depredate offenders.

We strongly object to the Technical Working Group's recommendations on State Listing and Delisting Thresholds and recommend much lower thresholds. With just a few wolves in the state we're currently seeing significant depredation events and problems with compensating livestock owners. Other species on the State List do not reproduce in packs and cause significant harm to other wildlife or agricultural resources. Therefore, in order to provide the maximum flexibility to manage wolves in Colorado's complex and crowded landscape, wolves need to be delisted as soon as possible.

Respectfully,

Nick Maneotis

President