

April 11, 2025

Colorado Advocates for Smart Wolf Policy
PO Box 49336
Colorado Springs, CO 80949

Dear Patrick Davis,

We, the undersigned organizations representing the Colorado Wildlife Conservation Project, write to express our concerns regarding Proposed Initiative #35.

The Colorado Wildlife Conservation Project (CWCP) is the state's largest alliance of hunting, angling, and wildlife conservation organizations representing tens of thousands of outdoors enthusiasts across the state. We share a common interest in conserving wildlife and wildlife habitats, and in preserving our hunting, angling, and conservation heritage. We are steadfast in our efforts to continue the state's long history of responsible, science-based wildlife management.

We have appreciated the open dialogue with Colorado Advocates for Smart Wolf Policy and the opportunity to provide feedback on the proposed initiative over the last several months. We also collectively share underlying concerns regarding the implementation of Proposition 114 to date and generally agree with the need to suspend any additional wolf reintroduction efforts until the policies outlined in the state-approved Wolf Management Plan are fully adopted and operational. However, we are of the opinion that the proposed initiative fails to provide meaningful policy protections for landowners and state wildlife managers while having a de minimus impact on the ability of the state to achieve the proposed reintroduction efforts fully. We maintain that proactive efforts should instead focus on improving independent wolf management capacity by Colorado Parks and Wildlife (CPW), providing depredation protections to agricultural producers, and focusing on the ongoing management needs of the state.

Notably, the proposed effective date of suspending subsequent wolf reintroduction efforts on December 31, 2026, is unlikely to restrict the state's capacity to comply with the statutory mandate of reintroducing sufficient minimum breeding pairs to establish a sustainable population. It is our opinion that the state will achieve its desired reintroduction objectives prior to the proposed timeline in the initiative.

We are also concerned that the proposed initiative fails to address the shortcomings and additional needs of the CPW Commission-approved Wolf Management Plan and the 10(j) rule. Of primary concern is the absence of statutory provisions, CPW regulations, or conditions requiring the transfer of management authority from the U.S. Fish & Wildlife Service to CPW post fulfillment of the state restoration goals, statutory provisions requiring the General Assembly to delist grey wolves from the state endangered species list upon a federal delisting decision, and the express authority of CPW to develop management objectives for balancing ungulate and predator populations upon fulfillment of the state restoration goals. Unfortunately, the proposed initiative fails to address these particular concerns.

As we continue to seek proactive engagement opportunities and efforts to advance science-based wildlife management in alternative ways, we are concerned that pursuing Initiative #35 will result in diverting community sweat equity and limited financial resources towards an endeavor that promises little return on investment at a time when aggressive, proactive policy measures that address future conditions are needed.

For the reasons stated above, we cannot support ongoing efforts to advance Proposed Initiative #35.

Sincerely,

Members of the Colorado Wildlife Conservation Project:

