

# PROJECT COYOTE

F O S T E R I N G   C O E X I S T E N C E



## Talking Points on the draft 10(j) rule for Colorado wolf reintroduction:

- The draft 10(j) rule must be modified to ensure wolves in Colorado are reintroduced and conserved using an ecosystem-based approach that ensures the return of healthy and self-sustaining populations across suitable habitat, while promoting ethical human-wolf coexistence.
  - Wolf populations should be allowed to flourish to ensure the [restoration of the full ecological benefits the species brings to ecosystems](#).
- USFWS should retain authority to ensure CPW is properly fulfilling its legal obligations pursuant to Proposition 114 to promote species recovery, including the development of a wolf reintroduction plan that will “[restore and manage gray wolves in Colorado, using the best scientific data available](#).”
  - The latest science shows how killing individual wolves negatively impacts surviving wolves’ physiology and behavior, which translate to negative impacts on wolf dynamics including wellbeing, fitness and ecological relationships ([Ausband et al. 2017](#), [Borg et al. 2015](#), [Cassidy et al. 2023](#), [Creel et al. 2015](#), [Pereira et al. 2022](#))
- [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) rule should be revised to prioritize and concentrate solely on the non-lethal management of wolves in response to livestock conflicts. Several studies have proven a [proactive non-lethal approach to reduce livestock conflicts leads to better conflict mitigation](#).
  - At minimum, the 10(j) rule should require any landowner or permittee engaging in lethal take of wolves to first document that multiple nonlethal coexistence practices were deployed and proved unsuccessful before allowing any permitted lethal take of wolves.
- USFWS should modify the proposed 10(j) rule to strictly curtail any lethal management of wolves especially and importantly on public lands. USFWS should remove any provisions in the draft management rule that allow individuals to “shoot on sight” and

# PROJECT COYOTE

F O S T E R I N G   C O E X I S T E N C E



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

- Lethal management often fails to provide a long-term solution to wolf-livestock conflict and has the highest variability of outcomes [compared to non-lethal practices](#). In addition, there is significant evidence showing that lethal management of wolves may be [less 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 allowing liberalized killing of wolves result in a direct increase in the hazard and incidence of illegal killings ([Louchouart et al. 2021](#), [Santiago-Ávila et al. 2022](#), [Santiago-Ávila et al. 2020](#), [Treves et al. 2021](#)).
- 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 wolf experimental population area and [would provide this critically endangered subspecies with much-needed genetic diversity and resilience](#).