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U.S. Fish and Wildlife Service
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Submitted electronically to <https://www.regulations.gov>, Docket No. FWS-R6-ES-2026-0958

**RE: Request for Information on Implementation of the Gray Wolf (*Canis Lupus*)
Nonessential Experimental Population Rule in Colorado**

U.S. Fish and Wildlife Service,

Thank you for the opportunity to comment on the implementation of Colorado's nonessential experimental population (NEP) of gray wolves. Defenders of Wildlife (Defenders) is a national, non-profit conservation organization established in 1947 with more than 52,776 members and supporters in Colorado and over 1.8 million nationwide. Defenders is dedicated to the protection of all native animals and plants in their natural communities.

It is important to recognize at the outset that the Colorado wolf reintroduction program has only been active for two and a half years, yet already has encouraging levels of pack formation and recruitment, a high level of collaboration among diverse stakeholders, considerable public and private investment in minimizing wolf-livestock conflict, as well as comprehensive compensation for wolf-related livestock losses. Defenders is impressed with the progress Colorado has made toward wolf restoration thus far and looks forward to future milestones. However, the program has not yet met the science-driven minimum translocation of 30-50 individuals unanimously approved in the Colorado Wolf Restoration and Management Plan. This initial reintroduction phase must be completed to give CPW and the wolf population protected by the U.S. Fish and Wildlife Service's (FWS) 10(j) rule a chance to succeed before initiating formal evaluation. The 10(j) rule reaffirms that five years after reintroductions are completed is a reasonable timeline to evaluate the management program, wolf population growth, and progress toward the State's recovery goals. See "Endangered and Threatened Wildlife and Plants; Establishment of a Nonessential Experimental Population of Gray Wolf in Colorado," 88 Federal Register 77014 (Dec. 8, 2023).

Over the last three decades, Defenders has played an important role in the restoration of wolves throughout the western United States. Defenders assists livestock producers in the northern Rockies and across the West, including Colorado, with funding, tools and techniques to minimize losses to wolves and other predators. Our livestock loss compensation program was in effect for twenty-three years, until 2010, when availability of federal funding supported the transition of our compensation program to the Montana Livestock Loss Board in 2008. During Colorado's wolf reintroduction, we have operated many projects in partnership with ranchers, county, state, tribal and federal agencies. Defenders supported Colorado Parks and Wildlife's (CPW) extensive public engagement process, and we were selected by CPW to have a representative on their Stakeholder Advisory Group (SAG). We urge the FWS to integrate the consensus recommendations developed by the SAG and Technical Working Group (TWG) where appropriate in this response to your request for information, as these teams represent diverse interests brought together voluntarily by CPW to seek areas of common ground for inclusion and equity in the Colorado wolf recovery effort. See Exhibit A and B attached.

We remain committed to working with FWS, CPW and other agencies to implement mechanisms that will best reestablish this iconic species in Colorado. Defenders supports the current implementation of the 10(j) rule and its continuation so long as it facilitates the recovery of the species. A 10(j) rule for wolf restoration in Colorado is a practical approach that has gained great support among the state's diverse constituencies. Below, we address your questions regarding the current implementation of Colorado's 10(j) rule.

(1) Trends and patterns in livestock depredation since implementation of the 10(j) Rule

Based on your observations or data, what trends in wolf-livestock interactions have occurred in Colorado since 10(j) Rule implementation on December 8, 2023?

Since the Colorado wolf reintroduction began in December 2023, wolf-livestock interactions have naturally increased in correlation with a very small but growing number of wolves. Some conflict was anticipated, and both lethal and nonlethal forms of conflict mitigation were addressed during the regulatory rulemaking for the establishment of the experimental population. See "Endangered and Threatened Wildlife and Plants; Establishment of a Nonessential Experimental Population of Gray Wolf in Colorado," 88 Federal Register 77014. According to [CPW's public wolf depredation log](#), there were two confirmed livestock "depredation events" in calendar year 2023, followed by 19 events in 2024, and 31 events in 2025 (CPW, 2026b). CPW defines a depredation event as a 24-hour period in which the Division determines by at least a preponderance of the evidence standard that a wolf or wolves caused physical trauma resulting in injury or death to a producer's livestock or working dogs. Interpreting these trends requires important context: Colorado's reintroduction is still in its early stages, and unlike other documented reintroduction efforts, such as the wolves in Yellowstone Park, wolves in Colorado are establishing territories across a mosaic of land ownership and land uses that makes direct

comparison to other populations difficult. What constitutes a baseline for wolf depredation in Colorado is still being understood but is expected to remain negligible compared to losses caused by disease, weather, and theft (USDA APHIS, 2017; USDA NASS, 2024).

That said, not all areas have seen increasing conflict despite greater wolf activity, and this variation offers valuable insight. In Jackson County, where there has been far greater willingness to collaborate between stakeholders and adopt conflict mitigation tools among producers, depredation events have remained relatively consistent with five events in both 2024 and 2025, despite the resident pack has grown from two to ten individuals in 2025 (CPW, 2026b). This is where many outreach events are held and where an increasing proportion of ranchers are using turbo-fladry, range riders, camera monitoring, and effective stockmanship. This trend suggests that proactive investment in effective conflict prevention measures is making a positive impact, even as pack sizes grow.

Conversely, depredation rates have been higher among packs that have experienced human-caused mortality. The Copper Creek pack, for example, was implicated in an increasing number of livestock conflicts following the illegal injury and death of the pack's breeding male. Disruption to pack structure can alter hunting behavior and increase the likelihood of livestock depredation, making conflict prevention and minimization of human-caused mortality critical to both wolf and livestock safety, particularly in these early stages of recovery when pack sizes are small (Cassidy et al., 2023; Wielgus & Peebles, 2014). Where conflicts have been considered chronic by CPW, the agency has authorized three lethal removal actions and relocated one depredating pack to an area with fewer livestock, demonstrating that CPW is managing wolves and implementing the 10(j) Rule in a way that seeks to balance the concerns of livestock producers and the needs of wolf restoration.

(2) Effectiveness of nonlethal and other preventative tools and strategies

What nonlethal deterrence or preventive measures have been employed in Colorado, and how effective have they been?

In only two and a half years since the start of the wolf reintroduction, Colorado developed an impressive and growing arsenal of nonlethal conflict mitigation tools and strategies, and the results are encouraging. As of fall 2025, CPW has secured 45 miles of turbo-fladry, 160 scare devices, and has two active drone programs (CPW, 2026d). Turbo-fladry projects in particular have been notable, not only for their effectiveness, but for the collaborative, community-building nature of their deployments. Ranchers, CPW, Colorado Department of Agriculture (CDA), USDA Wildlife Services, Natural Resource Conservation Service (NRCS), and nonprofit partners have come together in the field on these deployments, and to date no wolf-caused livestock losses have occurred on any project where turbo-fladry has been properly installed and maintained (CPW, 2026d; CPW, 2026e). Progress on conflict mitigation, as well as reproduction, funding, communication, and other aspects of

the program are also detailed in CPW's annual biological reports, as required by state and federal entities (CPW, 2026e).

Range riding is probably the most sought-after conflict mitigation strategy by Colorado ranchers. As a result, Colorado is one of the only states in the country that has a state-funded range rider program that has seen strong results and rapid growth. The State Range Rider Program has expanded from 11 riders in 2025 to 17 riders in 2026, with two additional CDA staff available to range ride (CPW, 2026a). Defenders is the only nonprofit organization in Colorado fully funding range rider projects with one rider in 2024, two riders in 2025 and three for 2026. The producers that Defenders has partnered with to deploy range riders or wolf deterrents have not experienced any wolf-caused livestock losses, which is a testament to the value of proactive planning and a consistent commitment to shared goals.

Partners across the state are also actively positioning Colorado at the forefront of emerging conflict mitigation technology, such as AI-powered trail cameras, drone hazing, GPS ear tags for cattle, and virtual fencing systems. These tools have the potential to greatly expand opportunities to prevent wildlife conflict, particularly in more remote areas, not only in Colorado but on a global scale. We have had the distinct advantage of learning from ranchers and partners in states that have been living with wolves for decades, accelerating the development of projects and programs that might have otherwise taken years to get off the ground. For example, Defenders and Colorado State University's (CSU) Center for Human-Carnivore Coexistence partners with the Blackfoot Challenge from Montana, a place-based collaborative nonprofit at the forefront of proactive wildlife-livestock conflict prevention, for workshops where ranchers from Montana can speak to ranchers from Colorado about their model for, recommendations concerning, and approach to wolf coexistence. As a result, multiple ranching communities in Colorado have expressed interest in forming their own community-led collaborative modeled after the Blackfoot Challenge. Similarly, CPW and CDA feature several ranchers from the northern Rockies in their [annual range rider training](#) to share their experience and advice. With committed producers, willing partners, and the capacity to deliver, we've built a strong foundation for the future.

(3) Practical experiences with incident response, conflict mitigation, and verification of depredations

How has the process of verifying depredations and documenting claims in Colorado functioned in your experience?

The process of verifying depredations and documenting claims in Colorado has, in our experience, functioned with professionalism and responsiveness. CPW has established a dedicated team of rapid-response damage specialists across the state that are trained and available to respond to conflicts, investigate potential depredations, and deploy nonlethal tools as needed. These specialists, along with other CPW staff, receive annual trainings on

depredation investigations, building institutional knowledge, consistency, and credibility. While the process for verifying depredations and documenting claims for wolf losses is consistent for investigations for other predator-related losses, this is a process that is bound to improve with time and experience. The ranchers we've talked to report that CPW staff typically arrive on the scene within hours of a reported depredation, though response times vary depending on the remoteness of the location. CPW reports all confirmed wolf depredations to a publicly accessible, anonymized log of livestock losses that includes the date, county, livestock type, number of livestock involved, and a claim payment total if a claim was submitted (CPW, 2026b). This level of transparency is notable in the broader national context, as most states only report this information on an annual basis and with considerably less detail. Staff also demonstrate a proactive approach to incident response rather than waiting for depredation to occur. For example, when wolves began denning near the grazing area of a producer enrolled in our range riding program, CPW reached out in advance to collaboratively develop a response plan for increased wolf activity, coordinating areas that needed more human presence, establishing protocols for wolf encounters, and assisting the producer in obtaining a nonlethal hazing permit. This kind of anticipatory coordination and accountability supports both agricultural interests and conservation objectives.

What barriers exist to implementing mitigation strategies?

Barriers to implementing livestock conflict mitigation strategies typically come down to three core challenges: cost, capacity, and identifying the right approach. Colorado has made deliberate and substantial efforts to address all three and is highly equipped to support ranchers navigating wolf-livestock conflict both proactively and reactively.

On the question of cost, eleven assistance programs are available through state and federal agencies, nonprofits, and institutions to ensure that producers have access to tools and support at little to no cost, with the freedom to work with whichever partners they are most comfortable with. Critically, Colorado has also established a sustainable, dedicated funding stream for nonlethal conflict prevention through the Born to Be Wild license plate program, which has generated over \$1.8 million specifically for this work and provides a long-term financial foundation that most states lack entirely (CPW, 2026e). Additionally, NRCS has [\\$2.5 million to incentivize producers](#) in reducing the risk of carnivore and livestock conflict through their Regional Conservation Partnership Program (RCPP).

Capacity has been addressed through significant investments in staffing. CPW alone created a team of nine damage specialists to respond to conflicts in addition to 140 available district wildlife managers (CPW, 2026d). CDA has also created a new team to assist with wolf restoration and conflict prevention, along with staff at USDA Wildlife Services and the NRCS. These agencies, along with nonprofit partners, frequently work together on larger projects, and these joint efforts have proven invaluable for building not

only capacity but community among people who are committed to supporting both producers and wolves on a shared landscape.

The challenge of identifying reasonable and effective approaches for each livestock operation has been addressed through CPW's site assessment program, where agents visit the site and work with the rancher to determine what conflict mitigation tools or strategies could be appropriate. These assessments have been available since 2022 but were formalized and dramatically scaled up in 2024. What began as a single staff person conducting assessments has grown to a network of 140 staff from CPW, three from CDA, and more than 20 federal agents. Over 273 CPW site assessments have been completed since 2022, with an additional 53 completed by NRCS (CPW, 2026c). All site assessments are voluntary and available at no cost to the producer.

The most significant remaining challenge is not resources or infrastructure, but time. Building the trust needed for more ranchers to take full advantage of what is available requires time for sustained and authentic relationship-building, and Colorado is well positioned to continue this as wolves are restored to the state. In addition, Defenders' conflict-reduction experience in New Mexico, Arizona, and elsewhere, has shown that the behavior of dispersing solitary wolves is less predictable than that of packs with established territory and family structure. Although Colorado's reintroduced wolves have formed four breeding packs, most wolves are still on their own, and the population is still too small and newly established to have stable territories and social structures, or to tolerate increasing lethal removal in areas where nonlethal conflict management proves impractical.

(4) Coordination among Federal, State, Tribal, and local entities

How would you characterize coordination among agencies, producers, Tribes, and local communities in addressing conflicts?

Colorado has built an impressive level of coordination among agencies, producers, and conservation organizations. What distinguishes Colorado's approach is not only the number of entities at the table, but the genuine commitment each group brings to finding real-world solutions for both people and wolves on a shared landscape.

Much of this coordination is anchored by the Colorado Conflict Reduction Group (CCRG), an informal but highly productive working group hosted by the CSU Center for Human-Carnivore Coexistence. Formed in February 2021, the CCRG brings together state and federal agencies, local ranchers, researchers, CSU Extension agents, and conservation organizations engaged in wolf conflict minimization. The group meets virtually every month to communicate, share updates, and coordinate projects. It also convenes regularly for in-person workshops focused on building trust, developing strategic plans, and identifying gaps that members can work together to fill. Many of the efforts described throughout

these comments would not have been possible without the relationships and common ground forged by this group.

Beyond the CCRG, coordination has taken many practical forms. CPW partnered with CDA, CSU Extension, and Wildlife Services to organize a traveling series of outreach events across the Western Slope, tailored specifically to ranchers and designed to clearly communicate what each agency can offer, their respective roles, and how producers can participate in available programs. Furthermore, the development of CPW's site assessment protocol described in the previous section is another strong example of proactive cross-agency coordination. CPW voluntarily convened multiple state and federal agencies, conservation organizations, and ranching associations in the protocol's development, ensuring both effectiveness and consistency with complementary funding mechanisms, such as NRCS's RCPP funding. CPW has even partnered with state agencies outside Colorado to coordinate staff training in states that have more experience managing wolves and investigating depredation, including Wyoming, Idaho, and Oregon.

Wildlife Services' new Livestock Guardian Dog Program offers yet another example of the cross-agency coordination taking root in Colorado, bringing together Wildlife Services, CPW, CDA, ranching associations, and conservation organizations including Defenders, to build a comprehensive program to increase the reach and effectiveness of guardian animals in mitigating livestock-carnivore conflict. These are just a few examples of what has become a broad and collaborative network, building the kind of durable trust among communities and agencies that allows us to tackle challenges more effectively and efficiently.

(5) Communication and outreach regarding wolf management, risk, and prevention

How would you characterize Communication and outreach regarding wolf management, risk, and prevention?

Communication and outreach to the public regarding wolf management, risk, and prevention in Colorado has been robust and consistent since the reintroduction began. CPW plays a central role in these efforts but regularly collaborates with many partners. In 2025, CPW organized more than 20 outreach events with over 80 staff members and reached at least 500 Coloradans (CPW, 2026d). These events focused on wolf conflict reduction and the resources available to livestock producers west of the continental divide, where wolves are being restored. Additionally, the 326 site assessments conducted by CPW, CDA, and NRCS provide valuable opportunities for one-on-one engagement with producers, allowing agency staff to discuss property-specific risks, reasonable next steps, and how producers can obtain needed equipment (CPW, 2026c).

To increase transparency and communicate wolf activity and movement in the state, CPW biologists release [distribution maps](#) every month. These maps are designed to protect the precise location of the wolves while being specific enough to inform ranchers of where

they are expanding. While some producers continue to express a desire for more detailed access to collar data, this request is unwarranted, especially in early phases of wolf recovery. Additionally, the practical value of such information diminishes overtime due to delays in data transmission and the reality that a smaller proportion of wolves will be collared as the population grows. Thus, outreach efforts have emphasized the importance of adopting proactive conflict mitigation strategies and utilizing available assistance programs, rather than relying solely on real-time wolf location data.

In addition to agency efforts, nonprofit organizations like Defenders have played an important role in communication and outreach. These outreach initiatives have focused on fostering informed dialogue, building trust among stakeholders, and promoting the adoption of practical conflict mitigation methods. In 2024, Defenders organized five outreach events for roughly 150 participants, including livestock producers, agency staff, researchers, conservationists, and community members. These events focused on creating opportunities for constructive conversations about wolf ecology, management, and conflict. Outreach expanded in 2025 with eight events that reached 238 Coloradans. These workshops highlighted successful partnerships and effective livestock protection measures, from operational strategies like stockmanship and range riding to tools like trail cameras and fencing. To address an identified resource need, Defenders also developed a comprehensive rancher guide to using trail cameras to monitor wolf presence and livestock conflict. Momentum continues in 2026, with four outreach events conducted year-to-date, two of which were rancher-led workshops featuring producers from Montana who have been living with wolves for decades. Our focus this year is on peer-to-peer learning where ranchers share their lived experiences and demonstrate effective strategies in real-world conditions. Collectively, these efforts highlight the value of coordinated outreach that equips local communities with the knowledge and resources necessary to minimize conflict and support effective wolf conservation.

(6) Colorado's livestock loss compensation program

To what extent have the state's available compensation funds met the need for indemnity and associated costs?

Colorado's compensation program has proven sufficient to cover livestock losses to wolves, and CPW leadership has stated explicitly and publicly that the agency has resources to cover compensation, even in years where claims exceed the minimum \$350,000 secured annually by state law. Colorado stands out as one of only two states that also compensate for indirect losses attributable to wolf presence, including weight loss and reduced pregnancy rates. This indirect loss program advocated for by producers was not part of the original cost projections when Coloradans voted on reintroduction, explaining why costs are higher than initially expected. Compensation for indirect losses represents an additional commitment by CPW and Colorado taxpayers to support producers living with wolves.

What barriers exist to obtaining compensation from the state?

While a few producers have found the claims process burdensome, this process is largely consistent with what is already expected for other types of wildlife damage claims, including losses from bears, mountain lions, and elk. Because indirect loss has never been part of Colorado's compensation model and is so rare in other western states, these claims naturally require more documentation to demonstrate clear reductions in herd productivity. Regardless, efforts to address these concerns are actively underway. CSU Extension is working with producers to improve recordkeeping and file management systems so that those who need to file a claim are well prepared to do so. CPW also convened a working group to assess and streamline the compensation process for both staff and producers while maintaining the documentation needed for fiscal accountability (CPW, 2026e). Producers have until the end of the calendar year in which losses occurred to submit a claim, providing ample time to gather necessary records.

Conclusion

What improvements, in your view, would make 10(j) Rule implementation more effective in reducing conflict and improving outcomes for producers and wolf conservation in Colorado?

Colorado has demonstrated in a short period of time what is possible when agencies, producers, and conservation organizations approach wolf recovery with genuine collaboration and a shared investment in outcomes. The tools, partnerships, and infrastructure now in place will effectively allow Colorado to support conservation objectives and minimize livestock conflict as wolf restoration progresses. However, successful wildlife restoration initiatives take time. We urge the federal government work collaboratively with the State of Colorado to support the wolf reintroduction program and refrain from a formal review of the NEP until five years after the last reintroductions are completed, as originally stated in the 10(j) rule. See "Endangered and Threatened Wildlife and Plants; Establishment of a Nonessential Experimental Population of Gray Wolf in Colorado," 88 Federal Register 77014.

Additionally, a federal action that would strengthen Colorado's ability to assist more producers, would be to fill the current staffing vacancies within USDA Wildlife Services Nonlethal Initiative and NRCS, and support the expansion of regional programs as recommended by field staff. Both agencies have solid trust and respect among the ranching community, making them effective at increasing the adoption of conflict mitigation measures. For example, to fund a range rider through the RCPP, recent changes require ranchers to create a grazing plan with an NRCS planner; however, capacity is limited in certain areas, as dozens of NRCS vacancies in Colorado have not gotten approval to be refilled. These vacancies do not stop conflict reduction efforts from moving forward, but they do slow the interagency coordination that makes this work most effective and hinders ranchers from obtaining funding set aside for this very purpose. While we

recognize that staffing decisions for these agencies fall outside the direct purview of the FWS, we urge the Service to coordinate across federal Departments to help ensure the resources needed to fill those gaps within the Department of Agriculture.

Ultimately, the 10(j) rule provides a practical and flexible framework for managing Colorado's wolf population, and the State has implemented it thoughtfully and responsibly. The progress documented in these comments reflects what we can achieve, and Defenders is committed to continuing that work alongside our agency and community partners in the years ahead.

We greatly appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Senatore". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Mike Senatore
Senior Vice President of Conservation Programs

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