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Comment from Anonymous

Posted by the **Fish and Wildlife Service** on May 6, 2026[Docket \(/docket/FWS-HQ-ES-2025-1465\)](/docket/FWS-HQ-ES-2025-1465)[/ Document \(FWS-HQ-ES-2025-1465-0001\) \(/document/FWS-HQ-ES-2025-1465-0001\)](/document/FWS-HQ-ES-2025-1465-0001) / [Comment](#)

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I am submitting this comment in response to the U.S. Fish and Wildlife Service's request for input on information collection activities related to the Endangered and Threatened Wildlife—Experimental Populations rule for the Colorado gray wolf. After reviewing the available data and early outcomes of Colorado's wolf reintroduction, I urge the Service not to continue or expand wolf reintroduction in Colorado under the current framework.

1. Disproportionate and Documented Impacts on Livestock Producers

Since wolves were reintroduced to Colorado beginning in December 2023, confirmed and suspected livestock depredations have occurred repeatedly, particularly on the Western Slope. Ranchers have experienced direct cattle and sheep losses, secondary impacts such as weight loss and reduced conception rates, and ongoing operational stress. Compensation programs address only confirmed kills and do not fully cover indirect or long-term economic damage borne by producers who operate on thin margins.

Peer-reviewed and agency-supported research from across the American West consistently shows that wolf–livestock conflict is most severe on large, rugged, and remote grazing lands, where rapid intervention and non-lethal deterrents are difficult to implement effectively. Much of western Colorado fits this landscape profile, making conflict predictable rather than exceptional. [research.fs.usda.gov]

2. Unequal Distribution of Costs and Benefits

Economic analyses of Colorado's wolf reintroduction demonstrate that most perceived benefits accrue to urban and Front Range populations, while the costs are concentrated almost entirely on rural Western Slope communities. One Colorado State University–affiliated economic study found that nearly all measurable economic losses fall on livestock producers and local hunting economies, while “existence value” benefits largely accrue to residents who will never interact with wolves directly.

This imbalance raises serious concerns about environmental justice and rural equity, particularly when participation in the original ballot initiative was geographically uneven.

3. Effects on Big Game Populations and Conservation Funding

Wolves are apex predators whose primary prey includes elk and deer—species that are already under pressure from habitat loss, drought, harsh winters, and disease. Evidence from other Western states shows that wolf presence can alter elk behavior, reduce hunter success, and ultimately decrease license sales,

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which are a primary funding source for state wildlife conservation programs.
In Colorado, this could undermine the very conservation goals that reintroduction proponents claim to support.

4. Management Limitations Under Experimental Population Rules

Although the 10(j) experimental population rule is intended to provide management flexibility, federal protections still significantly limit timely lethal control or removal, even when chronic depredation occurs. Early experience in Colorado indicates delays in response and an emphasis on relocation rather than resolution—an approach that has failed to prevent repeat conflicts in other states.

5. Availability of Alternative Wildlife Management Approaches

Colorado already manages elk populations through regulated hunting, targeted culling, and habitat management. Scientific literature acknowledges that while wolves can influence ecosystems, their role can be partially substituted by active human wildlife management, avoiding many of the social and economic costs associated with large carnivore reintroduction in heavily working landscapes.

Conclusion

Based on documented livestock losses, uneven economic burdens, risks to big game management, and practical limits of conflict mitigation, continued or expanded wolf reintroduction in Colorado is not justified. I respectfully request that the U.S. Fish and Wildlife Service:

- Reconsider continuation or expansion of the Colorado gray wolf experimental population;
- Give greater weight to rural, agricultural, and wildlife-management impacts;
- Evaluate whether the information collected to date demonstrates net public benefit; and
- Prioritize management strategies that protect both wildlife and the people who live and work alongside it.

Thank you for the opportunity to comment on this important issue.

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