June 6, 2023

Jeff Davis, Director
Colorado Parks and Wildlife
6060 Broadway
Denver, CO 80216

Dear Director Davis:

Thank you for your letter of May 15th regarding the statutorily mandated wolf reintroduction in Colorado and your interest in Idaho as source population for translocations. I greatly appreciate the cooperative working relationships that fish and wildlife management agencies in Idaho, Colorado, and other western states have enjoyed over the years. Idaho remains committed to maintaining these mutually beneficial relationships and assisting sister agencies in projects that are beneficial or neutral in their impact to Idaho. However, after giving the potential effects of your request careful consideration and conferring with Governor Little, I respectfully decline the request to use Idaho wolves as a source for translocation to Colorado.

Idaho respects that decisions regarding what’s best for the State of Colorado should be made by the people of Colorado. Were the potential effects of a successful wolf reintroduction solely confined to the State of Colorado and subject only to state management considerations, our response might be different. Unfortunately, Idaho’s experience leads us to conclude that negative impacts of wolves sent to Colorado will not stay in Colorado.

Wolves in Idaho have been part of the Northern Rocky Mountain Distinct Population Segment, which took an act of Congress to delist from the ESA list, despite a robust population that far exceeded recovery criteria for nearly a decade before delisting. Regardless of the Republican or Democrat administration, the U.S. Fish and Wildlife Service was unable to live up to its assurances about delisting the Northern Rocky Mountain DPS when criteria were achieved and surpassed because of multiple lawsuits. The robust Great Lakes wolf population is also back on the ESA list based on procedural reasons and not biological status.

Because of litigation, the Service was also unable to live up to its assurances about more management flexibility under ESA “10j” regulatory provisions (for “nonessential experimental” translocated populations) to address unacceptable impacts of wolf predation on some of Idaho’s elk and deer populations. Even today, more than 10 years after delisting, litigation involving Idaho wolves continues, and the Service is considering a petition for re-listing, despite populations that remain robust and resilient. We are justifiably concerned that the implications of ESA-litigation related to the translocation of wolves into Colorado will not be isolated to Colorado. It is unclear what ESA distinct population segment a 10j wolf population in Colorado...
is intended to support recovery of. It is also uncertain how translocated wolves and their
descendants would affect the status, recovery, and delisting path of the “Mexican wolf”
subspecies. Idaho is concerned with expanding the scope of our potential biological and social
conflicts regarding wolves rather than reducing them.

Idaho has paid an enormous price to have wolves on the landscape. There are actual costs
associated with monitoring, managing, and controlling wolves; costs associated with depredation
compensation and prevention; and costs associated with the never-ending litigation related to
wolf management. Though these costs are significant, they are at least measurable. Less
measurable are costs associated with unaccounted for livestock loss and increased production
costs, and loss to rural economies due to decreased elk populations and hunting activity.

There are also the immeasurable, but very significant costs to the broader endeavor of wildlife
conservation. Now more than ever, durable wildlife conservation involves people with differing
values working together to achieve shared objectives. Private landowners, particularly the
livestock industry and other agricultural producers, are critical to the future of conservation, even
in states with large amounts of public lands. Collaborative conservation efforts are built on
trusting relationships. In Idaho’s experience, the prolonged inability to delist wolves under the
ESA and strong disagreements over how they should be managed have fostered mistrust and
social conflict among our rural communities, hunters, trappers, other outdoor recreation users,
agricultural interests, wolf advocates, conservation organizations, and governmental entities.
The result is a strain on many of the very relationships that are critical to future conservation
efforts.

In summary, under the current litigation, ESA, and social framework, we do not believe
providing wolves for translocation is in the best interests of Idaho. Were gray wolves to be
delisted and solely under state management authority in Colorado, we might have a different
view.

Sincerely,

Jim Fredericks
Director