Beyond Lethal to Compassionate Conservation Katherine Webster, 40-Year Sierra Club Member Photo: Range rider in the Tom Miner Basin

We appreciate the hard work that has gone into the Colorado Parks and Wildlife (CPW) draft plan for wolf reintroduction and how hard it is to "please all of the people all of the time." After concessions on both sides of the issue, a final draft should be approved by the CPW Commission in May 2023.

However, gray wolves now face a new threat. Under the ESA, there is a provision, Rule 10(j), that allows for exceptions to species listed as "endangered." This exception, if adopted, would once again leave wolves vulnerable. Rule 10(j) would designate grey wolves as a "non-essential experimental population" with a "flexibility" loophole to kill. We know what happens when wolves lose protections as evidenced in the northern Rockies. Wolves are slaughtered in the most barbaric ways. It is premature to remove protections before wolves have even been reintroduced in Colorado, much less, have formed sustainable family packs. Initially, the focus should be on changing attitudes and values, and not reinforcing and condoning outdated and deplorable ancestral practices.

The misnamed North American Model for Conservation (NAM) is outdated and defines "wildlife as a species-specific renewable resource to be managed in the human interest," Scientific research supports the fact that wolves are sentient beings, have close family structures, suffer in pain, grieve, and play an intricate role in the balance of ecosystems." NAM equates management with killing. The lethal words "hunting" and "killing" are inappropriate, whether the action is by CPW officials or the general populace on public or private lands. The emphasis must be on following the best and current science and educating farmers and ranchers how to be successful at coexistence; thus, attitudes will change and this cycle of maligning the wolf can finally end. The 10(j) rule will perpetuate the "big bad wolf" myth. Anja Heister, PhD. and author of Beyond the North American Model of Wildlife Conservation, states, "a move from lethal conservation to compassionate conservation is warranted."

North America is not the only continent to face the challenge of coexistence in the effort to restore biodiversity and environmental equilibrium and resilience. Colorado has the rare opportunity to be a role model, following the lead of Chile in South America, Namibia in Africa and the rewilding efforts across Europe. In Chile, the top predator that has faced extinction is the puma. In 2017, since introducing Maremma Sheepdogs, who are nomadic and roam with livestock herds, and solar Foxlights, which emit random 360-degree patterns from a mile away, "there have been robust results, that are changing attitudes." In addition to a 30% decrease in the loss of livestock by pumas and other predators, there has been a growing demand for tourism and a desire to align with conservation efforts. The tourism drive and conservation efforts are changing local attitudes and many now recognize the puma is important to Patagonian heritage.

In Africa, a top predator is the cheetah. In 1994 a Livestock Guarding Program was introduced and has been one of the most successful at saving cheetahs and protecting livestock. The program has proven that humans and wildlife can successfully coexist. The program exists in Namibia, South Africa, Tanzania, and Botswana. The Kangal and Anatolian Shepard puppies are placed with their herd and as they mature, they bond with the herd and follow them and aggressively protect them. "Farmers and ranchers report an 80-100% reduction in livestock killed

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by cheetahs...and no longer feel they need to kill cheetahs or other predators." As in South America, economic benefits followed in the form of tourism. "African farmers and ranchers who once viewed the cheetah as worthless, now proudly brag that their country is the "Cheetah Capital of the World."

In 2011 the Rewilding of Europe program was initiated. "Rewilding is an effort to ensure sustained positive effects of biodiversity and resilient ecosystems for future generations. Rewilding efforts work toward the long-term perspective with the idea that if you "let nature lead, there will be little or no need for people to intervene in nature." In a September 30, 2021, World Wildlife Fund article, "Return of the Wolf in Europe" written by Ellen de Wolf, she states, "Nature is amazing! When left to manage itself, natural processes begin to function more efficiently." She praises the implementation of "non-lethal holistic and integrated methods of management" in the countries of Norway, Netherlands and Romania. "Romania demonstrates it is possible for humans and wolves to live together..."

The reintroduction of wolves can be successful for all people. Livestock owners are businessmen, and like all businesses, they incur business expenses. They need to take responsibility for ensuring the protection of their merchandise, whether it be a product or livestock. Working towards coexistence is a choice. Coexistence is the only key to the success of a self-sustaining free-roaming population of wolves which was what voters voted for, not some artificial limit. Livestock owners must be required by law to use at least one of the above proven methods of deterrence before they can be reimbursed. They also have some financial protections under the 2014 Farm Bill. "Evidence suggests that financial incentives alone do little to change attitudes." Only education, respect and tolerance for all life, and the willingness to restore the delicate intricacy and biodiversity of nature, will change attitudes and make for a successful wolf reintroduction that will sustain itself for future generations.

To assure ecological restoration and resilience over time, the 10(j) must be rejected. Wolves need legal protections. Please send comments to the U.S. Fish and Wildlife Service in support of legal protections for wolves and the rejection of any exemption under rule 10-J of the ESA at: https://www.regulations.gov/document/FWS-R6-ES-2022-0100-0791, before April 18th.

Shoot down, the 10(j) rule, not wolves!

This reintroduction needs to give Coloradans a reason to be proud that wolves are an important part of our state's heritage.