



UTE MOUNTAIN UTE TRIBE

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February 17, 2023

Carrie Besnette Hauser
Chairwoman – Colorado Parks and Wildlife
c/o Commission Assistant
Colorado Parks and Wildlife
6060 Broadway
Denver, CO 80216

Re: Draft Colorado Gray Wolf Restoration and Management Plan

Dear Ms. Besnette Hauser,

After reading the comments by the Southern Ute Indian Tribe on Colorado's Restoration and Management Plan, I agree with the SUIT regarding its concern that the restoration of the gray wolf might present an unacceptable risk to its hunting resources. I think in spirit, the Ute Mountain Ute Tribe doesn't oppose wolf restoration in Colorado. However, the Tribe wants to protect its sovereign immunity and its capacity to manage its land and natural resources, both on trust and fee lands. This would include monitoring and protecting wildlife within the Brunot Area.

Furthermore, wolf restoration poses an even greater risk to the Ute Mountain Ute Tribe's elk herds and livestock on its Tribal ranches located in Gunnison, La Plata, and Montezuma Counties, risks that are not shared by the SUIT.

It's difficult to know what the long-term impacts wolf restoration will have on elk populations across the state, but the UMUT agrees with SUIT that "if ungulate populations decrease and it becomes necessary to limit hunting licenses, it is our strong opinion that any hunting license reductions within the Brunot Area must fall on the hunters licensed by the state. The Tribe(s) will continue to monitor game populations in the Brunot Area and any voluntary reductions in Tribal hunting licenses will be within the sole discretion of the Tribe(s). This is the only approach that is consistent with the intent of the 1874 Brunot Agreement."

Along with the Southern Ute Indian Tribe, the Ute Mountain Ute Tribe believes that addressing wolf-livestock conflicts is an essential part of the Plan. Colorado Parks and Wildlife arbitrarily caps the compensation at \$8,000 for all depredations rather than assess the true market value of each animal. While this cap should cover most losses, it won't adequately compensate an owner

who loses a valuable saddle horse or an expensive breeding animal. Therefore, the UMUT believes that CPW should incorporate the actual cost of each depredation into the proposed rule.

There is another consideration, too. If a cow is lost to wolf depredation, a livestock owner must not only replace that cow but loses two or three years of production from that cow if the owner replaces that cow with a replacement heifer. By the time that replacement heifer weans a calf, she will be two-and-a-half or three years old, if she weans a calf at all. Consequently, the owner loses the revenue from the sale of at least two calves, more likely three, which is the number of calves the cow would have had if not lost to wolf depredation. I understand that there are other considerations and other means by which a livestock owner can be compensated for any wolf depredation, but CPW must keep in mind that any kind of loss to a livestock owner is reflected not only in financial considerations but in the disruption of the overall livestock operation.

I also agree with the Southern Ute Indian Tribe's comment that "it is critical that funding is in place to support the programs needed for this effort, including a restoration program, a monitoring and research program, an education and outreach program, and a conflict mitigation and compensation program." Both Tribes are exploring the possibility of working in coordination with CPW to address gray wolf issues, including livestock depredations on the Reservations and big game impacts in the Brunot Area. The UMUT also has special concerns about livestock depredations and reductions to elk herds within its Tribal Ranches and is exploring the possibility of writing its own Wolf Management Plan. To this end, the Tribe would look to both CPW and U.S. Fish and Wildlife Service for assistance.

From page 32 of the Draft Colorado Wolf Restoration and Management Plan:

Within Colorado, preliminary release locations are constrained by several geographic criteria. State statute requires that wolves be released only west of the Continental Divide (CRS 33-2-105.8). Fritts et al., (2001) found that wolves released in Yellowstone and central Idaho moved substantial distances in the months immediately after release (average distance was approximately 50 miles ranging from approximately 22 to 140 miles from the release sites). Because of this, releases in Colorado will be located a minimum of 60 miles from the northern border with Wyoming, the western border with Utah, the southern border of New Mexico, as well as a similar buffer, as requested by the Tribes, of sovereign tribal lands in southwestern Colorado (Figure 4). This geography should not be interpreted as the only places in the state where wolves will be tolerated or successful – this is only to inform initial release locations. It is anticipated that wolves will expand widely over time, including to the Front Range of Colorado. Furthermore, it is unknown whether wolves will remain in proximity to initial release sites or range more widely before establishing territories within suitable habitat.

While the UMUT is grateful for the State's consideration of sovereign Tribal lands in southwestern Colorado, the Tribe owns a ranch inside one of the key release locations in the Gunnison, Grand Mesa, and Uncompaghre National Forests. The Tribe would ask that CPW adopt a broader recognition of Tribal sovereignty not only on Trust lands and the Brunot Area but also on fee lands owned by the Ute Mountain Ute Tribe through a Tribal Wolf Management Plan or MOU. This plan would outline in detail the responsibility of both the State and the Tribe in the management of the gray wolf within Trust lands, the Brunot Area, and fee lands owned by the Tribe. We agree with SUIT that cooperation is important for the successful restoration of

gray wolves into Colorado. In this regard, the Tribe should be regularly updated on the status of gray wolves in the State, which should include detailed information on the date and location of each release along with the number, age, and sex of each wolf. Additionally, the Tribe would ask that the State provide updates on the movement of wolves and share GPS locations and radio collar data from collared wolves.

The UMUT appreciates CPW's ongoing cooperation and willingness to work with both the Southern Ute Indian Tribe and the Ute Mountain Ute Tribe in the restoration and management of the gray wolf in Colorado. We hope to continue a healthy and productive relationship going forward.

Sincerely,

Manuel Heart, Chairman
Ute Mountain Ute Tribe