



COLORADO
Parks and Wildlife
Department of Natural Resources

Director's Office
6060 Broadway • Denver, CO 80216
January 16, 2026

United States Department of the Interior
U.S. Fish and Wildlife Service
Washington D.C. 20240
Attn: Director Brian Nesvik

Dear Director Nesvik,

I write in response to your December 18, 2025, letter concerning the Colorado nonessential experimental population of gray wolf, established pursuant to the U.S. Fish & Wildlife Service's ("FWS") 10(j) rule, 88 Federal Register 77,038 (Nov. 8, 2023). Pursuant to the December 12, 2023, Memorandum of Agreement ("MOA") between our agencies, Colorado Parks and Wildlife ("CPW") is designated as the lead management agency for the Colorado nonessential experimental population. Your letter identifies two CPW management actions that are of concern to FWS. This letter addresses each concern and clarifies how CPW is acting within the requirements of the 10(j) rule and the MOA.

First, your letter raised a concern related to the January 2025 translocation and release of 15 gray wolves from British Columbia and the terms of the 10(j) rule.

As requested, Exhibit A, and its supporting documents, fully detail the January 2025 release.

This operation was consistent with the terms of the 10(j) rule. We respectfully disagree with any interpretation that the 10(j) rule limits the source population for wolves or otherwise prohibits CPW from sourcing wolves from British Columbia. The 10(j) rule



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itself does not discuss source populations. See 50 C.F.R. § 17.84(n).¹ Only the preamble to the 10(j) rule discusses source populations. There, the Service recognized “[t]he *preferred* donor population for the reintroduction of gray wolves to Colorado is the delisted [Northern Rocky Mountain] NRM population,” which “is part of a larger metapopulation of wolves that encompasses all of Western Canada.” See 88 Fed. Reg. at 77023 (emphasis added). The use of the word “preferred” is instructive here. Further, while the Service considered possible negative effects on the NRM population of sourcing wolves from there, *id.* at 77023, it did not purport to limit the donor population to the NRM population. Thus, CPW’s sourcing of 15 wolves from British Columbia for release in the state was permissible under the terms of the 10(j) rule.

Consistent with our practice, this sourcing and translocation effort was closely coordinated with FWS staff, who did not raise any concern with sourcing wolves from British Columbia at any point during the process. Coordination with FWS began as early as February 2024, with FWS confirming that no Federal authorizations or permits are required from FWS for the import of gray wolves from Canada. Exhibit A, Tab 6. Consistent with FWS’s advice, CPW obtained authorization from FWS’s Office of Law Enforcement to import the wolves into alternate ports for inspection and clearance. *Id.*, Tab 5.

Furthermore, we assure you that Coloradans had ample notice of CPW’s planned releases of the British Columbia wolves. CPW first announced through a [press release](#) in September 2024 that it had reached an agreement with British Columbia to be the source for up to 15 wolves for the second year of wolf releases into Colorado. See *id.*, Tab 7. In early December 2024, CPW issued a [press release](#) which updated the public on this effort, recounted the milestones of the first year of the wolf reintroduction program, and detailed the agency’s improvements to its conflict minimization program. *Id.*, Tab 9. CPW further informed the public that the expanded program provided greater

¹ The rule only establishes a nonessential experimental population of gray wolves in Colorado, *id.* § 17.84(n)(1)-(3); relaxes the ESA’s take prohibition within the NEP, *id.* § 17.84(n)(5), (7); sets reporting requirements, *id.* § 17.84(n)(6); provides for monitoring and reviewing the success of the NEP, *id.* § 17.84(n)(8)-(9); and describes how Colorado and Tribes within the state can assume lead management responsibility, *id.* § 17.84(n)(10).



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access to site assessments so that producers could identify the most effective non-lethal tools and techniques for their operations, added conflict specialist staff, refined CPW's depredation response protocols, created a range rider program, and a grant program to assist with implementing non-lethal conflict reduction measures. *Id.* CPW discussed much of this information, including the source of the forthcoming wolves to be released, at the January 8, 2025 public meeting of the Colorado Parks and Wildlife Commission. *Id.*, Tab 10.

Finally, CPW issued press releases [when operations began](#) and immediately after [concluding the releases](#) and provided additional public updates and reports on the effort through June 2025. *Id.*, Tabs 11-14.

The second concern raised in your letter is related to the December 2025 re-release of gray wolf 2403.

As requested, Exhibit B details the capture and relocation effort of this wolf. To summarize, this effort was in accordance with the 2023 Memorandum of Understanding between the state wildlife management agencies for Utah, New Mexico, and Arizona, as well as with USFWS. Exhibit B, Tab 1. In that MOU, the agencies agreed to cooperate on actions necessary to assist in CPW's gray wolf restoration efforts, protect the genetic integrity of the Mexican gray wolf population, and collaborate in association with the 10(a)(1)(A) permit for neighboring states outside of Colorado's 10(j) boundary to return wolves that leave the experimental population area. *Id.*

In early December 2025, CPW staff informed New Mexico Department of Game and Fish (NMDGF) staff that wolf 2403 was traveling toward New Mexico. After the wolf crossed into the state, NMDGF began planning a capture effort, consistent with the MOU. CPW notified Region 6 USFWS of the planned effort and received an email confirming that the two state agencies could proceed with the capture and re-release of wolf 2403 into Colorado. *Id.*, Tab 2. On December 11, 2025, NMDGF successfully captured the animal and drove it to the state border, transferring it to CPW staff.

In determining where to re-release the animal within the state, CPW considered many factors, including: proximity to an unpaired female gray wolf in an effort to support



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pairing; nearby natural prey populations; distance from developed areas and roads; and distance from livestock.² CPW staff notified Grand County commissioners approximately 45 minutes prior to the release, and the local stockgrowers association president was notified immediately after the release. Monitoring data on the wolf shows that, within 24 hours, the wolf had crossed 2 county lines and, within 2 days, was over 20 miles away from the release site.

CPW issued a [press release](#) immediately after concluding the re-release operation. *Id.*, Tab 3. On December 18, 2025, CPW responded to letters from the Grand County Commissioners and the Grand County Sheriff, further explaining the operation and the selection of the re-release location, as well as the information that the wolf had migrated away from the re-release site. *Id.*, Tabs 4-5. On December 30, 2025, CPW responded to a second letter from the Grand County Commissioners. *Id.*, Tab 6.

Your letter also requests a “complete reporting” from December 12, 2023, to present.

For a report through March 31, 2025, I direct your attention to first and second annual wolf reports, issued in compliance with the requirements of the 10(j) rule. *See* 50 C.F.R. §17.84(n)(9)(i). The 2024 report, covering December 2023 through March 31, 2024, documented 12 wolves in Colorado (2 naturally occurring wolves plus 10 introduced wolves) with 100% survival and no known wolf reproduction. *See* Exhibit C. There were 3 confirmed wolf depredations. The Division did receive requests to lethally remove depredating wolves but declined to do so after consultation with FWS.

The 2025 report covers April 1, 2024, to March 31, 2025. *See* Exhibit A, Tab 14. The report details the successful reproduction of one pack, known as the Copper Creek pack, resulting in 5 pups that survived through the end of the calendar year. The report also details the January 2025 translocation of an additional 15 wolves from British Columbia. There were five known wolf mortalities through March 31, 2025. The Division confirmed 25 wolf-livestock depredations. The Division did not authorize any lethal removals during this period.

² While this wolf, who had dispersed from its natal pack months before, met the definition of “depredating wolf” at the time of re-release, the situation did not meet the criteria for “chronic depredation” in CPW’s administrative directive.



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CPW's management of the experimental population since March 31, 2025, is detailed in Exhibit D. There have been challenges as well as successes - CPW authorized lethal removal efforts and worked with USFWS to investigate additional wolf mortalities but also documented four successful breeding wolf pairs. CPW also continues to work to improve its management of this complex program, including its conflict minimization program and the damage compensation claims process. With these improvements, CPW looks forward to working with its partner agencies, stakeholders, producers, and the interested public to continue the success of the wolf reintroduction program.

CPW has no current plan to introduce wolves this release season. During this intermediate time, we intend to meet with producers and other stakeholders and we invite you, Director Nesvik, to participate in these discussions. As noted above, CPW has invested in a significant conflict minimization program, and we look forward to exploring how we continue to maximize this program with producers. The goal of Colorado's reintroduction effort is the creation of a self-sustaining population of wolves in the state, and, similarly, the Service's goal of establishing a 10(j) population is to promote the conservation of the species.

We believe this response satisfies your requests and that termination of the MOU mentioned in your December 18 letter is not warranted. However, if you identify additional questions, we will supplement this response. We value the partnership between our agencies, not only in this wolf management context, but also the many other collaborative situations in which our joint efforts benefit Colorado's wildlife and natural resources. We believe that it is advantageous for both of our agencies for CPW to continue as the lead management agency for Colorado's nonessential experimental population of gray wolves. In accordance with the MOA, our leadership and staff will continue to closely coordinate on wolf management decisions with regional FWS staff, utilizing the standing bi-weekly staff call that has existed since early 2024 and other higher-level communications, as appropriate; we also welcome a discussion about how that coordination can continue to be improved.



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Sincerely,



Laura Clellan

Acting Director, Colorado Parks and Wildlife

Attachments: Exhibits A-D



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