



# COLORADO

## Parks and Wildlife

Department of Natural Resources

Fort Collins - Area 4  
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Fort Collins, CO 80526  
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RECEIVED  
JUL 17 2017

July 9, 2017

Mr. Rob Helmick- Senior Planner  
Larimer County Planning Department  
P.O. Box 1190  
Fort Collins, CO 80522-1190

RE: WOLF II Special Review

Dear Mr. Helmick:

Thank you for the opportunity to comment on file number 16-ZONE2038, concerning the WOLF II Special Review Public Hearing application with a proposed site location of 16278 County Rd 74E, Livermore, CO. Colorado Parks and Wildlife (CPW) is familiar with the proposed site and has read over the updated current proposal plan.

This proposal would allow for the development of a captive wildlife sanctuary that would hold captive born wolves and wolf hybrids in a sanctuary setting. The facility would be owned, developed and maintained by the W.O.L.F. Sanctuary. Currently, the W.O.L.F. Sanctuary is licensed through CPW to operate a wolf wildlife sanctuary in Larimer County at 1870 Spring Valley Rd, Bellvue, CO.

As mentioned in CPW's land use comment letter on August 15, 2016, the surrounding land, including this 180 acre site, is very valuable habitat for a wide array of wildlife such as deer, elk, mountain lions, black bears and various raptor species. Due to its proximity to neighboring higher and lower elevations, the mixed coniferous/shrub vegetation and southerly facing aspects provide key cover and food sources for migrating deer and elk in the fall and early spring.

This particular proposal site is increasingly important as a wildlife migratory route because in its current state, it is mostly undeveloped. Large residential subdivisions to the west (Red Feather Highlands) and to the southeast (Glacier View) limit migratory route options due to the presence of human activity. If the sanctuary is developed, migrating elk and deer would likely have to shift or disperse their routes to the more sparsely developed Red Feather Highlands and areas to the north.

Also, as discussed last year in CPW's comment letter, the potential negative impacts to migration in the area may be reduced if the facility's footprint is reduced or compacted on both the west and east side of the property, allowing for more open area for wildlife to move across the landscape. Although more restricted, this could allow a migration corridor to continue its existence on the property.



A review of the most current W.O.L.F. development plan submitted to Larimer County by Landmark Engineering on June 12, 2017 allows for some portions of the property to remain undeveloped to aid in wildlife migration and general wildlife use. The majority of the proposed development will take place near the center portions of the property. These more highly developed areas may see less viable site conditions for continued wildlife use.

The west corner, portions of the east side of the property, areas of the south boundary and parts of the wet meadow area on the property's north boundary will remain largely undeveloped. This may be beneficial in allowing wildlife an unhindered passage route through the property onto adjacent lands while also providing some limited grazing and resting opportunities.

While this updated site plan on the W.O.L.F. property may help to lessen negative impacts on wildlife, a few changes can be made to further reduce the negative effect site development may have on future wildlife use.

First, on the eastern side of the property, the "V1" enclosure development could act as a migratory barrier for elk and other big game animals. Removing "V1" or by moving it further to the west to an area directly north of enclosures 1-3 would help consolidate disturbance on the land. This would keep site development more centralized on the property, which allows for a larger undeveloped corridor for wildlife use.

Secondly, page five of the W.O.L.F. II Sanctuary Special Review Public Hearing Project Description document mentions that some site tours may be conducted by utilizing all-terrain vehicles (ATVs) or other similar vehicles. ATV use in wildlife habitat can cause disturbance to wildlife due to noise and vegetative degradation. ATV use should be restricted to previously disturbed surfaces (i.e. developed roadways) to avoid compromising existing vegetative communities on site. This use should also avoid areas on the property set aside for wildlife habitat. This would include the east and west sides of the property.

In addition, ATV use should be limited during periods where wildlife may be more stressed and more vulnerable. For example, late spring and early summer months are times when big game will be calving/fawning and winter months are often conducive to harsh weather conditions that can stress body conditions of various wildlife due to the lack of food sources.

As mentioned in last year's comment letter, CPW Wildlife Commission Regulations outline specific wildlife sanctuary facility requirements that must be met to legally hold captive wildlife species, including wolves, to limit the interaction of these animals with native wildlife, prevent disease exposure and other issues. Escape prevention is also critical to ensure human health and safety is not compromised. These requirements detail minimum fencing standards to prevent escape of captive wildlife. An on-site inspection of the facility's infrastructure to ensure the wildlife sanctuary standards are met will be conducted prior to issuing a CPW Wildlife Sanctuary License.

If general fencing is constructed on the property separate from the wolf holding pens, it is strongly recommended that W.O.L.F. Sanctuary construct them following CPW's friendly wildlife fencing guidelines. These guidelines specify such things as fence wire height and wire type to ensure safe wildlife passage over or under the fences.

Thank you again for the opportunity to comment on this proposed development. If you have any further questions, please contact local District Wildlife Manager Brock McArdle at (970) 218-4941 or at [brock.mcardle@state.co.us](mailto:brock.mcardle@state.co.us).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ty Petersburg', with a long horizontal flourish extending to the right.

Ty Petersburg  
Area Wildlife Manager

CC: B. McArdle, J. George, T. Kroening, W. Padia, M. Leslie, File