

# W.O.L.F. II Sanctuary



## Special Review Public Hearing Project Description

Submitted: June 12, 2017  
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Larimer County File No. 16-Z2038

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## SECTION 1: PROJECT SUMMARY

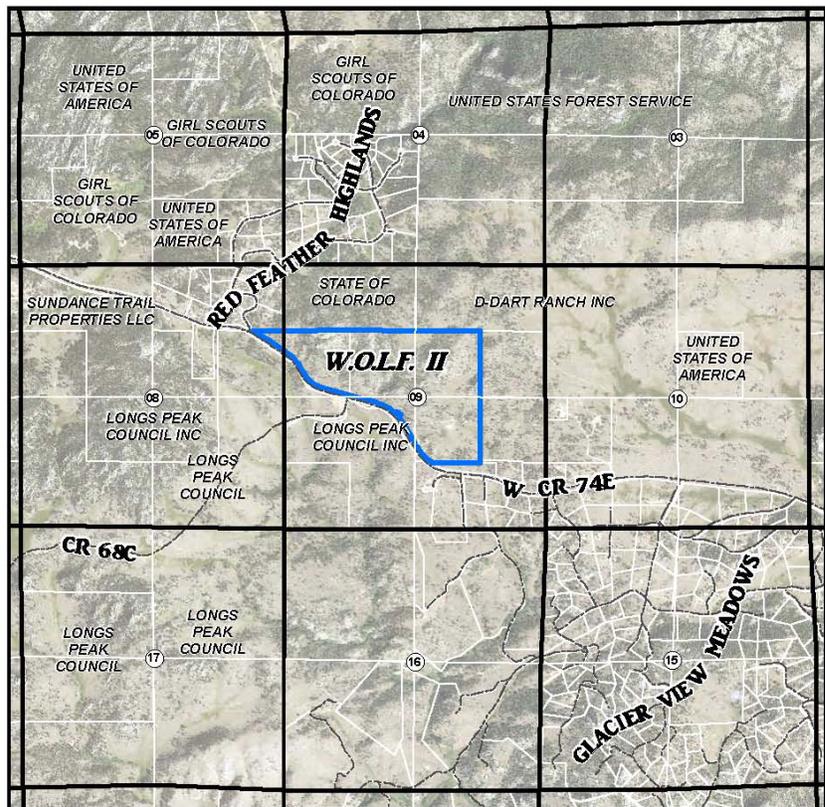
Wolves Offered Life and Friendship (W.O.L.F.) is a 501(c)3 non-profit organization in Northern Colorado that provides sanctuary to captive-born wolves and wolf-dogs, their veterinary care, as well as educational efforts raising awareness of problems associated with keeping these and other exotic animals as pets.<sup>1</sup> The organization operates under USDA and State of Colorado permits,<sup>2</sup> in addition to a Special Review Permit issued in 1999 by Larimer County for the Rist Canyon facility.

Funded primarily through donations, W.O.L.F. is one of approximately 30 similar sanctuaries around the country, as captive wolf and wolf-dog breeding continues. The nearest wolf sanctuary to Larimer County is west of Colorado Springs, near Florissant.

W.O.L.F. is in the process of relocating from its current facility in Rist Canyon, to a new facility east of Red Feather Lakes – referred to herein as W.O.L.F. II – north of the intersection of West County Road 74E (Red Feather Lakes Road) and West County Road 68C (Boy Scouts Road): Parcel No. 2909000051, a.k.a. 16278 and 16888 W. CR 74E. The total property size, before right of way dedication, is about 162 acres, subject to verification with a boundary survey following the public hearing process.<sup>3</sup> This application seeks a new permit allowing its operation at W.O.L.F. II.

W.O.L.F.'s existing ±180-acre facility in Rist Canyon<sup>4</sup> is problematic, to say the least. The organization finds itself forced to move, primarily for the reasons listed below.

- W.O.L.F.'s access to the Rist Canyon facility has an allowed maximum of five



**Figure 1:** Vicinity Map. The property is northeast of Red Feather Lakes Road (CR 74E) and Boy Scouts Ranch Road (CR 68C). Gates 12 and 13 of the Glacier View Meadows neighborhood are near the southern property line.

<sup>1</sup> A detailed description of W.O.L.F. and its mission can be found at [www.wolfsanctuary.co/more-about-us/](http://www.wolfsanctuary.co/more-about-us/).

<sup>2</sup> USDA License No. 84-C-0071 and CPW License No. #17sanc738.

<sup>3</sup> Public records indicate that the W.O.L.F. II property area is ±180 acres; however, area calculations based on County mapping indicate that the land area is ±162 acres north of CR 74E, prior to any right of way dedication. The 180-acre figure was used in the Sketch Plan application. Discrepancies between recorded and measured land areas are not uncommon in rural mountain areas, particularly on large, unplatted parcels; however, a 10% difference is unusual.

<sup>4</sup> Parcel No.'s 1836000929, 1702000929, 1701000903, and 1701000909; addressed as 1693, 1840, and 1870 Spring Valley Road. One parcel has no Post Office mailing address.

vehicles per day on a severely rutted, poorly maintained private road (about 2.5 miles from Rist Canyon Road). To use the road, W.O.L.F. is subject to the terms of three separate access easements. Owners between Rist Canyon Road and W.O.L.F. who control access to Spring Canyon Road are unwilling to permit W.O.L.F. any additional use of the road.

- An alternate route to W.O.L.F. does not exist, is not planned, and is not feasible. Because of the distance to W.O.L.F. from Rist Canyon Road via Spring Valley Road, an abundance of vegetative fuel, severe topography, and resultant danger to firefighting personnel (especially if the road is blocked during a fast-moving fire event), the Rist Canyon Volunteer Fire Department provides limited fire protection to the current W.O.L.F. facility. Evacuation of humans and animals from W.O.L.F. is difficult and time-consuming, at best.
- W.O.L.F. relies on donations to operate. Donors typically like to see first-hand the facility they support. Due to lack of access per the permit under which W.O.L.F. operates currently, as well as the terms of access easements, the public is unable to visit the property.
- The High Park Fire exacerbated the flooding of 2013 and events since. With less cover upstream following the fire and resultant additional runoff, property damage at W.O.L.F. has occurred on eight separate occasions since the High Park Fire (most recently in May 2017), causing severe financial hardship. W.O.L.F.'s current permit to operate its facility constrains buildings, parking, and enclosures into that part of the property most prone to flooding.
- Because of the flooding history at the Rist Canyon property, insurance is not available for most of W.O.L.F.'s infrastructure, and prohibitively expensive otherwise.
- Electric lines do not extend to W.O.L.F.'s facility, and are not planned to do so in the foreseeable future. Because of topography, aspect, and dense vegetation, the property is poorly suited for wind and solar systems. Operations requiring electricity are limited to 3 – 4 hours per day due to the expense of operating generators.
- The existing well is shallow and frequently contaminated by upstream livestock. Water for human consumption must be delivered.
- Despite the size of the property, all enclosures are restricted to a 5-acre area along Redstone Creek, near the northern property lines of Parcels 1701000909 and 1701000903.<sup>5</sup>
- Spatial constraints preclude an on-site sanitary veterinary facility, meaning that surgeries and similar care should occur off-site to avoid infection. Tranquilizing and transporting sick or injured animals is difficult because of the poor access.
- Enclosures at the current facility are small. Several enclosures are less than 1/3-acre, which increases the likelihood that bare ground will be exposed, leading to soil erosion.
- W.O.L.F. currently must transport "ambassador" animals off-site to fulfill its educational outreach program, as it has no classroom facilities or the ability to bring groups to the site due to access agreements. Other similar sanctuaries include classrooms, as well as a gift shop, which would supplement donations and ensure the continued success of the organization.
- Caretaker quarters are rudimentary and cramped, with little or no room for expansion.

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<sup>5</sup> This restriction was the result of W.O.L.F.'s prior management opening and operating the facility without necessary permits to do so, attempts by the same management to expand the facility without necessary permits, and an antagonistic relationship with adjacent property owners, the media, and Larimer County.

- Toilet facilities are rented port-a-potties, which are expensive both to rent and maintain.
- W.O.L.F. is only a 50% owner of its facility. Frank Wendland – the other property owner and prior Executive Director – continues to live at W.O.L.F. year-round in the building that had been the organization’s headquarters, while disputing the ownership. Mr. Wendland is attempting to sell or force a partition of the current property, potentially displacing the sanctuary before a new location is approved.<sup>6</sup> Responding to this effort is an ongoing financial burden. W.O.L.F. and Mr. Wendland’s cabin are physically located on the same parcel. Three enclosures surround the cabin where Mr. Wendland lives.

Some of the above concerns (risks of fire and flooding, lack of electrical service, and similar) could be considered inconveniences associated with being in a rural mountainous community. However, following the one-two punch of the 2012 High Park Fire and 2013 Flood, combined with the ongoing ownership dispute, the W.O.L.F. Board elected to acquire a new property better suited for its needs. Therefore, the organization purchased W.O.L.F. II in April 2016, based on the following criteria:

- **Good Access.** Being adjacent to a maintained paved county road – and not at the end of 2.5 miles of steep, winding road in poor condition – was critical, in addition to being within a reasonable driving distance from Front Range communities. The physical distance to the Red Feather Lakes property is greater, although drive times are nearly identical to the Rist Canyon facility from Fort Collins and Loveland.
- **Distance from Adjacent Structures.** While the W.O.L.F. II parcel is not isolated – private land near paved roads in Northern Colorado tends not to be – the intent was to minimize the number of homes near and within line of sight from enclosures. The organization is well aware that wolves make noise a few times daily; however significant distance separates enclosures from large-lot subdivisions and other nearby properties. All but a small fraction of that noise will dissipate before becoming audible to adjacent and nearby property owners, even before discounting the effects of terrain and land cover.
- **Topographic Relief.** The ideal setting for a wolf enclosure is on sloping ground, ranging from 10% (10:1), up to 50% (2:1), with topographic separation between enclosures and structures on adjacent properties to create multiple pods of enclosures.
- **Elevation, Vegetation and Cover.** The mix of vegetative cover, including Ponderosa & Lodgepole Pine, is ideal for shade. Because wolves are better adapted to cooler temperatures, higher elevations are generally preferable.
- **Availability of Electricity.** W.O.L.F. will be delighted to need a generator only to supply back-up power, as Poudre Valley REA currently serves W.O.L.F. II. The southern orientation of the land, as well as its position along a ridgeline in a generally windy area, make both solar power and wind generation possibilities that may be explored.
- **Existing Buildings in Good Condition.** By not having to construct buildings in the initial phase, the organization has considerably more latitude with the timing of its move and expenditure of funds.
- **Zoning & Land Use.** The property selected is zoned O-Open, which allows the proposed use, with a Special Review. The majority of land in the area surrounding the property consists of large lots and very large non-residential property assemblages. The pages following discuss the potential impacts of W.O.L.F. II on the surrounding area, and the ways in which these are mitigated.

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<sup>6</sup> Larimer County District Court Case No: 2016CV030619.

## Proposed Land Use

Under the County's Land Use Code, a sanctuary for captive-born wolves and wolf-dogs is considered a "Pet Animal Facility" as a principal use. This use is allowed in the O-Open district, following a Special Review process. Because of the nature of an animal sanctuary, staff will be present continuously; however, most staff and volunteers will be on the property during regular business hours. The following uses are proposed to be permitted on the W.O.L.F. property through this Special Review:

- Sanctuary for 30 captive-born wolves and wolf-dogs are proposed in the initial phase, with a capacity of 60 animals in the final phase. An average of two animals per enclosure is proposed for the thirty full-time enclosures. Two additional enclosures (one in each phase) are intended primarily for recovery from surgeries and/or other veterinary care, for a total of 32 enclosures on the property when the final phase is completed. From time to time, up to four animals may be within one enclosure for limited periods to allow for maintenance and/or other activities.
- Caretaker facilities will use the existing cabin through the first phase, with construction of a second cabin north of the intersection of CR 74E and 68C in the second phase. The existing cabin has one bedroom. The cabin constructed in the second phase also will have one bedroom.
- On-site veterinary care for sanctuary animals, non-profit administrative offices, sanctuary animal food preparation and storage, maintenance vehicle and equipment storage, etc., are proposed in and adjacent to the existing metal barn on the subject property. To facilitate recovery and close supervision following intensive veterinary care, a small indoor-outdoor pen is planned adjacent to and within the existing garage near the existing caretaker's cabin.
- Guided educational tours of the facility and seminars, to be conducted at set times by prior arrangement, will occur as weather permits Wednesday – Sunday. The schedule may vary with holidays. Tours will be scheduled to occur, at most, five days weekly. The public facilities in Phase 1 will include the Lower Staging Area, a small pavilion and waterless restroom facilities near the main entry. Phase 2 will expand public access to include a visitor's center, which will include indoor and outdoor classroom space, a gift shop, an observation deck, and similar items to be determined as architecture is more fully developed. An accessible pedestrian trail is proposed north of the visitor center to allow walking tours to the ridge south of Enclosures 1 – 3, with access to an overlook south of the Jess Scott Spring.





**Figure 3:** Existing metal barn, looking west. The Visitor Center site is to the right of the road, near the ridge in the background.

The primary access road is proposed to be relocated west to meet sight distance requirements. A small parking area will be constructed in the initial phase, with a pavilion and waterless restroom, near CR 74E. This Lower Staging Area will be gated, and will be opened to the public prior to scheduled tours.



**Figure 4:** Lower Staging Area, looking north. CR 74E is behind the viewer. This bowl was used as a borrow pit when CR 74E was relocated and paved.

The Visitor Center will be constructed in the second phase, near the top of a saddle more than 350 feet from CR 74E, with a small parking lot to its east. The building will be about 90 feet vertically above the road. An observation deck is proposed along the west side of the structure. When the building is constructed, tours are planned to commence from there; until then, the Lower Staging Area will be used. Unguided public access will not be allowed on the property. Only vehicles on W.O.L.F. business will be allowed beyond the entry gate east of the Visitor Center. The Visitor Center will include running water, via a buried cistern uphill from the building.

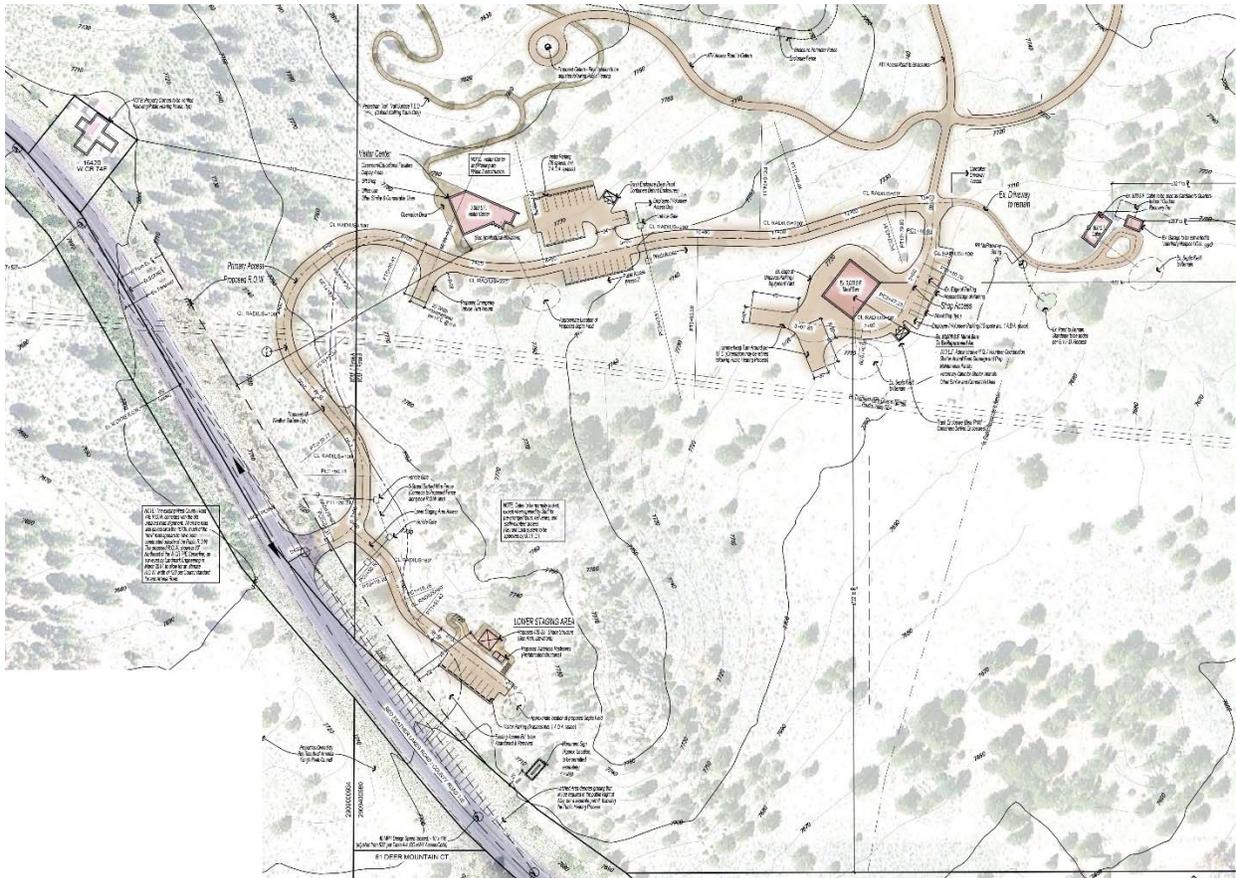


**Figure 5:** Proposed Visitor Center. Façades will reflect local construction materials and methods, with a standing seam metal roof, and a combination of stone and wood fascia, generally similar to lodges and homes in the area. Final building plans and elevations will be developed following the public hearing process.

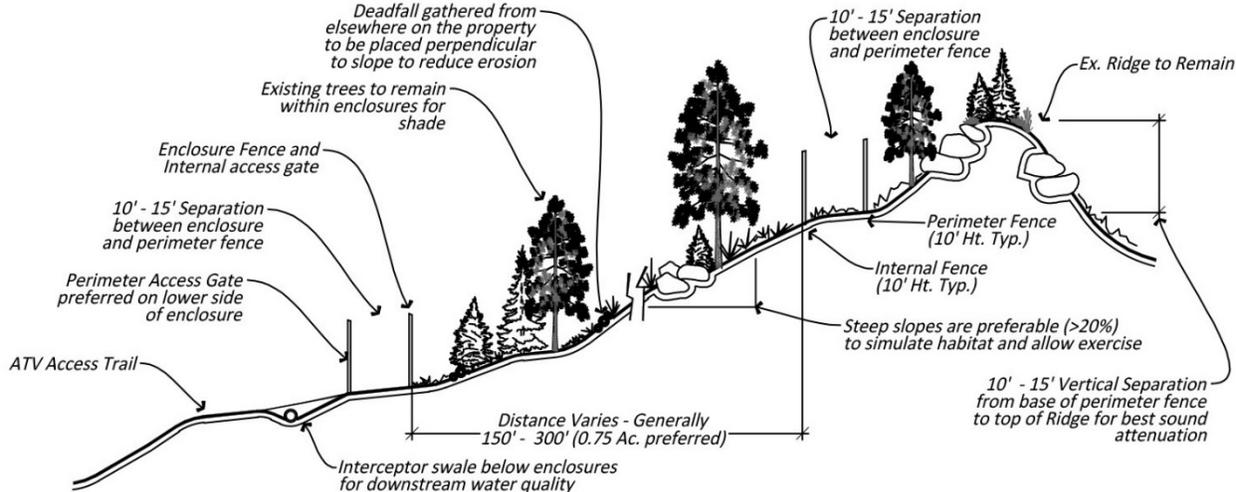
In the initial sketch plan, the concept of using a portion of the Log Cabin settlement – the white cabin – as a visitor center was proposed. Because of the condition of this structure and its location partially within proposed right of way, that adaptive reuse of the building is not viable. Off-street parking compliant with county regulations, as well as access to the remainder of W.O.L.F. facilities, would be extraordinarily difficult from the location due to severe topography.

Through Phase 1 improvements, W.O.L.F. intends to leave the structure in place. Following the public hearing process, W.O.L.F. intends to explore the concept of donating the white cabin to the Red Feather Lakes Historical Society, to be relocated and restored elsewhere in the Red Feather Lakes area. Alternatively, W.O.L.F. may seek grant monies to restore the building in place, subject to the county permitting the building to remain partially in the expanded public right of way and an appeal to standard regarding parking. If requested, any appeals related to the white cabin would be completely separate from this application.

Following this public hearing process, W.O.L.F. intends to work with the RFLHS to inventory the settlement area. Some of the Phase 2 improvements will make inventorying remaining foundations, portions of structures, etc., more difficult.



**Figure 6:** Primary access road detail, overlain on 2015 aerial photography. The proposed entry is to be relocated west from the current driveway to achieve safe entry sight distances at 50 mph. The Visitor Center is proposed east of the ridge line, such that the building is not visible from the Campbell Property below. Hammerhead turnarounds suitable for fire apparatus are proposed at the top of the ridge (approximately 600 feet from CR 74E) and in conjunction with the metal barn parking area. With the exception of the portion within public right of way, the access road is proposed to be paved with crushed gravel (see page 41 for discussion). A full-size version of this plan is included separately in this application.



**Figure 7:** Enclosure Concept Section.

Most of the wolf enclosures are in Parcels A and B, in the largest bowl in the center of the property, with a few enclosures north of the metal barn in Parcel A. Parcel C is to remain open in the first phase, with a few

enclosures added in the second phase. Final phasing plans may vary slightly based on permitting and construction sequencing; however, 20 full-time enclosures are planned in the first phase, with the remainder being constructed in the second phase. For all 32 enclosures, the average area per enclosure is 0.58 acres. The smallest enclosure is 0.50 acres, with the largest at 0.80 acres. The total fenced area at full buildout is 24.7 acres, or 15.7% of the property.<sup>8</sup>



**Figure 8:** Aerial perspective (Google Earth), looking generally east, with Site Plan / Site Inventory Map draped over existing topography. Proposed enclosures are shown in green, and assumed wildlife corridors are yellow. The Red Feather Highlands neighborhood and Springmeadow Way are on the left side of the image. The western portion of Glacier View Meadows (Gates 11 – 13) is south of CR 74E on the right side of the image, behind the primary access road to W.O.L.F. II.

Following right of way dedication of approximately 5.0 acres, the remaining land area was calculated to be ±157.18 acres. At completion of the final phase, buildings, parking, access roads, and trails will cover approximately 4.5 acres (including existing buildings and roads to remain). Combined with the enclosure area above, the total developed footprint on the property will be about 29.2 acres. While a greater area than the above will be disturbed for grading operations associated with the primary entry drive, roughly 80% of the property is planned to remain open following the completion of the second phase.

Following the public hearing process, the applicant may remove one or two 35-acre parcels from the W.O.L.F. II assemblage for fee-simple sale to private land owner(s). Parcel boundaries have not been determined, although access presumably would be shared with the sanctuary. Enclosures and other activities related to the sanctuary would occur on the land retained by W.O.L.F. Funds generated would offset partially the costs of improvements described in this application and reduce the area for which W.O.L.F. is responsible to maintain.

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<sup>8</sup> This figure reflects the entire fenced area around the enclosures, as measured to the perimeter fence, which will be at least 10 feet beyond each enclosure.

## Issues to be Addressed

The following concerns were raised by agency reviewers and nearby property owners during neighborhood meetings and sketch plan review: neighborhood compatibility, noise, traffic and access,<sup>9</sup> views, wildlife, domestic animals, wildfire prevention, safety, security, evacuation, water use, water quality, lighting, and property values. Given the rural nature of the area, and the fact that the W.O.L.F. II property has been de facto open space since the Red Feather Highlands and Glacier View Meadows subdivisions were platted several decades ago, these concerns are understandable. The following subsections address each of these potential impacts. Other issues are discussed as responses to stakeholder comments in Section 9: Other Information, beginning on page 42.

### Neighborhood Compatibility

Existing uses near W.O.L.F. II include residential (Red Feather Highlands, Glacier View Meadows, and unplatted properties),<sup>10</sup> agricultural (D-Dart Ranch), accommodation (Sundance Trail Guest Ranch, Boy Scouts, and Girl Scouts). The historic use of the W.O.L.F. II property included, among other things, a hotel, general store, and school at the Log Cabin settlement.

The proposed sanctuary is an allowed principal use under the O-Open zoning district in Larimer County, and is consistent with other land uses described for the district, so long as potential land use conflicts are mitigated by distance, topographic relief, and other means. A total of 54 defined land uses are allowed within O-Open zoning, including agricultural, residential, institutional, recreation, accommodations, industrial, and utility uses.<sup>11</sup> Given the topographic constraints and remoteness of W.O.L.F. II relative to population centers, the vast majority of the allowed uses by right and review would be unlikely to occur on W.O.L.F. II in the foreseeable future. However, because of the value of the land and relative scarcity of large parcels with good access, water, electrical service, etc., the property would be unlikely to remain as privately owned open space.

In the absence of W.O.L.F., the most likely development scenarios under the O-Open zone district would be large lot single-family residential properties. Under a traditional layout, up to 15 lots at a 10-acre minimum would be allowed. Using the county's conservation development process, which would be more likely because of access constraints, up to 16 lots could be platted, with a minimum lot size of 2.0 acres each.<sup>12</sup> Preliminary analysis suggests that most of these would be in the southeastern corner (north of Glacier View Meadows Gate 13), with a second cluster in the western corner north of the CR 68C intersection. Because of the property's proximity to USFS land and its location within Colorado Game Management Unit 191, a private hunting lodge, resort, or similar hospitality facility would be a viable option. Any of the above alternatives would entail a public review process.

To be clear, W.O.L.F. II is proposed as neither a residential development, nor a hospitality use. Aside from providing sanctuary, the primary purpose is education. The other uses proposed on page 4, including fundraising through the sale of merchandise, are allowed in the O-Open district both as principal and accessory uses.

W.O.L.F. II is similar in many respects to the Boy Scout property, the Girl Scout property, the Sundance Trail Guest Ranch, and the Shambhala Center: all of these contribute to the rural character of the area by being large tracts of predominantly open lands, with relatively small areas set aside for other permitted uses. All

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<sup>9</sup> See Section 7: Traffic and Access, starting on page 31, as well as the Traffic Impact Study prepared in conjunction with this application by Delich Associates.

<sup>10</sup> Both RFH and portions of GVM zoned O-Open include lots at less than the minimum lot size.

<sup>11</sup> Refer to Larimer County Land Use Code, Section 4.1.5, for the full list of allowed uses in the O-Open district.

<sup>12</sup> Gross area prior to right of way dedication, divided by the minimum lot size in the base zone district.

allow visitors, but rely on relative solitude to remain attractive. While each property is privately owned, all provide vital habitat and migration corridors for wildlife.

In the case of W.O.L.F., the other permitted uses would be an animal sanctuary, with human visitors, as described above. About 75% of the enclosures will be off-limits to all but staff and qualified volunteers. The site plan as submitted calls for approximately 80% of the property to remain as undeveloped open space, which is consistent with the area.

## Noise

Most of the attention received since the initial sketch plan application is related to noise, particularly from howling animals.<sup>13</sup> W.O.L.F. acknowledges that captive-born wolves and wolf-dogs howl; however, this noise will be of extremely short duration (cumulatively, around a percent of a day), and unlikely to be noticeable on nearby properties, except in limited instances described below. The conclusion of this section recommends a series of procedural mitigation methods as well.

When wolves and wolf-dogs howl together, the behavior is called a “chorus,” which can occur up to 5 – 10 times daily, normally less, with a typical duration of about two minutes.<sup>14</sup> Sanctuary animals rarely howl individually, and tend to howl in response to other animals howling. About half or two-thirds of the animals participate in any given chorus at W.O.L.F. Recorded observations in Rist Canyon in May 2017 achieved a sound power level of 90 DbA<sup>15</sup> for an individual animal participating in a chorus.

Not every chorus has an easily defined trigger, although staff and volunteers can stimulate animals to begin a chorus to establish a baseline for a noise study. Typical causes in Rist Canyon include an unfamiliar vehicle approaching, the ATV delivering meat to enclosures, veterinarians conducting examinations, and other changes to the daily routine. Choruses are most commonly near dawn and dusk. Not every wolf participates in every chorus, and some animals are louder than others. Oddly, noise from gun shots, car alarms, low-flying helicopters, and overhead jets seem to have no observable effect.

Barking is typically not a concern: W.O.L.F. is not a kennel. Aside from participating in choruses, sanctuary wolves generally are quiet, although some animals are more boisterous than others. Animals at W.O.L.F. are neither bored, neglected, lonely, nor hungry – conditions which lead to domestic dog barking complaints in urban areas. Animals have companion(s) selected for compatibility to share an enclosure, in addition to frequent volunteer and staff interactions, as well as toys, room to run, kibble on demand, shelter, and water. Wolf-dogs were not bred to be guard dogs, and are normally uninterested in raising an alarm. Like most pack animals, the majority of communication between wolves is visual. Oral communication between sanctuary animals tends to be low frequency growls and similar sounds associated with play and pack communication that would be inaudible beyond a few hundred feet outside of an enclosure.

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<sup>13</sup> Billboards have been erected immediately adjacent to CR 74E right of way near W.O.L.F. II to draw attention to and mischaracterize the proposed land use of this application. Additionally, a website devoted to opposing W.O.L.F.’s relocation ([www.quietmountains.org](http://www.quietmountains.org)) was created.

<sup>14</sup> The total quantity of choral arrangements is a function of disturbances to the daily routine, not a figure to be multiplied by the number of animals. Increasing the number of animals from 30 to 60, for example, will not increase the number of choruses in a given day.

<sup>15</sup> Wayaho and Nysa, both of whom were measured for the study, are W.O.L.F.’s two loudest animals. Please note that a “sound power level” is different than “sound pressure level.” Please refer to the Noise Impact Assessment for additional details.

A noise study<sup>16</sup> was prepared concurrently with the Site Plan. Numeric standards in the Larimer County Noise Ordinance (55 DbA daytime, 50 DbA nighttime)<sup>17</sup> will not be approached, let alone exceeded, on adjacent properties, with the exception of along the north property line (near Enclosures 17 and 18). Public land is north of Enclosure 18, and a portion of the D-Dart Ranch is north of Enclosure 17. Small portions of the 80-acre public lands parcel and the D-Dart Ranch (up to a few acres each, per Noise Study) may occasionally exceed the 50 DbA nighttime noise standard less than one percent of the time. Impacts to humans are expected to be minimal. Development of the 80-acre parcel north of W.O.L.F. II would be remarkably difficult: the transfer of federal land to a private entity would entail (literally) an act of Congress. The D-Dart Ranch is unlikely to be subdivided into residential lots in the foreseeable future, although the possibility exists because of its O-Open zoning designation. If development of the D-Dart Ranch does occur, constructing a home where the nighttime standard is exceeded would be very difficult due to topographic constraints. Potential impacts to domestic animals grazing on the D-Dart Ranch, which are expected to be non-existent, are discussed on page 16.

Residents immediately southeast of W.O.L.F. II and to the west will be able to discern sanctuary animals occasionally from outside their homes, depending on wind conditions. The likelihood of hearing sanctuary animals from inside a residential structure with windows open or closed – while theoretically possible – is low. For perspective, other noise sources, such as coyotes, elk, horses, birds, wind, and automobile traffic on CR 74E, will be heard with greater regularity and audibility at these properties.<sup>18</sup> Portions of the Boy Scout property, especially those areas closest to CR 74E will be able to hear wolves, although at levels not approaching measurable standards.

Section 6 of the Larimer County noise ordinance allows noise in a quiet mountain environment, despite representations to the contrary. The question is whether or not a person of normal habits and sensitivities present at the time the noise is made would be annoyed. That language is a part of the ordinance for a reason: someone standing at their property line listening for noise trespass, or setting up a recorder to monitor sound levels in their absence, might not be considered reasonable – or, for that matter – enjoying their property. Indeed, a prohibition on the transmission of sound onto an adjoining property as a condition of use would be an effective moratorium on any sort of land development.

Several on-line references state that wild wolf choruses are audible up to ten miles away across tundra. These findings are not disputed, although the chorus would be audible at that distance to other wolves, not humans. Under near-perfect conditions for noise transmission near W.O.L.F. II, humans might hear sanctuary animals about a mile away. Conditions for sound to be audible to humans at such a distance would include minimal background noise interference, transmission from low ground to high (with minimal topographic relief between the sanctuary and the listener), icy and rocky ground (and an absence of powdery snow), cool and falling temperatures and/or a temperature inversion, and light winds moving from the chorus to a motivated listener. The most efficient noise transmission would occur in winter, although good conditions for noise transmission could occur throughout the year, especially near dawn (cool temperatures, light winds, and temperature inversion). While these conditions exist independently frequently, their convergence is less likely.

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<sup>16</sup> See “Noise Impact Assessment, W.O.L.F. II Sanctuary” (May 2017). Please note that the noise study was prepared based on an earlier draft of the traffic study, so vehicle trip numbers in the two documents are slightly different. The conclusions are unaffected by the difference.

<sup>17</sup> The entire Ordinance may be found at [www.larimer.org/policies/noise.htm](http://www.larimer.org/policies/noise.htm), as well as an appendix to the Noise Impact Assessment.

<sup>18</sup> Four nearly identical form letters from nearby property owners were received identifying the unique health concerns related to wolf noise and stress. Direct responses to form letters begin on page 56.

- **Background Noise.** The lands near W.O.L.F. II – while quieter than suburban neighborhoods – are far from silent. During the measuring period (May 2017), measured sound levels on W.O.L.F. II in the high meadow above the Jess Scott Spring ranged from roughly 26 DbA to in excess of 55 DbA. Noise levels were below 27 DbA less than 1% of the testing period, and greater than 40 DbA less than 10% of the testing period. The monitoring location was selected for isolation from CR 74E and equestrian operations, both of which can be noisy. W.O.L.F. staff was not present when the noise levels were sampled: all staff was in Rist Canyon preparing for the May 2017 blizzard and subsequent flood event. The level of quietness achieved at the monitoring location would be unlikely to occur within view of CR 74E.
- **Terrain.** W.O.L.F. is higher than the surrounding area within a mile of the property, and noise tends to be deflected upwards over distance. Beyond a mile, some of the higher terrain in GVM south of Gates 11 – 13 will have unobstructed views of several enclosures, and are about the same elevation as the enclosures in south-facing valleys. For this reason, several of properties in GVM at a mile or more distant were analyzed for noise potential. Any noise increase associated with W.O.L.F. II is anticipated to be imperceptible at these locations.
- **Weather.** While light winds assist in the transmission of sound in the downwind direction, the turbulence through trees, rocks, etc., associated with wind speeds greater than about 15 mph creates additional background noise sufficient to mask any wolf chorus. The Red Feather Lakes area is listed as “moderate” wind potential for residential scale wind development, at an average velocity of roughly 6.5 m/s, or about 14 mph at 30 meter height.<sup>19</sup> Calm conditions, or wind less than 5 mph, are less common. Falling temperatures occur most frequently near sunrise and sunset in summer and fall.
- **Icy, Rocky Ground.** Hard, frozen ground with an absence of trees is ideal for noise transmission. Conversely, soft, powdery snow tends to damp sound transmission. Much of the land surrounding W.O.L.F. II is forested, although areas to the south and west are open.
- **Listener Activity.** Presumably, most residents remaining in the area during cold weather would be active outdoors (i.e., snowshoeing, cross-country skiing, snowmobiling, etc.). The noise from mechanized activities would drown out a wolf chorus, and most outdoor winter recreational activities are less desirable without soft snow. Alternatively, most property owners would be expected to be indoors, with the windows closed, during a temperature inversion, further reducing the likelihood of hearing wolves. However, it is acknowledged that many property owners sleep with windows open.

### *Mitigation Measures*

The use of distance and vertical separation between enclosures and nearby properties as a means of reducing potential noise trespass is discussed elsewhere (e.g., page 5). Additionally, the Site Plan intentionally separated the primary entry topographically from enclosures to reduce the likelihood of animals reacting to approaching vehicles. The Lower Staging Area was placed as far away from enclosures as possible to reduce the potential for sanctuary animals to hear unusual human activity. Enclosures were sited, in part, for lack of visibility to and from CR 74E, which will further reduce the likelihood of sanctuary animals reacting to vehicles passing by on Red Feather Lakes Road. The following procedural mitigation measures are proposed as well:

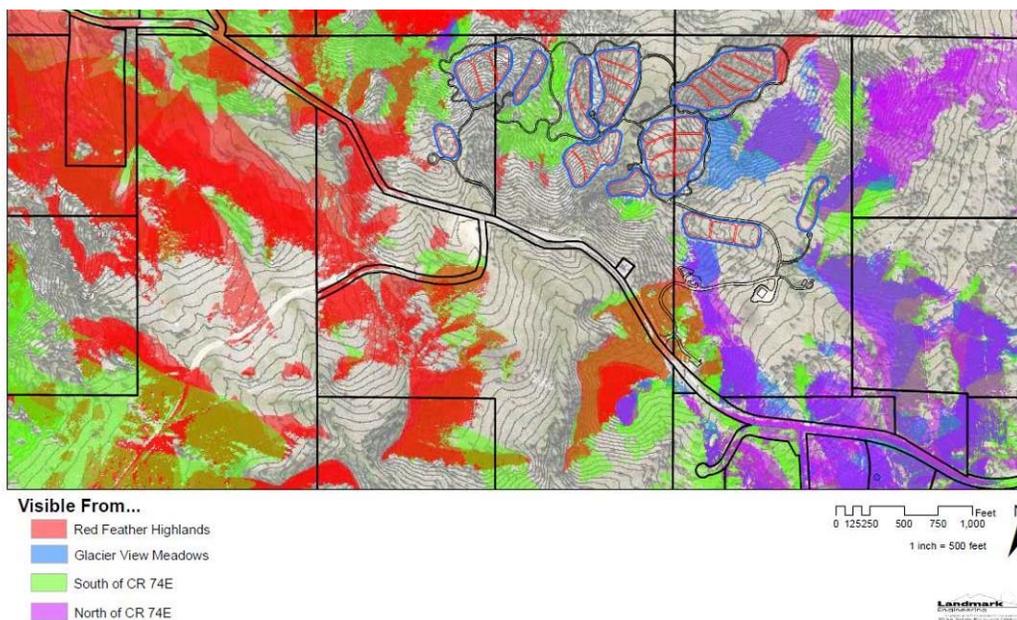
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<sup>19</sup> See [apps2.eere.energy.gov/wind/windexchange/windmaps/residential\\_scale\\_states.asp?stateab=co](https://apps2.eere.energy.gov/wind/windexchange/windmaps/residential_scale_states.asp?stateab=co). Wind speeds will be less at the surface; however, 30 m height estimates are indicative of surface speeds.

- **Animal Placement.** Some wolf pairs are considerably more tolerant than others to visitors, unfamiliar sights and sounds, and are less likely to initiate a chorus. These animals will be housed nearest the Visitor Center, and will be the animals most frequently viewed during educational tours. Boisterous and reclusive animals more likely to respond poorly to stimulation will live in the interior of the sanctuary.
- **Timing of Disruptions.** Captive-born wolves and wolf-dogs react most strongly to disruptions of their daily routines. Maintenance activities, meat delivery, routine veterinary care, and similar activities will be planned near midday when fewer nearby residents might hear the resultant chorus, and preferably during weather conditions less suitable for noise transmission (e.g., not near dawn and dusk).
- **Visitor Education.** In addition to W.O.L.F.'s normal curriculum for its visitors, all visitors will receive instruction prior to visits regarding appropriate behavior to avoid human-caused choruses. Visitors intentionally triggering a chorus will be removed from the tour.
- **Monitoring and Review.** W.O.L.F. will continually monitor noise on and adjacent to the property to determine its source (wolf or non-wolf), and will seek to minimize potential noise to adjoining lands. Other mitigation measures may be developed and used over time if needed.

### Visual Impacts

Enclosure fences are not expected to be prominent from nearby structures or CR 74E. Landmark Engineering used the County's GIS data to identify the least-visible enclosure locations, based on lack of visibility from nearby structures within 0.50 miles of the subject property, using an assumed eye height of 6 feet at the structure and a 12-foot enclosure fence height. Obscured views of portions of enclosure fences will be possible with binoculars from some of the higher lots in Glacier View Meadows, depending on intervening vegetation and the viewer's motivation; however, fence materials will be treated with non-reflective materials (mainly to inhibit rust). To err on the side of being too conservative, vegetative cover was not used in the analysis.



**Figure 9:** Enclosure fence visibility from nearby properties. Please note that the enclosure layout has been updated based on site recognizance since this graphic was prepared.

Existing buildings on the property are visible from parts of Glacier View Meadows south of Gates 11 – 13, as well as from high points in the 80-acre parcel north of W.O.L.F. II. The proposed Visitor Center and Lower Staging Area will be visible from portions of CR 74E and some residential structures, particularly those along ridge lines. Parking areas associated with these will be situated to minimize views from off-site. Construction materials of each structure will use similar materials and methods to other buildings in the area. It must be noted that the Visitor Center will not be visible from 16420 CR 74E property because of steep topography.

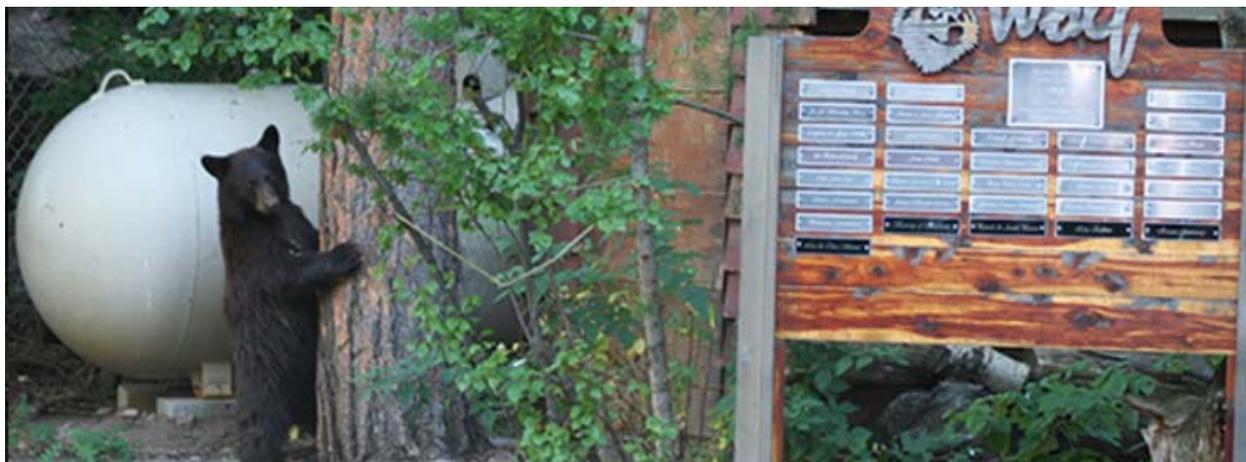
### Wildlife

No formal wildlife study was prepared with this application. The property is not listed as critical habitat, is not part of a major migration corridor, and appears unlikely to include endangered and/or threatened species based on preliminary observation and site recognizance. However, as an open area with a broad mix of land covers, W.O.L.F. II is used for grazing and local migration for larger animals, with suitable habitats for smaller animals and birds. Moose, deer, and elk are common, as well as bears, mountain lions, and coyotes. No raptor nests were observed in Spring 2017, although standing dead trees can provide perches.

The applicant agrees with CDOW’s assessment that ungulates congregate along south-facing open hillsides in winter, and use the higher meadow areas in summer. Most south-facing open hillsides are on the eastern and western portions W.O.L.F. II. Elk are common in the meadow above the Jess Scott Spring, the bowl north of the existing metal barn, and the broad open area south of the existing brown cabin. These areas are proposed to remain undeveloped.

Multiple north-south passes through the ridge along the north property line allow for relatively easy wildlife movement from open lands to the southwest of the property (Boy Scouts) to the northeast (D-Dart Ranch). Indeed, when W.O.L.F. took possession of its land, the 80-acre parcel to the north included five hunting blinds, three of which overlooked the high meadow in the subject property. The owners of these blinds were required to remove them in 2016 at the direction of the USFS. The blinds were installed, presumably, for ease of harvesting migrating ungulates.

Steep rocky outcrops make passage more difficult elsewhere on W.O.L.F. II. These corridors are not proposed to be blocked with fences, structures, etc. Therefore, a minimum distance between fences of 100 feet is proposed to allow the continued function of migration corridors identified on the Site Plan.



**Figure 10:** Black Bear at Rist Canyon facility. A wolf enclosure is directly behind the propane storage tank.

Extensive literature exists on the impacts of wild wolves and their effects on wildlife, particularly with regard to deer and elk populations following the wolf reintroduction to Yellowstone National Park. This literature is not particularly germane to W.O.L.F. II, as the sanctuary animals will be contained in enclosures. Very little – if any – research exists with regard to the impact of sanctuary animals on wild populations, although common sense suggests that the long-term impact would be low. Elk, bears, turkeys, and other wildlife frequently move through the existing W.O.L.F. facility on Spring Canyon Road, within a few feet of enclosure fences and animals inside. Deer often bed down for the night right next to enclosures. The sanctuary wolf-dogs and prey animals seem to ignore each other: the wolf-dogs have no idea how to hunt and are well-fed; presumably, the prey animals ignoring the sights, sounds, and smells of wolf-dogs have not been hunted by wolves. Mountain lions, bears, bobcats, and coyotes continue to be seen (and heard) near the Rist Canyon property, and do not appear to be affected by the presence of the sanctuary.

This behavior is consistent with that of other wildlife throughout Colorado’s Front Range and other urban-wild interfaces: as animals adjust to human activity within an historic range, they become accustomed to the change. Based on anecdotal evidence received from W.O.L.F. II neighbors, local wildlife appears to have adapted to traffic on CR 74E, houses in the Red Feather Highlands and Glacier View Meadows neighborhoods, guest lodges, equestrian operations, etc.; logic suggests that W.O.L.F. II will have an insignificant impact.

### Domestic Animals



**Figure 11:** Cattle on W.O.L.F. Sanctuary grounds, 2016. Enclosure fencing is visible in the background. Several additional enclosures and wolf-dogs within those enclosures are within a few dozen feet of both sides of the image.

Since the grey wolf reintroduction at Yellowstone National Park in the mid-1990s, considerable resources have been devoted to determining wolf impacts on livestock, with a particular focus on the cattle industry. Reintroduced wolf ranges cross public and private rangelands in Idaho, Montana, Oregon, and Wyoming. Wild wolves typically prey on deer, elk, and similar species. Open range cattle are also prey, which has resulted in fewer calves, reduced weight, and reduced ranching income.<sup>20</sup> Cattle that had not witnessed wolf predation were unaffected by the playing of pre-recorded wolf noises and wolf urine being sprayed in their pens; conversely, cattle that had experienced predation in their herds in Idaho exhibited symptoms indicative of stress when subjected to similar stimuli.<sup>21</sup>

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<sup>20</sup> Lyon, Ted B. et al (2013). *The Real Wolf: The Science, Politics, and Economics of Co-Existing with Wolves in Modern Times*, Farcountry Press, Helena, MT.

<sup>21</sup> For additional reading, see [oregonstate.edu/dept/EOARC/sites/default/files/publication/792.pdf](http://oregonstate.edu/dept/EOARC/sites/default/files/publication/792.pdf). The study was funded by the Oregon Beef Council.

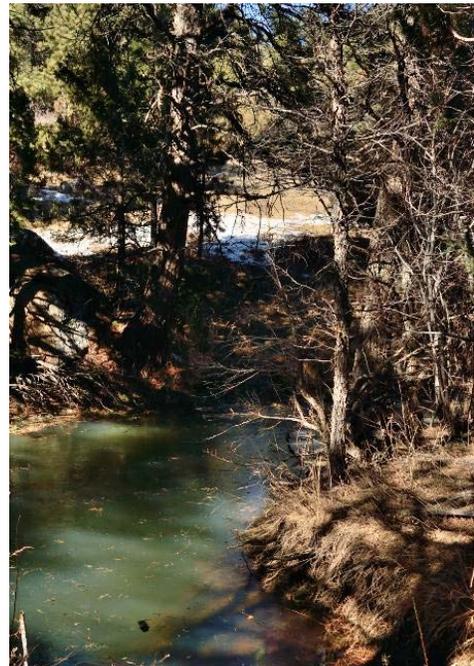
Cattle in the Red Feather area presumably have not been hunted by wild wolves, which is unlikely to change in the foreseeable future. The animals at W.O.L.F. II do not hunt: they are well-fed with donated raw meat and kibble on demand within their enclosures, which they do not leave (see page 19 for a full discussion of enclosure and fence design). Cattle on adjoining lands will continue to be fenced out of the W.O.L.F. II property, and would have, at best, a limited view of the nearest enclosures to the D-Dart Ranch: Enclosure 17 (planned for Phase 2 construction) is to be 100 feet south of the common property line. The land between the property line and the enclosure will remain forested. Open range cattle are common on W.O.L.F.'s Rist Canyon property, to the point of grazing for long periods directly adjacent to enclosures (see Figure 11) in a head-down position. Cattle near Red Feather are unexpected to behave differently than those in Rist Canyon.

Considerable anecdotal evidence exists that horses are generally unaffected by the presence of wolf-dogs in sanctuaries. The Rist Canyon facility, for example, is within ¼-mile of an equestrian operation. The acoustics of the Redstone Creek Valley are such that wolf sounds are commonplace on the equine property. Horses are ridden along Spring Valley Road frequently, which seems to bother neither wolves, nor horses, nor riders. The riders often are accompanied by dogs, which seem unaffected by the sanctuary animals, and *vice versa*. Some of the sanctuary animals will bark at Mr. Wendland's dogs when he walks them through the facility, although these events are typically of short duration.

### Wetlands

Surface water is present on W.O.L.F. II year-round, which attracts wildlife. No formal wetland delineation has been conducted; however, standing water generally implies the presence of wetlands here. Areas most likely to be wetlands are south of the brown cabin, in the ravine near the Bennett Spring, and in the ravine above the former Log Cabin settlement (adjacent to the Jess Scott Spring). Potential wetlands are unlikely to be considered jurisdictional because of a lack of connectivity between W.O.L.F. II and downstream named bodies of water. Wet areas on W.O.L.F. II will be treated as jurisdictional until the Army Corps of Engineers makes a formal determination.

Enclosures will be constructed outside of springs and wetland areas for obvious reasons related to water quality and continued wildlife use. No grading operations beyond access road crossings will occur in or near wetlands: those will be minimized to the extent possible. The physical area of access road construction is expected to be much less than thresholds for Section 404 permitting, to be confirmed as plans are developed following the public hearing process. Wetland edges will be identified following the public hearing process, and a minimum standard of 50 feet from wetland edge to enclosure will be used to determine final fence locations.



**Figure 12:** Jess Scott Spring, looking north. The pool was excavated downhill from the spring decades ago for storage and ease of water collection.

### Wildfire Prevention Management

Wildfire prevention is a serious concern, as prolonged drought conditions continue to be common in the southern Rockies. Having been through and profoundly affected by the High Park Fire in 2012 and its aftermath, W.O.L.F. approaches fire prevention management very seriously. Based on state hazard

mapping, W.O.L.F. II is listed as “moderate hazard” and “very high hazard” for wildfire potential.<sup>22</sup> The “very high hazard” designation corresponds to steep, forested areas along the northern property line.

Based on the Site Plan, about 75% of W.O.L.F. II will be undeveloped when the final phase is completed. The entire property will be managed to promote forest health while reducing the chance of a wildfire spreading through the canopy, with a particular emphasis on forested areas.

The Ponderosa pine forest and perennial meadow landscape at W.O.L.F. II has departed from its historic state due to fire exclusion and the consequent shift in tree composition and structure. As fire was excluded from the region starting around 150 years ago, fire-sensitive tree species such as Douglas fir have been able to establish or even dominate many tree stands. Additionally, the mountain pine beetle epidemic moved through the Red Feather Lakes area and killed many old Ponderosa pine trees. The historically Ponderosa pine-dominated forest has shifted to Douglas fir-dominated stands in these areas. Large meadows that have been a part of the landscape for hundreds of years are also being encroached or replaced by forest.

Forest canopy health declines resulting from dwarf mistletoe and bark beetle infestations pose a significant management challenge, particularly with regard to fire prevention. Diseased trees tend to be the first to burn, and can draw a relatively cool grass fire up into the crown.



**Figure 13:** Fire mitigation underway north of Visitor Center, April 2017. Diseased portions of Ponderosa Pine have been removed, and are waiting to be chipped per Best Management Practice. The eastern property line generally follows the ridge in the background.

Since acquiring the property, W.O.L.F. staff has evaluated hundreds, if not thousands, of trees for symptoms of dwarf mistletoe, which frequently precedes bark beetle infestation. The focus to date has been in the center of the property, as this area will have the most enclosures, and is the most densely forested.

W.O.L.F. applied for and received a grant from the Natural Resource Conservation Service to assist with mitigation measures for 40 acres last year, with work to be completed in 2017. W.O.L.F. anticipates additional funding for other parts of the property in years to come. The Healthy Forest Initiative project aims to change the trajectory of this departed forest to a more historic state and function through the use

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<sup>22</sup> See [www.larimer.org/wildfire/fire\\_haz\\_lc.jpg](http://www.larimer.org/wildfire/fire_haz_lc.jpg).

of mechanized treatment. This project will remove many trees from the property in targeted areas to achieve a multiple resource benefit. The majority of removed trees will be from meadow edges and from very dense stands to increase wildlife forage and habitat, improve tree health, and lessen the potential effects of fire in the area.

Because dwarf mistletoe spreads very slowly, the disease is manageable, especially if trees are not too close together, and if diseased portions of trees are removed early. Most, if not all, ponderosa pines near the southeastern property corner exhibit symptoms of dwarf mistletoe. In addition, persistent drought conditions, combined with unusually warm temperatures over the last decade, have severely weakened many of the mature pines and spruce. Several prominent specimens along ridgelines have been blown down in 2017 alone. Evidence of blow-downs from previous years can be seen across the property. Staff has been actively removing portions of trees infected with dwarf mistletoe, and chipping beetle-kill pines as recommended by Colorado State University research.

With surface water and high ground water present in parts of the property, aspens may replace at least some of the declining pine and spruce specimens. However, with extensive wildlife grazing of the property likely to continue, aspens are unlikely replace dying coniferous trees without additional fences in and along wildlife corridors, which would impede migration. Other possibilities for expanding canopy and understory diversity may include Rocky Mountain Maple (*Acer glabrum*), Rocky Mountain Juniper (*Juniperus scopulorum*), Serviceberry (*Amelanchier utahensis*), and other native species less likely to be grazed.

Smoking will not be allowed on the property outside of designated smoking areas for obvious reasons.

W.O.L.F. has agreed to work with the Glacier View Fire Department to ensure that the property is managed to minimize wildfire potential. The nearest fire station (unmanned) is about five miles east of W.O.L.F. II. Like other tax-exempt organizations in the vicinity, W.O.L.F. will contribute to annual funding in line with similar agreements developed for other nearby nonprofit organizations to offset the costs of providing emergency services.

In addition to the measures described above, ATV roads accessing enclosures will be designed to accommodate relatively small emergency vehicles (e.g., Ford F-350), serving also as fire breaks. As part of the review process for this application, the GVFD requested that: a standpipe be installed in the pond associated with the RR McEldowney Spring for use in a fire emergency; access be provided to the Jess Scott Spring for additional firefighting capacity on W.O.L.F. II and on surrounding properties; and, that any culverts constructed below access roads be designed to accommodate the GVFD's heaviest vehicle when fully equipped. W.O.L.F. intends to comply with these requests, with details to be determined following the public hearing process. Additional measures may be discussed at that time as plans are developed.

## **Safety**

Safety is, of course, of paramount concern to any sanctuary. W.O.L.F. takes its responsibility seriously, and is continually evaluating and refining its security and procedural protocols for improvement.

Captive-born wolves and wolf-dogs are purposely bred exotic animals poorly suited for life as pets in domestic situations, which is why they were brought to W.O.L.F. in the first place. These animals have not been taught to hunt and would be unable to survive for long in the wild without human assistance. Animals having bitten a human typically are euthanized by local authorities for obvious reasons. W.O.L.F. evaluates prospective candidates for its sanctuary carefully, as staff and volunteers are in close contact with each animal on a daily basis.

Prior to 2012, W.O.L.F.'s former management kept few records, including those of escapes. Anecdotes from W.O.L.F.'s staff, volunteers, and neighbors indicate that there were a total of two escape incidents before 2012, one of which occurred at W.O.L.F. One animal escaped in 1999 or 2000, almost immediately

after an animal was brought to W.O.L.F., and before being introduced to her companion. She scaled a fence and chewed through netting above the fence. It is unknown if authorities were notified or the animal was seen again. In 2003, W.O.L.F. placed four animals in a foster location, from which the animals escaped shortly thereafter. It is unknown if authorities or neighbors were contacted, or if the animals were located.<sup>23</sup>

Under current management, one animal escaped. The animal – Cree – had lived on scraps and rodents on a New Mexico reservation for most of her life, during which she became a good climber. Cree also learned to quickly identify weak points in fences on the reservation: the escape occurred shortly after her arrival in 2013. W.O.L.F. staff worked with wildlife biologists, a veterinarian who aided with the reintroduction of wolves to Yellowstone, local media outlets, authorities, other sanctuaries, and neighbors to keep Cree safe and guide her back to the sanctuary and her companion. Cree was never a danger to people; she was frightened from being in an unfamiliar place, and remains reclusive today. Wildlife cameras showed her returning to her enclosure at night to eat. Those who tracked her believe she was unlikely to have left the property. Because W.O.L.F. notified the media, the incident received national attention.<sup>24</sup> Cree returned without injury, and has not left since her enclosure fence was modified.

As a result of Cree’s well-publicized escape, W.O.L.F. evaluated fences and security protocols throughout its facility, and made several changes to prevent additional escapes. Additionally, an animal’s history has become a much more important part of W.O.L.F.’s evaluation procedure prior to the organization agreeing to provide sanctuary. An escape has not occurred since Cree’s escapades, although the current enclosure design in Rist Canyon can be improved, as described below. Fences in place at the Rist Canyon facility will not be reused, except as dig guards: the design is different than what W.O.L.F. intends to construct at the new facility.

Fences will be more robust than most of those at the current facility. Enclosures at W.O.L.F. II will be fenced twice at a typical height of 10 feet (see enclosure fence detail) with a minimum separation of 10 feet between an inner enclosure fence and a perimeter fence of a similar design.<sup>25</sup> Both the external and internal enclosures will be accessed through separate, normally closed and double-locking, self-latching gates. A smaller rectangular area will be partitioned in the front of the enclosures for catching up animals for medical exams and evacuation, also providing an additional passive layer of security. Key codes and/or other unlocking devices will be provided to only certain qualified W.O.L.F. personnel. Visitors and other unqualified personnel will not be permitted within enclosures or in the area between enclosure fences. Facility protocol requires that one gate be closed and secured before another is opened. Activity in and around enclosures and entry gates will be monitored and recorded with motion-activated security cameras.

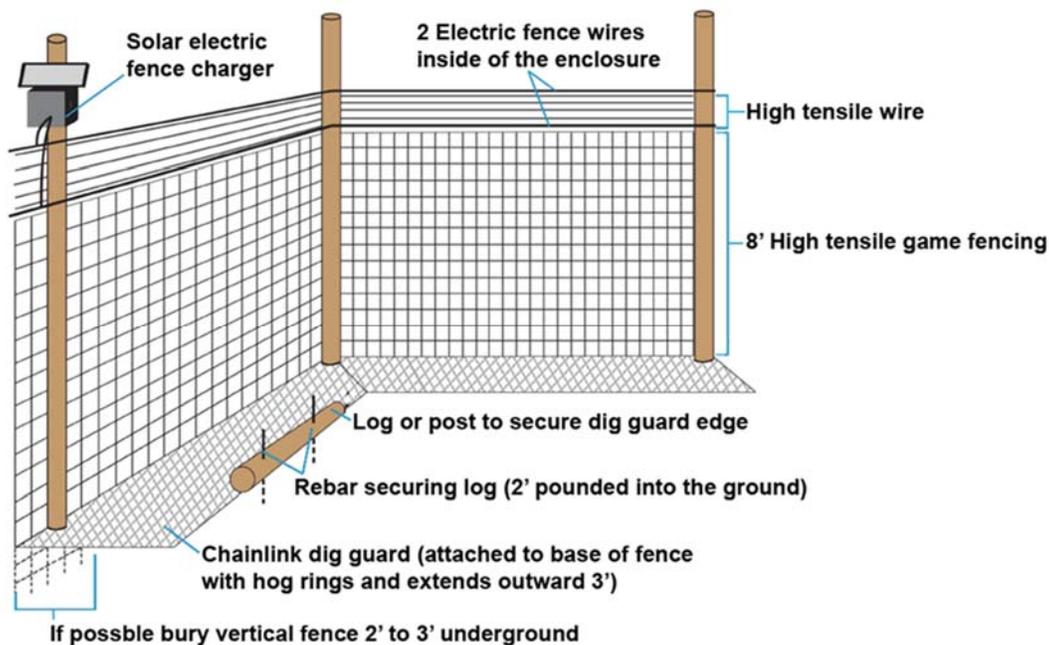
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<sup>23</sup> Under W.O.L.F.’s previous management, animals periodically were placed in foster homes while waiting for a spot to open. W.O.L.F. keeps animals for the duration of their lives. To remain compliant with the county’s cap of 30 wolves, a W.O.L.F. resident must pass away before another animal can be introduced. The wait could take years, which is an unreasonable expectation to place on foster caregivers. Therefore, foster homes are no longer used.

<sup>24</sup> USA Today’s video (set to dramatic music) is at [www.usatoday.com/videos/news/2013/04/12/2077781/](http://www.usatoday.com/videos/news/2013/04/12/2077781/).

<sup>25</sup> A tragic incident in the State of Washington earlier this year at an unregulated breeder further illustrates the need for perimeter fencing: a child lost her hand by putting it through a fence into an enclosure. A similar incident involving the loss of part of a child’s finger occurred in Rist Canyon several years ago under W.O.L.F.’s prior management. Both of these terrible incidents could have been avoided by preventing access to the space immediately adjacent to the enclosure, which is one goal of separating the internal and perimeter fences by at least 10 feet.

Both enclosure fences will be top rimmed with either tensile wire, potentially with electric wire, and/or other means to prevent climbing breaches. Also, fences will be sited to prevent the possibility of tree-climbing as a means of defeating a fence. Dig guards will prevent tunneling below fences in softer soil where digging might be possible. Bedrock at and near the surface, in addition to the rocky soil prevalent on the property, will make tunneling extraordinarily difficult. With the distance between fences and the need to tunnel below two fences to escape, an overnight digging escape will not be possible; the excavation would be obvious to staff and volunteers during the daily enclosure inspection / waste removal procedure, and would take too long to complete. Snow drifts do not regularly occur adjacent to fences, and freshly fallen snow is ill-suited as a launching pad. Large drifts are removed before hardening.



**Figure 14.** Enclosure fence design. The fence will surround each enclosure. A second fence of similar design surround each group of enclosures. Fences will be evaluated and maintained constantly, and will be treated with a matte finish to prevent rust.

To put the likelihood of an escape into perspective: at minimum, an escaping animal would have to climb a vertical 8-foot section of fence, scale a 2-foot section of tensile wire, jump down, and repeat the feat over a similar fence at least another 10 feet away. To escape by digging, the animal would have to tunnel at least 3 feet below grade a minimum of 10 horizontal feet through rocky soil and/or bedrock ill-suited for the purpose.

Because escapes are still technically possible, W.O.L.F. has an established notification protocol. At minimum each animal is counted twice daily (around sunrise and sunset), in addition to ongoing video monitoring and staff activities in and around enclosures. Should an escape occur, W.O.L.F. would notify neighbors, authorities and media once basic facts are known, and would enlist the assistance of local experts in the field (similar to the approach with Cree, above). W.O.L.F. has attempted to join local online Nextdoor.com neighborhoods (Red Feather Highlands and Glacier View Meadows), as a quick way to stay in touch with neighbors; however, thus far W.O.L.F. has been unable to do so. Other means of notification would include traditional means, such as Larimer County's reverse 911 system.

In the event that an escape does occur, the escapee would be expected to work hard to avoid unfamiliar people and domestic animals. While the USDA does not recognize the efficacy of rabies vaccines in wolf-

dogs,<sup>26</sup> the State of Colorado has provided guidance,<sup>27</sup> to which W.O.L.F. adheres. To comply with licensure requirements, W.O.L.F.'s inhabitants receive a thorough veterinary examination before being brought to the facility, are vaccinated for rabies and other diseases (heartworm, parvo, etc.) as required, and receive ongoing veterinary care. These common sense practices, which are required by W.O.L.F.'s licenses and permits, will continue at W.O.L.F. II.

## Security

The W.O.L.F. II property is more accessible than the Rist Canyon facility because of proximity to CR 74E. The potential for trespassing from CR 74E is anticipated to be greatest during hunting season.<sup>28</sup>

The barbed wire fence surrounding the property will be repaired and reset on the new right of way line north of CR 74E. Taller fences would be deter wildlife movement, and, therefore, have been ruled out. At least some staff will be present on the property continuously. Areas near enclosures will be patrolled at varying times to prevent trespassing. Cameras, including models capable of high resolution night vision with motion sensing devices, are in the process of being installed to identify trespassers and wildlife along the entire perimeter and points within W.O.L.F. II. Images of all visitors—human or otherwise—will be recorded.

## Evacuation

In the event that W.O.L.F. II needs to be evacuated for fire or another type of emergency situation, the animals will be transported via trailers to predetermined offsite facilities in Loveland and Fort Collins, in coordination with Larimer County and the Glacier View Fire Department. Staff regularly monitors potential emergency situations as they develop – most commonly, fires, floods, and blizzards – to determine the likelihood and/or need to evacuate, or the need to import additional staff and supplies. Obviously, any scheduled visitor activities will be canceled in the event of a developing emergency, with visitors notified as far in advance as possible.

Catching up the animals and transporting them to trailers can be completed relatively quickly. Each animal has a preset location in a kennel within each trailer, dictated by temperament, need for darting, etc. The trailers will be stored on the property, most likely in the existing barn, and will undergo regular maintenance. Sufficient numbers of W.O.L.F. staff own vehicles capable of pulling livestock trailers, and are licensed to do so. W.O.L.F. currently owns three trailers large enough to transport all of its animals. More trailers will be purchased as needed when additional wolves are provided sanctuary with the second phase.

To be clear, human safety is always the first priority. If an evacuation of some or all of the animals is not possible because of a quickly developing emergency, sheltering in place is an option, albeit an undesirable one. Following the public hearing process, an evacuation plan specific to each phase will be developed separately in coordination with various Larimer County departments and the GVFD.

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<sup>26</sup> The US Animal and Plant Health Inspection Service (APHIS) proposed to change the term “dog” in 1999 to include *Canis lupus*, *Canis familiaris*, and all combinations thereof, which would have allowed the rabies vaccine to be considered effective on wolves and wolf-dogs. The change was not adopted, apparently to prevent being viewed as an endorsement of owning wolves and wolf-dogs as pets. The proposed rule change can be viewed at: [www.gpo.gov/fdsys/pkg/FR-1999-09-28/html/99-25177.htm](http://www.gpo.gov/fdsys/pkg/FR-1999-09-28/html/99-25177.htm).

<sup>27</sup> See [www.colorado.gov/pacific/sites/default/files/DC\\_CD\\_Zoo-Recommendation-Hybrid-Wolf-Vaccination-Exposure.pdf](http://www.colorado.gov/pacific/sites/default/files/DC_CD_Zoo-Recommendation-Hybrid-Wolf-Vaccination-Exposure.pdf) and [www.colorado.gov/pacific/sites/default/files/DC\\_CD\\_Zoo-Hybrid-Wolf-Bite-Management-Algorithm.pdf](http://www.colorado.gov/pacific/sites/default/files/DC_CD_Zoo-Hybrid-Wolf-Bite-Management-Algorithm.pdf) for the State of Colorado's approach to rabies control in wolves and wolf-dogs.

<sup>28</sup> According to the previous property owner, hunters attempting to access the open lands north of W.O.L.F. II and the D-Dart Ranch would park in the gravel area on the Boy Scouts property at 68C and 74E, cross CR 74E, and hike north through the canyon above the old white cabin past the Jess Scott Spring. W.O.L.F. staff is aware of this route, and will actively discourage its use.

## Water Use

The current facility in Rist Canyon uses about 150 gallons daily (0.17 acre-feet per year), which includes both 30 wolves and humans providing their care. Water requirements for sanctuary animals are light, and generally include staff refilling metal tubs and 5-gallon buckets within enclosures as needed. Indoor plumbing does not exist at the Rist Canyon facility.

With visitors, additional animals, and more staff at W.O.L.F. II, Landmark Engineering estimates an annual demand of roughly 1.02 acre-feet with the first phase, and 3.08 acre feet ultimately.<sup>29</sup> These figures may be refined following the public hearing phase; however, the sanctuary is not anticipating to substantially impact water supplies in the area, particularly when compared to other uses allowed in the O-Open zoning district that would be allowed on the property either by right or following review.

Name of Spring	Decreed Flow (CFS)	Ac-Ft / Yr Conversion
Jess Scott Spring	0.0066 CFS	4.78 Ac-Ft / Yr
Freda Scott Spring	0.0033 CFS	2.39 Ac-Ft / Yr
Bennett Spring	0.00222 CFS	1.61 Ac-Ft / Yr
RR McEldowney Spring	0.00666 CFS	4.82 Ac-Ft / Yr
Ryckert Spring <sup>30</sup>	0.00222 CFS	1.61 Ac-Ft / Yr
<b>Total:</b>	<b>0.021 CFS</b>	<b>15.21 Ac-Ft / Yr</b>

The property was purchased with the rights to five decreed springs, four of which are on the property.<sup>31</sup> The combined decreed flow rate of 0.021 CFS is summarized in the table above. One cubic foot per second is 723.97 acre-feet per year. Therefore, the decreed flow of 0.021 CFS equates to 15.21 acre-feet per year. For a sense of scale, an average home along Colorado's Front Range consumes 0.5 – 1.0 acre-feet annually, depending on lot size, irrigation, and other factors.

Manmade structures have been in place for several decades at Bennett, Freda Scott, RR McEldowney, and Jess Scott Springs. Based on discussions with previous owners and those who worked on the property, the Bennett Spring supplied water to the Log Cabin Stage Stop. The RR McEldowney Spring supplied water to the existing cabin and the barn via underground plumbing, and continues to do so, with excess water flowing to the pond near the cabin. The Jess Scott Spring was used to water livestock in the upper meadow via another series of underground cisterns. The Freda Scott Spring most likely supplied water to the white cabin near CR 74E, and possibly other portions of the Log Cabin settlement, although this has not been confirmed.

Water quality sampled directly from the above springs was tested and found to be suitable for human consumption in 2016. Water passing through plumbing must be treated prior to be potable. This problem will be addressed following the public hearing process as funds permit.

Three overlapping GIS data points listed as "Glacier View Aug," "Glacier View Aug Impact Reach," and "Glacier View Subdivision Well Field" are displayed in county mapping near the center of Parcel B. These data points indicate that an augmentation plan has been adopted for Glacier View Meadows, a portion of which is in Section 9, Township 9 North, Range 72 West.<sup>32</sup>

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<sup>29</sup> Please refer to memorandum from Rod Harr of Landmark Engineering, dated 3/31/2017 for additional details.

<sup>30</sup> The Ryckert Spring is about ¼-mile east of W.O.L.F. II (apparently on the 15458 CR 74E parcel) per the legal description decree.

<sup>31</sup> A fifth spring, the Bennett Meadows Spring, is located uphill from the existing cabin on W.O.L.F. II, and does not appear to flow. The rights to this spring did not come with the property.

<sup>32</sup> See full legal description, page 26.

Flow rates appear to depend on season and precipitation. W.O.L.F. is investigating sinking a commercial exempt well to be a more consistent source for the metal barn in the first phase. To provide water in the second phase, W.O.L.F. will explore several options, such as non-exempt well permits, water leasing, and/or buying or sharing water supplies as part of an approved augmentation plan.<sup>33</sup>

Regardless of source, the water delivery system to the Visitor Center would be, in all likelihood, via a new underground cistern. The cistern size and location are to be determined, most likely uphill from the proposed building, subject to County and State permitting requirements. The “Primary Access Plan View Detail” shows an approximate cistern location north of the Visitor Center parking lot.

## **Water Quality**

Potential threats to water quality – if unmanaged – include sewage disposal via septic leach fields, storm water runoff and increased erosion from increased impervious surfaces, and waste from animal enclosures. All of the above will be managed appropriately, and are not anticipated to be problematic.

As no sanitary sewer system exists in the area, sewage disposal will be via septic leach fields. Approximate locations of existing septic leach fields are shown on the Primary Access Road Detail sheet submitted with this application. These fields have been in place for several years, and appear to function adequately.

A caretaker couple living in the existing cabin on a full-time basis is unlikely to strain the existing system. The septic system at the existing barn may need to be enlarged as additional staff migrate to the property. A new septic system will be required for the visitor’s center, the Lower Staging Area, and at the second caretaker’s cabin. Based on preliminary studies and percolation tests conducted by local firms in 2016, soils in the area appear suitable for septic systems, with proper design. Depending on depth to bedrock, the beds may need to be raised, and concrete sand probably will need to be imported. All of the above will be confirmed and re-evaluated in greater detail following the public hearing process. We recommend geotechnical investigation in the area to determine suitability for both foundations and septic systems once the site layout nears completion.

Storm water runoff and potential erosion will increase as a result of the construction of the new access road, parking areas, and visitor center. Runoff and erosion will be mitigated, as required. Detailed stormwater designs, including possible water quality and/or detention ponds, if required, will be developed following the public hearing process. At this time, Landmark Engineering believes that the increase in impervious area will be negligible and will not change existing drainage patterns, q. Please see memorandum, “Wolf Sanctuary Drainage Approach & Road Design” from Jeff Olhausen to Clint Jones, dated April 2017.

If not removed, fecal matter within enclosures is a potential threat to water quality downstream. Typically the animals leave droppings near the catchup areas at the Rist Canyon facility; this material is removed daily, with the remainder of each enclosure checked weekly. When removed, fecal matter from wolf enclosures is stored in heavy-duty plastic garbage bags, placed within metal enclosures with lids, and transported to a landfill by W.O.L.F. personnel. This practice will continue at W.O.L.F. II, although a commercial trash hauler will be used instead. Wolf urine is not anticipated to be a threat to downstream water quality, as the greatest concentration of animals within an enclosure will be four animals to an acre (based on two animals per enclosure, and smallest enclosure size of 0.50 acres), and all but a small fraction of urine will be contained within water quality swales downstream from enclosures.<sup>34</sup>

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<sup>33</sup> See letter from Shelley Coldiron to Rob Helmick, RE: Water Rights and Use (June 2017) for additional information.

<sup>34</sup> Grazing animal and coyote waste is not normally removed from private open lands. If W.O.L.F. II was to be a kennel, for example, with 25 or more animals per acre, water quality as a result of urine flowing untreated off the property would be a legitimate concern.

To reduce erosion potential within enclosures, boulders and logs will be placed strategically within steeper areas to reduce storm water velocities. Placement of logs will be generally perpendicular to slopes. To the greatest extent possible, existing groundcover will remain in place; however, portions of enclosures will become bare due to wolf activity, and therefore more susceptible to erosion. Portions of enclosures may be periodically cordoned off to allow vegetation to recover. Some enclosures may be rested for all or a portion of a growing season, with their inhabitants rotated to other enclosures. Enclosures are not proposed within drainage areas or within 50 feet of springs. ATV access roads placed below enclosures will include a shallow swale on the uphill side to intercept and collect sediments before entering water ways.

## Lighting

The value of being able to see the night sky in rural areas cannot be overstated; however, the land surrounding the W.O.L.F. II property is not perfectly dark. There is a glow on the eastern horizon from Front Range communities and homes in Glacier View Meadows, with a lesser glow along the northwestern horizon from Red Feather Highlands.

W.O.L.F. does not wish to contribute to additional light pollution to the area. If nothing else, lights are expensive to install and maintain, and most light is wasted. However, some form of security lighting will be required at the W.O.L.F. Sanctuary. The vast majority of lights proposed will be in conjunction with buildings, parking, and primary entry. These are concentrated in the eastern third of the property, with the exception of the cabin to be constructed in the second phase.

Because of the distances and topographic relief involved, measurable light trespass on adjacent properties and the Glacier View subdivision will not be an issue. To preserve views of the night sky, downward-cast and fully-cut off fixtures will be used – not wall packs and barn lights, which are common in rural foothill communities and degrade night sky views greatly – with warm light temperatures (less than 3,000K). Lighting details will be determined as formal site plans are prepared following the public hearing.

## Property Values

The question of effects on property values by the presence of a sanctuary has been raised. The vast majority of the property is to remain open and undeveloped. Aside from the sign and improved driveway, few indicators of change from the current condition will be apparent from nearby properties.

Traditional land planning theory suggests that keeping large tracts of land open increases nearby property values, as buyers are assumed to be willing to pay a premium to be near open space. However, neighborhoods adjacent to noisy and/or otherwise intensively used open space uses, such as sports complexes, dog parks, popular trail heads, etc., are less likely to be valued.<sup>35</sup> This potential reduction is why the County requires a detailed analyses of potential impacts within any land use application. Based on the analyses on the preceding pages, the amount of traffic, noise, and other impacts associated with W.O.L.F. II are not expected to be noticeable, and will not affect property values. Properties near W.O.L.F.'s Rist Canyon facility have been bought and sold over the last few years. To the best of our knowledge, the presence of W.O.L.F. did not factor into the purchase price.

Landmark Engineering conducted an extensive literature search to see if anybody has studied the impact to property values by this – or any – type of animal sanctuary in a rural setting. While a wide variety of opinions exist, as evidenced by recent proceedings in Elbert County with the Lion's Gate sanctuary, as well as W.O.L.F.'s previous applications with Larimer County, the body of peer-reviewed literature appears nonexistent. Several impact studies have been prepared regarding land values near airports, landfills,

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<sup>35</sup> A summary was prepared in 2006 by the Connecticut General Assembly Office of Legislative Research ([www.cga.ct.gov/2006/rpt/2006-R-0344.htm](http://www.cga.ct.gov/2006/rpt/2006-R-0344.htm)), which included several references to additional studies.

quarries, nuclear waste disposal sites, etc., none of which are comparable in any way to the W.O.L.F. II sanctuary.

The applicant requested input from real estate professionals familiar with the area to determine if the W.O.L.F. II sanctuary as proposed would impact property values in any way (see letters from real estate professionals, starting on page 67). Compared with other uses, including the current undeveloped state, the presence of W.O.L.F. is projected to benefit properties in the immediate vicinity.

## SECTION 2: REVIEW CRITERIA

- A. The proposed use will be compatible with existing and allowed uses in the surrounding area and be in harmony with the neighborhood.

We have received a substantial number of comments on this proposal. Negative comments based solely on number would not suggest a compatibility issue, but the consistency of the comments raises a number of issues. Noise, wildlife impacts, safety/security, property values, and commercial uses have all been raised by a number of commenters. As a use with a previous history, it is not possible to ignore the influence of that on the comments. From a technical standpoint, however, the issues with the application are the level of activity on the site, traffic safety, and other issues related to the standards in the Code. The staff believes that most can be addressed to our satisfaction. Noise is, however, a significant concern and issue. Based on approvals in this immediate area, the level of activity and the general use of the site are consistent with other approved uses in the area (Boy Scouts, Girl Scouts, and guest lodges). The level of activity and traffic to this site are similar to and less than these uses. There are a number of residential lots in the area: some are seasonal and some are year round. Within 3500 feet of the site are approximately 140 individual parcels, most in Red Feather Highlands and Glacier View Meadows. Most of the area is zoned O-Open or RE-Rural Estate, which does not allow for pet animal facilities. Some of the Glacier View area is zoned E-Estate, which does not allow this use. We believe that the deciding issue in the discussion on compatibility will be the impact of noise on these nearby residential properties.

*Agreed.*

- B. Outside a GMA district, the proposed use is consistent with the County Master Plan. Within a GMA district, the proposed use is consistent with the applicable supplementary regulations to the GMA district, or if none, with the County Master Plan or county adopted sub-area plan.

The site is located in a rural area of the County, outside any GMA. There is no sub area plan adopted for the area. The County Master Plan anticipates development in rural areas to be consistent with zoning and requires additional facilities.

*Agreed.*

- C. The applicant has demonstrated that this project can and will comply with all applicable requirements of this code.

*8.1.1 Sewage disposal level of service standards:* The applicant proposes to use existing or new individual sanitation systems to treat the domestic waste produced on site. The Health Department has noted that this is feasible. No other water treatment is proposed on site. Animal waste will be collected and disposed with the trash service to the site.

*Agreed.*

*8.1.2 Domestic water level of service standards:* The applicant indicates that there are several springs on site, which have been developed for use on site. This use may require the applicant to convert the legal rights with those springs to commercial use. This use question will need to be addressed in future applications, and ultimately there will need to be a definite approval from the State with respect to the legal right to use water. Flows will need to be evaluated to determine their adequacy for the domestic and other uses on site.

*The applicant has initiated the process of determining the availability of water from the property, and is securing the rights to a backup supply system.*

8.1.3 *Drainage level of standards:* The specifics of how the developed area drainage plans will be addressed during the public hearing and site plan reviews. The Engineering Department comments address this issue.

*See responses to memorandum from Clint Jones (below).*

8.1.4 *Fire protection and emergency medical service level of service standards:* The Glacier View Fire District has not yet provided comments. Emergency medical and fire protection in this area will rely on ensuring that there are adequate on-site safeguards and provisions for notification. A further concern would be the additional impact of another tax exempt entity locating in the bounds of the district. The higher level use may generate additional calls for service. The applicant should address this issue as well as what on-site measures will be incorporated into the operations of the site.

*A concept layout of the entire site and SE ±40 acres was provided to the GVFD in March 2017. Landmark Engineering staff met with Fire Chief Perry shortly thereafter to discuss the layout. Chief Perry had no concerns with the proposed layout. He requested that a standpipe be installed for GVFD use in the pond associated with the RR McEldowney Spring to augment fire-fighting activities on and near W.O.L.F. II, that the primary access road be designed to accommodate the GVFD's largest and heaviest truck, and that the ATV roads be designed to accommodate a small emergency vehicle (e.g., F-350), in the event of a fire or emergency on the property. Compliance with these requests is not problematic. An updated plan was sent via email prior to this application, as a few adjustments were made to the layout following that discussion. W.O.L.F. has offered to contribute to GVFD to offset the revenue loss associated with W.O.L.F. being a non-profit organization being served by the fire department.*

8.1.5 *Road capacity and level of service standard:* Access and traffic generation have been identified as issues and have also been identified in the comments from the Engineering Department. Access spacing and sight distance evaluations must be done and a full traffic study should address the impact of the use by phase.

*A full traffic study has been prepared. See attached.*

8.2 *Wetland areas:* County maps do not show the site as having wetlands; the plan appears to avoid any possible wetland areas.

*Agreed. This item will be addressed in more detail following the public hearing process.*

8.3 *Hazard areas:* County maps show the site as having both severe Geologic Hazards with respect to rock falls and slopes, mostly in the rocky areas of the property. The site is a mix of severe and low wildfire hazard. The next application must address how the hazards will be addressed and mitigated, if necessary.

*Slope & Rock Fall. Much of the north end of the property slopes at or greater than 2:1. While this slope is absolutely not suitable for residential or commercial construction without significant mitigation, no structures are proposed in or near these areas. Other than avoidance generally, no mitigation is proposed.*

*Wildfire Mitigation. See page 17 for discussion.*

8.4 *Wildlife:* There are no specific wildlife designations on this site, which would require a conservation plan or raise issues that are in conflict with the proposed plans.

*Agreed.*

8.5 *Landscaping:* There is no landscaping proposed, nor is any required.

*Noted. As a portion of the right of way will be graded back to address sight distance, at least some new landscape will be required.*

8.6 *Off-Road parking standards:* Off-road parking is not expected to be an issue with this request. Surface treatment is required by the Code to be paved. An appeal will be necessary for both the parking and access on this issue if they are not to be paved.

*The provision of off-street parking will not be an issue. An appeal related to the paving of roads and parking areas is included (see page 41).*

8.10 *Signs:* Any proposed signs will need to be permitted through the approval of a sign plan, which would occur with the Site Plan Review.

*Agreed. One sign associated with the east entrance as noted on the Site Plan.*

8.11 *Air Quality:* No issues identified.

*Noted.*

8.12 *Water Quality:* No issues identified.

*Water quality was brought up as a potential issue in the county engineering letter. See page 43.*

8.15 *Lighting:* The applicant is directed to the provisions of this section. Requirements shall be followed in site development.

*Agreed. Night sky preservation is one of the applicant's concerns. See page 25 for discussion.*

8.16 *Fences:* Any perimeter fencing for the project must comply with the requirements in Section 8.16.2

*Perimeter fencing is currently three-strand barbed wire fence, and has been in place for many years, more or less following the property boundary. The top strand is about 42" above grade.*

*No changes to the fence are proposed, except where being removed and replaced to accommodate new and relocated entries, and reset at the new right of way line.*

**D. The proposed use will not result in a substantial adverse impact on property in the vicinity of the subject property.**

The application referrals / citizen comments have noted possible questions regarding the impacts of noise, air, and water quality. Compliance with the noise ordinance may meet a technical requirement, but this site is in a remote and rural area. Any additional noise may be seen as an impact. Noise mitigation plans and modeling will be important in future evaluations. Air and water quality will be addressed through the issuance of permits for any discharges, if required. The use of the road and the impacts on CR 74E will be addressed in the traffic analysis.

*Agreed.*

**E. The recommendations of referral agencies have been considered.**

Referral comments address the issues of the use of appropriateness, impacts to additional traffic on CR 74E, noise mitigation, safety and integrity of any fencing, drainage, and other issues. The public hearing application should address how the applicant has or will intend on responding to these concerns.

*Agreed.*

**F. The Applicant has demonstrated that this project can meet applicable additional criteria listed in Section 4.3 Use Descriptions.**

There are no special criteria or standards listed for a pet animal facility.

*Agreed.*

## SECTION 3: EXISTING CONDITIONS

The W.O.L.F. II property is zoned O-Open, which is proposed to remain unchanged, and is outside of the Red Feather Lakes Planning Area. W.O.L.F. II is situated between the Boy Scouts of America assemblage, the D-Dart Ranch, an 80-acre US Forest Service Parcel, the western edge of the Glacier View Meadows subdivision, the southern extent of the Red Feather Highlands subdivision, and other large unplatted properties. The Sundance Guest Ranch is about 0.5 miles west of the subject property, across from the Girl Scouts entry, which is generally west of Red Feather Highlands. The land surrounding W.O.L.F. II is also zoned O-Open. Parts of the Glacier View Meadows subdivision are zoned RE-Rural Estate and E-Estate.



**Figure 15:** W.O.L.F. II panorama, as viewed from CR 68C in April 2017, looking generally northeast. The three hills in the background are along the northern property line. The Red Feather Highlands neighborhood is behind the ridge to the left, while Glacier View Meadows is to the right of the photograph. The land in the foreground is part of the Boy Scouts Ranch.

The W.O.L.F. II property is a combination of sloping lower montane forests, clearings, meadows, deep ravines, and steep granite outcrops. Forests are predominantly a canopy of Ponderosa pine, with stands of blue spruce and Douglas fir. Slopes range from less than 10% to in excess of 1:1. The highest and most prominent ridge parallels the northern boundary. Several smaller ridges and rocky outcrops divide the land into a series of south-facing bowls. There is approximately 500 feet of elevation change from a high point on the ridge near the northwestern corner to a low point at the southeastern corner.

Most of the property is dry, with a southerly aspect. Five springs with decreed flows within manmade structures are in and along existing drainages. Normal flows are insufficient to reach other waters downstream. Major wildlife corridors are not identified through the property, although deer, elk, and moose are common in meadows and along south-facing hillsides. Domestic animals currently do not graze the property.

Soil are typically thin and rocky. Per NRCS data, five distinct soil types are on W.O.L.F. II: Boyle gravelly sandy loam, Breece coarse sandy loam, Haploborolls-Rock outcrop complex, Trag-Moen complex, and Wetmore-Boyle-Rock outcrop complex. Bedrock is exposed prominently on the surface over much of the property, and appears to be at a depth of less than 36 inches elsewhere. Soils are well-drained, and are generally derived from a granite parent material. Clay is present in some of the soil types, but differential expansion (dipping bedrock) affecting wildlife fences and building foundations is unlikely in the area.

The eastern third of the property includes an existing metal barn and a small one-bedroom cabin with a detached garage (Figure 16). The existing structures are not inhabited on a full-time basis, although W.O.L.F. personnel has performed ongoing maintenance a few days weekly since acquiring the land, and has used the metal barn as a base of operations.

Remnants of the Log Cabin settlement are close to CR 74E, generally north of the intersection with CR 68C. Historic records indicate that the settlement included several homes and cabins, a school, general store, a hotel, post office, and other uses. Today, the site consists of remnants of concrete foundations, a white cabin in disrepair close to CR 74E, an outhouse, and the original log cabin building. The “log cabin” building is located on a separate property, has seen at least one addition made to the structure, and used as a private residence. A manufactured home was placed near the outhouse long after the Log Cabin settlement was abandoned, and has been vacant for several years.

Larimer County classified CR 74E as an arterial, with a 120 foot planned right of way width. Current right of way varies, although the right of way is 50 foot width adjacent to most of the property. The surface has been paved since the 1970s. The road is not entirely within the right of way, which appears to have been dedicated prior to paving, and probably aligns with the original unpaved road. The location of existing structures on nearby properties will make exercising the ultimate right of way difficult to achieve.



**Figure 16:** Existing cabin and detached garage, looking northwest.

## Owner

W.O.L.F., PO Box 1544, La Porte, CO 80535

## Zoning

O – Open, unincorporated Larimer County.

## Property Area

As measured north of the current CR 74E right of way line, the property is  $\pm 162.18$  acres. The proposed right of way dedication is  $\pm 5.00$  acres (see page 38 for discussion). The remaining gross property area is 157.18 acres, subject to verification when the property is surveyed following the public hearing process.

## Legal Description

### *Parcel A*

The southwest quarter of the northeast quarter and the northwest quarter of the southeast quarter, Section 9, Township 9 north, Range 72 West of the 6th Principal Meridian, County of Larimer, State of Colorado, except that Parcel described in the deed recorded December 11, 1989, under Reception No. 89056890.

### *Parcel B*

A tract of land situated in the west one half of Section 9 , Township 9 north, Range 72 West of the 6th Principal Meridian, County of Larimer, State of Colorado, more particularly described as follows:

The southeast quarter of the northwest quarter and that part of the northeast quarter of the southwest quarter of Section 9, Township 9 North, Range 72 West of the 6th Principal Meridian, lying northeast of the present County Road right of way, except a tract of land described in the deed recorded January 30, 1957 in Book 1038 at Page 143.

### *Parcel C*

That part of the southeast quarter of the northeast quarter of Section 8, and the southwest quarter of the northwest quarter of Section 9, Township 9 North, range 72 West of the 6th Principal Meridian, lying north

and east of the right of way of the County Road between Livermore and Red Feather Lakes, County of Larimer, State of Colorado.

Together with any and all rights and interest the Grantor has in and to Jess Scott Spring, Freda Scott Spring, Bennett Spring, RR McEldowney Spring, and Ryckert Spring as stated in Water Division I, State of Colorado Case No. W1616 Filed August 22, 1975.

### **Current Use of the property**

The property is vacant grazing and forest land, with one seasonally occupied cabin and barn. Historically, the land has been grazed, and includes most of the Log Cabin settlement site, which included several residences, a school, post office, hotel, and general store. One structure from the settlement remains, along with remnants of concrete foundations just north of the intersection of CR 68C and CR 74E.

### **Size (Outer Dimensions and Area in Square Feet) of all Existing Buildings**

Metal Barn: ±50' x 60' (3,000 SF)

Brown Cabin: ±20' x 40' (800 SF)

Garage (next to brown cabin): ±20' x 16' (300 SF)

White Cabin: ±20' x 15' (300 SF)

Existing Modular Home: ±14' x 70' (1,000 SF)

Please note that the above measurements are approximate, and subject to revision when the property is surveyed.

### **Existing Uses of All Buildings:**

With the property being vacant, buildings are currently used for storage of vehicles and equipment necessary for maintaining the property. The existing cabin and modular home have, at various times in their history, been used for residential purposes. The barn appears to have been used as a shop.

### **Uses of Surrounding Properties and Offsite Conditions**

The vast majority of the property is adjoined by unimproved land, either privately owned (the D-Dart Ranch and Boy Scouts Long's Peak Council), or publicly owned (the 80-acre parcel listed as being owned by the State of Colorado). A total of seven improved residential properties directly abut W.O.L.F. II.

**North:** The northern property line is approximately 4,570 feet in length. A three-strand barbed wire fence more or less follows the property line, except where prevented by rock outcrops. Unless otherwise noted, the land north and west of the W.O.L.F. property is predominantly forested, with open clearings of grassland, areas of steep slopes, and significant rock outcrops.

The western 675 feet of the northern property line is adjacent to one approximately 7.0-acre single-family residential lot within the Red Feather Highlands neighborhood (142 Springmeadow Way). From county aerial photography, the property includes two structures. The closer of the two is about 265 feet from the W.O.L.F. property line. This property is zoned O-Open, which is consistent with the zoning for all of the Red Feather Highlands neighborhood.

Red Feather Highlands is a large-lot residential neighborhood, with 67 separate lots in about 270 acres. The neighborhood enjoys an unusual level of isolation: A total of two homes exist within 1/2-mile of RFH, both of which are directly south of CR 74E from Red Feather Highlands. A total of nine homes are within a mile of RFH, six of which are in Glacier Meadows.

The entire perimeter of RFH is about 3.37 miles in length. Of this, about 2,000 feet is CR 74E right of way. The remaining three miles – including the W.O.L.F. II property – is adjacent to large land holdings ranging from two BLM remnant properties of 40- and 80-acres each, a very large USFS parcel appearing to be several thousand acres (not calculated), the D-Dart Ranch (about 860 acres), and the Magic Sky Girl Scout Ranch (listed as 733 acres).

The nearest remaining residential structures in Red Feather Highlands to the W.O.L.F. property line are at about 575 feet, 620 feet, and 820 feet (243, 319, and 311 Springmeadow, respectively). Two lots (238 and 380 Spring Meadow) are relatively close to the W.O.L.F. property (at about 330 feet and 700 feet, respectively, to the nearest property corners), but include no residential structures, based on current aerial photography. Two additional properties north of CR 74E (17284 and 17240 CR 74E) have prominent views of the western few hundred feet of W.O.L.F. II, as well as of the higher ridges, looking over the county road. Structures on these properties are roughly 1,200 feet and 1,900 feet west of the west property corner, respectively.

Going east, the next half-mile of property line is adjacent to land listed by Larimer County as being owned by the State of Colorado (Parcel No. 2909000961); however, local sources indicate that county records should identify the owner as the US Department of Agriculture (US Forest Service).<sup>36</sup> The property is landlocked, and has no street address. The area is about 80 acres, (a quarter mile by a half mile) and is forested with predominantly pine and spruce species, with open grassy areas and rock outcrops. A ridge runs east – west along the southern boundary of much of this parcel, directly adjacent to W.O.L.F. II.

The land appears to be grazed, and also appears to include evidence of vehicle use in recent high resolution aerial imagery. Vehicle tracks connect a private lot along the west property line (238 Springmeadow Way), a lot along the north property line (700 Springmeadow Way), and peter out in a clearing just north of the W.O.L.F. II property. No structures exist on Parcel No. 2909000961; however, five permanent hunting blinds, three of which were close to and facing the high meadow in Parcels A and B, were removed following W.O.L.F.'s land acquisition at the direction of USFS personnel. Zoning is O-Open.

The easternmost quarter-mile north of W.O.L.F. property is adjacent to the D-Dart Ranch, a large assemblage of about 860 acres (Parcel No. 2910000018). This land is predominantly open grazing, with stands of ponderosa pine and other species. No domestic animals were visible from W.O.L.F. II at site visits conducted in February and March 2017, although only a small portion of the property was visible from along the common property line. No site address is listed. Access appears to be from County Road 74E, well east of the W.O.L.F. property. Zoning is O-Open.

**East:** The eastern property line is approximately 2,680 feet in length. A three-strand barbed wire fence generally follows most of the property line, with the exception of rock outcrops. Unless otherwise noted, the land adjacent to the eastern boundary is partially forested, with open grass and scrub between stands of ponderosa pine.

The northern quarter-mile of the eastern boundary is adjacent to a 40-acre property (quarter-mile by quarter-mile) that includes a single-family detached home near its northeastern corner. The land slopes sharply to the east, down from a substantial rock outcrop near the W.O.L.F. boundary. The structure is about 1,000 feet from the W.O.L.F. property line. The property address is 15240 W. County Road 74E (Parcel No. 2909000062). The property is accessed via a private drive from CR 74E, through the D-Dart Ranch property. Zoning is O-Open.

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<sup>36</sup> Whether the property is federally owned or state owned is immaterial to this application, although we would like this item clarified.

Going south, the next property along the eastern boundary appears to be multiple parcels under the same ownership (Parcel No.'s 2909400023 and 2909400024). The W.O.L.F. II frontage is about 1,250 feet, with the total land area at or slightly below 80 acres (quarter-mile by half-mile). The assemblage includes two single-family detached homes, the closest of which is approximately 1,500 feet from the W.O.L.F. II boundary. The second home, which was constructed following the County's most recent aerial photography (but shows up on Google Maps) is approximately 2,100 feet east of W.O.L.F. II. Zoning is O-Open.

The southernmost 60 feet of the eastern boundary is adjacent to the westernmost panhandle of an approximately 5.7-acre single-family detached lot at 15880 W. County Road 74E (Parcel No. 2909400046). The property includes multiple structures, the nearest of which is approximately 600 feet from the W.O.L.F. southeastern corner. Zoning is O-Open.

**South:** One parcel (16080 W. County Road 74E, Parcel No. 2909400078) adjoins the southern property line (about 675 feet), up to the county road right of way. The structures appear in aerial photography to be very close to, if not across, the W.O.L.F. property line.

The western extent of the Glacier View Meadows Subdivision, 3<sup>rd</sup> Filing (Gate No.'s 12 & 13) is south of County Road 74E. The entire GVM Subdivision is about 3,000 acres, with over 1,000 platted lots.<sup>37</sup> Zoning within Glacier View Meadows is E-Estate and RE-Rural Estate. Lots within Glacier View Meadows closest to the W.O.L.F. property are approximately five acres, with other lots further south and east at about 2.5 acres. The nearest homes in the Glacier View Meadows subdivision to the closest W.O.L.F. property line are 380 feet, 550 feet, 607 feet, and 614 feet (61 & 60 Deer Mountain Ct, and 77 & 70 Mt. Tileston Ct., respectively).

**Southwest:** The southwestern property line (approximately 4,700 feet) is formed by County Road 74E, with the exception of 16420 County Road 74E, which is a quarter-acre single-family lot accessed directly from the county road. The structure is the historic schoolhouse from the original Log Cabin settlement, and appears very close to the property line.

The Long's Peak Council of the Boy Scouts of America owns a several thousand acre assemblage across multiple parcels to the southwest of the W.O.L.F. property, on both sides of County Road 68C. No structures associated with the Boy Scouts are within a mile of the subject property boundary.

**West:** The W.O.L.F. property narrows to a point on the west end of Parcel C. Going west from that point, the nearest residential structure to the W.O.L.F. property is at 17311 CR 74E, which is approximately 1,150 feet from the westernmost corner of W.O.L.F. (south of CR 74E). Closer to the county road, a residential structure at 17391 CR 74E is about 1,500 west of the property corner.

Other than the properties described above in Red Feather Highlands and the Girl Scouts property, the only other structures within a mile west of W.O.L.F. II are associated with the Sundance Trail Guest Ranch, about 0.75 miles from the property corner.

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<sup>37</sup> A quick summation of the property map listed on the Glacier View Meadows web page yielded 1,028 lots, although it is not known whether all of these are buildable, currently include homes, etc.

## SECTION 4: OPERATION

Hours and Days of Operation:	The property will be staffed at all times, and normally open to the public five days per week, 8 a.m. – 6 p.m. (8 a.m. – 5 p.m. winter). The public will be allowed on the property only by prior arrangement, at pre-arranged times, for guided tours at 10 a.m., noon, and 2 p.m. A 4 p.m. tour will be added in summer months. All of the above will be weather dependent, and may be adjusted.
Number of Employees and/or Subcontractors arriving / leaving the site each day:	In the first phase, up to 8 full-time staff and 10 volunteers will be on the property. At completion of the second phase, up to 12 full-time staff, 30 volunteers will be on the property. Fewer than the above will be driving to/from the property when the facility is not open for tours.
Number of clients and/or customers arriving / leaving the site each day:	In the first phase, up to 40 visitors daily will be allowed on the property, weather permitting, up to five days per week. As phase 2 is completed, the figure will grow to a maximum of 120 visitors, up to five days per week.  Please see Parking Analysis on the Site Plan for parking calculations.
Total square footage of buildings used:	In the first phase, the existing metal barn, brown cabin, and garage next to the brown cabin will be used, for a total of ±4,120 SF.
Number of residences:	Two caretaker cabins are proposed (one in each phase), including the existing 800 square foot house that is to be used as a caretaker's cabin. The cabin to be constructed in the second phase is expected to be about 800 square feet as well.
Any outdoor display or storage areas proposed:	No formal outdoor display areas are contemplated at this time. Because the wolf sanctuary use is closely related to agriculture, and the property is quite large, some outdoor storage may be required, particularly for ongoing maintenance of fences and enclosures.  Any outdoor storage areas will not be visible from adjacent residential properties or rights of way. For example, the unpaved area north of the existing metal barn may be used to store fence materials or similar items that do not need to be kept indoors.
Special events outside normal operations:	None are proposed at this time.

## SECTION 5: INFRASTRUCTURE

Storm water detention or retention ponds and easements:	Because of the minimal increase in impervious surface area, no stormwater detention ponds are proposed. Neither stormwater detention ponds, retention ponds, nor easements for such exist on the property today. Currently, a shallow drainage ditch follows the northeastern (uphill) side of CR 74E.
Existing and proposed utilities and easements:	The only existing utility on the property is an above ground electric line running east-west south of the metal barn, operated by Poudre Valley Rural Electric Authority. The line is presumably in an easement, which will be confirmed once the property is surveyed. No other utilities or easements for such are proposed at this time.

## SECTION 6: PROPOSED CHANGES AND IMPROVEMENTS

Size (outer dimensions and area in square feet) of all new proposed buildings:	Two new buildings are proposed: a visitor center of about 3,000 SF (irregularly shaped, 90 feet x 55 feet on longest dimensions), and a roughly 20 foot x 40 foot caretaker's cabin. As neither building has been designed beyond a very preliminary level will not be constructed for at least a few years, actual dimensions may change.
Proposed uses of all new buildings:	The visitor center will used for educational purposes (primary use) and gift shop (accessory use). The caretaker cabin will be used as on-site residence for caretaker.
Proposed additions and/or uses to existing buildings and outdoor space:	No existing buildings are proposed to be expanded at this time. A second floor may be added to the metal barn, pending further study and separate permitting requirements, without affecting the building footprint and/or building height.
Buildings being removed:	The existing trailer near the intersection of CR 68C and CR 74E is to be removed. The white cabin may be removed, pending further analysis.
Number and type of animals to be on site:	In the initial phase, 30 captive-born wolves and/or wolf-dogs are to be on the property. In the second phase, this number will grow to 60.
Associate facilities or services on the site (e.g., grooming, vet service, etc.)	Veterinary service and food preparation will be in the existing metal barn building, along with office uses related to the operation of the non-profit organization.
Plans for minimizing potential noise pollution:	Please see Noise discussion, page 11.
Plans for minimizing impacts of dust, flies, outdoor lighting:	Historically, dust and flies have not been an issue at the current W.O.L.F. facility, which is expected to continue at W.O.L.F. II. Solid waste is removed, placed in a metal container with locking cover, and picked up for delivery to a land fill as a means of minimizing flies. Outdoor lighting will be used primarily adjacent to the Visitor Center, existing metal barn, and caretaker facilities. Any outdoor lighting will be low-level, downward directed, and compliant with dark skies ordinances, as discussed on page 25.
Plan for enclosure area maintenance, and disposal of animal wastes:	The primary concern with enclosure areas will be the potential for erosion and loss of cover from the animals repetitively moving up and down hillsides over the same terrain. To mitigate erosion, animals may be relocated from one enclosure to another periodically to allow vegetation sufficient time to recover. Further, felled trees are partially buried perpendicular to the slope to disrupt erosive surface flows. In conjunction with rocks and boulders placed for the purpose, this technique has proven effective at the existing Rist Canyon facility. Animal waste will be removed daily, placed in metal storage bins, and delivered to a sanitary landfill.
Expected traffic:	Daily: Phase 1 – 56 daily trip-ends; Phase 2 – 128 daily trip ends. See Traffic Impact Study and Section 7: Traffic and Access, below.
Impact (number and frequency of vehicles to the site, impact on local existing traffic patterns, etc.)	Impact on local existing traffic patterns will be light. See Traffic Impact Study and Section 7: Traffic and Access, below.

## SECTION 7: TRAFFIC AND ACCESS

### Traffic

West County Road 74E is the principle connection between Red Feather Lakes, Livermore, and Fort Collins. Other routes between Red Feather Lakes and the Front Range exist; however, CR 74E is the only route paved the entire distance, and is the most direct route. The County classified CR 74E as an arterial road, with an ultimate right of way width of 120 feet. Following the public hearing process, W.O.L.F. will dedicate additional right of way, such that a total of 60 feet is provided north of the existing centerline. Today, most of the right of way is about 50 feet in width near and adjacent to W.O.L.F. II, with some areas considerably wider. As seen on the Site Plan, the paved road was constructed outside of dedicated right of way in several areas, and appears to correspond to the original unpaved alignment. No improvements to CR 74E are proposed in the foreseeable future; however, the ultimate 120 foot right of way width will allow for a much wider road surface and vehicle capacity than the two-lane road currently serving the area.

A Traffic Impact Study was prepared with this application.<sup>38</sup> Two points of full turning movement access are proposed, as discussed in Access and Visibility, below. Virtually all trips to and from W.O.L.F. will be via the primary access, near the southeastern corner of the property. While traffic on CR 74E will increase as a result of W.O.L.F. II, the increases will be small, even compared to current use levels of CR 74E: a total of 56 daily trip ends<sup>39</sup> to W.O.L.F. II will occur as the first phase is completed, with a total of 128 daily trip ends at the second phase. The second phase trip generation figure represents an increase of about 8% of 1,493 vehicle trips (counted in September 2016), and about 7.5% of the 1,668 vehicle trips projected for 2022. As discussed in the TIS, these figures do not approach the planned capacity of CR 74E.

To put the above increases into context: A typical single-family detached home generates 9 – 10 daily trip ends. Therefore, the entirety of traffic generated by W.O.L.F. at full buildout following the second phase on its busiest day will be comparable to that generated by 12 – 13 homes. By contrast, the Red Feather Highlands subdivision – about 65 single-family detached residential lots sharing a single access/egress point at CR 74E – would be expected to generate more than 600 trip ends on a summer day at the southwest terminus of Springmeadow Way. With the low levels of traffic generated by the sanctuary, turn lanes, acceleration lanes, deceleration lanes, etc., are not necessary at either access to W.O.L.F. II.

As a private non-profit organization, W.O.L.F. has the ability to limit public access to its property to reduce potential traffic impacts to the greatest extent possible. Tour schedules are set, such that the vast majority of access and egress will be during off-peak hours, and each tour will have a participation limit. The earliest tour will not begin until 10 a.m. (after the morning peak), and the latest summer tour will conclude after 6 p.m. (after the afternoon peak). Based on observations at other similar sanctuaries, the average vehicle occupancy is about 3 persons per vehicle; however, for the purposes of this analysis, the more conservative figure of 2.5 persons per vehicle was used to reflect typical household size in and along the Front Range.

W.O.L.F. has developed a culture of ridesharing for staff and volunteers to its existing facility because of the severe restrictions regulating the organization's use of Spring Valley Road. Seeing six staff and volunteers in one vehicle arriving at the Rist Canyon facility is common. While CR 74E is public right of way and has no such restrictions, W.O.L.F. will strongly encourage carpooling and will provide carpool schedules. To determine parking and trip generation, an average of 3 persons per vehicle was used to be on the conservative side. Additionally, W.O.L.F. is exploring options to implement a van-sharing program to assist volunteers and staff coming in from Front Range communities to further ensure reduction of traffic

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<sup>38</sup> Delich Associates Traffic Impact Study, June 2017.

<sup>39</sup> A round trip is two trip ends (one trip end leaving and one returning).

and promote environmental consciousness. If nothing else, parking is expensive to provide, and the organization has no wish to contribute to the air pollution problem in Red Feather Lakes.

### **Access and Visibility**

County Road 74E defines the entire southwest boundary of the W.O.L.F. II property, with the exception of a short segment adjacent to 16420 CR 74E. Parcel A is accessed currently via an unpaved private drive, about 540 feet northwest of the southernmost extent of the property (referred to as the “primary access”). Per historic aerial photography, this access point has been used since at least 1958, well before CR 74E was paved and speeds were lower. No formal access from public right of way exists to Parcel B. Parcel C is accessed from CR 74E via an unpaved private driveway (secondary access) that aligns with CR 68C. Given the size and topography of the property, two access points will be required for emergency access once Phase 2 is underway.

Both points of access are to allow full turning movement, and will be gated. The primary access will be opened during business hours and prior to any off-hours deliveries, and otherwise locked. The secondary access will be normally locked. Both gates will be situated far enough back from the edge of pavement to allow vehicles to fully pull off the pavement in front of the gate. The applicant intends to work with the Glacier View Fire Department with regard to gate design and emergency vehicle access, and will comply with their standards.

The posted speed limit is 40 mph adjacent to the property, and is the minimum required by the County for sight distances in the Larimer County Rural Area Street Standards<sup>40</sup>. Based on local driving habits observed during multiple site visits, 50 mph appears to be an appropriate design speed in both directions on CR 74E. To evaluate sight distance for vehicles entering the road, an assumed driver’s eye was at 3.5 feet above grade and 10 feet behind the current edge of pavement. The hypothetical driver must be able to see an oncoming vehicle, defined as 4.25 feet above grade in the approaching lane. Based on the proposed use, a single-unit truck<sup>41</sup> (e.g., a fuel delivery truck) is exiting the property in the worst-case scenario. At the posted speed limit of 40 mph, a safe sight distance is 520 feet along CR 74E; at 50 mph, the distance increases to 650 feet. Because the westbound approach exceeds a 5% uphill grade, the safe distance can be reduced to 520 feet.<sup>42</sup>

Given the low levels of traffic generated by W.O.L.F. II, intersection improvements, such as accel / decel lanes and signals, will be required at neither intersection. A stop sign will be posted for vehicles exiting the facility at both points of access. The majority of traffic generated by W.O.L.F. II will be from Front Range communities (90% of visitor trips and 65% of employee / volunteer trips). As such, in the morning peak hour, a total of 9 right-in turns are anticipated to the primary entry (36% of the threshold for a right-turn lane). In the same peak hour, a total of 5 left-in turns are anticipated to the primary entry (50% of the requirement for a left-turn lane).

### **Primary Access**

Landmark Engineering surveyed CR 74E near the primary access and determined that the optimal driveway location would be about 290 feet further west than present due to sight distance concerns. The exact location may be refined slightly following the public hearing process as additional survey information on the property is gathered. At the new location, looking right (west) when exiting the property, sight distances

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<sup>40</sup> The LCRARS reference the Colorado State Highway Access Manual, 1998 (updated 2002). See Table 4-2: Entering Sight Distance (in feet), p. 49 for distances, and 4.3(3)b for other methodologies.

<sup>41</sup> The use of a single-unit truck is allowed when multi-unit trucks (a.k.a. semis) are not anticipated more than twice daily. While semis may deliver materials to W.O.L.F. II periodically, such visits would not be a regular occurrence.

<sup>42</sup> It should be noted that the driver’s height for a truck should be considerably greater than 3.5 feet; however, we are using the state access standard as written.

exceed those required for 50 mph at the proposed location. Looking left (east), distances currently fail at 50 mph. This failure is due to topography and vegetation along the north side of the road, within and immediately adjacent to the public right of way. Once existing vegetation and a portion of the right of way north of existing pavement is regraded, a safe sight distance at 50 mph can be achieved (see Sight Distance Grading Exhibit included in this application). No changes to pavement elevations are proposed. Private properties other than W.O.L.F. II would be unaffected by these grading operations. Any grading within the public's right of way will require a county permit. Therefore, following the public hearing process, the applicant anticipates working with County Engineering staff to finalize grading plans for the portion of right of way described above, in conjunction with other earthwork required.

One item of minor concern with the proposed primary access location is the proximity to the Campbell Property (16240 CR 74E). As the County classified CR 74E as an arterial, a 660 foot intersection spacing distance is required between driveways and intersections. The proposed distance as currently proposed is about 560 feet. Given the infrequent use of the Campbell driveway and W.O.L.F. II access, the fact that both are on the same side of the road, and no additional access points will be proposed in the foreseeable future on either side of the road, this reduction is not expected to create an unsafe condition.

The access road connecting the public to the Lower Staging Area in Phase 1, and to the Visitor Center in Phase 2, is being designed to comply with Appendix G2 of the Larimer County Rural Area Road Standards. While earthwork will be required to construct the access road, few other opportunities on this property exist to allow access. Preliminary road layout and grading designs indicate the need for earthwork to be removed to meet the County's maximum standard of 12% grade for 200 feet, and 10% elsewhere. These plans will be finalized following the public hearing process.

Please note that the access road is to be paved with an all-weather surface, not asphalt. The all-weather surface will allow fire and emergency vehicles access to the property, will be considerably less expensive to construct, and will be consistent with the character of other roads and private drives nearby. An appeal to standard with regard to the paving surface is being submitted with this application as well (see page 41).

### ***Secondary Access***

The secondary access will align with CR 68C, and will be constructed in Phase 2 to allow a more direct route from CR 74E to a future caretaker's cabin. Landmark Engineering surveyed the access road location and the existing pavement surface within 650 feet of the intersection. Visibility meets the standard for at least 50 mph. Survey work did not extend beyond 650 feet west of the intersection.

## SECTION 8: APPEALS

One appeal to standard is proposed: the applicant requests that the primary access road be approved to be paved with native crushed granite, rather than a traditional paving surface, such as asphalt or concrete, as required by LCLUC 8.6.3.c.1 – Pavement. The areas affected by this appeal include the Lower Staging Area, the primary access road, and the Visitor Center parking lot. Other areas not mentioned would not be subject to the requirement. Please note that the applicant intends to pave the apron approaching CR 74E with concrete (up to the first gate), and will pave accessible parking spaces and routes with concrete as well.

The native crushed granite at W.O.L.F. II is suitable for use as an all-weather surface, and is a practical low-impact solution. About 1,300 square yards would remain unpaved. The advantages to this approach are greater permeability (and, therefore less stormwater runoff quantities and velocities), reduced vehicle speeds (and therefore less of a chance of affecting wildlife), consistency with the area surrounding (no other roads are paved nearby, aside from CR 74E), and lower up-front construction costs faced by the applicant.

Larimer County Land Use Code 8.6.3.C.1 – Pavement states in part:

*“In areas outside GMA’s, all off-road... non-residential parking areas used primarily by customers, employees... must be surfaced with asphalt, concrete, or other similar all-weather materials. Loading and/or storage areas, seasonal and/or temporary parking areas, or parking areas that take access off unpaved public roads may be surfaced with compacted gravel or other surface that does not generate dust, if the county engineer determines such a surface treatment is practical and appropriate.”*

A. Approval of the appeal will not subvert the purpose of the standard or requirement.

*The purpose of the requirement is to minimize dust and soil erosion, particularly in highly travelled areas accessible from paved public roads. Dust is not anticipated to be an issue with the crushed granite surface: the road surface will receive, at most, 54 trip-ends in the first phase, and 124 trip-ends in the second phase on its busiest day. The speed limit will be 15 mph. While final engineering for the primary access road has not been completed, Landmark Engineering is aware of the proposed surface, and will design a stormwater conveyance system accordingly. The applicant owns a road grader, and will periodically blade the road as needed.*

B. Approval of the appeal will not be detrimental to the public health, safety or property values in the neighborhood.

*Aside from CR 74E, no roads, public or private, are paved in the vicinity. The GVFD was consulted on this paving concept and other matters earlier this year, and had no stated objections. The only item of concern identified by GVFD was to ensure that any culverts installed below the road be designed to withstand the weight of fully loaded fire apparatus. While formal design of the road, parking lots, etc., have not been completed, Landmark Engineering does not believe this request to be problematic.*

C. Approval of the appeal is the minimum action necessary.

*The only goal is to avoid installing roughly 1,300 square yards of asphalt.*

D. Approval of the appeal will not result in increased costs to the general public.

*The general public will be unaffected.*

E. Approval of the appeal is consistent with the intent and purpose of the Code.

*The code allows for practical alternatives to the code to be approved on a case-by-case basis.*

## SECTION 9: OTHER INFORMATION

### Applicant Responses

This section includes comments received from referral agencies and other stakeholders following the initial sketch plan application.

*Applicant responses are indented and italicized. Please note that individual emails sent to Larimer County planning staff are not included herein.*

### Larimer County Engineering Department

#### Transportation / Access Issues

1. This project has frontage along County Road 74E. The Larimer County Transportation Plan, adopted in November 2006, functionally classifies CR 74E as an arterial road that requires a 120-foot right of way dedication (60-foot half right of way). In the next submittal, the existing and any proposed dedicated right of way necessary to satisfy this requirement must be delineated on plans. According to Section 9.7.4 of the LCLUC, right of way dedication for this project must be accomplished by a properly executed Deed of Dedication at the time of final approval.  
*A 60 foot right of way dedication will be proposed north of the existing centerline. Please note that substantial portions of CR 74E were constructed outside of the right of way, and appear to correspond to the original unpaved road alignment.*
2. Please confirm that the proposed access onto CR 74E meets the access spacing requirements of Table 10-1 of the LCRARS.  
*The proposed primary access, which is about 230 feet west of the existing gate, is about feet east of the driveway of the Campbell Property. This distance, which is 65 feet less than the 660 foot standard, will not create an unsafe condition.*
3. The applicant needs to provide detailed location and sight distance information for the proposed access with the preliminary submittal. The sight distance must be shown to meet the minimum requirements specified in Section 4.3.2.3 of the LCRARS.  
*Sight distance exhibits for both access points are included with this application.*
4. Per Section 8.1.5.E of the LCLUC and Appendix F of the LCRARS, since this proposed development will likely create more than 20 new trips per day, the applicant will need to provide an Intermediate Traffic Study or Full Traffic Impact Study per the requirements of Appendix F of the LCRARS. The traffic study will need to provide an estimated trip generation for each phase.  
*A full traffic impact study has been provided.*
5. Per LCLUC Section 8.6.3.C, all off-road, multifamily and non-residential parking areas must be paved with asphalt or concrete. If the applicant does not intend to meet this standard, a formal appeal must be submitted with a rationale for not meeting the standard.  
*An appeal to this standard has been submitted.*
6. The internal roads that will be utilized by the public will need to meet the requirements of Appendix G of the LCRARS. This includes a 20 foot wide all-weather surface with roadside drainage. The applicant will need to submit plans that show these standards can be met.  
*The only internal road to be accessed by the public is the primary entry drive, from CR 74E to the visitor center. It should be noted that the visitor center will not be constructed until the second phase. The only public vehicular access will be to the Lower Staging Area until the visitor center is complete. As discussed with County Engineering staff, a centerline profile of the proposed access road will be sufficient for the public hearing stage. Please see attached road profile exhibit.*

7. The applicant should contact the local fire district to ensure that the building and internal street layout is adequate for their purposes.

*The Glacier View Fire Department met with the applicant to discuss the adequacy of a concept layout, and had no substantial concerns. An updated plan was provided to the GVFD via email prior to this application.*

### **Drainage / Floodplain / Erosion Control Issues**

1. This office will require that the applicant address the issue of erosion control, as per Section 8.12 of the LCLUC. Proposed erosion control measures must be briefly described in a narrative and also shown on preliminary plans. The plan must include measures to control erosion and sedimentation during all phases of construction and a plan for permanent erosion control after development is completed. Erosion control measures must be based on calculated performance standards. An example of the acceptable format for an erosion control plan can be reviewed in Volume 3 of the Larimer County Stormwater Design Standards (LCSDS). This report may be submitted after approval by the Board of County Commissioners.

*The report requested above will be submitted following the public hearing process.*

2. This office will require a site management plan for water quality with the next submittal. This plan should identify potential pollution sources, and discuss a plan for preventing pollution.

*Please refer to drainage memorandum from Jeff Olhausen (attached).*

3. A professional engineer prepared drainage memo/report will be required. This report may be submitted after approval by the Board of County Commissioners.

*This plan will be prepared following the public hearing process.*

### **Larimer County Department of Health and Environment**

**Noise.** The applicant and county staff anticipate that noise will be an important issue to consider for this use. Larimer County has a noise ordinance, [www.larimer.org/policies/noise.htm](http://www.larimer.org/policies/noise.htm). It contains standards for maximum sound levels, and a prohibition against creation of a noise disturbance. Part of the definition of a noise disturbance is sound “of such volume, frequency, and/or intensity that it unreasonably interferes with the enjoyment of life, quiet, comfort, or outdoor recreation of an individual of ordinary sensitivity and habits.” This matches the kind of language people use when complaining about barking dogs or howling wolf dogs and wolves.

The applicant intends to prepare a noise study for the future public hearing phase. That study should help characterize the noise levels to be expected. It is important that the study also include a mitigation plan to describe how sound levels can be reduced to the maximum extent feasible. Topics that I believe would be appropriate to discuss in the mitigation plan include the location of enclosures and how topography and distance separation will affect the sound levels at nearby residences, the design of enclosure areas as related to separation or grouping of wolf dogs for compatibility and noise, the location of the visitor arrival / parking area as it relates to visibility and disturbance of animals, staff oversight and the ability to manage noise situations that arise, and other relevant factors that the applicant understands can limit noise.

*The noise study described above has been prepared, based on an updated layout that located enclosures to use the parts of the site most separated from adjacent residential areas, both vertically and horizontally. While some of the enclosures may be visible from points outside of the property, the vast majority will be hidden from view. The visitor center and entry drive will be well below and out of sight from the nearest enclosures. Please refer to page 11 for additional discussion.*

**Water.** Water service is currently provided by a spring. As the project moves forward, it will be important to verify that adequate water rights are available, and that water quality is addressed. Water rights refers to the ability to use the water for the intended uses as they are classified by the Colorado Division of Water

Resources. This typically relates to the distinction at the state level between domestic and commercial use classifications. W.O.L.F. is meeting with a water attorney to evaluate that issue. The applicant's future public hearing submittal will be sent to the Division of Water Resources for comment, and that is the time that the water rights issue will need to be clarified and defined. Water quality relates in part to the potential need to treat the water as a small public supply. The need to do so will depend on the uses that are ultimately approved, and on the number of people visiting the site. Our office is available to consult on water quality issues.

*Water may not be resolved fully for some time. Please refer to page 23 for discussion.*

**Wastewater.** Sewer is currently provided by a series of on-site septic systems. Our office has been working with the applicant regarding the septic system capacity available, and the sewer needs of the proposed uses. At this point it is anticipated that the only wastewater flows will be domestic sanitary wastes that need conventional type treatment. Our office is available to consult with the applicant on permitting future systems for the various phase improvements.

*Agreed.*

**Sanitation.** The most common method to manage sanitation regarding animal feces is to provide regular pickup of droppings for storage in a covered receptacle with frequent pickup by a commercial hauler. The project description confirms that this will be the practice at W.O.L.F. II.

*Agreed.*

**Licensing.** W.O.L.F. is currently licensed by the USDA as a Class C Exhibitor, and by Colorado Parks and Wildlife as a Wildlife Sanctuary and intends to transfer those licenses to the new facility.

*Agreed.*

**Veterinary Care.** W.O.L.F. provides regular veterinary care to the animals. An important animal health issue that also pertains to public health is rabies. The Colorado Department of Public Health and Environment has published recommendations for hybrid wolves regarding vaccinations, bite follow-up and exposure to rabies at <https://www.colorado.gov/pacific/cdphe/Colorado-rabies-resource-guide>. Our office refers to that guidance for bites involving humans.

*All animals are vaccinated before being brought to W.O.L.F. and receive regular follow ups.*

**Conclusion.** As this project moves to the public hearing stage, the elements related to our review that will need to be addressed in greater detail are noise and water availability. The other topics outlined here can be addressed as part of the building permit or site plan review process.

*Agreed.*

### **Colorado Parks and Wildlife, Department of Natural Resources**

This proposal would allow for the development of a captive wildlife sanctuary that would hold captive born wolves and wolf-dogs 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 Road, Belleview, CO.

*Agreed.*

The surrounding land, including the 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 resources for migrating deer and elk in the fall and early spring.

*Agreed. Please see discussion starting page 15*

This particular proposed 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.

A reduction of these potential migratory impacts may be obtained if a portion of the property on the west or east side is left undeveloped. Although more restricted, this could allow for a migration corridor to continue its existence on the property. Increased development in the form of buildings, a visitor center, parking lots and other infrastructure, in combination with an increased level of traffic to and from the area, will eventually cause an incremental degradation of habitat and less use by local wildlife populations.

*The approach described above was used to develop the proposed site plan layout. Nearly all of the enclosures are proposed within Parcel B (the middle of the property). All but a small portion of Parcel C (the west third of the property) is proposed to remain in its undeveloped state. As the deep north-south ravines appear to function as wildlife corridors currently, these are proposed to remain undeveloped to the greatest extent possible to allow for their continued use as migration corridors. Parcel A (eastern portion of the property) will see the most human activity, with the continued use of existing buildings, as well as the visitor center and parking; however, most of Parcel A will remain undeveloped, which will allow the area to continue to be used by wildlife.*

CPW Wildlife Commission Regulations outline specific wildlife sanctuary facility requirements that must be met to legally hold captive wildlife species, which include wolves. These requirements detail such things as minimum fencing standards to prevent escape of the wildlife. Escape preventive measures are important to protect local native wildlife populations from such things as disease exposure. Escape prevention is also critical to ensure human health and safety is not compromised. 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. More information may be found at Colorado Parks and Wildlife's website, [www.cpw.state.co.us](http://www.cpw.state.co.us).

*Noted. Please refer to page 15.*

## **US Fish and Wildlife Service**

Please find attached our stamped concurrence that we have No Concerns for the proposed W.O.L.F. shelter in Larimer County, Colorado.

*Noted.*

## **Comments Received at the Neighborhood Meeting (as transcribed)**

### **Noise**

- Request information as to study funding, findings, etc.  
*The noise study was prepared by Stuart McGregor, P.E., is included as part of this application, and is part of the public record. The report was reviewed by County staff. As with any land use application, all consulting costs are borne by the applicant.*
- Concern that homes within 1/4-mile will hear barking, etc., particularly in summer with windows open. Where will sound be measured from, and how specific to the setting will the study be? Want to be able to verify and validate the results of the noise study.  
*The study conducted was specific to the exact setting, using best information available.*
- On the east side, sound will travel far. Currently can hear coyotes.  
*Coyotes will continue to reside in the area independently of W.O.L.F., and will continue to make noise. Agreed that sound can travel far; however, given topography on the east side of the property, sound will be directed upward and away from homes.*

- Sound travels farther than ¼-mile. Concern that acoustics of the property will amplify noise. *Sound does travel farther than ¼-mile; however, the questions at hand related to the site plan are whether noise from the wolves rises is annoying to a person of normal habits and sensitivities who is present to hear the noise. Amplification in this instance is simply not possible, as hillsides are not sufficiently steep or tall. The comment most likely refers to echoes. Audible echoes can be generated from a few places in W.O.L.F. II; however, the roughly 45° angle of rock outcrops direct all but a small fraction of the noise upward, and not back down to the source or adjacent properties.*
- What are current background noise levels? Neighbors value the quiet that currently exists. *Background noise levels ranged from 26 DbA to over 55 DbA in an area secluded from CR 74E. Please see Noise discussion, beginning on page 11.*
- Concern about impacts of wolf noise on pets and livestock. With traditional uses (horses), ranchers are concerned about smell and noise impacting operations. *Noise within the current W.O.L.F. facility in Rist Canyon appears to have no noticeable effect on wildlife, and, to the best of our knowledge, no problems with horses and cattle being spooked by wolf-dogs. Once other animals realize that the sanctuary occupants are on the other side of a fence, they generally ignore them. W.O.L.F. staff periodically photographs deer, turkeys, foxes, and domestic cattle adjacent to enclosures. One would assume that domestic animals living in the Red Feather Lakes area also would be accustomed to the sounds of coyotes, mountain lions, bears, and other animals endemic to the region. Presumably sounds (and smells) of sanctuary wolf-dogs would be similarly ignored.*
- What recourse is available if the noise levels are worse than predicted? *W.O.L.F. will operate a sanctuary on this property until people quit adopting wolf-dogs unsuited for domestic life. To be clear, we believe that the noise study presents a worst-case scenario that would be difficult to exceed. However, if noise on adjacent properties is a greater issue than predicted, there are a few options.*
  - *Relocation of animals within W.O.L.F. II. Not all wolves are created equal. Just as people have different voices, and are more vocal than others, some wolves tend to be noisier. Moving the noisier animals into enclosures that are furthest from neighboring properties, and/or into social groups likely to participate in choruses will be the most direct methods.*
  - *Monitoring. Several packs of coyotes are active in the area already, and are not known for compliance with the County's noise ordinance. W.O.L.F. will have noise monitors adjacent to enclosures and near property lines to document noise levels continuously, as the organization is not interested in being blamed for every dog barking and coyote howling in and around residential properties.*
  - *Mitigation. As proposed, the principal mitigation methods are the advantageous use of distance to adjoining lands, vegetation, and topographic relief. If these are not as effective as predicted, additional measures will be considered.*
- Noise of additional traffic plus animals is a concern. *The noise associated with animals is discussed at length starting on page 11 and the noise study. With regard to traffic, the additional trips – the vast majority of which will occur in the daytime – are not anticipated to have a substantial impact on noise levels, possibly in the range of 1 – 3 Db(A) beyond current background levels. Noise generated from traffic from within the property is not anticipated to trespass on adjoining lands based on distance.*
- Noise will be generated from weddings and other special events.

*This item is no longer proposed.*

- Potential to debark animals or employ the use of bark collars.  
*Debarking animals is an inhumane practice, at best.*
- Impact of noise on health and well-being of some residents.  
*Extensive literature exists regarding the effects of repetitive noise, such as barking dogs, outside of a neighbor's residential window or in an adjacent urban apartment. Those claims are not disputed, but make no sense in this instance. As a few form letters drafted by the attorney retained by the RFH owner's association bring up the issue, a formal point-by-point response begins on page [cross reference once received].*
- Construction equipment to build the site will be noisy. Ongoing maintenance, trash disposal, etc., will also be noisy.  
*Earthwork operations – typically the noisiest construction activity – will be primarily limited to entry road construction and the visitor's center, and will occur during times allowed by the county. Because of the distance from the primary access road from nearby properties, trash trucks and other deliveries are not expected to be noticeable.*

#### **Wildlife**

- Elk migration comes through this specific property.  
*Agreed. See page 15.*
- Other wildlife, e.g., deer, turkeys, bobcats, moose, etc., may be impacted.  
*The total footprint of fenced enclosure area will be about 22 acres. The intent is to leave the vast majority of the property open, as noted above.*
- Additional traffic will impact wildlife.  
*While conflicts between vehicles and wildlife cannot be ignored on a county road in the foothills, the additional traffic generated by this proposal (see Traffic Impact Study by Delich Associates) represents a small fractional increase on CR 74E. Any beneficial use of the property would entail an increase of traffic. Vehicle speeds within the property itself will be typically less than 15 mph, and would be unlikely to affect wildlife.*

#### **Traffic**

- Visitor traffic could be significant. Could this be limited?  
*Visitor traffic, 56 trip-ends and 128 trip-ends in Phases 1 and 2, respectively, will be limited to a few specific times daily.*
- Additional noise from cars. Residents hear every car. Having more cars is disruptive.  
*While additional traffic will be a positive number, the level of increase will be negligible.*
- Additional accidents, trespassing (look-e-loos) in private areas, and loitering. Tourists stop randomly.  
*Again, the increase in traffic resulting from this project will be small. Trespassing and loitering are already illegal behaviors. Random stopping is indicative of poor driving skills.*
- Prefer to see an acceleration / deceleration lane, shoulders, traffic control on CR 74E.  
*With the minimal increase in turning movements into the property, an acceleration and/or deceleration lane is unwarranted.*
- Traffic impact study needs to reflect increased summer use of CR 74E.  
*The TIS includes counts from 9/2016. A correction factor was applied to reflect summer use.*

- Trash will increase (litter out car windows).  
*Littering is illegal.*
- On the S-turn by the property, traffic accidents and fatalities are common. The entrance to the property has poor visibility.  
*Agreed that the entry has poor visibility at present. The entry is proposed to be moved further west for better visibility. County data recorded from 1984 to present indicates no accidents adjacent to the subject property, although there have been fatalities on CR 74E. A cursory review of crash data along CR 74E suggests that snow and animal strikes are the most common contributing factors. See <https://maps1.larimer.org/gvh/?Viewer=RIL> for additional information.*
- Do not want the county to pay for improvements to accommodate. What is the role of county traffic engineers in this?  
*Development in Larimer County, including a traffic study, is paid for by the property owner. The County's engineering department will review and approve the application for compliance with code before the project goes to public hearing, and will work with the applicant's engineer following the public hearing.*

#### Land Use Inconsistency

- A zoo is inappropriate in a residential area.  
*Agreed. However, the proposed sanctuary is not a zoo, as the comment implies. Only a small portion of the facility will be open to the public, and only then on guided tours. The vast majority of the facility will be off-limits, except to W.O.L.F. staff and volunteers.*

#### Water

- Local subdivisions have problems with wells going dry.  
*Noted.*
- There are five springs on the property, and the aquifers are interconnected. Water rights are tied to the property.  
*Agreed.*
- Concern about water contamination from scat, liquid waste, food preparation, and grease traps.  
*Scat from sanctuary animals is removed daily and disposed of legally. It should be noted that nobody currently removes the elk, deer, moose, and coyote scat on the property (volunteers are welcome). The proposed density of animals on site will be low enough that liquid waste is not anticipated to be an issue. Uneaten food and waste from grease traps will be disposed of legally, and will not have a chance to contaminate surface water.*
- What is daily water use?  
*The current W.O.L.F. facility uses about 150 gallons daily. Water use on an annual basis in the first phase will be slightly over an acre-foot, and about three acre-feet at completion of the second phase. Daily use will vary based on the season and number of employees, volunteers, and visitors.*
- How will increased runoff from rain and melting snow affect downstream water quality?  
*Any proposed development in Larimer County must ensure that downstream water quality is unaffected. Assuming that the appeal to standards with regard to using crushed granite in lieu of asphalt is granted, the total quantity of new runoff generated will be vanishingly small. However, the additional rooftops of a visitor's center, shade structure, and a few concrete walks will increase runoff slightly, such that minor storm water management will be required. Roadside ditches within the property will convey water, and prevent additional erosion, which also affects water quality. Details of the stormwater design will be developed following this hearing process.*

## Safety

- Risk of forest fire – current property has considerable dead wood and difficult access, and visitors may cause a fire.  
*W.O.L.F. agrees that the property has considerable deadwood, both standing and otherwise. The situation has improved since W.O.L.F. acquired the property. Please see page 17 for discussion.*
- There is difficulty in moving livestock in emergencies.  
*Agreed. W.O.L.F. has three trailers currently with capacity to move all animals simultaneously. As the number of animals at W.O.L.F. II increases, additional trailers will be acquired. An evacuation plan is in place for the current facility, to be updated for W.O.L.F. II. Please see page 19 for discussion.*
- What protection on site will ensure safety of animals, staff, etc.?  
*The organization has several protocols with regard to safety and behavior of humans when working with and near the animals, in addition to safety and security discussions beginning on page 19.*
- Excessive snowfall creates an additional challenge with animals being able to jump the fence more easily.  
*In the event of drifting snow reducing the effective wildlife fence height, staff and volunteers will shovel the snow before drifts become packed down and become launching pads.*
- How would the neighborhood know if an animal escaped? How are animals captured / what is the protocol? Will there be helicopters?  
*In the event of an escape, the animal would be unlikely to travel any distance, as the only food and shelter sources it knows are in the enclosure. W.O.L.F.'s protocol involves notification of staff and volunteers, followed by a press release and notification of nearby property owners once basic facts are known. Capture is typically coaxing the animal back into its enclosure once the animal is located. Please refer to the discussion related to on page 19.*
- What right do residents have if an animal escapes and attacks other animals and people?  
*In the hypothetical situation above, anybody has a legal right to defend themselves on their property. That said, captive-born wolves have not been taught to hunt, and the only food source they know is delivered to them daily in their enclosures. Sanctuary wolves would be hesitant to approach humans.*
- What about disease control?  
*Health is always a concern. Before being brought to the W.O.L.F. sanctuary, animals are examined for disease and quarantined. Every animal receives regularly scheduled checkups. The facility will have an infirmary for elderly and/or sick wolves to isolate them from the remainder of the population (Enclosures No. V1 & V2)*
- What insurance backs potential liabilities? Could a bond be issued to protect livestock?  
*W.O.L.F. carries liability insurance that would cover such an incredibly unlikely scenario.*

## Specific Questions (Post-It Notes), as Photographed at the Meeting

- Why is the value of a dog's life taking value over the lives of humans?  
*An animal's life is not more valuable than that of a human. W.O.L.F. has neither suggested, nor implied, otherwise.*
- Why did you choose this piece of land (not one close to home)?  
*The W.O.L.F. II property was the closest available assemblage meeting W.O.L.F.'s criteria that was for sale at a price W.O.L.F. could afford.*

- Define “processing” food building in new proposal?  
*W.O.L.F. receives butchered meat in bulk (purchased and donated). “Processing,” in this instance, refers to cutting the meat further into smaller pieces for storage and feeding the animals.*
- This business is owned by and run by people who live elsewhere with little, if any, community ownership. Are there any other businesses owned by people who do not live here?  
*As a private property owner in the Red Feather Lakes area, W.O.L.F. has a substantial vested interest in the neighborhood and community as a whole. To be clear, W.O.L.F. is not a business, but a non-profit: the organization relies on donations. W.O.L.F. has not researched the ownership of businesses in the area to determine the locations of business owners’ homes.*
- How many wolves? How many staff? How many volunteers?  
*As described in more detail in the attached application, a total of 60 animals are proposed to be permitted, with 30 in the initial phase. The number of staff and volunteers on site will vary daily and seasonally. At full capacity, we estimate up to 12 staff and 30 volunteers on the property at any one time on the busiest day.*
- 100,000 – 150,000 captive wolves and hybrids born every year. Why not pick a location with room for many more?  
*The vast majority of captive-born wolf-dogs are euthanized or otherwise killed before W.O.L.F. (or a similar organization) has an opportunity to receive an animal. Many animals are simply unable to come to W.O.L.F. because they fail acceptance criteria (e.g., disease, behavioral concerns, etc.). Budget constraints also limit the size of a property that W.O.L.F. can acquire.*
- Will a copy of the revised program be available for us to look at?  
*This application, and any amendments to it, are a matter of public record.*
- What info can be put out to the public that addresses real facts instead of misinformation? For instance, I have heard about noise. From being around other sanctuaries, that is not an issue.  
*The issue of potential noise trespass is taken very seriously. Please refer to discussion on page 11.*
- Was the property purchased on contingency of approval? If not, what happens if the application is denied?  
*W.O.L.F. owns the assemblage outright. In the event of a denial, W.O.L.F. would sell the land, either as three parcels together or individually, to somebody else intent on using or otherwise developing the property. Under Larimer County’s Land Use Code, a wide variety of other uses are allowed in the O-Open zoning district by right and with a special review. The most likely scenarios would include residential development at 15 lots with a minimum lot size of 10 acres (conventional development), or up to 16 lots at 2.5 acres minimum each (conservation development). The extensive list of residential and non-residential uses allowed within the O-Open zoning district is in the Zoning Table, Section 4.1 of the Larimer County Land Use Code.*
- Why are you entering into another relationship of conflict with your neighbors?  
*The applicant prefers not to view the County’s Special Review process to be a conflict, although it can feel that way to nearby owners when a private property that had been de facto open space is proposed to be put to beneficial use. The goal of the process is to foster a dialogue between property owners to ensure that all issues are identified and mitigated to the greatest extent possible.*
- What is the closest home to the current proposed area?  
*Based on the County’s GIS data, two homes are close to the W.O.L.F. II property line (16420 and 16080 CR 74E). These are approximately 445’ and 1,145’, respectively, from the nearest enclosures. Five additional residential properties share a common property line with W.O.L.F. II.*

- How do you sleep at night knowing you are ruining people's lives?  
*Based on the analysis above, lives will not be ruined as a result of this project.*
- Why in the world would you put this in the middle of all these homes? There is property other places surrounded by forest land and no houses.  
*Very few large property assemblages within a reasonable drive of the Fort Collins – Loveland area come available, at least for a reasonable price. In preparation of this narrative, Landmark Engineering determined that, as of spring 2017, no private properties greater than 75 acres in Larimer County between 7,000 and 9,000 foot elevation with paved access existed without multiple homes in a ½-mile radius.*
- Why are communities that are not affected part of this process?  
*In an effort to be inclusive before entering into the public process, W.O.L.F. sent out 350 mailers notifying residents in the area. Several postcards went to out of state addresses, as those were the mailing addresses associated with the property per Larimer County's records.*
- If this were not a sure thing, why would W.O.L.F. invest over \$1 million in the property?  
*W.O.L.F. paid \$650,000 total for the three parcels, plus transactional fees, consulting fees, etc. There is no certainty in land development, even with a use by right. Typically, a public hearing process takes about 12 months, depending upon the type of application, from the initial pre-application conference to the final public hearing. Purchase agreements tend to last a small fraction of that period. W.O.L.F. attempted to lease this property in 2015, with an option to purchase at the conclusion of the public hearing process; however, the seller was not interested in that approach. After assessing the risk of purchasing the land, W.O.L.F. elected to buy.*
- How do camping, events and weddings fit your mission of sanctuary, education, and rescue?  
*As a result of public input and subsequent discussions with County staff following the Sketch Plan application last year, the items described above are no longer on the table. W.O.L.F. would have used those methods as additional fundraising mechanisms; however, the organization will survive without them.*
- How exactly are containments set up?  
*Please refer to discussion starting on page 19.*
- Why did I attend the first three meetings? These are all the same questions that have not been answered before.  
*Public outreach is a lengthy two-way street, and all participation is greatly appreciated. Much of the proposal had not been formulated before the meeting sequence, and was conceptual in nature. The applicant listened to questions to identify issues of greatest concern and used those to prepare this application.*
- How is there going to be any security without perimeter fencing?  
*At least one caretaker will live on the property full-time, with another caretaker cabin to be constructed in a later phase. Modern technology – including wildlife cameras (both hidden and visible), microphones, and similar methods being determined – will allow surveillance of the entire property.*
- W.O.L.F. needs to respond to ALL emails sent to them, with answers to questions. W.O.L.F. ignores these.  
*Unless intercepted by a spam folder, emails to W.O.L.F. get read by humans; however, responding to all emails is not possible. W.O.L.F. is a small non-profit organization: its limited staff has ongoing responsibilities and operates within a tight budget. Literally hundreds of email questions and*

*concerns were received in fall 2016. Many were from a small group, and were extremely repetitive. To conserve its resources, W.O.L.F. staff prepared comprehensive responses to an exhaustive set of Frequently Asked Questions at <http://wolfsanctuary.co/moving-faqs/>. Some of the language from the FAQ's was borrowed in this project description.*

### **Official RFHMA Letter (Dated 9/2/2016)**

*In addition to the comments received from referral agencies, W.O.L.F. received formal correspondence from the Red Feather Highlands Maintenance Association. The letter below identified noise, traffic, access, views, escape potential, neighborhood compatibility, negative effects on property values, and other concerns. These were addressed in this Project Description, beginning on page 10. Formal responses follow.*

We are writing on behalf of the Red Feather Highlands Maintenance Association (RFHMA), as our residential development is immediately adjacent to the proposed W.O.L.F Sanctuary. RFHMA has several serious concerns regarding the proposed relocation of the W.O.L.F. sanctuary to the immediate vicinity of our neighborhood.

*One lot in RFH shares ±664 feet of the western-most segment of W.O.L.F.'s north property line, or approximately 5% of W.O.L.F.'s perimeter. All but a few lots in RFH are separated from the W.O.L.F. property by a 1/4-mile wide x 1/2-mile long (80 acres) publically owned parcel. Please see page 30 for additional discussion.*

During an informal meeting held by W.O.L.F. staff on August 13 at the Red Feather Lakes library, the Executive Director of W.O.L.F. could not point out where our subdivision was in relation to their site map that they had on display. In fact, the map did not show the location of our subdivision at all. This is concerning when presented with the W.O.L.F. organization's comments that "W.O.L.F. wants to work together with our new community and show what a positive addition our organization will be to the area". How seriously can we take that comment when they don't even know where our subdivision is with respect to their property?

*The initial sketch plan concept described above was prepared at a scale necessary to illustrate a conceptual layout for the W.O.L.F. II property, not show a large neighborhood, most of which is 1/4-mile or more away. The director indicated the approximate location of RFH as being north and northwest of the property when introducing the project and responding to questions. As required, a vicinity map is included with the sketch plan application. To state that W.O.L.F. staff was unaware of an adjacent neighborhood relative to property the organization had recently purchased is untrue.*

In reading the Special Review Criteria, we noted the following criteria as being particularly relevant in this case.

Special Review Criteria: "To approve a Special Review application, the Board of County Commissioners must consider the following review criteria and find that each criterion has been met or does not apply:"

- A. The proposed use will be compatible with existing and allowed uses in the surrounding area and be in harmony with the neighborhood.
- D. The proposed use will not result in a substantial adverse impact on property in the vicinity of the subject property.

*Agreed.*

The proposed use is not compatible with the existing and allowed uses in the surrounding area. The W.O.L.F. sanctuary cannot be compared to the Shambhala Mountain Center, the Ben Delatour Boy Scout ranch, or the Magic Sky Girl Scout ranch. These are much larger acreage facilities and the educational

activities do not include animal shelters or a large congregation of animals that bark and howl at all hours of the day and night. The rest of our surrounding community is either residential or agricultural.

*For discussion related to compatibility, adjacent land uses, etc., see page 10. For a detailed description of existing conditions on and around the subject property, please refer to page 30.*

*To be clear, the proposed sanctuary is neither an “animal shelter,” nor “a large congregation of animals that bark and howl at all hours of the day and night.” Any proposal including such uses might be considered a substantial adverse impact; however, the above descriptions are greatly exaggerated.*

How does the Planning Commission and Board apply the concept of “substantial adverse impact on property in the vicinity of the subject property”?

In reading the past minutes of Larimer County Commission meetings regarding the W.O.L.F. organization and its sanctuary, it is common to find the phrase “minimal” impact on surrounding properties. It is unfair and subjective for those who will not be impacted by this facility to make a determination as to what is “significant” and what constitutes “minimal”.

*The terms “minimal” and “significant” have specific meanings as applied to land use decisions. Based on the above concept, any neighbor could veto any proposed land use for any reason.*

One of our major concerns is noise from the sanctuary. Many of us moved to this area for the peace and quiet of the mountains; to get away from the noise and traffic of the adjoining cities and towns. The introduction of a kennel of 30-60 wolf-dogs will destroy the tranquility of our area and is not in harmony with the neighborhood. According to the Larimer County Noise Ordinance, a “noise disturbance” means any sound which is or may be: “Of such a volume, frequency and/or intensity that it unreasonably interferes with the enjoyment of life, quiet, comfort or outdoor recreation of an individual of ordinary sensitivity and habits.” The frequency of the noise from 30-60 penned animals cannot be managed, and it cannot be described as a natural noise or in harmony with the surrounding area.

*While noise is a legitimate concern, much of the above assessment is quite a stretch. The site was selected, in part, because of its vertical and horizontal separation from nearby residential properties. Based on the results of the noise study, residents in RFH would be unlikely to hear the sanctuary without listening carefully to a chorus during ideal weather conditions at the right moment. We disagree that this sound level would constitute an annoyance to a reasonable person of ordinary sensitivity and habits. Indeed, the sanctuary will be quieter than many of the uses allowed by right within the O-Open district. To be clear, noise from the animals can be managed and mitigated.*

Although the noise can vary in frequency and volume during 24 hours, it will be a persistent noise 24 hours a day, 7 days a week, 365 days a year. Comments from W.O.L.F. such as “typically the frequency of animals howling is about 5-6 times per day for very short periods of time” are vague and do not take into consideration how many times a day any number of animals may become more vocal due to external sources of excitement. Multiply the 5-6 times a day by the number of animals, add more frequent sources of excitement, as well as the barking and yelping of a large group of penned wolf-dogs, and that amounts to significant frequency of noise.

*The above is untrue, and represents the noise impact of a very large kennel, or possibly an international airport, not of the W.O.L.F. sanctuary. Please see noise discussion, page 11.*

The noise study done in 1999 at the Rist Canyon location resulted in a Noise Mitigation Plan which consisted of procedural mitigation only, no structural mitigation. When the 1999 study was done, the sanctuary was

already in existence. In spite of the implementation of the Noise Mitigation Plan in 1999, there were still complaints from neighbors about noise at the 2008 hearing (W.O.L.F. was requesting an increase in the number of animals from 30 to 60). The complaints indicate that the 1999 Mitigation plan was not successful. W.O.L.F. has indicated that the noise study to be conducted at the Livermore property will use modeling utilizing the noise at the current sanctuary location and the background noise at various locations at the Livermore site and surrounding areas. This will result in even less reliable results than the 1999 study.

*W.O.L.F. has received no noise complaints at its current location since Dr. Coldiron has been the Executive Director. The requested increase from 30 to 60 animals was unsuccessful because of the terrible access road and the prior Director's communication style and non-compliance with county regulations and permitting, not because of noise. To be fair, several neighbors did claim to hear wolves occasionally in their testimony. Because of the distance between properties, it is likely that local coyotes, or possibly domestic dogs left outside to their own devices, may have been the actual noise sources for many of those testifying that they could hear wolves howling.*

There is no proof that the topography in the Livermore area will be conducive to mitigating the noise that exists at the current location in Rist Canyon. In fact the flatter topography may cause the noise to travel further. We are not convinced that modeling can and will be effective in producing accurate results for the noise study being proposed and therefore, produce a noise mitigation plan that will be truly effective (if such a plan is even feasible). We do not want to live where we can hear the persistent noise from 30- 60 penned wolf-dogs.

*Transmission of sound is subject to physics. Considerable research has gone into the study of noise effects in mountainous areas. Please refer to the noise study and page 11 for additional discussion.*

The greater the number of animals, the greater the impact on our lives and community. The property values in our subdivision will be impacted to the same degree that the sanctuary will impact our quality of life. If the reasons that people move to this area are negatively impacted, then property values, as well as the time it will take to sell, will be negatively impacted.

Unless W.O.L.F. has had an independent study of real estate values of property in close proximity to the current sanctuary (discounting the fact that all real estate in Colorado has increased as compared to 1995, when the sanctuary was started), then the concerns of property owners in close proximity to the proposed location cannot and must not be summarily dismissed.

*The study described above would be quite an endeavor, particularly since the area surrounding W.O.L.F. burned in 2012. Please refer to page 25 for additional discussion regarding property values.*

General statements from real estate agents that "it shouldn't affect property values" have no merit. In a handout from W.O.L.F. (at the August 25 Commissioner meeting) a realtor from Summit Real Estate in Red Feather Lakes states that neighboring mountain property real estate values generally benefit from the preservation of large tracts of land used for nature-based educational attractions (it wasn't a direct quote from the realtor, so we assume W.O.L.F. is paraphrasing). The example used is Shambhala Mountain Center on Boy Scout Camp Road and that neighboring real estate prices have increased. Again, all real estate prices in Colorado have increased over the past years, not because of the preservation of large tracts of land. The attempt to compare the Shambhala Mountain Center, which is located on more than 600 acres with educational activities involving humans only, and the proposed W.O.L.F. sanctuary of 180 acres with 30-60 penned wolf-dogs is more than a stretch and does nothing to address our real concerns regarding our property values. It is just an opinion of a real estate person whose qualifications with respect to this particular issue are unknown.

*The professional in question has worked in the area for about 40 years. Preservation of large tracts of land are one of the reasons Colorado remains attractive to buyers. Ironically, residents in the area made similar disparaging claims regarding the Shambhala Center when it was proposed.*

Current land owners have a much larger stake in this than the applicant. We live here, some of us full time, others part time, but we have all invested time and money into creating homes for ourselves and our families in this mountain community and do not believe that a non-profit should have the right to interfere with or destroy what we have here. If the Highlands homeowners prove at some point that the sanctuary has had an adverse impact on property values, who is going to pay? Unfortunately, not the W.O.L.F. organization, not the county; it will be the property owners.

*W.O.L.F. owns the property, and has invested considerable time and resources into ensuring that the sanctuary will succeed without interfering or destroying others' homes. Such claims are unnecessarily inflammatory.*

Safety issues regarding the security of the proposed facility are also a concern. The initial plan description states that the wolf dog enclosures would be 8-10 feet high with a dig guard. How far down would the dig guards be and how does existing rock formations affect the placement of dig guards? There are on occasion snowfalls in excess of 3 feet in this area (4-5 feet is not uncommon), as well as large snow drifts during heavy snowfalls due to high winds. These drifts and snowfalls would cause the height inside the enclosures to be substantially less than 8-10 feet. What measures would be in place to address the altered height in the enclosures to ensure that the wolf-dogs do not breach the fence and escape?

*Fencing is discussed in detail beginning on page 19. Digging through rock is remarkably difficult. It must be noted, however, that freshly fallen snow is a poor launch pad, even for the most determined animal. The weather in Rist Canyon is comparable to Red Feather, complete with drifting snows. Drifts are removed before they can become launch pads.*

We are concerned with the lack of security measures listed in the Sketch Plan phase. This facility will be far more accessible than the Rist Canyon location. There is 80 acres of public land that borders the proposed facility. If the wolf dog enclosures are located along this 80 acre border how will W.O.L.F. secure the facility from people entering through public land?

*Staff will patrol the property on a regular basis, in addition to passive security measures. The public land described above is adjacent to private properties in Red Feather Highlands, the D-Dart Ranch, and W.O.L.F. Anybody other than owners would be trespassing on private property to access the public land and W.O.L.F.'s northern property line. W.O.L.F. is concerned about trespassing, mainly from the 74E right of way, however, and addresses the issue on page 22.*

This again brings up a source of excitement that would cause the animals to bark and howl excessively.

*Sources of excitement typically would include unfamiliar vehicles arriving at the facility, and some animals are more concerned with visitors than others. For this reason, enclosures will not be visible from the primary entry, and vice versa. Those animals more likely to be upset by newcomers will be in enclosures to be visited by W.O.L.F. personnel only.*

Being more accessible than Rist Canyon will also bring additional issues due to that accessibility, one of them being the need for expanded security measures that far surpass what exists at the current location. The question has been posed as to how quickly will the surrounding community (and who will that include) be notified if a wolf dog escapes, and what is the means of notification. Using a social media site is unacceptable for a number of reasons: one cannot expect everyone to be online all the time, some people do not use these sites, some don't have access.

Due to the close proximity of the Highlands to the proposed facility, timeliness and reliability of notification is extremely important. We await an acceptable plan from W.O.L.F. regarding this notification, as well as notification when, and if, the animal is recovered. If an animal escapes, what is the action plan of W.O.L.F. to recover the animal? Will this plan be made available to the surrounding area?

*W.O.L.F. is aware that additional security will be required (page 22). Rejecting the use of social media out of hand seems counterproductive when instantaneous communication appears to be the standard being set; however, other means of communication exist. See page 19 for notification discussion. Noise concerns in the above are addressed beginning on page 11.*

If the W.O.L.F. sanctuary is approved at this new, proposed location, there will be inherent traffic issues. Regardless of what the final plan looks like, there will be an increase in the traffic on 74E as a result of the sanctuary. This will be a direct result of the number of volunteers, staffing, third party workers, vendors, and visitors. Even if the entrance is moved west, the road frontage on the west part of the property has multiple curves and elevations, causing blind spots and limited visibility of traffic from the east and west. As 74E has limited coverage by the Sheriff's department deputies due to the large geographical area they must cover and the limited number of deputies, there is already an issue with speeding, passing on double yellow lines, etc. The limited visibility in the curves, speeding in the 40 mph zone, combined with the possibility of people slamming on the brakes when they see the signage at the front entrance of the sanctuary, concerns us.

*The increase in traffic at W.O.L.F. II represents a small fraction of current background traffic, and is less than 20% of the traffic generated by Red Feather Highlands entering CR 74E alone. See page 38 and the TIS submitted with this application, as well as page 39 for a full discussion of access visibility.*

We believe the County needs to have traffic surveys done to ascertain the current levels of traffic and continue to have them done if the sanctuary is approved. A traffic light may become a reality if the increase in traffic is significant, particularly if the sanctuary begins to offer more educational activities to the public and adds the proposed visitor center and camping, etc.

*Larimer County conducted multiple traffic counts on CR 74E in the vicinity of W.O.L.F. II prior to this application, as it does on all county roads periodically. As part of this application, Delich and Associates was retained to determine background traffic levels and to conduct a traffic impact study. A traffic light and other measures – aside from ensuring adequate sight distances – are unwarranted, both by existing background traffic and trips generated by W.O.L.F. II. Please see page 38 for additional discussion.*

The proposed location of the W.O.L.F. facility would be disruptive to the wildlife that reside in this area and also to the elk migration. Maps depicting animal migration patterns provided by the Division of Wildlife do not include all migrations, particularly the smaller ones. There is definitely an elk migration pattern thru the proposed facility. Those who have lived in the Highlands have witnessed it.

*Wildlife certainly migrates through the area. W.O.L.F. II will have a limited effect on this migration. Please see pages 15 and 17 for additional discussion.*

A kennel of 30-60 wolf-dogs would be disruptive to all the wildlife in the area. Their presence in enclosures is not the presence of a "natural" part of nature.

*W.O.L.F. is not a kennel. This point was made at each neighborhood meeting, on multiple occasions, in response to questions and comments. To suggest otherwise (and then to erect multiple billboards using the term shortly thereafter) implies either confusion about W.O.L.F.'s mission, or is a cynical rhetorical device.*

*While animals in enclosures is not “natural,” W.O.L.F. II is private property adjacent to a county road that has been occupied on and off by people for more than a hundred years. The land is not pristine wilderness. Much like the Red Feather Highlands neighborhood, and most of unincorporated Larimer County, living in manmade structures surrounded by wildlife and hundreds of thousands of acres of open space is entirely possible, and is one of the reasons the area is attractive. The presence of a wolf sanctuary will not upset that balance.*

The pictures provided by W.O.L.F. of turkeys near an enclosure don't show a wolf-dog in the picture, so we aren't convinced that the wildlife will adapt to being around this kennel of wolf-dogs.

*Implying that W.O.L.F. staff evacuated thirty animals to wait for turkeys to amble by to pose for a photo op suggests a profound misunderstanding of logistics (and turkeys), or is simply an attempt at obfuscation. Please refer to page 16 for additional discussion.*

We are also concerned about the effect of this concentration of wolf-dogs on our horses and other pets, and remain dubious that they will adapt to the sounds and smells of these wolf-dogs.

*Sanctuary wolves apparently have no perceptible effect on domestic animals. See page 16 for additional discussion.*

The wolf biology lecture presented at the Red Feather POA on August 13 centered on the role of each creature within an ecosystem and how that balance needs to be maintained. The W.O.L.F. sanctuary appears to be in direct conflict with those ideals. This group of wolf-dogs will upset the balance in this small ecosystem and displace the wildlife groups here.

*The sanctuary enclosures include a fenced area of less than 22 acres out of approximately 160 acres. While one would not expect a flourishing wild ecosystem within an enclosure because of its use, the level of impact is considerably less than that related to paddocks, stables, and heavily grazed lands. Enclosures are proposed in areas outside of migration corridors. While it is acknowledged that the use of the property for anything – including no management at all – will affect wildlife in some way, the proposal is considerably less impactful than nearly all other uses that could be allowed within the O-Open zone district.*

If the W.O.L.F. organization intends on pursuing the visitor center, gift shop, public tours, etc. (either in this Special Review or in a subsequent one), then this non-profit is essentially a commercial operation. It will bring no material benefit to the area (as they pay no property taxes, etc.) but will bring multiple issues to a mountain community with limited fire, emergency, and law enforcement resources.

*W.O.L.F. is a non-profit organization. A gift shop combined with educational tours is a small, but necessary, part of W.O.L.F.'s mission. Without funding, non-profits like W.O.L.F. cannot exist. To suggest that W.O.L.F. II will bring no material benefit to the area is false; already, the organization has hired local contractors to perform work. Sales taxes will apply to items purchased in the gift shop, and W.O.L.F.'s visitors are likely to include a visit to W.O.L.F. as a fraction of their time spent in the Red Feather area. Donations, many of which from outside of Larimer County, are used to hire contractors, pay for food and supplies, and contribute to the local economy. W.O.L.F.'s staff earn wages, which are taxed, in addition to a positive multiplier effect rippling through the economy. Finally, W.O.L.F. will contribute annually to GVFD to offset fire and emergency services.*

The residents of RFHMA feel we are being made to pay for the mistakes of those who breed and own these wolf-dogs. Our property rights should be no less than those of the W.O.L.F. organization. To place a higher value on the lives and quality of life of animals over people is unfair and disrespectful to those of us who live here.

*Nobody has suggested that one property right is greater than another or that an animal's value outweighs that of a human.*

### **Attorney Letter (Dated 11/11/2016)**

*Mr. Phillips's letter, with the exception of introductory and concluding remarks, are below with the applicant's formal responses. The entire letter and its attachments are included separately within this application.*

First, a primary stated reason in the Special Review for the move is a "history of neighbor issues". Certainly the Zoning Staff as well as the Commissioners can appreciate the futility and ensuing frustrations produced by transferring problems from one area of the county to another.

*The history of neighbor issues is related primarily to access. As discussed above in this application and in meetings with RFH residents and others, W.O.L.F. must cross private property to access its land in Rist Canyon, and is limited to five trips daily. Remaining neighbor issues linger from the prior executive director's lack of respect for adjacent property owners and Larimer County. Current management and staff have worked very hard to mend fences over the last five years.*

Second, as Exhibits A and B (attached) illustrate, there is significantly more density around the proposed location than the current. A fact which is further exacerbated by an additional point in the Special Review: "in this immediate area the level of activity and the general use of the site are consistent with other approved uses in the area (Boy Scouts, Girl Scouts and guest lodges). The level of activity and traffic to this site are similar to and or less than these uses." The first two sites are 3,400 and 733 acres respectively; that simply does not correlate to the property size being considered under the proposed move at only 180 acres. It is appreciated that the Special Review does recognize and address the Red Feather Highlands and Glacier View Meadows, but it is our concern that the negative impact on those areas is downplayed. Although guest lodges do exist in the vicinity, one has to venture a speculation that if a party were to check-in with a number of hybrid animals in tow that questions and concerns might arise.

*An illustration showing the relationship of the subject property to both RFH and GVM is included on page 1. Potential impacts and mitigation measures are discussed throughout this application. The applicant agrees that checking into a guest lodge with exotic animals in tow would raise questions and concerns; however, that hypothetical is not germane to this application.*

Third, the Special Review states "Negative comment based solely on number would not suggest a compatibility issue..." Again, we would argue a large number of negative responses do directly correlate to a compatibility issue. I daresay we are venturing into statistics and physics, but if the property were in fact surrounded by a few large properties the relevant negative comments would be limited; here that is unquestionably not the case.

*The above quote is from Mr. Helmick's review comment (page 27), which stated that the deciding issue in this matter would be noise; the other concerns, while important, are more easily resolved. We agree with that assessment.*

An Issues Submittal Form submitted to Colorado Parks and Wildlife dated March 26, 2013 specifically states that Ms. Coldiron representing the Applicant requested a modification to "the existing regulations to allow the Applicant to move to a new *less wildfire prone location*" (emphasis added). As we all know all too well the 2012 High Park fire was devastating, notwithstanding the incredible bravery and hard work of all our firefighters, volunteer and paid. However, the Colorado Division of Homeland Security & Emergency Management makes no such distinction between Rist Canyon and the Neighborhoods with regard to fire restrictions and bans. Please see <http://www.coemergency.com/2016/07/map-of-colorado-fire-restrictions-and.html>.

*Both sites are forested, and susceptible to wildfires. W.O.L.F. II is more accessible, and not at the end of a long, single-lane dirt road that is impassable during a flood or fast-moving wildfire. Wildfire management and safety in an emergency situation will be considerably easier at W.O.L.F. II for several reasons, not the least of which is proximity to CR 74E. Please refer to page 17 for discussion.*

Another concern that we have is that the Colorado Division of Wildlife regulations C.R.S. §33-1-102 et. seq. governs wildlife sanctuary's. §33-1-102(52) specifically states that a wildlife sanctuary may not "Use the animal for any type of entertainment". Precisely what the Applicant appears to be proposing in this case under their current proposal. Colorado law does not specifically define "Entertainment", however the I.R.S. has determined that "Entertainment includes any activity generally considered to provide entertainment, amusement, or recreation, and includes meals provided to a customer or client." We would argue that is specifically the stated intent of the Applicant through their arguments of increased tourism, including shopping, paid tours, wedding parties and overnight camping experiences.

*As part of W.O.L.F.'s mission, the animals are used for education, not entertainment. However, weddings and overnight camping are no longer proposed in the land use application.*

Further, it has previously been noted on several occasions that the Applicant failed to either recognize, or acknowledge, the nearby presence of the numerous families surrounding their proposed facility.

*The above sentence apparently refers to an unfounded accusation by the author of the RFHMA letter stating that Dr. Coldiron was unaware of the location of Red Feather Highlands at one of the neighborhood meetings. Stating that a falsehood "has been previously noted" does not make it true. Please see page 52 for discussion of this falsehood.*

It is fully appreciated by the Neighborhoods that Mr. Ty Petersburg, Area Wildlife Manager with Colorado Parks and Wildlife in a letter dated August 22, 2016 accurately differentiated to Mr. Helmick of the Larimer County Planning Department the importance of the proposed location as "increasingly important as a wildlife migratory route because in its current state, it is mostly undeveloped". Mr. Petersburg continued to state that "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" (emphasis added). We are concerned as this fact is contradicted in assertions by both the Special Review and by the Applicant.

*The above assessment omitted a component of Mr. Petersburg's recommendation that the western third of the property be left open as a means of mitigating potential impacts to wildlife (see full text of letter on page 44). The layout was revised from the initial sketch plan application to leave the western third of the property undeveloped, in addition to other assumed migration corridors. Please see page 15 for additional discussion, as well as the Site Plan.*

Finally, at the October 15th meeting last month a drone video, as well as, a digital terrain model, were played for the audience. The drone video very conspicuously was directed away from either of the neighborhood areas in the immediate vicinity and the digital terrain model vertical exaggeration was grossly distorted to alter the appearance of the proposed location to such a degree that as a Colorado native and experienced hiker, backpacker, camper and outdoor enthusiast, I have not seen any such mountains this side of the Grand Tetons.

*The drone equipped with a video camera hovered over the area adjacent to the Jess Scott Spring, as the surrounding hillsides were identified early as most desirable for enclosures. The video included numerous 360° sequences at several elevations. The operator couldn't get the drone high enough to see much of RFH over the ridge and across the public land to the north, although portions of RFH adjacent to CR 74E are visible, along with some of the RFH properties furthest away. The western extent of GVM (Gates 12 & 13) is visible several times. Neither neighborhood is prominent:*

*the nearest lot is more than a half-mile from that spot, and the drone was not equipped with a telephoto lens.*

*The assessment of the digital terrain model was accurate, if melodramatic. Using a 10:1 vertical exaggeration for a property with more than 500 feet of vertical relief was overkill, however. Please note that sectional drawings included in this application illustrating horizontal and vertical separation between enclosures and adjacent structures have no vertical exaggeration; however, the primary entry road centerline profile is exaggerated, which is standard engineering practice used for roadway design.*

## **Form Letters**

*Four form letters were received from adjacent and nearby property owners as this application was prepared. Because of the writing style, we assume that these were drafted by the RFH attorney<sup>43</sup> for modifications by homeowners. The text of (and responses to) relevant portions of the first letter received are included. Unique parts of subsequent letters and responses are on following pages. Copies of each letter as received are included separately within this application. None of the letters were dated.*

### **Trusty Family Letter**

*(undated, received via email 4/7/2017)*

*I am writing to voice my concerns.... The Code states: No person shall permit, make, cause to be made or continue any noise disturbance, nor (emphasis added) shall any person or individual make any unreasonable noise in excess of the levels provided in section 30-155 and measured as provided in section 30-156.*

*The property in question – 142 Springmeadow Way – shares a common property line with the westernmost 664 feet of the W.O.L.F. II northern boundary, and is adjacent to the north right of way line of CR 74E. The sketch plan proposed enclosures south of the Trusty Property. Based on initial studies and comments related to wildlife movement, those enclosures were removed from the proposal.*

Furthermore, pursuant to Sec. 30-153. - Definitions. Noise disturbance means any sound which is or may be: (1) *Harmful or injurious to the health, safety or welfare of any individual;* (emphasis added) (2) Of such a volume, frequency and/or intensity that it unreasonably interferes with the enjoyment of life, quiet, comfort or outdoor recreation of an individual of ordinary sensitivity and habits; or (3) *Endangers or injures real or personal property or the conduct of business.* (emphasis added)

*The definition as partially copied above omits the final clause of item (2), which states that the individual of ordinary sensitivities and habits needs to be “present at the time the noise is made.” The distinction is important, particularly when very large properties are involved.*

Additionally the county clarified in section 30-156 - Classification and Measurement of Noise - "that a violation of section 30-154 above may occur without the following measurements being made". Furthermore, section 30-156(1) specifies that it is the "property boundary" that is the distinguishing geographical point of reference to determine whether there is a violation.

*While the above is correct, the reasonableness test begs the question of how often a person of ordinary sensitivities and habits might stand at the property line, listening for wolf noise.*

The stated purpose of the Code is to "preserve, protect and improve the health, safety and general welfare of Larimer County residents and to implement the Larimer County Master Plan adopted Nov. 19, 1997, and any future amendments."

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<sup>43</sup> See "Legal Update from Rob Phillips," Feb. 13, 2017 at <http://www.quietmountains.org/from-our-attorney>.

The guiding principle in acoustical engineering is "Signal - Path - Receiver". It is well documented that injuries, discomfort and fatigue in humans is attributed to noise pollution and is a growing concern in communities. For a complete discussion on acoustical engineering see the Encyclopedia of Acoustics Vol 1-4. (Riley, N. 1997). The Signal is the wolf-dog's vocal communications as stated in the article on Wolf Ecology and Behaviour published and owned by Western Wildlife Outreach ("WWO").

*The "growing concern" statement was more correct in the 1960's and 1970's when acoustical research began, primarily in response to commercial air traffic patterns over cities and placement of freeways through established neighborhoods.*

*The question of noise on adjoining properties and the surrounding area is addressed more fully in the separate noise study, as well as page 11. The 55 DbA day / 50 DbA night standard used by the county is based on EPA guidelines, specifically to prevent injury. For perspective, 55 DbA is conversational volume; 50 DbA would be low conversation. To suggest injury from conversational volumes for a person of ordinary sensitivities seems a stretch. Any wolf chorus heard from nearby properties would be difficult to discern from background noise, at best.*

Further as stated on the WWO site, such facts about wolf howling includes, but is not limited to, the following (collectively referred to as "Communications"): *Wolves also howl in the evening and early morning, in the summer when pups are young, and during the mid-winter breeding season. It is a myth that wolves howl at the moon, but they do point their snouts toward the sky to howl. Projecting their call upward allows the sound to carry farther.* Wolves have excellent hearing, and under certain conditions can hear a howl as far as six miles away in the forest and ten miles away on the open tundra. (emphasis added)

*While the above information is factual, it is irrelevant to W.O.L.F. II. The sanctuary animals are not bred, and have been neutered or spayed. There are no pups at the facility, and will not be. Noting that wolves can hear each other from 10 miles under ideal conditions attests to their hearing. Sanctuary animals don't need to communicate as loudly with each other to be heard.*

A wolf howl is a deep and continuous sound from about half a second to 11 seconds long. *A howling session by a pack lasts an average of 85 seconds. It is initiated by a single wolf, and after its first or second howl one or more others may join in.* (emphasis added) The Path is the direction the sound waves travel, particularly when unimpeded as is the case with my property. The Receiver are those biological beings subjected to the Communications. Because I am a neighbor who shares a property boundary directly adjacent to the site in the Proposal. The Signal will travel the Path unimpeded by distance, terrain or any other objects intensifying the stressors on myself, my kids, my grandkids and my animals; the Receivers.

*To suggest that the 142 Springmeadow Way property is "unimpeded" from proposed enclosures is a gross exaggeration. Please refer to sectional drawings in the Site Plan application illustrating the horizontal and vertical separation between 142 Springmeadow Way and the nearest enclosures.*

The Larimer County Department of Human Services, Children, Youth & Families Division states that their mission is to support the right of children to be safe. They believe it is the whole community's responsibility to support and ensure the welfare of children. It is therefore inconceivable that my kids and grandkids would be subjected to the inherent negative physiological and psychological impact that the wolf-hybrids will inflict and the county owes us the right not to be threatened pursuant to the county's own stated mission. The current (2013 - 2018) Larimer County Strategic Plan specifically states that the Larimer County Mission is: The people of Larimer County Government, consistent with our shared vision, are dedicated to delivering the services mandated by law, and services determined by the Elected Officials to be necessary *to protect the health, safety and welfare* of the citizens of Larimer County. (emphasis added)

*A portion of the county's mission is, in fact, to protect health, safety and welfare of its citizens. Claiming that the possibility of hearing a wolf howl away in the distance occasionally is a threat to human health seems overstated.*

While the historical, genetic, biological and fundamental negative visceral reaction to wolves cannot be disputed; humans, horses, cattle and domesticated dogs have always been prey to the predator wolf. Uncontrollable physiological reactions were originally scientifically determined by Stress pioneer Dr. Hans Selye who developed the theory of General Adaption Syndrome ("G.A.S.") based on physiology and psychobiology as a result of his research on the physiological effects of chronic stress on rats. His model states that an event that threatens an organism's well-being (a stressor) leads to a three-stage bodily response: Stage 1: Alarm; Stage 2: Resistance; Stage 3: Exhaustion.

*The first sentence is inaccurate for several reasons, and is disputed. Indeed, one of the reasons why W.O.L.F. exists is to educate people about the problem of adopting wolves and wolf-dogs, as they don't understand that these are essentially wild animals ill-suited for life as a pet.*

*The work of Dr. Hans Selye (known as the "father of stress") was used to bolster this claim that the howling of W.O.L.F.'s animals will create chronic stress for humans and domestic animals who hear it. The work of Dr. Selye himself does not support this contention. Dr. Selye created repeated stress reactions when he injected laboratory rats with a poisonous ovarian extract that caused enlargement of the adrenal cortex, atrophy of the thymus, spleen and lymph nodes, and deep bleeding ulcers in the stomach. The rats came to associate the injections with stress, such that injections of saline solution also induced stress. The above seems unrelated to humans hearing sounds in the distance that are easily confused with coyotes.*

Larimer County Health and Environment states: Our mission is to promote a healthy community and reduce unnecessary suffering caused by preventable disease, disability, or death. This mission is accomplished by providing community health and environmental health services, communicable disease control, health education, vital records management, health data assessment, development of policies that advance the public's health, and advocacy for community-based services that provide needed health care.

The Proposal is a direct assault on the health of myself and my family and will cause unnecessary suffering caused by preventable disease. Furthermore, the glowing letters from the Applicant's current neighbors further illustrates how ideal the current location, set-up and terrain is for both the wolf-hybrids and their present neighbors.

*The idea that proximity to W.O.L.F. II is a preventable disease seems a stretch as well. The applicant would be delighted if the final sentence was true, and the proposed move was unnecessary.*

Which is in complete contradiction to the Proposal, my families [sic] property and our surrounding family neighborhoods. The Code furthermore specifically states in Sec. 30-153(3) that noise disturbances which "endangers or injures real or personal property or the conduct of business" are violations. A major part of living in the mountains is having dogs, cats, horses and cattle. All of which are historically and inherently prey to predator wolves and are subject to the same negative inherent physiological reactions; including but not limited to, the well-known "fight or flight" or "hyperarousal state".

Again the G.A.S. theory developed by Dr. Hans Selye states that the Stressors that most certainly will be inflicted upon my animals, my personal property, being so closely surrounded by wolf-dogs will cause the following three-stage bodily response: Stage 1: Alarm; Stage 2: Resistance; Stage 3: Exhaustion. All of which are in direct violation of Code Sec. 30-153(3).

*The reliance on Selye's research to back up these claims is mildly surprising: his work in the 1960s and 70s severely damaged the credibility of his later stress research. Selye was willing to claim, on*

*behalf of the tobacco industry, that the carcinogenic effects of smoking accounted for only a small number of deaths, and that smoking could help control stress. His tainted research helped the tobacco industry successfully argue against putting health warnings on cigarettes.*<sup>44</sup>

*The point that stress can effect health is not debated; however, there is no scientific evidence to suggest that the intermittent howling of captive wolf dogs heard at a great distance causes long term stress in humans or domestic animals, let alone health effects.*

We have 2 very gentle horses on pasture directly bordering the site in the proposal. They are used for carriage rides at weddings and other events. Their expected change in behavior with Wolf-dogs next door will most certainly make their use during these events challenging and/or impossible. Our grandchildren also like to ride our horses. Again, the expected change in behavior will make this a dangerous practice.

*The horses described above currently live near bears, mountain lions, and coyotes, without apparent ill effect, which makes the above claims seem hyperbolic. Please see page 16 for additional discussion related to the effects of sanctuary animals and wild wolves on domestic animals.*

History has shown that noise complaints and a lack of adequate response were a major problem when W.O.L.F. moved to Rist Canyon and here not only is the terrain much more undeviating, there are significantly less natural formations to block the Path from the Signal. The problem is further exacerbated by the fact the Proposal completely ignored all of the nearby residence, mine included, in all of their documentation to date.

*W.O.L.F. has not received a formal noise complaint since Dr. Coldiron became Executive Director in 2012, although neighbors testifying against W.O.L.F.'s proposed expansion in 2008 stated their ability to hear the animals. W.O.L.F. conducted sound tests in 2008, and was unable to detect sanctuary animal noise at the property line. Adjacent properties have not been ignored: again, please refer to sectional drawings in the Site Plan application illustrating the horizontal and vertical separation between 142 Springmeadow Way and the nearest enclosures.*

Studies have shown that wolves, and by natural extension this would include wolf-hybrids, trigger interest and joy, *as well as anger and fear* (emphasis added) (Treves et al. 2013; Jacobs et al. 2014). *The emotion of fear is a fundamental human response and is as other emotions considered to include a subjective experience (feeling), physiological reactions, and behavioral expression* (Lang 1984). (emphasis added)

*While fear is a fundamental human response to certain situations, there is no research cited by the form letters that proves the contention that fear of wolf dogs or wolves is "historical, genetic, biological and fundamental negative visceral reaction [sic]." In fact, the studies cited in the form letters seem to indicate the fear of wolves in the wild is geographically based with rural residents in wild wolf recovery areas having a much greater fear than residents in urban areas.*<sup>45</sup> *As noted above and repeatedly throughout this application, the animals in W.O.L.F. II will not be leaving the facility.*

Studies have shown that wolves provoke a very sincere fear in humans that when coupled with a distrust of authorities plays itself out in a dual path of fear. The first path includes the appraisal of the environmental context, in this case the appraisal operationalized as cognitive vulnerability, the perceived danger in a potential wolf encounter, including the unpredictability of the animal's behaviour and *the uncontrollability of the individual's own reaction*. (emphasis added). The second path encompasses the appraisal of the social context around large carnivore management, here operationalized as social trust in the managing

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<sup>44</sup> Petticrew et al, The "Father of Stress" Meets "Big Tobacco": Hans Selye and the Tobacco Industry, *Amer. Journal of Public Health*, March 2011, Vol 101, No. 3 411-418.

<sup>45</sup> Johansson, *European Journal of Wildlife Research*, (2016) 62:749-760.

authorities. In fact, the negative factors that proximity to the wolves inherently brings thereafter combined with the lack of trust in authorities may serve as a hotbed for mistrust, further fueling feelings of fear. (Johansson et al. 2016) There is a negative history in Larimer County from the poor response to fears officials exhibited. Of further distress, is the fact that there have been wolf-hybrid escapes in the current location where the risks of harm are low due to steeper terrain and larger properties demonstrated by far-flung neighbors. Under the Proposal W.O.L.F. will be surrounded by families with children.

*Several studies conducted in Scandinavia regarding wild wolves following their reintroduction were used to support these contentions. These studies have few, if any, parallels to the W.O.L.F. II proposal. The animals at W.O.L.F. are captive born, and are not wild. Unlike wild wolves who must constantly hunt to survive, the wolf dogs at the Sanctuary do not hunt. They are fed a diet of raw meat, plus kibble on demand. The wolf dogs at the Sanctuary do not roam across wide territories in search of prey, and instead have quiet lives within large enclosures, with a constant source of food, water, companionship, and enrichment (toys, bones, animal hides, etc.), regular on-site medical care, and daily contact with staff and volunteers.*

*One study in Sweden looked at the attitudes of fear of people who lived in rural places where systematic efforts were being made to restore wild wolves in areas where they had previously been exterminated. These attitudes were compared with people who lived in more urban areas who were more concerned with ecological restoration and had greater social trust with managing authorities. Neither group showed an innate fear of wolves, as stated in the form letter. The fear of wolves was more likely to be formed by geography and lack of social trust in officials who were managing wolf reintroduction programs.<sup>46</sup>*

*Another Johansson study in Sweden<sup>47</sup> looked at the socio-ecological conflicts in wolf recovery areas that caused persons living in the wolf territories to have a fear of wolves. The study introduced the use of a hand held ultrasonic device that was intended to scare wolves. The device had no significant effect on participants' appraisal of wild wolves, their trust in the wildlife management authorities, or their self-reported fear. The use of the device was largely rejected by the public, and people who declined to use it stated they mistrusted the technology and considered it irrelevant in the conflict between wild wolves and humans.*

*Please refer to page 19 for discussion regarding escapes.*

In conclusion, between my family and me being pre-disposed to an innate inability to restrict disturbing physiological reactions and our concern here that we are not being heard today and will not be heard should this project move forward it is incumbent upon the Larimer County Department of Planning to make the appropriate call and reject the Proposal to relocate to within our neighborhoods. Thank you...

*All concerns are heard in any public decision-making process. One purpose of this process is to identify substantive issues as early as possible so that they can be mitigated.*

### **Brinn Family Letter**

(undated, received via email 4/27/2017)

I am a neighbor who is probably second only to the Trustys insofar as noise interference from the proposed site. I know this from actual experience. Our property will have unobstructed views of the proposed kennel

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<sup>46</sup> Johansson et al" "Factors governing human fear of wolves: moderating effects of geographical location and standpoint on protected nature." *European Journal of Wildlife Research*, (2016) 62:749-760.

<sup>47</sup> Johansson, et al. "The impact of access to an ultrasonic scaring device on human fear of wolves." *Wildlife Biology*, vol. 22, no. 2, 2016, p. 29+.)

locations. The Signal will travel the downhill Path unimpeded by distance, terrain or any other objects intensifying the stressors on myself, my family and my animals; the Receivers.

*The Brinn property (17311 CR 74E) is about a half-mile east of the nearest enclosure in the second phase, just south of CR 74E. This property has views of much of W.O.L.F. II, although not where the enclosures are proposed in the Site Plan. Enclosures were sited, in part, to avoid line of sight from the higher of the two structures on the Brinn property (we were unsure which of the two structures were the primary residence, so used the higher of the two). The Visitor Center will be visible from the Brinn property, about ¾-mile away. It's entirely possible that wolves will be audible under ideal conditions on the property, although extremely unlikely that a noise disturbance defined by any rational measure could occur. By comparison, traffic noise from CR 74E would be at least an order of magnitude greater than anything from the W.O.L.F. II property in the second phase, let alone the first phase.*

### **Ronnie and Loretta Weeks Letter**

(undated, received 4/28/2017)

Because I am a neighbor who shares a 1230' property boundary near some of the proposed enclosures in the Proposal. The Signal will travel the Path unimpeded by distance, terrain or any other objects intensifying the stressors on myself, my family and my animals; the Receivers.

*The 15458 CR 74E property shares a common property line with W.O.L.F. II, although the home in question is more than 1,500 feet away (about the same proximity to CR 74E) from the property line. The nearest enclosure in W.O.L.F. II (veterinary enclosure 1) is more than 1,700 feet from this residence, and well below a low ridge near the common property line. Wolf noise will be audible at the property line periodically, although well below the county standard for daytime and nighttime maximums.*

My wife Loretta has conversion disorder or functional neurological symptom disorder which is a mental illness aggravated by stress and anxiety. The condition was so named to describe a health problem that starts as a mental or emotional crisis – a scary or stressful incident of some kind – and converts to a physical problem. Having the wolf dogs so very close to our home would definitely aggravate her illness, causing her symptoms to get worse than they already are (she just returned from the hospital, after a 1 week stay due to a stress induced incident). She is homebound and stays in bed most the day and needs the peace and quiet that our property currently provides. According to some expert, most people get better with immediate and proper management. This is the reason we moved to this property and the proposed would complete defeat the purpose of our move. Doctor's evidence can be provided upon request.

*Any noise from W.O.L.F. II heard at this structure will be at least an order of magnitude (or two) less than that from howling coyotes, as well as the dog and chickens at the Jason and Tiffany Weeks property (see form letter, below). While a quiet listener inside the home may be able to discern wolves occasionally above background noise through a west-facing open window under good conditions for noise transmission from W.O.L.F. II, the likelihood of being able to do so on a regular basis is low.*

### **Jason and Tiffany Weeks Letter**

(undated, received by email 5/3/2017)

Because I am a neighbor who shares a 1230' property boundary near some of the proposed enclosures in the Proposal. The Signal will travel the Path unimpeded by distance, terrain or any other objects intensifying the stressors on myself, my family and my animals; the Receivers. The only reason we left our previous

property we had lived at for over 18 years was for the peace and quiet of being up here. You see, I have chronic pain which causes insomnia and I need absolute silence to get any sleep at all.

*The Weeks family owns two adjoining parcels, about 80 acres in total. The newer of the two homes is a bit further away, at 15454 CR 74E, and at a lower elevation than the property described above. The nearest property line of this parcel is about 1,320 feet from the eastern boundary of W.O.L.F. II. The nearest enclosure (veterinary enclosure 1) will be about 2,400 feet from the residential structure (not quite a half-mile). Similar to the Ronnie and Loretta Weeks property (above), a motivated listener may be able to discern wolf noise from background noise through a west-facing window very occasionally; however, sounds from CR 74E, as well as domestic animals on the property, would be much more noticeable on a regular basis.*

Our Horse, dog and chickens would all be affected by the proposed.

*Please see page 16 for discussion.*

## Attachments



To Whom it may concern,

As the Owner of a Successful Local Real Estate Company, a Board Member of the Red Feather Lakes Community Property Owner's Association, and owner of many personal properties and residences dating back to 1975, I would like to express my opinion on what I feel will be a positive impact that the WOLF Organization will have on the Red Feather Lakes area

The WOLF Project is a very unique situation ... so we can only predict based upon other controversial projects that have been attempted in the area and how they affected property values. Specifically I would like to point out the Shambala Center which is located on the Boy Scout Road.

I have been around long enough to have heard many of the same arguments that came from the Red Feather Lakes population 40-years ago when the Shambala Center was first being proposed and built. These complaints centered around increased traffic, undesirable "hippies" wandering the mountains, decreasing Real Estate Values due to increased noise and the general quality of living. As things turned out, none of these projected horror stories came to pass. Instead the Shambala Center was built and has been contributing positively to the local economy and the general perception of the area. Properties adjacent to the center have increased in value greater than the average increase for the area over that 40-year period of time.

The only unanswered question that I see regarding the current complaints from local residents is the possibility of the noise generated by this type of facility. The extent of the noise issues will be reflected in the results of the noise study that is currently being conducted by WOLF. Having visited the existing WOLF center in Rist Canyon, I believe the fear of a noise problem will turn out to be another unfounded fear.

In my 40+ year professional Real Estate Opinion, these types of attractions (or attractions in general) tend to increase property values as is evidenced by Zoos, Religious Centers, Parks and Camps. With the increased traffic comes increased revenues that will even further enhance the liveability and beauty of our mountain community.

Sincerely,

A handwritten signature in black ink that reads "F. W. Johnston". The signature is fluid and cursive.

Frederick W. Johnston  
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May 15, 2017

To Whom it May Concern,

RE: Surrounding property values as a result of the proposed W.O.L.F. Sanctuary

It is in my opinion after 21 years in the real estate industry that the proposed W.O.L.F. Sanctuary, as stated would have either a positive effect on property values or none at all.

Here is my reasoning for the statement above. Well maintained properties add value to neighboring properties. The current W.O.L.F. property is very well maintained and the area where the wolf dogs are cared for is a small percentage of their property surrounded by a large percentage of open natural space. That would be the same case in the proposed Sanctuary. It is ideal because the access is direct from a paved County Road, not through a private neighborhood. Also, there is 80 acres of National Forest to the north side of the subject property which create an even greater buffer of open space. The terrain of the property create visual and physical barriers for privacy, so it literally creates a sanctuary. W.O.L.F. also will be offering awareness of how to be a better steward of our environment. This is complementary to other organizations in the area; the Boy Scout Camp and Shambhala Center to name a few.

On the contrary, the issues that negatively affect property values in an area are lack of maintenance where there are rundown and abandoned buildings, unmanaged forests and collection of random items or trash on a property. Also, extreme odors, such as a feedlot, or packing plant. None of these issues would even remotely be a concern with the proposed W.O.L.F. Sanctuary.

The proposed W.O.L.F. Sanctuary will only attract mindful people to the Red Feather Lakes area, that have an appreciation for the Rocky Mountains and protecting our precious environment. This will only add value to properties in this area.

Sincerely,

Lorraine Schaeffer  
Broker, NorthWest Real Estate

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