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Dear Mr. Helmick and Larimer County Board of County Commissioners,

As the WOLF II Special Review Application has been deliberated, it has been disheartening to witness the blatant disregard for Colorado’s greatest natural resource ... its wildlife. In particular, the elk herd that requires our protection and understanding of their needs, in order to survive the encroachment of human expansion on essential territory.

The Rocky Mountain Elk was reintroduced to Colorado in 1913, after the near extinction of the regional herds. **The elk’s near extinction was mainly attributed to human encroachment and destruction of their natural habitats and migratory corridors.**

*C.R.S. 33-1-101. Legislative declaration*

**“(1) It is the policy of the state of Colorado that the wildlife and their environment are to be protected, preserved, enhanced, and managed for the use, benefit, and enjoyment of the people of this state and its visitors.”**

In 2000, the State of Colorado purchased 5400 acres of land in Larimer County with the exclusive intent to provide wintering grounds for this elk herd. It is therefore to be recognized, that our state considers this herd to be a significant natural resource worthy of an enormous financial investment into their protection and care. Any development that endangers essential habitat or the welfare of the elk would violate Colorado State policy and diminish the value of the investment made by its citizens to promote the prosperity of the herd.

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C.R.S. 24-65.1-202. Criteria for administration of areas of state interest

“(3) Areas containing, or having a significant impact upon, historical, natural, or archaeological as resources of statewide importance, determined by the state historical society, the department of natural resources, and the appropriate local government, shall be administered by the appropriate state agency in conjunction with the appropriate local government in a manner that will allow man to function in harmony with, rather than be destructive to, these resources. Consideration is to be given to the protection of those areas essential for wildlife habitat. Development in areas containing historical, archaeological, or natural resources shall be conducted in a manner which will minimize damage to those resources for future use.”

Due to the various residential developments in the area, the proposed WOLF II property is the last, remaining route for the elk to reach the wintering grounds and production area, located north of the property. The herd, once able to wander without restrictions throughout the area, is now constricted to this corridor by the presence of nearby neighborhoods. This migration pattern can be confirmed by the numerous homeowners and visitors to the area.

The relocation of WOLF to the proposed location would significantly interfere with the migration of the elk. Elk respond strongly to the presence of wolves and the intrusion of thirty to sixty wolf hybrids will cause the herd to engage in anti-predatory behavior.

The costs of anti-predator behavior have been well documented by research teams and include **changes in habitat use** (Werner and Peacor 2003, Creel et al. 2005, Heithaus and Dill 2006), **vigilance** (Lima and Dill 1990, Armitage 2004), **foraging** (Lima and Bednekoff 1999, Brown and Kotler 2004), **diet selection** (Christianson and Creel 2008), **aggregation** (Boesch 1991, Krause and Ruxton 2002, Caro 2005), **movement patterns** (Sih 1980, Sih and McCarthy 2002, Fortin et al. 2005), and **sensitivity to environmental conditions** (Winnie et al. 2006). Experiments have shown that these behavioral responses can carry costs that can affect prey population dynamics even more strongly than the direct consumption of prey (Preissner et al. 2005).

Anti-predatory behavior is responsible for the risk effects suffered by the elk including: decreased health due to compromised diet and nutrition, decreased progesterone levels, decreased calf production, and reduced population. Reduced time foraging caused by increased vigilance and marked shifts in diet selection, as a result of leaving preferred grassy meadows for the shelter of coniferous forests, cause nutritional deficiencies in the herd. Loss of essential body fat and mass could affect a female’s ability to sustain a pregnancy and low progesterone levels can cause miscarriages and infertility. Due to the loss of mass, during the fall rut, males are less capable of coping with the costs of anti-predatory behavior than females.

Elk sense their predators when they are three (3) km away; becoming most vigilant when they are within one (1) km of the elk herd. This reaction is appreciably enhanced when the pack size is more than ten wolves (*Liley and Creel 2007*). The map provided in the WOLF II Application, which indicates the locations of the proposed kennels, allows for a maximum passageway of 1700 ft. or 0.51 km (approximately) and other conceived passageways allow for 100 ft., between rows of questionably confined, wolf hybrids. Considering the insertion of thirty to sixty wolf hybrids and the narrow passageways, it is evident from researched and documented information that the elk will **NOT** enter or traverse this property to their detriment.

WOLF ignorantly presumes that elk distinguish between the sights, sounds, and smells of predators who do not know how to hunt and are well-fed, and those who intend to devour them. The Rocky Mountain Elk are preyed upon by coyotes, mountain lions, bobcats, bears, and wild wolves have been observed in Larimer County; they are vigilant of all threats that endanger their lives.

As of 2010, the Rocky Mountain elk herd has been diagnosed with Chronic Wasting Disease; the disease is progressive and always fatal. Healthy elk herds need our consideration and protection, not another obstacle to overcome.

The availability of water is imperative during the elks' migration to and from their wintering grounds. The proposed site of WOLF II includes five springs located on the property and are utilized by the elk and other local wildlife. The loss of this resource could be devastating on the herd, especially during a drought cycle.

*C.R.S. 29-20-104. Powers of local government*

*“(1) ... Each local government within its respective jurisdiction has the authority to plan for and regulate the use of land by:*

*(b) **Protecting lands from activities which would cause immediate or foreseeable material danger to significant wildlife habitat** and would endanger a wildlife species;*

*(g) **Regulating the use of land on the basis of the impact thereof on the community or surrounding areas**; and*

*(h) **Otherwise planning for and regulating the use of land so as to provide** planned and orderly use of land and **protection for the environment** in a manner consistent with constitutional rights.”*

The Larimer County Planning Department and the Board of County Commissioners have a duty to provide a harmonious future between citizens and wildlife for our county, not for the individual aspirations of an organization. The wildlife in the Livermore and Red Feather area are indigenous to the region. Thirty to sixty wolf hybrids are not natural in any setting and are not

harmonious in any environment. It is apparent and foreseeable that the elk will pay a heavy price for human objectives, should the WOLF II Special Review Application be approved.

Sincerely,

/s/ Monika Finlayson

Monika Finlayson  
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RMBA Group