



February 14, 2023

Colorado Parks and Wildlife Commission  
c/o/ Commission Assistant  
Colorado Parks and Wildlife  
6060 Broadway, Denver, CO 806216

RE: December 9, 2022 *Draft Colorado Wolf Restoration and Management Plan*

Moffat County appreciates the opportunity to comment on the December 9, 2022 Draft Colorado Wolf Restoration and Management Plan. We appreciate Colorado Parks and Wildlife (CPW) incorporating advice from the Stakeholder Advisory Group (SAG) and the Technical Working Group (TWG). Moffat County has provided three “general comments” and several “specific comments” for your consideration.

**General Comments:**

10j Rule: Moffat County has long held the position, and we have repeatedly testified, that wolves should not be released without an Endangered Species Act 10(j) rule established and functioning. The Colorado wolf introduction plan “*anticipates that the resulting 10(j) rule will take effect prior to the reintroduction of wolves into the state.*” Moffat County strongly supports the 10(j) rule being in-place prior to introductions and further, we believe the 10(j) rule is an absolutely critical component of the success of this plan. Therefore, if Colorado finds itself in the unfortunate position that law suits, injunctions, or other legal strategies are used to stop implementation of the 10(j) rule prior to wolf introductions, Colorado MUST NOT introduce wolves until the rule is implementable. The Colorado wolf introduction plan will be highly compromised and likely fail if wolves are placed on the ground without the 10(j) authorizations.

Compensation Ratios: Moffat County is concerned that the SAG group’s advice was not fully adhered to regarding compensation ratios. At a minimum, the Wolf Plan should offer the SAG group’s recommendation for yearling cattle. At the February 7, 2023 public hearing in Rifle, CO, the Wildlife Commission was supportive of compensating yearling cattle at the same ratio as calves. Moffat County supports this concept. We further support, offering the compensation ration to all species of livestock if evidence of wolf attack exists. To only offer a compensation ratio for sheep or calves, and not other livestock as defined by CRS 33-2-105.8(5)c, does not meet the intent of fair compensation. We strongly believe it is irrelevant which species or class of livestock is attacked by wolves. What is relevant, and over-arching to fair compensation, is reasonable evidence of loss. We support a producer providing a certain standard of evidence regarding wolf attacks regardless of the species or class of livestock

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