



July, 5, 2022

Nicole Alt
Colorado Ecological Services Supervisor
U.S. Fish and Wildlife Service
134 Union Blvd., Suite 670
Lakewood, CO 80228-1807

Dear Ms. Alt,

Moffat County appreciated you hosting a public meeting last night at the Moffat County High School regarding a 10J rule for State of Colorado wolf introductions. The Commissioners and our Natural Resources staff were present, and we are very supportive of the 10J process the USFWS is considering for Colorado wolf introductions.

During your presentation, and from discussions with our staff afterward, it is very clear that USFWS has minimal experience with Cooperating Agencies. Your proposal to let the Cooperating Agencies review the draft document after it is drafted is entirely inappropriate and does not meet the intentions of NEPA, which we clearly reference in our May 10, 2022 to you (attached to this letter). With that said, we are very encouraged by conversations after the meeting between you and our Natural Resources Director, about restructuring how Cooperating Agencies meaningfully participate in the development of the draft EIS, rather than simply commenting on it after it is written. Cooperating Agencies should be invited to all ID team meetings, and receive regular updates and opportunities for input as chapters are being written, as well as contribute concepts that should be incorporated into the document. We can be especially helpful in understanding local impacts of decisions being proposed.

It is imperative to the Cooperating Agencies that we DO NOT slow down the EIS process, and we honor the expedient timeframe necessary to complete the EIS. We look forward to working with you on meaningful involvement from Cooperating Agencies during the 10J rulemaking process. Please contact myself, any of the below listed Moffat County Commissioners, or Jeff Comstock, our Natural Resources Director, to additionally discuss our involvement as a Cooperating Agency.

Sincerely,

Donald Broom, Chairman
Moffat County Commissioners

Office of the County Commissioners
221 West Victory Way, Ste. 130
Craig, CO 81625
(970) 824-5517 Office
(970) 824-9191 Facsimile
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Tony Bohrer
District 1

Melody Villard
District 2

Donald Broom
District 3



May 10, 2022

Nicole Alt
Colorado Ecological Services Supervisor
U.S. Fish and Wildlife Service
134 Union Blvd., Suite 670
Lakewood, CO 80228-1807

Dear Ms. Alt:

The Moffat County Commissioners request an invitation to be a Cooperating Agency as the US Fish and Wildlife Service conducts an environmental analysis under the National Environmental Policy Act (NEPA) regarding the gray wolf reintroduction and management in Colorado pursuant to Colo. Rev. Stat. § 33-2-105.8. We are especially interested in Cooperating and Coordinating with the US Fish and Wildlife Service as your team considers wolf management under Section 10j of the Endangered Species Act.

Moffat County has over twenty years of direct experience as a Cooperating Agency and handling pre-decisional information from a variety of federal agencies, including but not limited to: Bureau of Land Management, U.S. Forest Service, the National Park Service, and the Bureau of Reclamation. We have the authority to adopt and enforce ordinances and resolutions regarding health, safety, and welfare issues (Colo. Rev. Stat. § 30-11-101(2)) and the authority to adopt a master plan that takes into consideration the location of endangered or threatened species (Colo. Rev. Stat. §§ 30-28-106(1), (3)(a)(XI)). We have special expertise regarding the social and economic impacts of wolves within our jurisdiction. In addition, we have had representatives on the 2004 effort to write the *Recommendations for Managing Wolves that Migrate into Colorado* and we hold a seat on the Stakeholder Advisory Group for introducing wolves to Colorado. Moffat County produces detailed comments, discrete recommendations, timely and thoughtful analysis of local impacts which the US Fish and Wildlife Service cannot produce.

Authority for Cooperating with Moffat County exists in NEPA, 43 U.S.C §§ 4331(a), 4332(2), and the implementing regulations, 40 C.F.R. § 1501.8(a), 1508.1(e), (n), (ee). See CEQ Memorandum, *Cooperating Agencies in Implementing the Procedural Requirements of the NEPA*, at 1-2, 4-5 (Jan. 30, 2002).

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We look forward to a timely invitation to be a Cooperating Agency in wolf management in Colorado. If you have questions concerning Moffat County's request, please don't hesitate to contact any of the below listed County Commissioners.

Respectfully,


Donald Broom, Chair
Commissioner District 3


Tony Bohrer
Commissioner District 1


Melody Villard
Commissioner, District 2

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