

**From:** [Zerrenner, Adam](#)  
**To:** [Fox, Lori](#); [Broderdorp, Kurt](#); [LeBlanc, Darren](#); [Niva, Liisa M](#); [Hansen, Craig](#); [Becker, Scott A](#)  
**Cc:** [Forbes-Guerrero, Jessica](#); [Stover, Margaret](#)  
**Subject:** Re: CO Wolves Revised Comment Response Document  
**Date:** Wednesday, July 5, 2023 8:19:46 AM  
**Attachments:** [image001.png](#)  
[Comment response questions for the service az\(1\).docx](#)

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Good Morning Everyone,

Attached is the revised response document with my additions and requests for assistance from others. Hope you all had a good 4<sup>th</sup> of July holiday weekend. Given our deadline of this Friday, 7/7, can folks have responses completed by COB today so they we have time to work through any outstanding items? Thanks all!

Concern Statement 13 - added to response - Liisa, others, please feel free to add more

Concern Statement 18 - Darren/Kurt, is the citation in the response ok to use throughout document?

Concern Statement 21 - Darren/Kurt, any info on tracking take?

Concern Statement 51 - My question about bison, I added additional response and would appreciate others thoughts

Concern Statement 52 - Darren/Kurt, question on definition of private lands and whether the rule will include more than Federal?

Concern Statement 66 - Working to resolve, Regulatory Standards

Concern Statement 113 - Comment from me and perhaps no action needed. Appreciate others thoughts

Concern Statement 114 - I believe we are ok given our response to Concern Statement 13

Concern Statement 121 - I think we are good, again appreciate others thoughts

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**From:** Fox, Lori <lori.fox@wsp.com>  
**Sent:** Monday, July 3, 2023 9:46 AM  
**To:** Zerrenner, Adam <Adam\_Zerrenner@fws.gov>; Broderdorp, Kurt <kurt\_broderdorp@fws.gov>; LeBlanc, Darren <darren\_leblanc@fws.gov>; Niva, Liisa M <Liisa\_Niva@fws.gov>; Hansen, Craig <Craig\_Hansen@fws.gov>  
**Cc:** Forbes-Guerrero, Jessica <Jessica.Forbes-Guerrero@wsp.com>; Stover, Margaret

<margaret.stover@wsp.com>

**Subject:** RE: CO Wolves Revised Comment Response Document

Hi Adam and all,

Thanks for the review on the concern statement responses. Doing a quick review this morning, there are a few in there where we will need your direction. Please see attached. If you could turn these back on Friday with your review we can get you the most comprehensive document possible. A few more may come but this should be the bulk of it to get us to the next draft. You have any questions please don't hesitate to reach out.

Adam/Craig, next up is a revised schedule. You should see that today as well.

Thanks,  
Lori



**Lori Fox, AICP**  
Senior Vice President, Federal Programs  
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**From:** Zerrenner, Adam <Adam\_Zerrenner@fws.gov>  
**Sent:** Thursday, June 29, 2023 1:08 PM  
**To:** Fox, Lori <lori.fox@wsp.com>; Broderdorp, Kurt <kurt\_broderdorp@fws.gov>; LeBlanc, Darren <darren\_leblanc@fws.gov>; Niva, Liisa M <Liisa\_Niva@fws.gov>; Hansen, Craig <Craig\_Hansen@fws.gov>  
**Cc:** Forbes, Jessica <Jessica.Forbes@wsp.com>; Stover, Margaret <Margaret.Stover@wsp.com>  
**Subject:** Re: CO Wolves Revised Comment Response Document

I meant to say, after tomorrow!

Thanks Lori and Jessica,

Adam

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**From:** Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>  
**Sent:** Thursday, June 29, 2023 11:49 AM  
**To:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>; Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>  
**Cc:** Forbes-Guerrero, Jessica <[Jessica.Forbes-Guerrero@wsp.com](mailto:Jessica.Forbes-Guerrero@wsp.com)>; Stover, Margaret <[margaret.stover@wsp.com](mailto:margaret.stover@wsp.com)>  
**Subject:** Re: CO Wolves Revised Comment Response Document

Hi Lori,

After today, you should have all of our comments.

Best,

Adam

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**From:** Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>  
**Sent:** Wednesday, June 21, 2023 8:57 AM  
**To:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>; Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>  
**Cc:** Forbes-Guerrero, Jessica <[Jessica.Forbes-Guerrero@wsp.com](mailto:Jessica.Forbes-Guerrero@wsp.com)>; Stover, Margaret <[margaret.stover@wsp.com](mailto:margaret.stover@wsp.com)>  
**Subject:** Re: CO Wolves Revised Comment Response Document

Got it! Will do.

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**From:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>  
**Sent:** Wednesday, June 21, 2023 8:56 AM  
**To:** Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>; Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>  
**Cc:** Forbes-Guerrero, Jessica <[Jessica.Forbes-Guerrero@wsp.com](mailto:Jessica.Forbes-Guerrero@wsp.com)>; Stover, Margaret <[margaret.stover@wsp.com](mailto:margaret.stover@wsp.com)>  
**Subject:** RE: CO Wolves Revised Comment Response Document

Thanks for the clarification Adam! And yes, please use comment bubbles/track changes for comments on the document.



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**From:** Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>  
**Sent:** Wednesday, June 21, 2023 8:55 AM  
**To:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>; Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>

**Cc:** Forbes, Jessica <[Jessica.Forbes@wsp.com](mailto:Jessica.Forbes@wsp.com)>; Stover, Margaret <[Margaret.Stover@wsp.com](mailto:Margaret.Stover@wsp.com)>  
**Subject:** Re: CO Wolves Revised Comment Response Document

Hi Lori,

Also, would you like all of our edits/comments in the file located at the link in your email?

Thanks!

Adam

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**From:** Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>  
**Sent:** Wednesday, June 21, 2023 8:53 AM  
**To:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>; Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>  
**Cc:** Forbes-Guerrero, Jessica <[Jessica.Forbes-Guerrero@wsp.com](mailto:Jessica.Forbes-Guerrero@wsp.com)>; Stover, Margaret <[margaret.stover@wsp.com](mailto:margaret.stover@wsp.com)>  
**Subject:** Re: CO Wolves Revised Comment Response Document

Thanks Lori!

To clarify, comments are due next Friday, June 30.

Appreciate you and your team's hard work and efforts,

Adam

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**From:** Fox, Lori <[lori.fox@wsp.com](mailto:lori.fox@wsp.com)>  
**Sent:** Tuesday, June 20, 2023 1:52 PM  
**To:** Broderdorp, Kurt <[kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov)>; LeBlanc, Darren <[darren\\_leblanc@fws.gov](mailto:darren_leblanc@fws.gov)>; Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>; Zerrenner, Adam <[Adam\\_Zerrenner@fws.gov](mailto:Adam_Zerrenner@fws.gov)>; Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)>  
**Cc:** Forbes-Guerrero, Jessica <[Jessica.Forbes-Guerrero@wsp.com](mailto:Jessica.Forbes-Guerrero@wsp.com)>; Stover, Margaret <[margaret.stover@wsp.com](mailto:margaret.stover@wsp.com)>  
**Subject:** CO Wolves Revised Comment Response Document

Hello all,

The revised comment response document is ready and can be found here: [DEIS Concern Response Report](#).

As discussed with Adam, in order to speed up the schedule, all comments/revisions will need to be in this document by next Friday, July 30. At that point, we will provide you the first internal FEIS for review and we will take back the comment report to finalize for the draft that the cooperating

agencies will see (as an EIS appendix). If you have any early questions/concerns on this document we can use our call next week on 6/27 to discuss or don't hesitate to reach out to myself or Jessica before then.

Please let us know if you have any questions.

Take care,  
Lori



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Questions for the Service on Comment Response Review

<p><b>CONCERN STATEMENT 13:</b> Commenters expressed support for adding a provision to the rule to manage gray wolves that are having an impact on ungulate populations. Commenters requested that the provision mirror the guidelines in the 2005 final rule that established a northern Rocky Mountains gray wolf nonessential experimental population. Commenters argued that the ungulate provision in the northern Rocky Mountains nonessential experimental population rule gave managers the tools to mitigate effects on ungulates, and they indicated that ungulate populations would be at risk without the provision. Commenters noted that a reduction of ungulate populations could have economic impacts, particularly in the form of reduced revenues from hunting and decreased funding for CPW via ungulate hunting license sales. Commenters also worried that if wolves are allowed to severely depopulate ungulates, they may seek out livestock as an alternate food source, increasing impacts on livestock. Some commenters were specifically concerned about wolf impacts to the recovering moose population without the ungulate provision in place. A few commenters worried about high levels of predation on ungulates during the winter because wolves can travel on snow while ungulates typically do not. One commenter said that because wolves reproduce in litters with multiple pups, they have an advantage over other species that produce a single offspring annually, so the ungulate provision should be included to counteract that advantage.</p>
<p><b>Response:</b> As noted in the response to concern statement 12, a provision has been added to the final rule to allow for take related to ungulate management that would only apply to the Ute Mountain Ute and Southern Ute Tribes on Tribal reservation lands. Adding this provision recognizes the sovereignty of these Tribal nations and is consistent with the State Plan that also recognizes Tribal sovereignty and ensures Tribal hunting. <b>This provision will not be applied to areas outside of Tribal reservation lands at the request of the State of Colorado for implementation of their State Plan.</b></p>
<p><b>CONCERN STATEMENT 18:</b> A commenter said reporting of lethal take or harassment should be permitted through a phone call or website in addition to mail or email.</p>
<p><b>Representative Quote:</b> Section 17.84(6) requires harassment or lethal take of gray wolves to be reported to USFWS or its designated agent. The Rule currently provides for reporting by US Mail or email. The Rule should also authorize reporting through a phone number or website to provide maximum flexibility to reporting individuals.</p>
<p><b>Response:</b> According to the proposed regulation promulgation provided in the rule <b>in § 17.84(a)(6)(i)</b>, any take of wolves, including opportunistic harassment or intentional harassment, must be reported to the Service, the Colorado Ecological Services Field Office Supervisor, or a Service-designated agent of another federal, state, or Tribal agency. The rule does not specify that any method of communication is not permitted.</p>
<p><b>CONCERN STATEMENT 21:</b> Several commenters requested a limit to the overall numbers of wolves that can be lethally taken.</p>
<p><b>Representative Quote:</b> The proposed rule lacks any quantitative or qualitative checks on the number of wolves that can be injured or killed under these take provisions (Proposed Rule 49-52). Given the concerns above regarding the vagueness and subjectivity of numerous take authorizations, coupled with substantial anti-wolf prejudice and the publicly-expressed intent of numerous individuals to engage in poaching, these provisions may well lead to levels of take comparable to those currently ongoing in Idaho and Montana. Particularly given expected low wolf numbers during early years of restoration efforts, coupled with the threat of being killed over the Wyoming border, these take provisions could, absent quantitative checks, lead to either the destabilization of individual packs or the overall failure of the restoration effort. No lethal take should be authorized without a</p>

- Commented [ZA1]:** Do we need to add more here to provide additional info and rationale?
- Commented [NLM2R1]:** Agree – current response does not address why the provision isn't being implemented outside of reservation boundaries.
- Commented [FL3R1]:** **Lori email service on Monday**
- Commented [FL4R1]:** This also applies to CS96, we need assistance from USFWS on the why not everyone else rationale, we have why the tribes but why not everyone else.
- Commented [ZA5R1]:** Added additional rationale – how does this look everyone? I realize this could change with additional guidance.
- Commented [NLM6]:** Need global consistency in how we cite the rule and regs.
- Commented [FL7R6]:** **Email service on their preference**
- Commented [FL8R6]:** Ok to use it as cited here as the standard?

prior analysis, by the Service, of how that take will affect both the pack in question and the resilience of the entire Colorado wolf metapopulation.

**Response:** The Service agrees that permits should limit numbers and duration of take authorized. As specified in table 1 of the rule, livestock operators may only be issued "shoot-on-sight" take authorization of a limited number of wolves, if: (1) the landowner has had at least one depredation by wolves on livestock that has been confirmed by the Service or its designated agent within the last 30 days; (2) the Service or its designated agent has determined that problem wolves are routinely present on the private land and present a significant risk to the health and safety of livestock; and (3) the Service or its designated agent has authorized lethal removal of wolves from that same private land.

**CONCERN STATEMENT 51:** Commenters asked the Service to revise the definition of livestock guard animals to include animals other than dogs, like llamas or donkeys.

**Representative Quote:** 48 (rule) "Livestock" Cattle, sheep, pigs, horses, mules, goats, domestic bison, and herding and guarding animals (alpacas, llamas, donkeys, and certain breeds of dogs commonly used for herding or guarding livestock). Livestock excludes dogs that are not being used for livestock guarding or herding." Owners of non-working dogs should have the ability to protect their pets when on their private property or if their dog is under leash or voice control on federal lands. Allowing wolves to kill dogs without consequences creates a bigger safety problem for livestock guardian dogs, livestock, and humans. There must be rapid and effective response to wolves that threaten and attack domestic animals and people.

**Representative Quote:** Lethal Take: Although GCSA supports the lethal take provisions in the Draft Rule, GCSA believes they should be clarified to address some points of potential confusion: - 50 C.F.R. 17.84(a)(5)(iii)(A) should make it clear that lethal take is authorized if a gray wolf is attacking any livestock guard animal on private land, not just dogs. While the definition of "livestock" includes guardian animals other than dogs, subsection (5)(iii)(A) as written refers to gray wolves in the act of attacking "livestock or dogs (working or pet)." This could be read to suggest that lethal take is not permitted if wolves attack other guardian animals, such as llamas or donkeys. - Similarly, 50 C.F.R. 17.84(5)(iv) should make it clear that lethal take is authorized if a gray wolf attacks any guardian animal on public lands that are being lawfully used under a valid Federal permit, not just dogs. While the definition of livestock includes guardian animals, the reference to dogs in subsection 5(iv) could suggest that lethal take is not permitted if wolves attack other guardian animals on public lands. Because this does not appear to be USFWS's intent, this subsection should be clarified.

**Response:** The definition of livestock provided in the rule has been revised and includes cattle, sheep, pigs, horses, mules, goats, domestic bison, and herding and guarding animals (alpacas, llamas, donkeys, and certain breeds of dogs commonly used for herding or guarding livestock).

**CONCERN STATEMENT 52:** A commenter asked for the definition of private land to include leased private lands. A commenter asked for clarity on the current definition because it could include state and locally owned lands and could create confusion.

**Representative Quote:** The proposed rule defines Private Land as all land other than that under Federal Government ownership and administration and including Tribal reservations. This definition will likely cause confusion as it includes all non-Federal lands such as state and locally owned lands.

**Response:** The definition of private land in the rule is sufficient and includes all land other than that under Federal Government (what about State and local?) ownership and administration and including Tribal reservations.

**Commented [NLM9]:** This seems to be the heart of the concern above. Is there anything we can add about how we are going to track take?

**Commented [FL10R9]:** Question for the service

**Commented [FL11R9]:** Information not in the rule, Service please provide info on how you will track.

**Commented [ZA12]:** Is this definition like previous 10j rules as stated in the previous response immediately above? And note bison

**Commented [FL13R12]:** Ask service

**Commented [FL14R12]:** Need input on if this change is consistent with previous 10(j) rules? Not sure what the comment about bison is asking? Is it asking if including bison is consistent with other 10(j) rules?

**Commented [ZA15R12]:** Maybe no need to address my comment if I understand that the rule is consistent with the State Plan

**Commented [LD16]:** The common definition of private land is "land that is not owned by a government entity". It encompasses more than just Federal lands.

**Commented [LD17R16]:**

**Commented [FL18R16]:** The draft rule defined private land as:  
All land other than that under Federal Government ownership and administration and including Tribal reservations.

By this definition state and local are not addressed. Is the final rule going to clarify or change this definition to be more inline with what Darren noted above?

**CONCERN STATEMENT 66:** Commenters asked the Service to clarify the term “regulatory standards” in this sentence in the DEIS, “States or Tribes must submit a science-based report showing the action meets regulatory standards.”

**Representative Quote:** 3 SCI requests that the Service clarify what is meant by “regulatory standards” in the provision stating that “States or Tribes must submit a science-based report showing the action meets regulatory standards” or “meets the regulatory standards.” DEIS at ix, 2-13, 2-19, 2-25. SCI reads this provision to mean State or Tribal regulatory standards, i.e., the provisions in Colorado’s wolf management plan. The DEIS should use that language to be clear.

**Response:** Text here – Response needed from the Service

**CONCERN STATEMENT 113:** Commenters stated that reintroduction of gray wolves without management flexibility would result in severe decreases in ungulate populations. Commenters also noted that potential impacts on ungulate populations or the current conditions of these populations must be considered in development of the rule or analyzed in more detail in the EIS. Specific areas suggested for further analysis included ungulate population and hunting license trends, indirect impacts as a result of changes in ungulate behavior, and potential impacts on ungulates in the focal counties. One commenter suggested that ungulate populations in Colorado are no longer sufficient to support a population of gray wolves and the reintroduction should be reconsidered. One commenter suggested that illegally reintroduced species, such as moose, should not be considered a sustainable source of prey for reintroduced gray wolves.

**Response:** The impacts from the reintroduction of wolves by the State of Colorado to other wildlife is described in the FEIS, section 4.9.2, “Cumulative Impacts Analysis.” This analysis notes that it is unknown if the presence of wolves would influence ungulate population dynamics but cites studies that indicate long-term, adverse impacts are not anticipated. The issue of whether ungulate populations are sufficient to support reintroduction is directly related to the State planning effort and outside the scope of this analysis.

**CONCERN STATEMENT 114:** Commenters noted that reintroduction of gray wolves in other parts of the country has contributed to improvements in the health of ungulate herds or ungulate population numbers. Commenters suggested areas of the analysis, including discussing the potential impacts on hunting, that should be revised to consider an improvement in the health of ungulate herds or ungulate population numbers.

**Response:** The impacts from the reintroduction of wolves by the State of Colorado on other wildlife is described in the FEIS, section 4.9.2, “Cumulative Impacts Analysis.” This analysis notes that it is unknown if the presence of wolves would influence ungulate population dynamics but cites studies that indicate long-term, adverse impacts are not anticipated. Available data are not conclusive regarding the likelihood of wolf predation to improve the health of ungulate populations over the long-term.

**CONCERN STATEMENT 121:** Commenters expressed concerns regarding funding for the management of reintroduced gray wolves. One commenter noted, in response to language in the rule stating that the rulemaking would not impose a cost of \$100 million or more in any given year on local or State governments or private entities, that costs below this amount could still significantly or uniquely affect local governments. Multiple commenters noted that the Service is ultimately responsible for the success of the reintroduction and requested that the reintroduction be paused until a long-term funding source is established. Commenters requested that the Service complete a federalism assessment pursuant to the provisions of Executive Order 13132 with input from organizations representing local governments in Colorado and the local governments most likely to be affected. Another commenter suggested that the Service ensure it is adequately funded to manage wolves that disperse outside the experimental population boundary.

**Commented [FJ19]:** Response needed from the Service

**Commented [LN20R19]:** Liisa sent email to Scott on 6/29 for guidance.

**Commented [FL21R19]:** Just a note this one is still outstanding.

**Commented [ZA22R19]:** Working to resolve

**Commented [ZA23]:** Ensure consistency with Tribal section

**Commented [FL24R23]:** This is from the other wildlife section. Please clarify what component of tribal this should be consistent with?

**Commented [ZA25R23]:** Perhaps nothing needs to be done here – want to ensure that sections of documents are consistent with our final approach to the ungulate provision

**Commented [ZA26]:** Same

**Commented [FL27R26]:** Same question regarding link to tribal

**Commented [ZA28R26]:** I think we are ok here given response to comment 13

**Response:** The costs of reintroduction and management of gray wolves in Colorado are addressed in the State Plan and are the responsibility of CPW and the State of Colorado.

**Commented [ZA29]:** Is this entirely accurate if wolves move south?

**Commented [FL30R29]:** The response does state "in Colorado", so the statement is accurate as written. Suggest no change.

**Commented [FL31R29]:** Confirm no change is ok.

**Commented [ZA32R29]:** Confirmed, unless others have thoughts