

**From:** [Zerrenner, Adam](#)  
**To:** [LeBlanc, Darren](#); [Fox, Lori](#); [Niva, Liisa M](#); [Broderdorp, Kurt](#)  
**Cc:** [Hansen, Craig](#); [Forbes-Guerrero, Jessica](#); [Stover, Margaret](#)  
**Subject:** Re: [EXTERNAL] Colorado Wolves EIS - Questions for Document Edits  
**Date:** Thursday, June 29, 2023 11:48:43 AM  
**Attachments:** [image001.png](#)

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Hi Lori,

Please let us know if there are any outstanding questions below after our discussion this week.

Thanks, and appreciate all you and your team does,

Adam

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**From:** LeBlanc, Darren <darren\_leblanc@fws.gov>  
**Sent:** Thursday, June 22, 2023 9:18 AM  
**To:** Fox, Lori <lori.fox@wsp.com>; Niva, Liisa M <Liisa\_Niva@fws.gov>; Broderdorp, Kurt <kurt\_broderdorp@fws.gov>; Zerrenner, Adam <Adam\_Zerrenner@fws.gov>  
**Cc:** Hansen, Craig <Craig\_Hansen@fws.gov>; Forbes-Guerrero, Jessica <Jessica.Forbes-Guerrero@wsp.com>; Stover, Margaret <margaret.stover@wsp.com>  
**Subject:** Re: [EXTERNAL] Colorado Wolves EIS - Questions for Document Edits

These are the only ones I can help with.

- Should references to “dogs” in the EIS be changed to “working dogs” or another term? (Global) **Yes, see response to Comment 24.**
- Should the language “including use as pets” be included in the definition of domestic animals? (Glossary) **Same as above. We are eliminating take of wolves attacking domestic animals, so text in the DEIS may need to be changed.**
- Is there a reference confirming that only 2 wolves are known to reside in Colorado? Might better be answered by the state as last data we have is the two wolves and their pups (Section 1.4) **Scott may be able to provide a reference.**
- Our response to CS 4 says, “Section 2.4.3 of the FEIS was revised to clarify how existing and reintroduced populations of gray wolves would be delineated separately under alternative 2.” We say in the description of alternative 2 (Section 2.4.3) that, “A section 10(j) rule would be developed for the remainder of the state in an area that is wholly separate geographically from the existing population.” Since we use the phrase “wholly separate geographically,” is it enough to say that the 10(a)(1)(A) permit area would encompass the home range of groups that are part of the existing population separate from the experimental population? (Section 2.4.3) **Yes, that would be sufficient**

Darren LeBlanc  
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**From:** Fox, Lori <lori.fox@wsp.com>  
**Sent:** Thursday, June 22, 2023 8:58 AM  
**To:** Niva, Liisa M <Liisa\_Niva@fws.gov>; Broderdorp, Kurt <kurt\_broderdorp@fws.gov>; LeBlanc, Darren <darren\_leblanc@fws.gov>; Zerrenner, Adam <Adam\_Zerrenner@fws.gov>  
**Cc:** Hansen, Craig <Craig\_Hansen@fws.gov>; Forbes-Guerrero, Jessica <Jessica.Forbes-Guerrero@wsp.com>; Stover, Margaret <margaret.stover@wsp.com>  
**Subject:** [EXTERNAL] Colorado Wolves EIS - Questions for Document Edits

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Hello all,

As you are diving into the comment response report, we are getting the FEIS/ROD/NOA ready for review as well. We have a few questions for the changes we are working on. If you see something you know the answer to and want to respond via email, that would be great. What ever questions are not answered by next week, we will use our call on Tuesday to review (in addition to whatever agenda items you may have on your end). So with that, here are the questions...

- Should references to “dogs” in the EIS be changed to “working dogs” or another term?  
(Global)
- Should the language “including use as pets” be included in the definition of domestic animals?  
(Glossary)
- Under “Additional taking provisions for agency employees,” do we need to include additional specificity on what “abnormal physical or behavioral characteristics” might include or add a footnote referring to additional information in the rule? (Global, provisions tables)
- Under “Agency take to reduce impacts on wild ungulates,” is the text in the rule being clarified to further explain “regulatory standards?” as requested in the comment or will the comment response just clarify what regulatory standards are ? (Global, provisions tables)
- Is there a reference confirming that only 2 wolves are known to reside in Colorado? Might better be answered by the state as last data we have is the two wolves and their pups  
(Section 1.4)
- Please provide the language being added to the rule to prohibit use of attractants or intentional feeding of wolves. (Section 2.4, multiple)

- Our response to CS 4 says, “Section 2.4.3 of the FEIS was revised to clarify how existing and reintroduced populations of gray wolves would be delineated separately under alternative 2.” We say in the description of alternative 2 (Section 2.4.3) that, “A section 10(j) rule would be developed for the remainder of the state in an area that is wholly separate geographically from the existing population.” Since we use the phrase “wholly separate geographically,” is it enough to say that the 10(a)(1)(A) permit area would encompass the home range of groups that are part of the existing population separate from the experimental population? (Section 2.4.3)
- Please provide the source “USFWS 2010” that was cited in the response to the concern statement regarding addressing climate change in the EIS. (Table 3-2) – I believe this is actually from Mexican wolf responses and carried over so if the source is not known, advise WSP and we will look for a new source.
- Discuss addressing disease risks that were brought up by commenters? (Table 3-2)
- Should we assume a ratio of unconfirmed to confirmed livestock kills in our estimates of depredation in the chapter 4 socioeconomic resources analysis, similar to what was done in the 2014 Mexican wolf EIS? This would be an assumption of something like 4 unconfirmed kills/missing animals for every 1 confirmed depredation (numbers TBD based on sources), which would raise our estimates of depredation under the no-action alternative. Are there any studies we should use as sources for this estimate? (Section 4.7)
- Re: language in section 4.8.4, “A similar provision related to ungulates in the section 10(a)(1)(A) permit would allow nonlethal take of wolves to reduce impacts to wild ungulates on Tribal reservation lands.” – Is this still theoretically the case under alternative 2? Would a 10(a)(1)(A) permit be issued to a Tribe? (Section 4.8.4)
- What other references should be cited in the discussion of ecosystem dynamics in the cumulative impacts analysis? (Section 4.9.2) – Last we talked, Scott was going to review and let us know if additional ones should be included. Has this occurred?
- What additional Tribal consultation meetings (including group meetings and meetings hosted by other organizations) should be added to chapter 5?

Thank you all! Very exciting to get to this next milestone for this one. Please don't hesitate to reach out with any questions.

Take care,  
Lori

**Lori Fox**  
Senior Vice President, Federal Programs



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