

**From:** [Becker, Scott A](#)  
**To:** [Broderdorp, Kurt](#)  
**Subject:** Fw: Review of two public comments  
**Date:** Tuesday, June 27, 2023 9:43:53 AM  
**Attachments:** [image001.png](#)

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**From:** Becker, Scott A <[scott\\_becker@fws.gov](mailto:scott_becker@fws.gov)>  
**Sent:** Monday, June 26, 2023 4:44 PM  
**To:** Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>  
**Subject:** Re: Review of two public comments

THanks for this Liisa (and sorry for finally getting back to you). I took a peek finally this afternoon and wanted to chat quick about what exactly you wanted me to do to help out. I know you are on leave, but if you come in for work for a bit, could you give me a quick shout to discuss these things. Just want to know exactly what you want me to do with the request.

I think on comment 99, there is a significant amount of research that questions the magnitude of wolf effects on these systems as well and has found other reasons for the observed effects. For the hunting aspect, while we agree that elk harvest has remained relatively stable overall since wolf reintroduction (and an expanding predator population in ALberta - from a recent paper), the effects that wolves may have may be more localized and impact specific herds or subherds (see Madison headwaters elk study). Also, although overall populations may not be in decline, wolves may be a contributing factor to reduced recruitment in some ungulate populations resulting in an older-aged population structure. As a result, agencies may reduce or limit the number of tags available in certain areas that may result in reduced hunter opportunity and overall revenue for state agencies.

For comment 116, I think there is plenty of evidence to suggest that the dynamics of ungulate populations will be impacted by the presence of elk, but as before, it is the magnitude of those

effects that managers and researchers are most interested in...may be high in some places and lower in others. It is difficult to quantify improvements in herd health because wolves preferentially select young-of-year and older aged ungulates. Also, while theoretical models suggest that wolves may reduce the spread and prevalence of some ungulate diseases, to date, there is no empirical evidence to indicate this is, or has occurred, in the real world. In fact, the distribution of CWD continues expand, even in areas where wolves and other large predators (grizzly and black bears, mountain lions) reside.

Thanks a bunch and hope you're having some fun!!  
scott

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**From:** Niva, Liisa M <Liisa\_Niva@fws.gov>  
**Sent:** Friday, June 16, 2023 3:40 PM  
**To:** Becker, Scott A <scott\_becker@fws.gov>  
**Subject:** Re: Review of two public comments

So sorry, Scott...I meant to attach the report.

We have some time since we're not getting together again until June 27.

Where are we on planning to brief the Director?

- Liisa

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**From:** Becker, Scott A <scott\_becker@fws.gov>  
**Sent:** Wednesday, June 14, 2023 4:24 PM  
**To:** Niva, Liisa M <Liisa\_Niva@fws.gov>  
**Subject:** Re: Review of two public comments

Hey Lisa - finally getting to this now. I am pretty sure you are referencing the response to public comment document that WSP has been working on, but I have not been in the know on

that and do not know exactly where it is saved on our teams site (even after about a 10 minute search). Any chance you can direct me to it because I cannot find it??

Regarding the response to the comments you referenced in your email, I looked at the EPA letter again and they really did not provide anything new. Whether or not the documents they provided were included in the DEIS, I do not know, but none of them are really new or exciting and are the typical, known documents folks send when discussing the topics they discussed. I know we significantly trimmed down the wolf benefits section in the DEIS because there was about a 4 page discussion on the positive benefits wolves bring without acknowledging the other side of the equation that suggests the magnitude of wolf effects are somewhat overblown or there are other reasons for the observed effects. I can take a closer peek at these specific responses to comments you noted when I figure out where the document is.

I also looked at the spreadsheet you forwarded along and also did not see anything from EPA in there. In looking at the spreadsheet, many individuals and groups sent in documents that were supportive of the benefits of wolves on the landscape, but the majority of those documents are known documents with little to no new info I could see while taking a quick peek. Again, it appears that very few submitted documents that support the assertion that wolf effects may be exaggerated or there are other causes for the observed effects.

If you could let me know where the response document is, I can take a peek. Thanks.  
scott

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**From:** Niva, Liisa M <[Liisa\\_Niva@fws.gov](mailto:Liisa_Niva@fws.gov)>  
**Sent:** Monday, June 12, 2023 12:24 PM  
**To:** Becker, Scott A <[scott\\_becker@fws.gov](mailto:scott_becker@fws.gov)>  
**Subject:** Review of two public comments

Hi Scott -

There are two comments that could use your insight ASAP.

Concern statement 99 (p. 71) in general is about beneficial ecosystem effects from wolf reintroduction, I believe from the EPA letter. I'd like to include in the response (on p. 72) whether there was any new information in the references received that we haven't reviewed. The email from Jessica (below) includes a link to a spreadsheet with all of the references we received during public comment. I'd appreciate you giving those citations a quick review to see if there's anything new. I didn't see any attributed to EPA...maybe it's under their name? Let me know if you need a copy of that letter.

Concern statement 116 (p. 84) is about improved herd health from reintroduction. Please review the response (p. 85) and see if it's accurate.

Let me know if you have any additional info/language that could be helpful.

Thanks!!

- Liisa

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**From:** Forbes, Jessica <Jessica.Forbes@wsp.com>

**Sent:** Friday, June 9, 2023 12:26 PM

**To:** Niva, Liisa M <Liisa\_Niva@fws.gov>

**Cc:** LeBlanc, Darren <darren\_leblanc@fws.gov>; Broderdorp, Kurt <kurt\_broderdorp@fws.gov>; Fox, Lori <lori.fox@wsp.com>; Stover, Margaret <margaret.stover@wsp.com>

**Subject:** Index of references from public comments

Hi Liisa,

We've uploaded an index of references included or cited in public comments to your SharePoint site here: [Public Comment References Index](#). The links in the "Commenter" columns will take you to the comment or comments where the reference was cited on the regulations.gov site. Column M indicates whether the reference was already considered and entered into the decision file, so you can filter for just new references by unchecking Y from the dropdown (so only N is selected).

Because of the number of references that were attached to or mentioned in comments, we used this index approach rather than saving individual PDFs of every reference. A lot of the references were attached to comments, so you'll be able to access the reference document on regulations.gov. If there are other reference documents that you'd like to review that aren't available on regulations.gov, please send us a list, and we can find those and send them your way.

Please let us know if you have any questions. Thanks!

Jessica



**Jessica Forbes**

Federal Programs, Planner/Project Manager

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*she/her/hers*

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