

From: [Zerrenner, Adam](#)
To: [Fox, Lori](#); [Stover, Margaret](#); [Forbes-Guerrero, Jessica](#); [Broderdorp, Kurt](#)
Cc: [Hansen, Craig](#)
Subject: Re: [EXTERNAL] RE: Wolf 10j comment letters
Date: Tuesday, July 25, 2023 9:03:29 AM
Attachments: [image001.png](#)

Thank you Lori,

Craig, how soon do you need these comment letters?

Adam

From: Fox, Lori <lori.fox@wsp.com>
Sent: Tuesday, July 25, 2023 10:02 AM
To: Zerrenner, Adam <Adam_Zerrenner@fws.gov>; Stover, Margaret <margaret.stover@wsp.com>; Forbes-Guerrero, Jessica <Jessica.Forbes-Guerrero@wsp.com>; Broderdorp, Kurt <kurt_broderdorp@fws.gov>
Cc: Hansen, Craig <Craig_Hansen@fws.gov>
Subject: [EXTERNAL] RE: Wolf 10j comment letters

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Hi Adam,

We can do this. What is the timeline on this?



Lori Fox, AICP
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From: Zerrenner, Adam <Adam_Zerrenner@fws.gov>
Sent: Tuesday, July 25, 2023 8:50 AM
To: Fox, Lori <lori.fox@wsp.com>; Stover, Margaret <Margaret.Stover@wsp.com>; Forbes, Jessica <Jessica.Forbes@wsp.com>; Broderdorp, Kurt <kurt_broderdorp@fws.gov>
Cc: Hansen, Craig <Craig_Hansen@fws.gov>
Subject: Wolf 10j comment letters

Good Morning Everyone,

Hoping you all can help us track down the individual comment letters that raised the issues below and provide to us.

Lori and team, is this something you all can do for us?

Thank you!

Adam

(1) Appointment of Designated Agent – We received a comment asking us to clarify the term designated agent, but no comments specifically regarding their appointment.

(2) Request for “Shoot-on-Sight” Written Take Authorization –

Issue #1: Commenters worried that regulations for shoot-on-sight in the rule are too vague and that key terms like harassing and molesting do not have clear definitions. They asked for more straightforward definitions to avoid confusion.

In addition, commenters expressed opposition to shoot-on-sight take authorizations and for permission to take wolves in the act of attacking. A commenter noted that wolves often chase or test prey without the chase resulting in an attack. One commenter noted that the 1994 rule governing wolf reintroduction in the northern Rocky Mountains does not include shoot-on-sight authorizations for private landowners and said that the allowance would not be necessary.

Also, commenters requested that take authorization permits be extended for a period longer than 45 days. A commenter asked for the shoot-on-sight requirements to be changed to specify that the predation event was confirmed within the last 30 days, rather than the predation event occurring within the last 30 days. The commenter noted that grazing allotments are often large and remote, and that it is impractical to expect all depredations to be discovered and confirmed within 30 days.

Issue #2: Commenters worried that the regulations for repeated depredation (formerly shoot-on-sight), and opportunistic and intentional harassment in the rule are too vague and that key terms like harassing and molesting do not have clear definitions. They asked for more straightforward definitions to avoid confusion

(3) Reporting Requirement – Lethal Take – Commenters expressed support for lethal take allowances in the rule and in the FEIS, and said that lethal take is a necessary management strategy to have available. Commenters were in favor of the management flexibility provided in the rule and under alternative 1 of the FEIS. Commenters noted that the previous reintroductions in the northern Rocky Mountains have succeeded with the

management flexibility of a 10(j) rule. Commenters noted that lethal take is necessary protect the livestock industry and other wildlife, and requested that the permitting process for lethal take be liberal and streamlined to prevent livestock losses. Some commenters were specifically supportive of take provisions for wolves caught in the act of predating on pets and working dogs. Commenters said that lethal take would be important to prevent extreme growth of wolf populations in Colorado and impacts on livestock, big game, and other wildlife species. Some commenters said they appreciated the greater flexibility allowed in the Service's rule compared to the State Plan, specifically in relation to taking wolves "in the act of attacking" and the reporting requirements. Commenters said that lethal take would be the only feasible option in many cases and asserted that nonlethal measures like relocation and livestock guardian dogs are ineffective.

Additionally, a commenter said reporting of lethal take or harassment should be permitted through a phone call or website, in addition to mail or email.

(5) Annual Report – A commenter requested that annual reporting should only be required for five 5 years post-reintroduction.

(6) PRA Language in Rule Document – Commenters requested that in the section of the rule related to the PRA, text be edited to read "The report, due by June 30 of each year, will describe wolf conservation and management activities that occurred in Colorado each calendar or biological year up until 5-years post reintroduction."

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