

From: [Forbes, Jessica](#)
To: [Toivonen, Lauren K](#)
Cc: [Fox, Lori](#)
Subject: RE: [EXTERNAL] RE: Talking points for OIRA
Date: Tuesday, May 2, 2023 1:45:56 PM
Attachments: [image001.png](#)

Hi Lauren,

Thanks for sending this to us for a quick look! I would delete the text you mentioned (“however we don’t expect any significant changes to the economic impacts”) since we’re at the beginning of reviewing public comments and determining what changes we may need to make.

I’d also recommend taking a look at the text I’ve highlighted below. In the first couple of highlighted lines, the language seems to be confusing wolf reintroduction with the 10(j) rulemaking. This rulemaking is separate from the reintroduction, so livestock depredation isn’t a consequence of the rulemaking. The economic effects of the rulemaking should overall be beneficial because allowing nonlethal and lethal take would be expected to reduce depredations, though livestock producers would incur costs to implement take strategies.

In the second highlighted section, the text was originally comparing this rulemaking to the 10(j) rule for the Mexican wolf, but that text has been deleted. So I would revise to take out “comparable” in the highlighted text. I think it’s good to mention that the economic effects are expected to expand as the population of reintroduced wolves grows, but again note that the effect of the rulemaking overall would be beneficial.

Hope this is helpful!

Jessica



Jessica Forbes
Federal Programs, Planner/Project Manager
Environment

T+ 1 303-222-8941
M+ 1 757-816-7762

From: Toivonen, Lauren K <lauren_toivonen@fws.gov>
Sent: Tuesday, May 2, 2023 12:19 PM
To: Forbes, Jessica <Jessica.Forbes@wsp.com>
Cc: Fox, Lori <lori.fox@wsp.com>
Subject: RE: [EXTERNAL] RE: Talking points for OIRA

Hi Jessica,

Thanks for this info! I’m working on this now, and wanted to send you the track changes I’ve done to

see if you or Lori have any additional input or revisions before I send it to Nicole. I wasn't sure if I should include some specific wording about the potential change of depredation estimates/dollar amounts, so I wrote the last sentence to reflect any potential updates. I could leave off "~~however we don't expect any significant changes to the economic impacts~~" if you think there would be a significant change once the methodology is reviewed, however.

This rulemaking will not result in an annual effect on the economy of \$100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal government or communities. ~~Although our~~ The draft economic analysis for this specific action ~~supports this conclusion is not yet complete, our previous experience promulgating similar rules for similar species supports this conclusion. Specifically, we expect that the economic effects would be less than or similar to those that we described for the section 10(j) rule revising regulations for the nonessential experimental population of Mexican wolf (87 FR 39368–39371; July 1, 2022).~~ Potential economic effects that could occur are those primarily associated with livestock depredation, ~~although they would be expected~~ **are estimated** to be far less than \$100 million and the management provisions to be incorporated in the section 10(j) rule would prevent or minimize losses. In our section 10(j) rule ~~for the Mexican wolf~~, we estimated that costs associated with livestock depredation would be ~~\$213,542.36~~ **\$327,819.83** annually, with a total potential cost of \$5.1 million. ~~We expect the total cost for this action to be less given that the State of Colorado intends to initially release only a small number of gray wolves, so the potential economic impacts from livestock depredation would likely be much lower than those estimated for the Mexican wolf nonessential experimental population.~~ **Further, any comparable economic effects would not be expected for at least a decade or more, while still not exceeding \$100 million.** ~~While the information provided is from the draft EIS, there will likely be some changes to the final EIS, this memo will be updated if changes are necessary however we don't expect any significant changes to the economic impacts. e will verify this assessment when our draft EIS for this action is completed, and will update this memo then, and at the final rulemaking stage, as necessary.~~

From: Forbes, Jessica <Jessica.Forbes@wsp.com>
Sent: Monday, May 1, 2023 4:34 PM
To: Toivonen, Lauren K <lauren_toivonen@fws.gov>
Cc: Fox, Lori <lori.fox@wsp.com>
Subject: RE: [EXTERNAL] RE: Talking points for OIRA

Hi Lauren,

I found the talking points we sent to Nicole for the previous briefing in October of last year. The socioeconomic data included is old, though, and the bullets on hunting still include the ungulate provision in the action alternatives. I can send them to you if you'd like to see them, but I think you'd be better off looking at the summary of impacts table in the EIS.

It's also likely that we'll be looking at our methodology for estimating depredation in the EIS, and that may change the estimates of annual depredation and dollar amounts based on that. Please keep that in mind as you're working on the briefing, and let me or Lori know if you have any other questions.

Jessica



Jessica Forbes

Federal Programs, Planner/Project Manager
Environment

T+ 1 303-222-8941
M+ 1 757-816-7762

From: Toivonen, Lauren K <lauren_toivonen@fws.gov>

Sent: Friday, April 28, 2023 3:11 PM

To: Fox, Lori <lori.fox@wsp.com>; Forbes, Jessica <Jessica.Forbes@wsp.com>

Subject: RE: [EXTERNAL] RE: Talking points for OIRA

Hello,

I don't think I sent anything to Scott. I've not previously seen the talking points before as the briefing was written before the dEIS/before my time. But basically I want to include some info to explain that, while there will likely be some changes to the fEIS, we don't expect any significant changes to economic impacts.

Monday works, have a good weekend!

-Lauren

From: Fox, Lori <lori.fox@wsp.com>

Sent: Friday, April 28, 2023 4:06 PM

To: Forbes-Guerrero, Jessica <Jessica.Forbes-Guerrero@wsp.com>; Toivonen, Lauren K <lauren_toivonen@fws.gov>

Subject: [EXTERNAL] RE: Talking points for OIRA

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Are these what you sent to Scott Becker (which could help you narrow it down)?



Lori Fox, AICP

Senior Vice President, Federal Programs
Environment
Pronouns (she/her)

T+ 1 303-985-6602
M+ 1 301-461-8772

From: Forbes, Jessica <Jessica.Forbes@wsp.com>
Sent: Friday, April 28, 2023 3:05 PM
To: Toivonen, Lauren K <lauren_toivonen@fws.gov>
Cc: Fox, Lori <lori.fox@wsp.com>
Subject: RE: Talking points for OIRA

Hi Lauren,

I'm not sure I still have that email. Do you have any more information on what the talking points covered or when I sent them? I can check my files when I get back in on Monday.

Thanks!

Jessica



Jessica Forbes
Federal Programs, Planner/Project Manager
Environment

T+ 1 303-222-8941
M+ 1 757-816-7762

From: Toivonen, Lauren K <lauren_toivonen@fws.gov>
Sent: Friday, April 28, 2023 2:43 PM
To: Forbes, Jessica <Jessica.Forbes@wsp.com>
Subject: Talking points for OIRA

Hi Jessica,

I'm working on updating the briefing memo for OIRA and had a note that you had previously sent Nicole some talking points that could be relevant. I was wondering if you had these talking points and if so, could you please send them to me?

Thanks and hope all is well!
-Lauren

Lauren Toivonen (she/her)
Fish & Wildlife Biologist
U.S. Fish and Wildlife Service
3425 Miriam Avenue

Bismarck, ND 58501
Cell: 701-202-6754

NOTICE: This communication and any attachments ("this message") may contain information which is privileged, confidential, proprietary or otherwise subject to restricted disclosure under applicable law. This message is for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on, this message is strictly prohibited. If you have received this message in error, or you are not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

-LAEmHhHzdJzBITWfa4Hgs7pbKI