

1. Commenters suggested additional provisions or elements that should be included in the section 10(j) rule.
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 - baiting wolves
 - recognition of the State of Wyoming's authority to manage wildlife species under its jurisdiction
 - a preference for relocating wolves that chronically depredate livestock
 - authorizing the use of trapping to support monitoring or translocation of wolves
 - requiring use of radio collars for monitoring, and allowing flexibility to manage the wolf population to maintain numbers once it reaches a certain target goal.
 - Commenters suggested the Service identify a population goal for gray wolves in Colorado and/or establish limits on lethal take until reintroduced gray wolves meet certain population targets.
 - expanding the optional provision related to ungulates to allow management flexibility to address unacceptable impacts to other wildlife or domestic species as they are identified. **Hold till this is decided by USFWS (estimated timeframe for this decision?)**
 - Another commenter requested an addition to the section 10(j) rule to forbid killing of wolves if they are not at an abundance that is serving to "meaningfully limit" coyote populations.

2. Discuss extent the EIS should get into biodiversity/trophic cascades – this was brought up by commenters and the EPA. Concern statement related to this is:

Commenters suggested that the proposed rule and EIS should be revised to discuss biodiversity concerns related to the reintroduction of the gray wolf in Colorado. Commenters discussed the ecosystem effects that have been attributed to gray wolves and provided data sources. Many commenters discussed the concept of trophic cascades and noted that predators affect the behavior and abundance of prey species, which can have more widespread ecosystem impacts. Potential effects mentioned included improvement in the condition of riparian areas, increasing habitat for other special status species, reducing disease transmission in ungulates, and mitigating climate change by creating carbon sinks. Commenters noted that lethal take would reduce or affect the ecosystem benefits provided by reintroduced wolves.

- Scientific information is not there to support benefit of wolves on a human-filled landscape (vs. nature), information has been added. Look at Mexican wolves responses.
3. Suggestion to include how wolves have beneficial impacts on ungulate numbers. Part of state plan but add analysis to cumulative?
 - Look at study being suggested
 4. How do we want to address climate change? CS is as follows:

One commenter asked the Service to include an analysis of the best available science on the benefits wolves can provide to ecosystems and how those benefits can mitigate the causes and effects of climate change. They also requested a description of anticipated climate change impacts in the planning area and a discussion of how climate change could impact the affected environment and environmental consequences of each alternative. They noted that climate change could exacerbate impacts of lethal take and could change the rule's ability to advance wolf conservation. The commenter suggested using the Council on Environmental Quality's Interim Climate Guidance for NEPA, particularly the section titled "Considering the Effects of Climate Change on the Proposed Action", to guide the analysis. They also recommended referencing the National Fish, Wildlife, and Plants Climate Adaptation Strategy for information on climate change analysis, resiliency, and adaptation measures. The commenter pointed out that Colorado is already experiencing the effects of climate change, so they encouraged the Service to examine how the impacts of 10(j) rule might be altered by climate change in the EIS. One commenter asserted that wolves could help mitigate climate change by depredating on ungulates and asked for the possible positive impacts to be evaluated.

- Wolves on the landscape is state plan issue

5. Recommendations for additional impact topics:

- Recreation, including impacts to local economies and revenue from the recreational hunting and outfitting industry
- Effects to the mining, oil and gas, and timber industries – if happening on federal lands don't need to consult with the 10(j), no take
- Impacts on the livestock industry, particularly related to grazing patterns
- Potential for wolves to disperse to New Mexico and possible damages caused by the wolves in the state

6. Discuss how to address this CS

One commenter suggested that the determination to establish the reintroduced population of gray wolves as "essential" or "non-essential" should be analyzed under the NEPA process and stated the NEPA document fails to take a "hard look" at this issue. Specifically they stated the DEIS does not look at the impact of the rule to Mexican wolves, including not considering whether potential benefits may exist in allowing a zone of integration between Mexican wolves and gray wolves. The commenter also stated that the EIS does not consider the impacts of lethal take that would be allowed under the proposed rule on the remainder of the listed entity (gray wolves) in the lower 44 states.

- Determination is not part of the NEPA process but the ESA process. Will be made in the final 10(j) rule. Doing a biological opinion. Analysis is in the EIS (WSP to look and see if we need to pull over info from the rule or if it is already in the EIS). See EIS cumulative impacts. Clarification on essential or non-essential for the entire entity.

7. Discuss how to address this CS under Take:

Add clarity to the definition of problem wolf, since "calendar year" implies a wolf attacking in December and a one month later in January might not count as a problem wolf. Commenters suggested changing the language to "within any 12-month period".

8. Further discussion needed regarding State Plan and this CS:
Domestic animals: A commenter asked that the Service not include non-working pets and domestic bison in the domestic animal definition for consistency with the State plan.
9. Further discussion needed on this CS and consistency with the State Plan:
Rename shoot on sight permits to "Chronic Depredation Permits" for consistency with the state plan.
10. Discuss how to address this CS in the table of issues considered but eliminated from detailed evaluation in the EIS:
Commenters asked the Service to consider evaluating the impacts of wolves causing ungulates with chronic wasting disease to disperse into new habitats, potentially spreading the disease. A commenter also requested an analysis of how wolves could act as disease vectors by transporting prions via their digestive tracts. Commenters also requested the Service address in the EIS other disease risks that may be caused or exacerbated by wolves, including Echinococcus and Hydatid Disease.

Response: Potential changes in the geographic extent of diseases or disease vectors as a result of the presence of gray wolves on the landscape would be a potential consequence of the State's plan to reintroduce wolves. Potential disease risks to humans and other wildlife species as a result of wolf reintroduction are addressed briefly in section 3.1.1 (table 3-2) of the EIS. The discussion in Table 3-2 has been expanded to address the concerns raised by commenters.

Add some language to cumulative about low risk

No difference in alternatives that would change this same if endangered or 10(j)