Cascadia Wildlands
we like it wild.

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USDA APHIS Wildlife Services
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September 10, 2012

Re: Environmental Assessment, Wildlife Services Gray Wolf Damage Management in Oregon

Dear Wildlife Services:

Please consider these comments from Cascadia Wildlands, the Center for Biological Diversity, Western Environmental Law Center, Oregon Wild, Predator Defense, NE Oregon Ecosystems, Wolves of the Rocky Mountains, and the National Wolfwatcher Coalition on the Environmental Assessment for Wildlife Services' Gray Wolf Damage Management in Oregon. Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore Cascadia's wild ecosystems and represents approximately 7,000 members and supporters across the region. Combined, our groups represent nearly 500,000 members and supporters across the country who support our efforts to recover wolves in Oregon.

Restoring gray wolves back into the landscapes of the Pacific Northwest has been a conservation priority of the above-named organizations well before the first wolf wandered back into Oregon in 1999, and our members and supporters are ardent supporters of wolf recovery across the region. Many of our organizations were involved in the creation of the 2005 Oregon Wolf Plan (OWP), its status review in 2010, and some have been engaged in subsequent litigation over the past few years, including a challenge to the unlawful activity of Wildlife Services (WS) in wolf damage management in Oregon in 2010.

Wildlife Services claims that this analysis is to assist the Oregon Department of Fish and Wildlife with wolf conservation in Oregon, however, the majority of the agency's efforts in the state since the first pack was re-established in 2008 have only served to cause public turmoil. Wildlife Services' attempts to kill federally endangered wolves in Oregon in 2010 without fulfilling National Environmental Policy Act duties and its questionable handling of livestock depredation investigations in Wallowa County in the recent past suggests to us that the agency does not and cannot play an unbiased role in wolf management in Oregon and that their involvement thus far has greatly undermined gray wolf recovery.

On a broader level, Wildlife Services appears to have lost trust of the American public and wildlife scientists over its controversial animal damage control activities to benefit a select industry. The recent *Sacramento Bee* exposé and the scathing letter from the American Society of Mammologists suggests that the agency has lost touch with American values and is entrenched in a culture of predator killing at the expense of American wildlife. We have little reason to believe Wildlife Services' role in wolf management in Oregon will be anything but detrimental to the recovery of the endangered gray wolf.

Please consider the following comments prior to making a decision on gray wolf damage management in Oregon.

1. The EA Fails to Establish a Purpose and Need for the Proposed Action

Wildlife Services proposes to assist Oregon Department of Fish and Wildlife (ODFW) and the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) in the management of gray wolves. Such management would purportedly be in accordance with the OWP and tribal management authority. Yet, currently, Wildlife Services is not providing such assistance to ODFW, and ODFW and CTUIR have stated that they would carry out such activities regardless of whether Wildlife Services assisted them. Where ODFW and CTUIR have stated that they would carry out the activities without the assistance of Wildlife Services, there is no valid purpose and need for the proposed action under NEPA.

To the extent that Wildlife Services' involvement in these activities is necessary in order to effectuate the purposes of the OWP or tribal management objectives, the EA does not explain or substantiate why this is the case. Although the EA states that Wildlife Services' involvement would make such management more efficient and effective, there is little to no underlying factual support in the EA for this assertion.

To the extent that Wildlife Services' involvement renders wolf management activities to be more efficient and effective than in the absence of the agency's involvement, it necessarily follows that the interests of Cascadia Wildlands and the other undersigned organizations are furthered by Wildlife Services' full legal compliance with NEPA and other laws, including in the ways described in these comments.

It bears noting here that ODFW and CTUIR argue that their activities would be assisted by Wildlife Services' involvement. ODFW claims that without Wildlife Services' lethal control measures, ODFW would have to divert funding from other, non-lethal management activities in order to address chronic depredations. This ignores the fact that to the extent compatible with the Oregon ESA, ODFW has been implementing the Oregon Wolf Plan in recent years without the assistance of Wildlife Services, and there's no evidence that the agency has had to divert resources from non-lethal management activities in order to do so. It also must be noted that in many cases ODFW lacks discretion to divert its resources from one set of management

activities (non-lethal control measures) to another (lethal control measures). All of the provisions of the Oregon Wolf Plan must be implemented consistent with Oregon law. Thus, the EA is not accurate to the extent it relies on these assertions in order to justify Wildlife Services in wolf management in Oregon.

2. Prospect of a Northwest DPS Encourages a Delay in Analysis

Wildlife Services concedes that this Environmental Analysis is limited to the potential impacts of wolf damage management on lands where wolves are not protected under the federal ESA.[1] Currently, this encompasses the eastern third of Oregon.[2] The United States Fish and Wildlife Service (FWS) is currently considering proposals to potentially change the areas within the state where wolves would be federally protected, and could remove federal protections for wolves in the remaining two-thirds of the state.[3] If this occurs, Wildlife Services would be forced to significantly re-evaluate its analysis. It would make sense and reflect a prudent use of taxpayers' dollars for Wildlife Services to delay reaching a decision on its involvement with wolves in Oregon until a decision is reached by FWS and finalized. Based on recent conversations with FWS staff, we understand the agency plans to release a Northwest DPS finding sometime after the new year.

3. Environmental Baseline Used is Flawed; No Action Alternative Isn't No Action

The environmental baseline used in the analysis of WS' involvement in wolf damage management in Oregon is flawed. Instead of truly being a no-action alternative, the baseline used here includes WS' involvement in depredation investigations in the eastern third of the state.[4] This is improper because WS' involvement in depredation investigations has relevant effects, particularly effects upon human attitudes towards wolves, which can in turn influence wolf poaching discussed in the EA. Social perspectives and human attitudes surrounding wolves is one of the issues driving the analysis within this EA.[5]

ODFW is responsible for making the final determinations for investigations, however, it has frequently been the case that WS' determinations conflict with those made by ODFW. During the peak of the conflicting investigations, ODFW even had its determination process assessed by outside experts and was given strong approval. WS' investigations can sometimes

[1] Environmental Assessment, Wildlife Services Gray Wolf Damage Management in Oregon (EA) at 10.

[2] *Id.* at iv.

[3] *Id.* at iv.

[4] *Id.* at 21.

[5] *Id.* at 28.

[5] *Id.* at 38.

conflict with those conducted by ODFW, in part because of the two entities' differing missions, cultures and loyalties, and funding sources, and this certainly affects the social perspectives and tolerance levels surrounding wolves.

Conflicting depredation investigation results will influence human tolerance and in turn affect the carrying capacity for wolves. The EA discusses that "a government which simultaneously imposes the risk of wolf depredation (*i.e.*, supports wolf recovery) and prohibits individuals from effectively reducing those risks (*i.e.*, no chance for removal of problem wolves) is creating an intolerance of wolf presence."[6] "This situation lowers the social carrying capacity for wolves (tolerance level) and could threaten the wellbeing of the population."[7] A situation where WS identifies (or misidentifies) wolves as being responsible for a depredation creates for the relevant landowner and the community a perceived risk of wolf depredation. But when ODFW does not confirm the depredation as a wolf kill, no action can be taken in response, which pursuant to the EA would create an intolerance of wolf presence.[8] The mere fact that they are part of the current program does not preclude analysis of their involvement.

A proper no-action alternative does not include current activities performed by the agency. A proper no-action alternative would include no WS involvement in wolf management in Oregon. The current involvement of WS in depredation investigations has had an impact on these social perspectives that is not accounted for or analyzed when its involvement in these investigations is included in the baseline. These effects on wolf tolerance and the associated wolf carrying capacity need to be included in the analysis of a separate alternative, which consists of WS only being involved in depredation investigations in Oregon. These activities should not be included in the no-action alternative.

Finally, to the extent that Wildlife Services can kill wolves or even live-capture them for radio-collaring (thereby possibly facilitating their lethal removal later) more efficiently and effectively than in the absence of the agency's involvement, as the EA touts, that added efficiency must be factored into the effects of adopting either of the action alternatives. That could make a real difference on the ground. For example, there are many instances in the Southwest in which wolves depredate for a few months, then cease depredating altogether, sometimes for a period of years. Wildlife Services, with its admitted easy access to aircraft and trained personnel, would likely kill any depredating wolves quickly. State agents, in contrast, may not be so successful, allowing time for preventative measures to protect stock or simply for the wolves to switch to natural food sources (as sometimes occurs when pups grow and are more mobile). Analyzing the difference in effects cannot be neglected in the EA, and should

[6] *Id.* at 57.

[7] *Id.*

[8] *Id.*

entail a realistic assessment of state capabilities in the absence of Wildlife Services' involvement.

4. Killing Wolves to Conserve the Species is Unfounded

The EA fails to analyze in detail the ecological effects of wolf removal on the grounds that wolf removal is anticipated to support wolf conservation. As an initial point, this assumption cannot be made without support.[9] WS merely cites the OWP for the contention that killing wolves is expected to support eventual wolf conservation. The OWP is not a scientific study, but merely puts forth an opinion on this issue. Supporting studies need to be cited in order for Wildlife Services to make the claim that killing wolves advances the conservation of wolves, thereby negating any ecological effects the killing of wolves has had. Scientific literature exists demonstrating the positive ecological effects wolves have had on the landscape.[10] WS fails to address any of this scientific body of literature and therefore fails to take into account the effects of wolf removal on the ecological systems at issue. WS needs to not only discuss the ecological effects of wolf removal, but should also conduct studies on the past effects continuing removal has had on the ecology of the landscape. The assumption that killing wolves supports conservation of the species is improper, fails to address science on the issue, and needs to be supported by studies and scientific evidence.

Wildlife Services' killing of wolves may also prevent population growth even to the minimal goals of Oregon state law. In the Southwest, Wildlife Services' removal of Mexican gray wolves has suppressed the population dangerously. Agency removals from the wild, primarily of depredating wolves and their dependent pups, are the biggest factor in the numeric stagnation of the wolf population and have accelerated loss of genetic diversity in the population, accounting for 32 wolves that were captured and never released, 18 that died as unintended consequences of capture, and 12 wolves shot – a greater toll than the widely-cited losses to illegal killings. As a consequence, the reintroduced Mexican wolf population has never come even close to its intended interim goal of 100 wolves that was projected to be reached by 2006, nor reached the projected 18 breeding pairs. (Just six breeding pairs survived last year.)

Oregon wolves, at this early stage in their return to the state, are likely to be just as vulnerable, and perhaps even more so given the ubiquity of livestock over much of eastern Oregon with few areas of high-quality wolf habitat that do not contain stock. (Whereas in the

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[9] *Id.* at 38-39.

[10] Ripple, William J. and Robert L. Beschta, "Wolves and the Ecology of Fear: Can Predation Risk Structure Ecosystems?" Bioscience, Vol. 54 No. 8 (August 2004). This study found that predation risk may have profound effects on the structure of ecosystems and is an important constituent of native biodiversity.

recovery area for the Mexican wolf, approximately 1,000 contiguous square miles are almost entirely without livestock – yet population-impacting wolf removals continue outside this area.)

5. Killing Wolves to Reduce Depredation Rates Lacks Scientific Backing

WS claims the purpose of its involvement is to reduce livestock depredation rates.[11] Wildlife Services cites no studies or science to support the fundamental assumption in this EA that killing wolves reduces depredation rates. In fact, numerous studies exist which conflict with this conclusion, raising a scientific controversy surrounding the issue. A study conducted in Minnesota concluded that "no analysis indicated that trapping wolves substantially reduced the following year's depredations at state or local levels."[12] A study that was conducted through four years and five months of telemetry monitoring of 930 radio-collared calves at two high-risk predation sites occupied by Mexican gray wolves, suggested that the most important factors in determining depredations were duration of extent of exposure of stock to predators (including wolves) and husbandry techniques, such as limiting calving to a seasonal endeavor.[13]

In fact, a look at confirmed depredations in recent years in the Mexican wolf reintroduction program demonstrates, if anything, an overall *positive* correlation between wolf removals for depredations and additional depredations the following year:

Confirmed Fatal Livestock Depredations by Mexican Wolves, 2003-2011, drawn from reintroduction project annual reports:

Year	End-of-year wolf population	Confirmed fatal livestock depredations	Number of wolves removed for depredations
2003	55	4	2
2004	44-48	8	1
2005	35-49	22	6
2006	59	28	14
2007	52	36	16
2008	52	21	0
2009	42	16	0

[11] *Id.* at 6.

[12] Harper, Elizabeth K., William J. Paul, L. David Mech, Sanford Weisberg, "Effectiveness of Legal, Directed Wolf-Depredation Control in Minnesota." *The Journal of Wildlife Management*, 72(3): 778-784 (2008).

[13] Breck, S.W., B.M. Kluever, M. Panasci, J. Oakleaf, T. Johnson, W. Ballard, L. Howery and D.L. Bergman. 2011. "Domestic calf mortality and producer detection rates in the Mexican wolf recovery area: Implications for livestock management and carnivore compensation schemes." *Biological Conservation* 144:930–936.

2010	50	9	0
2011	58	9	0

This could be because livestock owners who oppose the presence of wolves but who are reimbursed for depredations may not be motivated to take practicable measures to protect their stock, knowing that depredations will result in wolf removals.[14]

Further analysis by other researchers in the United States and Canada "does not support the notion that removal of wolves at current intensity reduces depredation, immediately or in the following years."[15] Other studies have shown that "killing carnivores may be a reciprocally self-cancelling action, as reducing wolf populations causes "mesopredator release" and increases coyote predation.[16] Obviously, there are conflicting scientific viewpoints on this issue, but WS does not address this conflict.

Instead WS relies on a few studies, which are specific to wolf depredation rates, not depredation rates in general. Again, the purpose and need here is to reduce livestock depredation rates in general, regardless of the predator or cause. The literature cited by WS establishes that "the majority of packs which were partially removed (68%) depredated again within the year."[17] Further, "[w]here entire packs were removed, the rate of recolonization was high (70%) and most re-colonization (86%) occurred within a year of removal of the previous pack; most packs (86%) that recolonized the same area were implicated in depredations."[18] Therefore, even the little science provided by WS does not support the contention that killing wolves reduces or prevents wolf depredation. In essence, this study demonstrates that killing wolves to address wolf depredation does not solve the problem, but contributes to a continuing need for further lethal control. This counsels in favor of WS developing an EIS as opposed to an EA, because one of the significance factors is whether the proposed action "establish[es] a

[14] Such a phenomenon was documented in an expose in *High Country News*, in which a ranch hand was quoted boasting about bringing a cow about to give birth to the vicinity of a wolf den and branding her there to create an olfactory lure through the blood attendant to branding. When the wolf and her newborn calf were killed that night by wolves, Wildlife Services then killed a wolf (J. Dougherty. 2007. "Last Chance for the Lobo." *High Country News*, 12/24/2007).

[15] Musiani, Marco, Tyler Muhly, C. Cormack Gates, Carolyn Callaghan, Martin E. Smith, and Elisabetta Tosoni. Seasonality and reoccurrence of depredation and wolf control in western North America. *Wildlife Society Bulletin*, 33(3): 876-887 (2003); *See also for coyotes* Conner et al. (1998).

[16] Prugh L.R., Stoner C.J., Epps C.W., W.T. Bean, W.J. Ripple, A.S. Laliberte, J.S. Brashares. 2009. The Rise of the Mesopredator. *BioScience 59*: 779-791.

[17] *Id.* at 63.

[18] *Id.*

precedent for future actions with significant effects."[19] It appears that the literature cited in the EA establishes that killing wolves creates the need to kill more wolves and does nothing to prevent actual depredations in the long term.

WS only cites to a single study which showed that *wolf depredation* rates were reduced when wolf removal occurred.[20] But again, this study did not address depredation rates as a whole, for example depredations by other predators, but only addressed depredations by wolves. Therefore, it is unclear whether depredations were in fact reduced by lethal control measures on wolves. WS needs to address this issue directly, and explain why lethal control in Oregon will actually meet the purpose and need of reducing overall depredation rates.

Wolf removal has been occurring for years now, and WS needs to conduct an analysis on the impacts this removal has had on depredation rates. The general lack of science in this context becomes more relevant in light of recent public criticism of the efficacy of WS' predator control programs by professional societies including the American Society of Mammologists and The Wildlife Society.

6. Geographic Scope Limits Cumulative Impacts Analysis

It is true that agencies generally have the discretion to determine the geographic scope of their NEPA analysis,[21] and here WS has limited the scope of their analysis to the eastern third of Oregon. Although the scope of this analysis is subject to discretion, WS cannot limit all analysis of impacts to those within the specific project area at issue, particularly when considering cumulative impacts.[22] The first primary issue driving analysis within this EA is the impacts to wolf populations.[23] Although the project area scope is limited to the eastern third of Oregon, the cumulative effects analysis must include, at the very least, an analysis and evaluation of WS' involvement in Idaho, the sole source of Oregon's wolves as well as how those actions will impact the progress of wolf re-colonization in both western and eastern Oregon, Washington, and California. WS needs to take into consideration their actions in neighboring states, and the effects these actions have not only on Oregon's wolf population but also on social perspectives surrounding wolves.

7. Analysis Overlooks Impacts to Non-target Animals

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[19] 40 C.F.R. § 1508.27(b)(6).

[20] *Id.* at 65.

[21] *Id.* at 39.

[22] *Lands Council v. Powell*, 379 F.3d 738 (9th Cir. 2004).

[23] EA at 38.

In its analysis of non-target animals, WS does well to acknowledge its expertise and skill in killing animals. However, again it fails to cite any data concerning non-target animal kill or capture rates.[24] WS keeps records of such data and documents extensive non-target animal mortality, however they fail to cite any of it, merely dismissing the potential of effects to non-target animals because of their incredible skill. A recent publication by the American Society of Mammalogists discusses the often very significant and disturbing data around non-target mortality, especially concerning the loss of threatened and endangered species.[25] WS concedes that there are federally and state listed species that could be affected by trapping operations designed to kill wolves in the state. Not only does this trigger a need to consult with US Fish and Wildlife Service, but also would require some base level of scientific analysis, such as generating percentages on the likelihood of incidental take based on data from non-target mortality. WS explains that wolverines and kit foxes, two state-listed species, would likely not be harmed by neck snares because of their size, but does not even discuss the possibility that they would be caught in foot traps. A wolverine was caught in a foothold trap in late December in the Eagle Cap Wilderness, an area of known wolf activity, and even ODFW has released a warning to trappers to be mindful of this fact: http://www.dfw.state.or.us/news/2012/February/020312b.asp. The cursory dismissal of effects to non-target animals does not constitute the hard look required under NEPA.

There is also little substantive discussion about impacts of WS activities, including trapping and poisoning, to humans and pets. The EA fails to address this critically significant issue that may severely affect the health and wellbeing of our human and pet population.

8. Wildlife Services Must Consult with US Fish and Wildlife Service

The Endangered Species Act requires federal agencies to consult with the United States Department of Fish and Wildlife if there is "reason to believe that an endangered species or a threatened species may be present in the area affected by his project and that implementation of such action will likely affect such species." 16 U.S.C. § 1536(a)(3). In this instance, WS concedes that there is "potential for WS activities to incidentally affect wolves in those areas outside the NRM DPS in Oregon (west of Highway 395, 78 and 95) which are protected by the

[24] *Id.* at 71.

[25] A third of badgers killed every year are kill unintentionally; 95% of kit foxes were killed unintentionally; 85% of river otters killed by WS were killed unintentionally; and 13 species of carnivores and several species of non-carnivore mammals killed by WS are state-listed (as endangered, threatened, rare, or special concern) in one or more U.S. states; and 10 species of mammalian carnivores killed by WS are on the federal list of endangered and threatened species. This information can be found at: http://www.mammalsociety.org/uploads/committee_files/ASM-Federal%20wildlife%20control%20letter_0.pdf

federal ESA, require consultation with the USFWS, pursuant to the federal ESA.[26] Despite this admission, no consultation has taken place. Although Wildlife Services is restricting their actions to the eastern third of the state, where wolves have been federally delisted, the same wolves that roam in the eastern third of the state could easily acquire endangered status merely by crossing the boundary of the Rocky Mountain DPS.

Wolves are a migratory and a pack species. Already, at least two dispersers from the Imnaha pack have crossed from the Rocky Mountain DPS into the federally protected area. Accordingly, endangered species or members from the same pack are present in the eastern third of the state, and Wildlife Services actions will clearly affect these species by either trapping or killing them. Therefore, Wildlife Services needs to consult with FWS to determine whether or not their actions will jeopardize the continued existence of wolves in the federally protected area in western Oregon. Because there are few if any wolves in the western portion of the state, any killing of wolves that temporarily cross into the eastern portion of the state will dramatically affect populations in the western half of the state.

9. WS Fails to Consider the Proper Significance Factors Under NEPA

The purpose of an EA is to determine whether or not the project at issue will have a significant effect on the human environment. The Code of Federal Regulations contains the significance factors that should be considered under NEPA.[27] Wildlife Services does not consider a number of these factors that are relevant here, as touched on throughout our comments. Accordingly, the agency does not consider the highly controversial nature of its involvement or the degree to which the action establishes a dependency on control actions with significant effects. Also the analysis glosses over the fact that wolves are cultural resources to many tribes in Oregon. WS reveals that it contacted several tribes in Oregon regarding the cultural significance of wolves, but fails to take into account the significance of intentionally killing a tribally significant animal.[28] Additionally, WS needs to address the significance of adversely effect endangered or threatened species, wolves are an endangered species in Oregon. Also killing wolves in Oregon is a violation of state law, specifically the state Endangered Species Act.[29]

CEQ's regulations set forth all of the factors that Wildlife Services is required to consider in determining whether or not its action is significant. Wildlife Services has improperly

[26] *Id.* at 48.

[27] 40 C.F.R. § 1508.27

[28] EA at 39-40.

[29] ORS 498.026 (prevents the taking of endangered species).

substituted its own much shorter list of factors, and is therefor not able to make a proper or informed decision about the significance of the proposed action.

10. An Environmental Impact Statement is Required

An analysis of the above factors clearly counsels WS to prepare a full Environmental Impact Statement (EIS), as opposed to an EA. The discussion above clearly establishes that the proposed action will have significant affects on the human environment necessitating an EIS. The lack of analysis and unsupported assumptions which comprise much of this document are further testaments to the necessity that the agency prepare a full analysis of the environmental effects of this proposed action.

Also, the extremely controversial nature of the proposed action and the agency involved counsels strongly in favor of the preparation of an EIS. Killing wolves, in a state where wolves are endangered (cannot be killed under state law) and wolf conservation and recovery is supported by a vast majority of the population is controversial.[30] Furthermore, Wildlife Services and their lethal predator control programs—including wolf control—have been under constant criticism for nearly three decades regarding the efficacy of their programs, their adherence to sound science, the unintended consequences of their activities, and for transparency in reporting. Moreover, their current affiliation with the Department of Agriculture and their client-like relationship with livestock producers significantly biases their how they approach depredation events and how those events get communicated to the livestock owner and the public.

11. The EA's Discussion of Economics is Not Supported by Data or Analysis

In the EA's discussion of its purpose and need for action, WS discusses the economics surrounding depredations and wolves. WS concedes that livestock losses to wolves are "minimal" but argues that killing wolves is necessary to keep individual ranchers financially afloat.[31] To justify this proposition, WS does not cite any data or scientific literature, but cites a declaration provided by a rancher who claimed losses of $7,400 from a wolf depredation.[32] This attempt at economic analysis is misleading and unfounded, and raises issues of a controversy surrounding the true economic benefit of wolf management in Oregon. FWS has spent around $40 million on wolf recovery in the United States, and wolf watching alone has been estimated to generate $70 million annual economic impact on the Greater Yellowstone

[30] *Id.* at 57.

[31] EA at 2.

[32] *Id.* at 7.

Area.[33] If WS wants to justify their killing of wolves economically, they need to have a full and fair discussion of the numbers surrounding the issue, as opposed to citing a single, biased declaration. A genuine economics analysis would consider the benefits to tourism and tourism-dependent businesses across Oregon, like in Yellowstone[34], and also the savings associated with not having to spend resources on ecosystem restoration. That is a function wolves are already performing in places like Yellowstone National Park just by being there (*see Ripple, et al citation*).

12. The EA Fails to Disclose the Funding Sources for Wildlife Services' Activities

Where Wildlife Services' activities are coming under increasing scrutiny for the agency's lack of transparency, and in accordance with NEPA, the EA fails to disclose how the proposed action would be funded. The EA must be revised to include a full and transparent discussion of the source(s) of funding for the proposed action.

13. Cumulative Impacts

Wildlife Service must consider the cumulative impacts of its actions. "Cumulative impact" is the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Given how small the population of wolves is in Oregon, the removal of some wolves from Wildlife Services, when combined with the cumulative loss of wolves from poaching, accidents, caught-in-the act permits, and other state and federal lethal control, is truly significant. In this regard, Wildlife Services must prepare an EIS.

The EA also fails to consider and disclose the cumulative impacts of lethal removal and other causes of wolf mortality in Idaho. Idaho is Oregon's only current source population for wolves. Since wolves in Oregon are still far below the threshold to be considered a self-sustaining population, the loss of wolves in Idaho has an affect that must be considered here. Idaho's wolf population may be drastically reduced in the near future by hunting, trapping, and

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[33] Stark, Mike 2006. UM economist: Wolves a big moneymaker. Billings Gazette. http://www.billingsgazette.net/articles/2006/04/07/news/state/25-wolves.txt.

[34] Duffield, John, C. Neher, D. Patterson. 2006. "Wolves and People in Yellowstone: Impacts on the Regional Economy," Prepared for Yellowstone Park Foundation.

other lethal control, including actions taken by Wildlife Services. This impact, along with killing individual wolves in Oregon, could be significant.

Further, the EA fails to consider the impact of killing wolves in Washington state. The impacts of lethal removal in Washington should be considered here, particularly because USFWS is considering listing the combined population from both states as a distinct population segment.

Conclusion

Given the incredible controversy currently surrounding Wildlife Services' management of American wildlife, our organizations urge the agency to take a backseat role in wolf damage management in Oregon. Moreover, we urge WS to develop and select an action alternative which limits the agency's involvement exclusively to non-lethal efforts to reduce conflict between livestock and wolves. Until Wildlife Services can rebuild the trust of the American public and shed its institutional bias toward livestock interests, we believe there is no place for the agency's involvement in lethal control of wolves in Oregon. Please continue to keep us apprised as the NEPA process continues.

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