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Re: Pre-decision Environmental Assessment—Wildlife Services gray wolf damage management in Oregon

Dear Director Williams:

The American Society of Mammalogists (ASM, hereafter “the Society”) is a non-profit, professional, scientific, and educational Society consisting of nearly 3,000 members from all 50 United States and 60 other countries worldwide. The ASM was founded in 1919 and is the world’s oldest and largest organization devoted to the study of mammals. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The Society has a long history of reviewing issues related to mammalian conservation and, where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats. We have strongly supported restoration of the gray wolf (*Canis lupus*) to the Northern Rocky Mountain (NRM) ecosystem, and we continue to urge that this still expanding population be allowed to colonize suitable habitat throughout the region, so that restoration of this apex predator can bring about ecosystem restoration in the NRM (see Bergstrom et al. 2009).

On behalf of the Society, I am submitting a response to your request for public comments on the environmental assessment (EA) of Wildlife Services’ (WS) proposal to assist the Oregon Department of Fish and Wildlife (ODFW) with lethal and non-lethal control of gray wolves in an effort to control depredation of livestock. The Society is strongly in favor of WS’s willingness to emphasize field operations that include non-lethal control of wild predators. In concert with the Society’s previous communications sent to your national office (21 March 2012, 1 May 2012), we continue to urge WS to reform substantially its heavy reliance on lethal control, which continues to this day. We are hopeful—but far from convinced—that WS will begin a new era of dealing with wild predators in the West by truly implementing the full range of non-lethal control methods in its collaboration with ODFW. Before this is possible, however, old attitudes

and prejudices against wolves that have been systemic within WS at the level of the field agents (Niemyer 2010) must be purged and replaced by scientifically supported views.

First, well-documented confirmation is essential for each purported wolf kill, which includes a high level of confidence that the evidence rules out coyote kills or mere scavenging by wolves. The Society is aware of several cases in which field reports of “confirmed” wolf kills of livestock in eastern OR by WS agents were disavowed by more thorough investigations by ODFW biologists (copies of field reports provided by Defenders of Wildlife). In these cases, ODFW could not rule out a non-predator cause of death followed by scavenging, usually by coyotes. Coyotes, in fact, are much more often implicated in livestock depredation than wolves, where the two species overlap (Francis 2004). Second, the Society challenges the assumption that even a confirmed wolf kill always requires a targeted lethal-control response. Three gray wolf removal studies in different areas of North America have shown that effects of lethal control (removal) are short-lived, because remaining individuals and recolonizing packs are just as likely to depredate as those removed (Treves and Naughton-Treves 2005). We suggest that people management is just as important as wolf management when dealing with livestock-wildlife conflict, and WS must become much more comfortable educating and persuading ranchers about the potential benefits of committing to non-lethal control methods first and foremost. We are encouraged to read that this outreach is included in the preferred alternative.

Recent research by the USDA-APHIS National Wildlife Research Center (NWRC) concludes that gray wolf populations are density-dependent or self-regulating (Cariappa et al. 2011). That implies that, even if wolves are not killed (for depredation control or by regulated hunting), territorial wolf packs will stabilize at fairly low densities, which is what has happened in Yellowstone National Park (USFWS 2012), and depredation will be a stable phenomenon that can feasibly be reduced by non-lethal, preventive means. As has been demonstrated in a 4-year pilot project in central Idaho (DOW 2012), free-range livestock grazing can coexist with stable, territorial wolf packs by using the full range of preventive methods, including range riders, guard dogs, night corralling with fladry or turbo-fladry fencing, prompt removal of carcasses, and having at least one wolf per pack radio-collared and monitored. We further recommend conditioned taste aversion (CTA; Gustavson and Nicholas 1987) training where feasible. Leaving a stable, territorial wolf pack in place with learned aversion to livestock predation is a better prescription for long-term control of depredation than to trigger the never-ending cycle of removing offending individuals and packs only to be replaced with naïve immigrants whose behavior is less predictable.

A broader question that is unanswered in the EA pertains to Oregon’s stated goal of maintaining a viable, sustainable wolf population in the eastern part of the state, with eventual colonization of suitable habitat in the Cascade Range. No analysis is included as to what population size ODFW considers to be a minimum sustainable population (beyond the “4 breeding pairs” requirement) or one that could serve as a source for emigrants. Whatever that number is, we doubt that the current population is close to that threshold. Therefore, at this early point in the colonization of Oregon by gray wolves, it is critical that lethal control be used sparingly, if at all.

Finally, we must take issue with the opinion of the US Fish and Wildlife Service (USFWS) in its Section 7 consultation letter on this EA, in which it states that WS has only captured (live, released unharmed) 1 Canada lynx (*Lynx canadensis*) in its recent history. To the contrary, our records indicate that a Canada lynx was killed in a WS trap in Utah in 1990, and this was

confirmed as a non-target kill by the WS archivist (Bob Myers, pers. comm.). We note this error in the USFWS letter as well as the overly optimistic appraisal of WS's "proven skill... in capturing target species" (see Niemyer 2010).

In summary, while we would tend to favor Alternative 2 (non-lethal control only), we acknowledge that rare extenuating circumstances could necessitate occasional lethal control, truly as a last resort. These might include a demonstrated failure of the full array of non-lethal methods, aggressively applied, to prevent repeated depredation by an individual wolf or pack; and an unlikely but conceivable threat to human safety. What concerns us most in endorsing Alternative 3 is that an insufficiently rigorous standard of "demonstrated failure" or of "confirmed wolf kill" will be applied. If WS fully embraces implementation of and outreach on non-lethal, preventive methods—which in our opinion would be a significant departure from its prior record in dealing with predators in the West—then we would endorse Alternative 3, the proposed action ("Integrated Wolf Damage Management").

We thank you for the opportunity to provide comments on the pre-decision EA for your proposed collaboration with ODFW on gray wolf management. The Society's membership includes several experts on carnivore biology and non-lethal control methods for decreasing wildlife depredation. We stand ready and willing to assist you in any way possible in order to move your agency in a positive new direction of education and outreach to ranchers in implementing the successful methods of non-lethal prevention. Please don't hesitate to contact me for further assistance.

Sincerely,



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President, American Society of Mammalogists

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Cc: USFWS, LaGrande, OR, Fish and Wildlife Office